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EcoVadis 360° Watch

A Key Component of the Assessment Methodology

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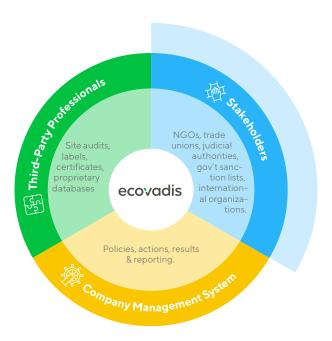
Introduction

A key distinguishing element of the EcoVadis sustainability monitoring platform is the integration of external inputs to augment company-provided documentation and data sources. Laws and regulations such as FCPA in the U.S., Sapin II in France and the U.K. Bribery Act have made companies even more liable for knowing about sustainability infractions, yet for many companies, the information is difficult to uncover, anticipate, and manage on their own.

The 360° Watch feature, and corresponding Management Indicator in the EcoVadis Rating Methodology, serves to collect, classify and selectively apply stakeholder inputs into the EcoVadis rating process. This process combines artificial intelligence with human analysis to identify the most relevant stories within the past five years, both positive and negative, collected from over 100,000 public sources. This is augmented by data from the Global Regulatory Information Database (GRID[™]) through a partnership with Regulatory Datacorp.

360° Watch Findings are the output of this process, where the analyzed results are integrated as part of the EcoVadis Rating, and are displayed in the EcoVadis Scorecard.

360° Watch provides essential intelligence and monitoring both for the assessed company, and their trading partners with whom they share their scorecards on the EcoVadis network.



Note: Similar technology is used for the Live News feature, which provides updates on current news items from the same set of sources between assessments, delivered through the EcoVadis platform.

Overview of the Two-Step 360° Watch Process

Step 1

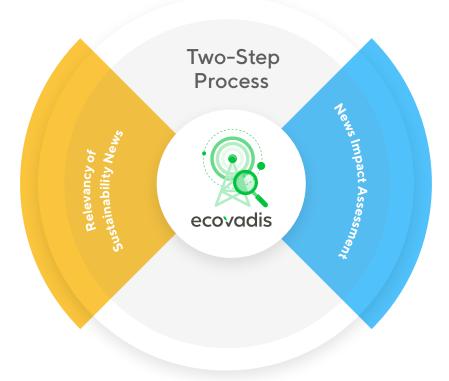
Collection of 360° Watch News Items.

The 360° Watch Findings are publicly available information items discovered by our news scanning and data relationships, selected based on their relevance to EcoVadis' 21 CSR criteria, and published on the EcoVadis platform. They are published without modification. All companies assessed by EcoVadis are systematically subject to the 360° Watch process by an internal 360° research team, who verifies the relevance of the information and facts. News can vary from negative to neutral or positive. As long as they are relevant to one of the EcoVadis 21 criteria, items selected as 360° Watch Findings will be displayed on the scorecard.

Step 2

Impact Assessment: Analysis and Scorecard Impact

In a second step, sustainability analysts assess 360° Watch news items on how they impact the quality and effectiveness of the sustainability management system or reflect positive innovation. If a 360° Watch news item is determined to impact the score negatively, a red downward arrow is activated to indicate it to the user and a point of improvement is activated for each theme. Positive news such as awards or top rankings can have a positive impact on the theme score which is reflected by a green upward arrow on the scorecard.



Step 1 Collection of News in the 360° Watch Items

Source Qualification

The EcoVadis 360° Watch Findings process begins with the selection and verification of 360° Watch news items gathered from sources that are carefully selected for credibility and reliability. Examples of sources that we consider to be reliable include:

- Official statements or publications from government bodies;
- Information from regulatory databases;
- · Extracts of court rulings or legal settlements;
- Articles from the mainstream media;
- Factual statements by organizations considered as subject matter experts (e.g. international NGOs, independent think tanks).

In order to be considered as credible and valid for the 360° Watch, sources are filtered and sorted according to selected quality criteria which include legitimacy, representativeness, technical expertise, transparent governance and funding structure.

Data Sources

The following examples are illustrative of the more than 100,000 sources included in the 360° Watch:



News & Specialized

Press

- China CSR Map (China)
- Novethic (France)
- CorpWatch
- OneWorld network
- Illegal Logging (U.K.)
- Lawyers & Settlements (U.S.)



CSR Networks

- AccountAbility
- Instituto Ethos de Empresas e Responsabilidade Social (Brazil) Business for Social Responsibility
- CSR Europe
- World Business Council for Sustainable Development
- Greenhouse Gas Protocol
- Business In The Community (U.K.)



