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**CORPORATE SOCIAL RESPONSIBILITY IN CHINA'S
LARGEST TNCS**

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CORPORATE SOCIAL RESPONSIBILITY IN CHINA'S LARGEST TNCs

Dylan Sutherland and Glen Whelan

Abstract

The purpose of this paper is to explore the extent to which corporate social responsibility reporting takes place within China's largest trans-national corporations (TNCs). We further examine the nature of this reporting and what motivates it. We use MOFCOM's listing of China's 40 largest TNCs (by OFDI stock) and identify if CSR reporting is undertaken in these groups. Our methodology pays attention to the level (within parent or subsidiary enterprise) at which reporting takes place within the group. By Chinese standards a comparatively large number, eleven of China's top forty TNCs, undertake CSR reporting at the level of the group parent company. While this may in part be driven by their internationalisation strategies, analysis of our sample suggests domestic concerns are as important.

Keywords: CSR, China, TNCs, Business Groups

Corporate Social Responsibility in China's Largest TNCs

Dylan Sutherland¹ and Glen Whelan²

INTRODUCTION

Since the CCP's espousal of the 'Go Global' policy at the Sixteenth Party Congress in 2002, Chinese outward foreign direct investment (OFDI) has increased rapidly from only several billion dollars to around \$50 billion in 2008 (MOFCOM, 2009). This rapid international expansion of Chinese firms – raises numerous questions. One multifaceted question concerns how China's most internationalised firms conceive of, act upon, and report upon, their social responsibilities. It is this question that the present paper investigates.

In doing so, we begin with a brief discussion of the internationalisation of Chinese business, the idea of Corporate Social Responsibility (CSR), and of CSR in China. Second, we outline our research questions. Third, we provide a discussion of our method for addressing, and a rationale for asking, each question. Fourth, we present and discuss our findings. In concluding, we suggest that whilst some of China's most internationalized business groups appear to have embraced the idea of CSR, they appear to have done so in a specifically Chinese fashion.

BACKGROUND AND LITERATURE REVIEW

There is growing interest in the internationalization of Chinese business. Recent studies, for example, have looked at: what motivates Chinese firms to undertake OFDI (Buckley, et al., 2007; Child & Rodrigues, 2005); the relationship between big business groups and outward investment (Morck, Yeung, & Zhao, 2008; Sutherland, 2009); whether domestic institutional constraints motivate Chinese firms to undertake OFDI (Boisot & Meyer, 2008); and whether or not, and/or the extent to which, Chinese firms seek foreign brands (Fetscherin & Sardy, 2008). What has not been looked into, however, is whether or not internationalizing Chinese business groups concern themselves with the idea of, let alone actually engage in, CSR. Given the opaque

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corporate governance structure of many Chinese business groups, their poor track record (with regard to social and environmental concerns for example), and burgeoning OFDI from China more generally, this is an important question.

Corporate Social Responsibility

CSR can be quickly understood as giving a name to the idea that corporations do, or should, engage in activities that are more than “strictly business”. Firms, in addition to their economic responsibilities, it is suggested, have legal, ethical and discretionary philanthropic ones. Some argue, for example, that managers have a responsibility to manage corporations in the name of not just shareholders, but stakeholders as well (e.g. suppliers, consumers, employees, future generations, etc. etc.) (Evan & Freeman, 1988; Marens & Wicks, 1999). Additionally – and given the continued absence of anything resembling a global sovereign (Griffin, 2003) and the continued existence of weak or failed nation states (Rothberg, 2004) – it is commonly suggested, within the CSR literature, that corporations might provide various political and/or public goods that are commonly associated with governments (Crane, Matten, & Moon, 2008). The general thrust then, of many writings on CSR, is to refute Milton Friedman’s (1970) pithy suggestion that the social responsibility of business is to increase its profits. Despite this general opposition to Friedman’s perspective within the CSR literature, it is important to note that profitability and CSR need not be entirely opposed. Indeed, a great deal of the literature on CSR has been concerned to suggest that those firms who promote the interests of “society” will tend to be financially successful (Orlitzky, 2008). In this sense, CSR is commonly conceived in both instrumental and normative terms (Donaldson & Preston, 1995).

CSR in China

Whilst the CSR literature has flourished more generally, the literature on CSR in China, or on CSR from a Chinese perspective, is rather limited (Whelan, 2007). Nevertheless, when it comes to such practical matters as implementation and engagement, it would appear that CSR is becoming increasingly important. Between 2004 and 2008 for example, the number of CSR reports released by Chinese companies increased from 4 to approximately 130 (Syntao, 2007, 2008). And, with the 2008 introduction of the Labour Contract Law and development of the Taida Environmental Index in the

Shenzhen Stock Exchange, it can be seen that a variety of institutional frameworks that will encourage more “socially responsible” activities amongst Chinese companies are beginning to emerge.

Perhaps the most important development regarding CSR in China, though, is a recent initiative of the State Council through its directly controlled body: the State Owned Asset Supervision and Administration Commission (SASAC). On December 29th 2007, SASAC – who is the majority shareholder and ultimate owner of many of China’s largest business groups – issued its *‘Notification on Issuance of The Guidelines on Fulfilling Social Responsibility by Central Enterprises’* (SASAC, 2008). In making the *Notification* their first policy directive for dissemination in 2008, SASAC symbolized its importance. Given thus, and given SASAC’s power, the release of the *Notification* is a strong indication that CSR is being considered with increasing seriousness.

In the *Notification*, SASAC identify four main reasons for adopting CSR. The first three emphasise domestic considerations, noting that large groups should contribute to China’s ‘scientific development’ and promoting a ‘harmonious socialist society’. More specifically, SASAC argues that it is particularly important that central enterprises so contribute due to their engagement in “backbone activities” (e.g. power supply and generation, telecommunications, natural resource extraction and processing, automobile production, for example). Further, the *Notification* indicates that social responsibility is an important way of contributing to the *creation* of a modern corporate system and in so doing improving firm competitiveness. Among other things, SASAC also envisages that CSR can, at the domestic level, contribute to eradicating corruption, improving product quality and service standards, protecting the environment, protecting employee rights, brand image, and corporate solidarity.