Administration

- European Economic and Social Committee
- European Environment Agency
- Conseil de la Concurrence (France)
- Competition Commission (U.K.)
- Environmental Protection Agency (U.S.)
- Food and Drug Administration (U.S.)

Trade Unions

Algeria, Argentina, Australia, Belgium, Brazil, Canada, Ecuador, France, Germany, India, Ireland, Italy, Japan, Mexico, Peru, Portugal, Scotland, Spain, Switzerland, U.K. and U.S.



International Organizations

- UN Global Compact Environment Program
- European Court of Human Rights
- Eco-Label Européan
- International Labour Organization
- World Bank
- Extractive Industries Transparency Initiative



- · China Labor Watch
- Human Rights In China
- Greenpeace
- Oxfam
- World Wildlife Fund (WWF)
- Movimento Difesa del Cittadino (Italy)
- · Friends of the Earth Middle East
- Milieudefensie (Netherlands)
- Silicon Valley Toxics Coalition (U.S.)



RDC Compliance Database

Systematic screening of companies against this industry-leading compliance database (PEPs, sanctions, etc.)



Step 1 Collection of News in the 360° Watch Items

Public and External Databases

EcoVadis has partnered with Regulatory Datacorp Inc ("RDC"), a third-party risk and compliance information provider, to cover additional risk related to economic sanctions, watchlists from governments or international organizations, politically exposed persons and other regulatory compliance issues. In some cases the RDC covers topics that are not directly related to sustainability issues and therefore do not fall under the four themes of the EcoVadis assessment. Nonetheless, these cases illustrate a level of risk exposure that may be of interest to scorecard readers. Watchlists cover entities potentially exposed to high-risk activities and subject to trade restrictions, exclusion lists, government warnings, and enforcement actions (e.g. World Bank List of Debarred Firms, BIS Denied Persons List). Sanctions cover global and national sanctions lists (e.g. OFAC Sanctions Programs).

EcoVadis also uses public databases such as the Beijing based Institute of Public & Environmental Affairs (IPE), Business & Human Rights Resource Centre, and various open government databases.

360° Watch Collection Process

News is scanned and curated from more than 100,000 qualified data sources. The selection process for 360° Watch items combines EcoVadis' proprietary Artificial Intelligence-based sustainability news analysis engine with curation and validation by sustainability experts to ensure quality. We also corroborate sources and verify facts, giving preference to official sources, in order to identify and exclude fake and low quality news. Findings are available in multiple languages.



Step 2

Impact Assessment: Integration of 360° Watch Findings Into the Methodology

The 360° Watch Findings is one of the seven management indicators that are assessed by EcoVadis to rate a company's sustainability performance. The other six indicators are Policies, Endorsements, Measures, Certifications, Coverage and Reporting.

Similar to the other management indicators, the 360° Watch Findings is assigned a score between 0 and 100, based upon a set of standard scoring guidelines. A theme score is attributed based on the scores of each of the seven management indicators and their relative weights. In this context, the 360° Watch Findings is a standalone indicator with a specific weight and impact on the entire scorecard as follows:

POLICIES (25%)	POLI 80% ENDO 20%	Policies, objectives, targets, governance Endorsement of external sustainability initiatives and principles, e.g. UN Global Compact	OInsufficient25Partial50Good75Advanced100Oustanding
ACTIONS	MESU 65% CERT 35%	Actions put in place to support objectives and targets Certifications, labels, third-party audits	 0 Insufficient 25 Partial 50 Good 75 Advanced 100 Oustanding
(40%)	COVE multiplying factor	Level of deployment of certificates or actions throughout the company	
RESULTS	REPO 40%	Quality of reporting readily available to stakeholders	0Insufficient25Partial50Good75Advanced100Oustanding
(35%)	360° Standpoints of stakeholders' representatives, e.g. administrative 60% & judicial authorities, trade unions, NGOs		0Severe25Major50Minor75None100Positive

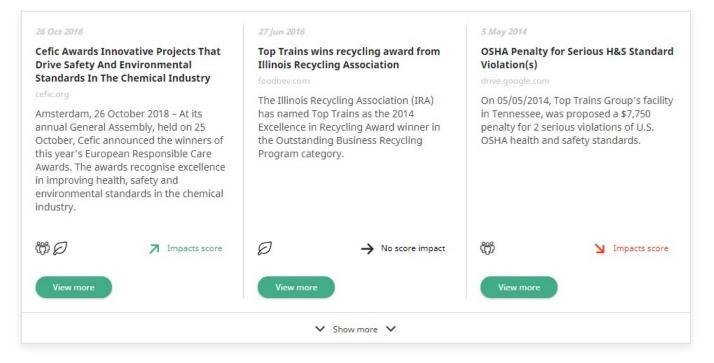
Step 2

Impact Assessment: How the 360° Watch Is Integrated Within the Overall Methodology Framework