In contrast to the first three reasons, the fourth reason SASAC puts forward for championing CSR is due to their belief that *‘as the economy becomes increasingly globalized, the international community shows great concern for CSR, and the performance on fulfilling social responsibility has become an important index with which the international community evaluates enterprises.’* Indeed, SASAC goes so far as to suggest that promoting CSR within Chinese firms may help establish *‘China’s image as a responsible developing country’* (SASAC, 2008, p. 2). Thus, SASAC’s *Notification* suggests that CSR is important not only for enterprise performance, but for China’s ‘soft power’ as well.

RESEARCH QUESTIONS

Given the rapid transnational expansion of Chinese corporations, and SASAC's ambitious policy to implement CSR, it seems important to try to establish the extent and manner in which CSR has hitherto informed, or impacted upon, the behaviour of China's most internationalized TNCs. With this general concern in mind, the remainder of the paper is guided by the following, more specific, questions:

- i. Is CSR reporting common amongst China's most internationalised business groups?
- ii. What does the content of these reports reveal about the factors driving CSR adoption in China's largest TNCs?
- iii. Following from this, and SASAC's instruction that international practice should be considered, what international CSR initiatives and programmes do China's largest TNCs engage with? Further, do these differ from those that their leading global counterparts engage with? If so, in what ways and why?

The concentration in (iii) on international CSR initiatives and programmes is of special interest owing to continued proliferation of trans-business and/or industry level CSR initiatives such as the UN's Global Compact and the Extractive Industries Transparency Initiative (EITI). These, arguably, are becoming increasingly important for CSR today (Detomasi, 2007). And second, it is due to the fact that many of these initiatives are obviously influenced by Western/global norms – e.g. liberalism, democracy, and accountability – which are not necessarily congruent with Chinese values (Chan, Lee, & Chan, 2008, p. 13). One would thus expect that there will be some discrepancy in this regard between Chinese business groups and their international counterparts. Finally, SASAC in the 2008 notification instructed China's largest TNCs to adopt global standards, raising the interesting question of whether, to what extent and how this objective is being achieved.

METHOD AND RATIONALE

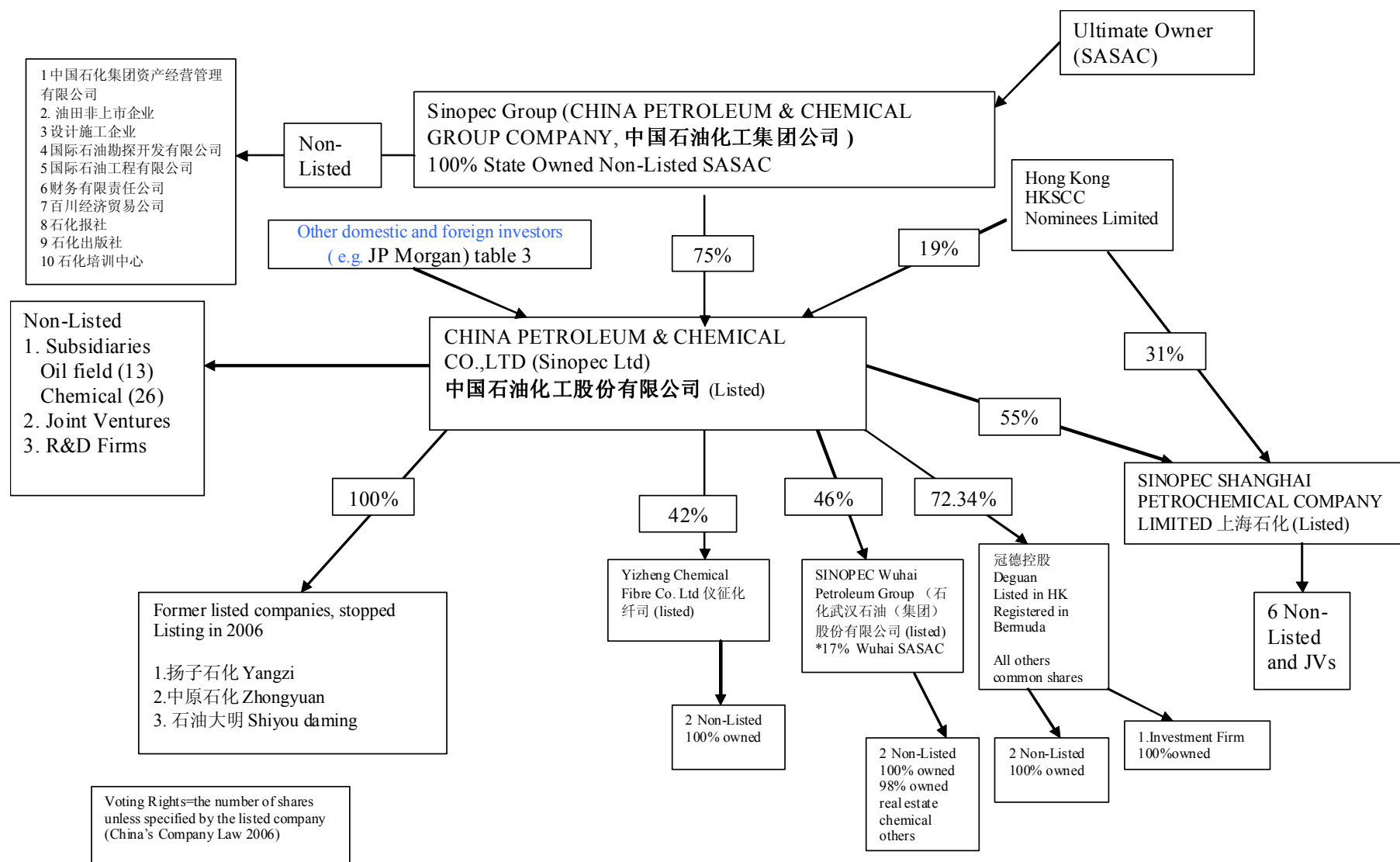
Question (i)

In addressing (i), we examined China's largest 40 business groups, as listed by MOFCOM, for evidence of CSR reporting (MOFCOM, 2008). We searched both company

websites and annual reports to ascertain whether CSR reporting is undertaken and the nature of this reporting (Table 1). Our sample (China's 40 largest business groups by OFDI stock) includes high profile companies involved in large transnational deals (such as Chinalco and Minmetals). Most of these are owned by SASAC and are state owned business groups (consisting of parent and subsidiary companies). A significant amount of Chinese OFDI is concentrated in China's largest groups. As such, they wield disproportionate influence (they are also role models for other firms). Our sample, therefore, covers an important area of Chinese TNC activity.

In addressing (i) we took special consideration of the business group structure of Chinese big business, which is quite different to that found among stand-alone corporations in the west, although similar to many other developing countries (Khanna & Yafeh, 2007). These groups consist of many legally independent firms, typically with a parent or 'group company' (*jituan gongsi* 集团公司) standing at the apex (see Figure 1 for the example of Sinopec, one of China's largest groups). In general business groups are assembled within pyramidal type ownership structures, often with a non-listed 'group corporation' holding a controlling share of the main listed entity in the group and other non-listed entities (See Figure 1). Above the 'group corporation' stands a SASAC as the ultimate owner, at either the central or local level. Further down within the group there may be numerous other listed and unlisted companies that come under the influence of the apex firm. In some instances CSR reporting may take place within a subsidiary as opposed to parent company. Thus in the example of Sinopec Group (Figure 1) CSR is only reported upon with regard to the listed company Sinopec Ltd., not with regard to the holding company Sinopec Group.

There can be problems if business groups report CSR activities only at the subsidiary level instead of the group level (typically this may be carried out by one of the largest listed corporations in the group obliged to adopt modern corporate practice). This is because reporting at the level of a single subsidiary may allow groups to move their more harmful activities away from the reporting company. Sinopec Group, for example, which has interests in Sudan, moved these assets to its parent company prior to its IPO. Given the large numbers of firms participating within China's large state owned groups such intra-group transfers may be a relatively simple avoidance measure. Within China's 3,000 or so business groups, for example, there were around 28,000 directly held subsidiaries (at the first tier) (SSB 2008). Beneath this first-tier are many more, lower level subsidiaries. Among the largest groups examined in this paper, for example, Sinopec has at least 18 subsidiaries, Sinosteel 76 and Baosteel Group Corporation 14 (Table 1).



There are numerous ways in which harmful and damaging activities may be moved between member firms within groups. It may, for example, be possible to move funds from firms actively reporting CSR (and those therefore appearing to be safe to lend to) within the group, to other firms that are not doing so. In China this is facilitated by the existence of finance companies within the largest centrally controlled groups. By 2008 nearly 37% of the State Council's 104 trial big business groups had established internal finance companies, making this type of avoidance activity a real possibility (SSB, 2008). This problem has not gone unnoticed by NGOs and other observers. As one recent critique of China's oil producers and their activities in Sudan has noted:

PetroChina has made it a practice to place much of its cash on hand with China Petroleum Finance Company, the wholly-owned finance subsidiary of CNPC (otherwise known as CP Finance), which then uses this cash to make loans to other CNPC subsidiaries (including, potentially, those subsidiaries active in Sudan) This practice of placing publicly-traded subsidiary cash in the finance arm of a state-owned parent is prevalent in China and has been widely criticized by shareholder activists who note that the action amounts to funding of projects by the subsidiary (like, potentially, CNPC's operations in Sudan) without shareholder approval (Taskforce, 2007)

The distinction between group level and subsidiary level reporting has not, as yet, been given the attention it warrants. Research to date has classed a group as having a CSR report regardless of whether the report is published within a subsidiary or parent company (Syntao, 2008). The distinction, however, is important and should be made given the past history of asset movement within groups.

Question (ii)

In addressing (ii), we analyzed the content of the reports and other company releases in an effort to identify any domestic factors – e.g. CCP directives, domestic events specific to China – that appear to be driving Chinese business groups to engage and report upon their CSR activities. Importantly – and whilst there is evidence to suggest that as many as 11 Chinese Business Groups have published a CSR report (Table 1) – only 5 of these reports were able to be found, accessed, and analyzed by the authors: i.e. the reports of Sinopec, CNPC, CNOOC, COSCO, and CMCC. A sixth report, Sinosteel's, was found and

accessed, but could not be analyzed due to it only being accessible to the researchers in a format that was difficult to read (i.e. the typeface was very small, and there was no capacity to zoom in and out on the document itself). With regard to the other five business groups, it should be noted that Sinochem's CSR report could not be downloaded; and that neither Chinalco's, Minmetal's, Baosteel's, nor ZTE's, could be found on the internet.