For details on the other indicators and their relative weighting please refer to the Scoring Principles Document. Set at 75/100 by default the 360° Watch can impact the score of each theme (i.e. Environment, Labor & Human Rights, Ethics, Sustainable Procurement). The impact can reduce the theme score across four ranges: 5.25 - 10.5 - 15.75 points respectively. Conversely, in the case of positive news without any adverse material events, the 360° Watch score can also increase the theme score by 5.25 pts.

The following shows some example news items as they would be displayed on the EcoVadis platform:

360° Watch Findings



Impact Assessment Part 1 Individual 360° Watch News Items

0	25	50	75	100
CASE(S) WITH SEVERE NEGATIVE IMPACT	CASE(S) WITH MAJOR NEGATIVE IMPACT	CASE(S) WITH MINOR NEGATIVE IMPACT	NONE OR NEUTRAL CASE(S)	CASES WITH POSITIVE IMPACT
Repeated major violations of internationally recognized standards with sanctions or fines	Major violations of internationally recognized standards with sanctions or fines	Minor incidents with legal or financial sanctions	No significant controversies or incidents	Multiple recognized sustainability management practices or awards
		Examples		
Repeated major pollution cases with massive fines	Major H&S violations with monetary sanctions	Minor fine for discrimination case	None	Top 5 ranking in sector index and external recognition of performance

Note: Simplified grid presented above, specific differences for themes exist

Each of the four themes has specific sets of detailed scoring guidelines, which define different thresholds for Minor, Major or Severe impacts. A non-exhaustive list of examples of news for each theme is provided below to give some context for what level of impact a news item can have.

Environment: Examples Cases

SEVERE	MAJOR	MINOR	NEUTRAL	POSITIVE
U.S. EPA announces \$25 million cleanup settlement at company's plant in Indiana	Milk producer fined \$460,000 over pollutant discharge	Subsidiary fined 1,000 euros for violations of the Law on Prevention and Control of Air Pollution	Company promises improvements after residents complain about noise from plant	 Paper mill performs successful energy optimization Car manufacturer receives energy-saving technology awards from Germany's Environment Minister

Impact Assessment for Each Single 360° Watch News Item

SEVEREMAJORMINORNEUTRALPOSITIVE· Company placed
in severe violator
enforcement
program by U.S.
OSHA· Global Shipping
Company to Pay
\$200,000 to Settle
EEOC Religious
Discrimination
Lawsuit· \$5,000
Penalty from
OSHA for
five serious
violations· Sacked
Employees to File
Lawsuit against
their employer
· Union wants
5.5 percent wage
increase· Employer Wins
Corporate Awards
for Excellence in
Gender Inclusivity· Company
heavily blamed
by protesters over
40 mine worker
deaths· IndustriALL
condemns company
for union busting· \$trike at Indian
subsidiary
crosses 10 days· Union wants
5.5 percent wage
increase· Tech company
introduces a
gender pay parity
policy in India

Labor & Human Rights: Example Cases

Ethics: Example Cases

SEVERE	MAJOR	MINOR	NEUTRAL	POSITIVE

Sustainable Procurement: Example Cases

SEVERE	MAJOR	MINOR	NEUTRAL	POSITIVE
• Five dead, dozens injured when luxury hotel being built in Laos collapses		Animal rights group calls out restaurant chain over alleged		 Printing company earns triple chain-of-custody certification Freight company renews
• Amnesty Intl. finds cobalt used in electric car batteries is mined using child labour	Greenpeace urges Cosmetic company to reject harmful palm oil practices	cruelty in supply chain		fleet with electric cars • Major car paint suppliers join initiative against child labour in mica mines

Impact Assessment for Each Single 360° Watch News Item

Scope Rules

Each 360° Watch Finding is assessed while taking into account whether the news applies to the exact scope of assessment, parent company, subsidiary, or sister company. Whereas news directly related to the assessed company or its subsidiaries are considered to have a full impact, news about sister and parent companies impact the score in very limited circumstances based on the severity of the news, geographical proximity and similarity of the business activities.