Question (iii)

In addressing (iii), we again analysed the content of the five CSR reports released by Chinese business groups. In addition to this, however, we examined CSR reports published by 3 of their leading international counterparts taken from the Fortune Global 500 2008 rankings (see. <http://money.cnn.com/magazines/fortune/global500/2008/>; site visited: 01/05/2009). More specifically, we identified the industry category to which each of the Chinese business groups were assigned: i.e. Sinopec and CNPC (Petroleum Refining); CNOOC (Mining, Crude Oil Production); COSCO (Shipping); and CMCC (Telecommunications). We then identified the top 3 ranked counterparts in terms of revenue to the Chinese business groups, and obtained copies of the latest CSR report released by each company: i.e. Exxon Mobil, Royal Dutch Shell, BP (Petroleum Refining); Pemex, BHP Billiton, CVRD (Mining, Crude Oil Production); A.P. Møller-Mærsk Group, Nippon Yusen, Mitsui OSK Lines (Shipping); and AT&T, Verizon Communications, and Nippon Telegraph and Telephone (Telecommunications).

When it came to analyzing the reports, the authors were specifically concerned to identify what, if any, international CSR initiatives and programmes the five Chinese business groups are engaging with or utilizing; and, whether or not there was any notable difference between the Chinese business groups and their international counterparts in such matters.

RESULTS AND DISCUSSION

Question (i)

Findings

Following from (i), how common is CSR reporting in our sample? In improving on previous research, moreover, does the CSR reporting emanate from the parent of the group and cover the major activities of the entire group? Interestingly, we found evidence for group wide CSR reporting surprisingly common. In total there was evidence that 11 of the top 40 overseas groups produced group wide CSR reports (though, as noted, the reports were not actually publicly available in all cases). Coverage of CSR, moreover, typically emanated from the parent companies. From the largest 40 this included China National Petroleum Group Corporation, (2nd largest by OFDI stock, 中国石油天然气集团公司), China National Offshore Oil Corporation (3rd largest, 中国海洋石油总公司), COSCO Group (4th, 中国远洋运输集团), China Mobile Communications Corporation (8th), Sinochem Corporation (9th, 中国中化集团公司), Sinosteel (16th, 中国中钢集团公司), BaoSteel Group(29th, 宝钢集团有限公司), Chinalco (18th, Aluminum Corp of China,中国铝业公司), China Minmetals (20th, 中国五矿集团), China Huaneng (32nd, 中国华能集团) and ZTE Corporation (中兴) (30th).

TABLE 1 HERE

The main industries included oil and petrochemicals (4), steel (2), mining (2) transportation (1), telecommunications hardware (1) and telecoms (1). Our findings also showed notable differences in the level of reporting within similar industries. In shipping, for example, COSCO Group has clearly made greater efforts to report CSR activities. COSCO is one of China's most transnational corporations. It has been commended by the UN and is involved with the Global Compact. It has comparatively extensive group wide CSR policies. China Shipping Group, by contrast (12th largest by OFDI stock) has very little on CSR. In steel production, both Sinosteel and Baogang have produced among the most impressive CSR reports to date. Shougang, by contrast, historically a well known polluter (owing to its factories' close proximity to Beijing) has little to no mention of CS. It is also noticeable that the construction groups, which are among China's largest overseas investors, have no CSR reporting. If we account for the relative number of firms in each industry it would appear the concentration of reporting is much higher (and also more comprehensive) in certain industries. In particular mining and energy groups, of which there are comparatively few, have a higher chance of undertaking CSR.

Discussion

Is CSR reporting within China's largest TNCs more common than among other corporations in China? By 2008 there were, reportedly, 50 non-central enterprises engaging in CSR reports, 20 of SASAC's central enterprises, 22 foreign enterprises or joint ventures and 29 private Chinese enterprises (Syntao, 2008). There are only, however, around 150 or so central SASAC enterprise groups but many hundreds of provincial and lower level state owned business groups and private firms. While in nominal terms there were fewer central enterprises with CSR reports, as a share of this enterprise category it was actually far higher than for other types of enterprise. CSR reporting in China's largest TNCs, therefore, appears to be more common than in non-centrally owned firms. Our results also showed that those groups with no formal CSR reporting mechanism were still engaged in various forms of philanthropic activities. Without exception, nearly all groups were keen to publicise these philanthropic activities.

The speed and vigour with which CSR reporting has been adopted in China's TNCs is surprising. As CSR practices become more standardised and extended to other groups, and as China's TNCs expand, their reach and influence is likely to become more important both domestically and internationally. So too will their CSR policies come under greater scrutiny.

Question (ii)

Findings

Why then do China's largest TNCs adopt CSR reporting? Further analysis of the CSR reports shows that the strongest common theme running through them is the commitment to implementing government policy. This is most commonly captured in language that closely echoes that of central policy makers. In particular, promotion of a 'harmonious society' and contributions to 'scientific development' are frequently repeated. The exact elaboration of what these slogans means in practice is not discussed in great detail in the CSR reports. As such these stock phrases are clearly meant to signify adherence to political ideology of the CCP. To illustrate, using some examples: COSCO (4th) notes it is 'propelled by a scientific outlook on development' and 'it shoulders the political responsibility to construct a harmonious society'; China Resources (5th), 'keeping in mind its social responsibilities, is dedicated to promoting the mutual progress of the industry and society'; China Mobile's (8th) goal 'is to create a healthy and positive social

environment to procure the *harmonious development* of society'; CITIC, as a state-owned backbone enterprise group, 'took seriously... its corporate social responsibilities'; COFCO notes: 'Just as the performance of Chinese enterprises decides China's competitiveness as a nation, their social ethics and responsibility is crucial in building a harmonious society in China'; Sinochem, 'in accordance with the Party and state policy, the Corp is to construct a harmonious enterprise under the concept of scientific development'; Chinalco 'conducts its business with integrity, harmony and fairness by complying with the relevant laws and regulations'. A typical example can be found in Liu Zhenya's (President of State Grid Corporation China (SGCC)) introduction:

State Grid Corporation of China (SGCC) is a state-owned enterprise that is crucial to national energy security and economic lifelines. Adhering to a scientific outlook on development and the ten principles of the United Nations Global Compact, we vigorously assume our social responsibilities. We are committed to building a world class utility through securing a safe, quality, convenient and clean power supply, and unremittingly improving services for the country, customers, business partners as well as economic and social development. With joint efforts from all circles of society, we will make greater contribution to building a harmonious socialist society.' (CSR Report 2008)

SGCC mentions the UN Compact here (to which we return in (iii)). The overwhelming focus of this report as others, however, is on stressing domestic considerations and promoting the government line.

Discussion

Our analysis suggests that the CSR reporting undertaken in China, even in the largest TNCs, is still strongly driven by domestic considerations despite their relatively (by Chinese standards) large holdings of overseas assets. The reports talk largely to their domestic constituencies. Why could this be? It is worth keeping in mind that even in China's most internationalised groups, their overseas assets, sales, employees and affiliate numbers still only account for a small share of group activities. CNPC, for example, has \$178.8 billion in assets but only \$6.3 billion overseas (5 of a total 53 subsidiaries). It has a trans-nationality index of only 2.7% (the TNI index is calculated by an average of three ratios: foreign assets to total assets, foreign sales to total sales and foreign employment to total employment). The average trans-nationality index for Chinese groups listed in UNCTAD'S (2008) listing of the top one hundred developing

country TNCs was only 24. This compared with an average of 54 for the top 100 non-financial TNCs from all other developing countries. In other words, most of the business activities are still predominantly focused on the domestic market, as are their stakeholders. Most of China's largest TNCs are not highly transnational. To add to this, appointments and promotion of senior executives still remain a Party matter. There are strong incentives, therefore, to follow state policy. NGOS and civil society, moreover, remain weak. As such it is hardly a surprise that one of the main factors influencing CSR adoption in China appears to be state policy. Given this policy has also asked for the adoption of international standards, it is interesting to further explore this question, to which we now turn.

Question (iii)

Findings

From our analysis of the content of the five CSR reports released by Chinese business groups, and our analysis of the reports of 3 of their leading international counterparts it is possible to identify a number of interesting patterns (see Table 2). With regard to the *Petroleum Refining and Mining, Crude Oil Production* companies most particularly, there are a number of important differences that serve to distinguish the Chinese business groups (i.e. Sinopec, CNPC and CNOOC) from their international counterparts (i.e. ExxonMobil, Shell, BP, Pemex, BHP Billiton, and CVRD). For example, all six of these international companies are supporters of the Extractive Industries Transparency Initiative (EITI) whilst none of the Chinese business groups are. The EITI 'is a coalition of governments, companies, civil society groups, investors and international organizations' which 'aims to strengthen governance by improving transparency and accountability in the extractives sector'. In short, the EITI is concerned to promote the adoption of "Western" notions of best-practice in terms of transparency and accountability with specific regard to corporate-government relations in the extractive industries (see: <http://eitransparency.org> more generally).

TABLE 2 HERE

This Western-centrism of the EITI is reflected by the fact that it is supported by Australia (the home country of BHP-Billiton), Great Britain (BP), the Netherlands (Shell) and the US (ExxonMobil). It is not, however, supported, or currently being considered for adoption, by Brazil (CVRD), Mexico (Pemex), or China (Sinopec, CNPC and CNOOC). Nevertheless, both Pemex and CVRD are – unlike Sinopec, CNPC and CNOOC – supporters of the EITI. Similarly, each of the four companies from Australia (BHP-Billiton), Great Britain (BP), the Netherlands (Shell), and the US (ExxonMobil), are participants of the *Voluntary Principles on Security and Human Rights* (even though Australia, unlike the other three countries, is not a government participant).

The *Voluntary Principles* 'are a unique tripartite, multi-stakeholder initiative established in 2000 that introduced a set of principles to guide extractives companies in maintaining the safety and security of their operations within an operating framework that ensures respect for human rights and fundamental freedoms' (see.

<http://www.voluntaryprinciples.org/> more generally). In effect, the *Voluntary Principles* seem concerned to avoid the sorts of human rights abuse allegations that have been made against various companies around the world who have employed security forces (that are commonly more or less directly linked to a host government), and who, subsequently, are accused of committing some sort of human right violation in the process of carrying out the task for which they have been employed (e.g. protecting equipment used in the production of an oil pipeline). Whilst neither Pemex nor CVRD are members of the *Voluntary Principles*, they do, along with ExxonMobil, Shell, BP, and BHP Billiton, make fairly extensive reference to their concern to respect human rights throughout their reports. More importantly, all six companies – who commonly reference documents such as the Universal Declaration of Human Rights in their publications – report much more extensively on human rights than either Sinopec, CNPC, or CNOOC (who don't actually mention human rights at all).

In contrast to these differences, all six *Petroleum Refining and Mining, Crude Oil Production* companies are similar in that they are all either members of, participants of, or make mention of:

1. The United Nations Global Compact (UNGC): a "soft" global governance initiative concerned to promote learning and best practice amongst corporate with regard to 10 principles (see www.unglobalcompact.org more generally);
2. The Global Reporting Initiative (GRI), which is concerned to see that disclosure on economic, environmental, and social performance is as commonplace and comparable as financial reporting' (see <http://www.globalreporting.org> more generally); and

3. ISO certification programmes such as ISO 14000 or ISO 14001 (which are environmental standards).

With regard to the *Shipping* and *Telecommunications* industries, it is interesting to note that the “tables are turned” somewhat. COSCO (Chinese, *Shipping*) for instance, is a member of the UNGC and also makes considered use of the GRI. By contrast, A.P. Møller-Mærsk Group (Denmark), Nippon Yusen (Japan), and Mitsui OSK Lines (Japan), are only members of the UNGC (although Mitsui OSK Lines do make some reference to the GRI guidelines in their report). Further, COSCO makes much more extensive reference to their human rights activities than any of their international counterparts (albeit with a specifically Chinese slant: e.g. their report notes that ‘COSCO group organized a series of six human rights training courses, five of them about the human rights content of the Seventeenth National Congress of the Communist Party of China... and one about the new Labor Contract Law’). Importantly, A.P. Møller-Mærsk Group does state that future reports will engage more fully with human rights.