Additional Factors

When assessing the materiality of individual news items, we also consider a set of mitigating factors in the following cases:

- · Joint-ventures or minority owned assets or operations without significant management control;
- Ethics cases with facts within the last two years of validity period (see more details on timeframe below);
- The amount of the fine or penalty is negligible considering the size of the assessed company (e.g. \$1,000 health and safety violation for a 20,000 employee organization).

Timeframe

A timeframe of validity specific to each 360° Watch news item is applied.

This is determined by looking at the date of the underlying facts, e.g. when a non-compliance, misdeed, accident took place.

The following relevant number of years for each theme are outlined below:

- Environment: Facts related to the case less than 5 year old;
- · Labor & Human Rights: Facts related to the case less than 5 year old;
- Ethics: facts related to the case less than 7 year old for Corruption, 10 year old for Anti-Competitive Practices, 5 year old for Responsible Information Management cases;
- Sustainable Procurement: Facts related to the case less than 5 year old.



- The case date refers to the date of the underlying facts (e.g. when the violations actually occurred), not the publication date of article.
- Ethics cases such as corruption, bribery and anti- competitive practices experience a longer time frame are included in the assessment of the company for a longer time period due to the typical lengths of investigations leading to an enforcement decision.

Impact Assessment Part 2 Cumulative Rules In Case Of Multiple 360° Watch Findings

In cases where multiple 360° Watch Findings are collected for one or more themes, a set of rules is applied to determine how these cumulative findings impact the scores. The table below summarizes to what extent the Environment, Labor & Human Rights, Ethics and Sustainable Procurement theme scores are impacted – either increase or decrease – for various cumulations of findings:

Theme Score Impact	-15.75	- 10.5	- 5.25	0	+5.25
If multiple cases	If multiple cases • At least one severe case • Or at least five major cases, or 25 minor cases	 There are several negative cases, of which the worst case is major Or there are at least five minor cases 		• Several cases with no impact	

Comment Period:

In situations when our analyst team identifies through the 360° Watch adverse information that impacts the assessment score severely, the assessed company is given an opportunity to comment on the key controversial items. This "comment period" occurs before the scorecard is published, and allows the assessed company to provide additional information, context and specific details to illustrate its point of view, often leading to disputing the relevance or impact of certain news. This engages companies in the assessment process and provides a platform to interact before publishing information from third-party stakeholder news on the EcoVadis scorecard.



Other Uses of 360 Indicators

Medal Allocation and 360° Watch Findings:

EcoVadis Medals are awarded to companies when various criteria are met. A Gold, Silver or Bronze EcoVadis Medal may be awarded in recognition of a company's sustainability rating when an overall score of 37 or higher is achieved with no theme scores below 20. Additional requirements for medal eligibility based on 360° Watch Findings are:

- The company must have no severe negative 360° Watch Findings for Environment, Labor & Human Rights and Sustainable Procurement in the past three years;
- The company must have no severe negative 360° Watch Findings for Ethics in the past five years.

Scorecard Revision Process: Adverse Event After Publication

The Live News feature provides real time monitoring of stakeholder's opinions between assessments, using many of the same inputs and processes as the 360° Watch Process. These results are displayed in the EcoVadis platform alongside the scorecard. Critical adverse events that occur between assessments and are captured in the Live News feature can lead to scorecard revisions, after a thorough review process from the Research Management Committee. This process includes a due diligence process to duly inform the affected company of the scorecard revision as well as the respective trading partners.

Conclusion

The EcoVadis 360° Watch is an essential part of the EcoVadis Sustainability Rating methodology. It brings vital thirdparty inputs from a wide variety of sources that bolsters the robustness and reliability of EcoVadis Sustainability Ratings. The sources, criteria and process are reviewed regularly as part of the methodology governance process.

About Ecovadis

EcoVadis is the world's most trusted provider of business sustainability ratings, intelligence and collaborative tools for global supply chains. Backed by a powerful technology platform and a global team of domain experts, EcoVadis' easy-to-use and actionable sustainability scorecards provide detailed insight into environmental, social and ethical risks across hundreds of purchasing categories and countries. Industry leaders such as Johnson & Johnson, Verizon, L'Oréal, Subway, Nestlé, Salesforce, Michelin and BASF are among the more than 10's of thousands of businesses on the EcoVadis network, all working with a single methodology to assess, collaborate and improve sustainability performance in order to protect their brands, foster transparency and innovation, and accelerate growth. Learn more on ecovadis.com, Twitter or LinkedIn.

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