A similar state of affairs is evidenced with regard to *Telecommunications*. Once again, it is the Chinese business group, CMCC, which is a member of the UNGC and makes most use of the GRI. None of the other three companies – i.e. AT&T (US), Verizon Communications (US), and Nippon Telegraph & Telephone (Japan) – are members of the UNGC. With regard to the GRI, however, AT&T and Nippon Telegraph & Telephone do make some rudimentary reference to it (i.e. they make considerably less use of the GRI than do CMCC). Once again, it is CMCC who provides most discussion of human rights (this time with specific reference to Hu Jintao’s definition thereof: i.e. a definition which prioritises the right of people to meet basic needs and the right of people to development). With regard to both the *Shipping* and *Telecommunications* companies more generally, it should also be noted that the only companies that do not make any reference to some sort of ISO standard are the A.P. Møller-Mærsk Group, AT&T, and Verizon.

The final point to make is that of the five Chinese business groups here investigated, two are members of the World Business Council for Sustainable Development, or WBCSD (i.e. Sinopec and COSCO); whilst four of the twelve international counterparts are also members (i.e. Shell, MP, BHP Billiton and CVRD). The WBCSD has over 100 corporate members from all over the world. As an institution, ‘it is committed to sustainable development and to promoting the role of Eco-Efficiency, Innovation and Corporate Social Responsibility’. Membership is by invitation, and ‘member companies pledge their support and contribution to the WBCSD by making available their knowledge and experience, and appropriate human resources. They are asked to publicly report on their

environmental performance and to aspire to widen their reporting to cover all three pillars of sustainable development -- economic, social and environmental' (see www.wbcsd.org more generally). Of all the International CSR initiatives mentioned, the WBCSD is the most business-centric.

Discussion

The above findings are suggestive of a number of interesting points. First, they indicate that Chinese business groups are – as a recent work by Chan, Lee & Chan (Chan, et al., 2008) begins to suggest – adopting those International CSR initiatives/programmes that are “technical” by nature, and not so closely related to issues of “politics” (and/or “security”, and/or “human rights”). Thus, all of five Chinese business groups make some use of the GRI, all five Chinese business groups make reference of ISO standards, and two of the five Chinese business groups are members of the WBCSD (which, importantly, companies need to be invited to join). Not all of their international counterparts, by contrast, do the same.

Second, when Chinese business groups do engage with some sort of “political” CSR initiative/programme, they choose those that are developed by institutions in which Nation-States are a major player (with the UN being the archetype here). By contrast, they are less likely to choose “coalition” initiatives involving a diversity of actors: e.g. States, NGOs and businesses. Accordingly, all five Chinese business groups are members of the UNGC, but none of them are members of political coalition initiatives such as the EITI or the *Voluntary Principles*. This finding is consistent with the clear and continued emphasis that the CCP places on State sovereignty, and, on the fundamental role of the State in governing social concerns (Bailes & Dunay, 2007).

Third, the findings suggest that Chinese TNCs are continuing to refrain from getting involved with those voluntary regimes that are most “political”: e.g. the EITI and the *Voluntary Principles*. With specific regard to the EITI for instance, there has been pressure placed on China to support this initiative since as far back as 2005 (Chan, et al., 2008), and yet no Chinese group (let alone the Chinese government) has signed up as of early May 2009. One reason why this might be the case is that such initiatives could be understood as an attempt to institutionalize “Western” ideals within Non-Western countries. Such initiatives then, seem largely opposed to the manner in which China is currently presenting itself as a promoter of, or, at the very least, as being

tolerant of, “international pluralism” (Bailes & Dunay, 2007; Barma & Ratner, 2006; Barma, Ratner, & Weber, 2007; Chan, et al., 2008).

CONCLUSIONS

Very little is still known about the nature of CSR in China’s most internationalised groups. These groups belong to a special batch of big business groups, owned by SASAC, which are also going to ‘*set examples for all other enterprises in China*’ (SASAC, 2008). As such the nature of CSR activities and reporting enacted in these groups is important. As they increase their outward overseas investments, moreover, their international reach and influence will also increase.

To conclude, we first of all highlight a methodological issue to pertinent to understanding CSR in China. Owing to the formation of extended business groups (affiliations of legally independent firms) monitoring CSR in China is somewhat different to most other developed economies. Given the complex nature of China’s business groups we must be careful in establishing where in the group CSR reporting takes place. This is somewhat different to what is found in the Anglo-Saxon type economies where CSR reporting has evolved in the context of stand-alone firms. Secondly, we note that CSR reporting in China’s TNCs is expanding extremely quickly. Eleven of China’s largest TNCs already have formal CSR policies. These policies, moreover, have been extended to all member firms within the groups. Thirdly, despite being China’s largest TNCs, the reports testify to the very strong influence of central policy making in shaping Chinese CSR. The hand of the state is very much present in the development of CSR in China.

Finally, we looked at the types of international initiatives/programmes adopted. When such international programmes are adopted we found they tend be more “technical” in nature, eschewing overtly political programmes. When political programmes are adopted, moreover, they tend to be those that are developed by institutions in which Nation-States have significant input, further indicating the close relationship between CSR and state sovereignty in China.

The emergence of CSR in China has been as dramatic as expansion of Chinese outward investment. If China’s TNCs want to take their place on the world stage they will undoubtedly have to show that they can comply with current international norms regarding CSR. Attaining high levels of transparency and building social responsibility into their activities, therefore, may well be necessary for the success of future internationalisation efforts. Here we have touched upon some important issues regarding Chinese CSR and the internationalisation of Chinese business. The situation,

however, is highly dynamic and changing quickly. Future research, therefore, could look to further explore and extend some of the questions we have raised here using the more comprehensive sample of CSR reports that will become available in the near future.

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Table 1: Summary of CSR policies in China's largest TNC business groups (based on OFDI stock, 2007)

Name of Group Company, ranking and source (page).	Additional notes on group, including CSR policies.
1. Sinopec (China Petrochemical Corporation)(中国石油化工集团公司)	Report at subsidiary level . http://english.sinopecgroup.com/company/11.shtml Main Business: Oil & gas operations. See figure 1 for more details of structure. Sinopec Ltd. has controlling shares in numerous other listed companies (i.e. Yizheng Chemical Fibre Co. Ltd). Claims to undertake work on poverty relief At least 17 subsidiaries, first tier. SASAC, 2 nd , 6 th Driven by: 'competitiveness and various societal factors as a good corporate citizen , energy conservation and environment protection, so that the Company would achieve sustained, effective and harmonious growth , and realise the goal of becoming a multinational energy and chemical corporation with strong competitiveness' (Annual Report, 2007: 2).
2 China National Petroleum Group Corporation, (中国石油天然气集团公司)	CSR report, at group level. http://www.cnpc.com.cn/CNPC/default.htm . CNPC owns oil and gas assets and interests in 27 countries, and provides oilfield services, engineering and construction in 49 countries worldwide. Operations in Sudan. At least 41 subsidiaries. Listed on Hong Kong and New York exchanges in 2001.
3. The China National Offshore Oil Corporation 中国海洋石油总公司	CSR report at group level . www.cnooc.com.cn/ SASAC. 4 listed companies in group (two listed subsidiaries in HK). The China National Offshore Oil Corporation (CNOOC) is one of the largest state-owned oil giants, as well as the largest offshore oil and gas producer. Total staff of 51,000. 'As a key state-owned company, CNOOC is an active participant in social welfare and public initiatives. Our mission is to create a bright future for our country and people, and to forge ahead in the harmonious development of people, society and the environment.'
4. COSCO Group 中国远洋运输集团	CSR report at group level . http://www.cosco.com/en/about/index.jsp?leftnav=/1/1 (Group website) SASAC, 6 listed subsidiaries. First in China to join UN compact. COSCO specializes in shipping and modern logistics, serving as a shipping agency and providing with services in freight forwarding, shipbuilding, ship repairing, terminal operation, trade, financing, real estate and IT industry as well with an aim at taking one of the leading roles in these areas. There are CSR reports online for 2005-2007 at the group level. There are six listed companies within the group. 'COSCO Group companies have set up their respective Commission on Sustainable Development' COSCO Group 'shoulders the political responsibility to construct a harmonious society'
5. 中国华润总公司 China Resources National Corporation	No group CSR report, brief mention on web page. http://www.cre.com.hk/ (SASAC, 22 nd largest) 20 plus subsidiaries. It is a diversified group involved in retail, beverages, food processing and distribution and textiles. See interim report for CSR details, p. 10). See 2007 Annual Report (p.32) for more.
6. CITIC Group 中国中信集团公司	No group CSR report, but mention in annual report. www.citic.com/ . 44 subsidiaries. (in Hong Kong, the United States, Canada, Australia and New Zealand). CITIC's core business ranges from financial

	industry, industrial investment to service industries. On CSR: 'As a state-owned backbone enterprise group, CITIC Group took seriously in fulfilling its corporate social responsibilities by proactively repaying the society and vigorously nurturing a sound corporate culture'. (Annual Report 2007: 42)
7. COFCO Group Ltd 中粮集团有限公司	No group CSR report. http://www.cofco.com.cn/cn/about_cofco/general_situation.aspx , SASAC (31 st), 14 plus six listed companies. COFCO is a leading grain, oils and foodstuffs import and export group as well as one of China's largest food manufacturers. On social responsibility: http://www.cofco.com/en/responsibility/society.aspx# : 'Enterprises create social wealth, but often at the cost of the natural resources and environment of the place in which they are located. They serve as the benchmark for a country's economic development. Just as the performance of Chinese enterprises decides China's competitiveness as a nation, their social ethics and responsibility is crucial in building a harmonious society in China.'
8. China Mobile Communications Corporation	Yes, group CSR report. http://www.chinamobile.com/en/mainland/about/profile.html 'China Mobile believes that besides pursuing their own development, businesses are also responsible for assisting the poor and the disadvantaged in the society... Our goal is to create a healthy and positive social environment to procure the harmonious development of society.' Extensive CSR reports for 2007 and 2008. With performance metrics as well. Quite impressive.
9. Sinochem Corporation 中国中化集团公司	Group level CSR report. http://www.sinochem.com/tabid/63/Default.aspx . (SASAC (7 th) 'As our major businesses concern sensitive areas including recourses, environment and safety; Sinochem ought to assume the responsibility to protect the environment, to conserve recourses, to conduct safe production and to promote the harmonious coexistence between the human beings and the nature. As a huge conglomerate with high public attention, Sinochem has the responsibility to follow lofty business ethics and the code of behavior, observe laws and regulations, to contribute to the society and to make an excellent corporate citizen.'
10. China Merchants Group	No group CSR report. http://www.cmhk.com/en/ Very little on CSR. Has around 20 listed subsidiary companies owned by the group, heavily involved in transport infrastructure (toll roads). Listed as a large overseas company because of interests in Hong Kong.
11. Shum Yip Holdings Company Limited	No group CSR report. http://www.shenzheninvestment.com/ Is the holding company of numerous subsidiaries, see for example. Very little if nothing on CSR. Probably included as large overseas investor owing to HK interests.
12. China Shipping Group Company 中国海运集团公司总公司	No group CSR report. http://222.66.158.218/b-1.asp SASAC (40 th), 31 subsidiaries. In general very little on CSR. http://www.cscl.com.cn/info/sms.jsp Lists State Council regulations, though has not gone nearly as far as COSCO. No CSR section in annual report of the listed company.
13. China National Aviation Holding Corporation	No group or subsidiary CSR report. http://www.airchinagroup.com/cnah/ China National Aviation Holding Co is the parent of mainland flag carrier Air China Ltd. It is therefore a state-owned Chinese holding company (CNAHC). The website for the parent company: CSR not mentioned on web site. It does however discuss the 'scientific concept of development' and the role it may in working towards it.

	Annual report of Air China does not include a section on CSR. Though mentions it is following SASACs guidelines on scientific development: http://www.sasac.gov.cn/n1180/n6130640/n6192763/index.html
14. China National Chemical Corporation 中国化工集团公司	No group level CSR report. www.chemchina.com.cn , Owns numerous other groups, SASAC (35 th). A large-scale state-owned group company approved by the State Council on the basis of China National Bluestar (Group) Corporation, China National Haohua Chemical (Group) Corporation and other companies affiliated with the former Ministry of Chemical Industry. No CSR reports mentioned on the web site. At least 11 listed subsidiaries though.
15th. China State Construction Engineering Corporation 中国建筑工程总公司	No group wide CSR report. http://www.cscec.com.cn/ SASAC (13 th), subsidiaries (21 domestic and 16 abroad). The largest construction conglomerate in China. China Overseas Group Holding Ltd (中国海外集团有限公司) is listed in Hong Kong. China Overseas Land & Investment Ltd ("COLI" or the "Company"), a Hong Kong listed subsidiary, controls (along with observation group subsidiaries) China State Construction International Holdings Limited is also listed on Hong Kong.
16. Sinosteel 中国中钢集团公司 Zhongguo Zhonggang Jituan Gongsi	Group level CSR report. Extensive. Reference to role as global citizen. www.sinosteel.com Formerly China Iron & Steel Trade & Industry Group, Sinosteel includes 76 subsidiaries. It has established iron ore and chrome ore resource bases in Australia and South Africa, providing abundant mineral resources for the sustainable development of China. One of few reports to mention international concerns. Sinosteel has also released a report on CSR in Africa.
17. China Network Communications Group Corporation 中国网络通信集团公司	No group wide CSR report. China Network Communications Corporation (CNC) is a state-owned enterprise and the ultimate controlling shareholder of publicly traded China Netcom Group and its subsidiaries, including CNC China. CNC operates a national and international fixed telecommunications network that covers the whole country -- it is the leading provider of fixed-line telecom services, including broadband and Internet access, data, and business communications. The company, which also provides limited wireless services, has more than 100 million wireline subscribers. Merged with China Unicom
18. 中国铝业公司 Aluminum Corp of China	Yes, group CSR report (Chinese). www.chinalco.com.cn/ , SASAC (21 st), 38. Chinalco has 34 directly owned or controlled subsidiaries, and approximately 200,000 employees. ON CSR: 'At Chinalco, the respect for human dignity and diversity is central to all operations. It seeks to contribute to sustainable development and to be an outstanding corporate citizen.' Recently invited Australian Aborigines to China to view some of their mining project. Is strenuously attempting to improve corporate image and raise awareness in Australia. 'The members of the Aurukun Aborigines Community Delegation have developed new understanding of CHINALCO through the exchange, and expressed their support to CHALCO's Aurukun Bauxite Project in Australia'. Looking to take large share in Rio Tinto, one of world's largest mining groups.
19. GDH Limited	No group CSR report. Subsidiaries unclear. GDH Limited ("GDH" or "The Group") is an investment holding company established by the collaboration of the former Guangdong Enterprises (Holdings) Limited, Nam Yue (Group) Company Limited and the Guangdong Province Dongshen Water Supply Management Bureau. http://www.gdh.com.hk/english/corporate_value_e.php This group is further from centre (i.e. Beijing) and appears less encumbered by social duties.

20. China Minmetals 中国五矿集团	Recent CSR report. Though in general limited evidence in subsidiaries. www.minmetals.com.cn/ , SASAC (16 th), 37(China), many overseas branches. China Minmetals Corporation, founded in 1950, is a large sized group dealing worldwide in development, production, trading and operation for metals and minerals. The Group is China's largest nationwide supplier of raw materials for the metallurgical industry and also the largest steel trading company. The Group has established a joint venture with CODELCO to develop copper resources in Chile and has activities in Peru. 'Cherish limited resources, pursue boundless development', company slogan. Also involved in real estate, logistics and financing. Quite typical in this respect. Minmetals controls shares of Minmetals Resources and Minmetals Land, two listed red-chip companies in Hong Kong. None found in Minmetal Resources Ltd.
21. CITS Corporation	No group wide CSR report. http://www.citsgroup.com.cn/enbak/index.asp 'China International Travel Service is the biggest and strongest international travel service group, with a registered capital of RMB 280 million and 2,300 employees.
22. Shanghai Automobile Industry Group Co. 上海汽车工业集团总公司	Some group wide CSR awareness, no report though. http://www.saicgroup.com/chinese/index.shtml , Shanghai SASAC (14 th) 'With a view to future industry and state economy, SAIC concentrates preponderant resource to develop new energy cars, and has a breakthrough now. In the 11th 5-years, SAIC will realize series production of hybrid cars in both own brand and JV brands. In World Expo, SAIC will serve the hybrid car for demonstration run.' No annual reports for listed subsidiaries.
23. Legend Holdings 联想控股有限公司	No group wide CSR report. http://www.legendholdings.com.cn/ Established in 1984 with 11 researchers and an investment of RMB 200,000 from the Institute of Computing Technology of the Chinese Academy of Sciences. In 2006, turnover of Legend Holdings reached RMB 138.9 billion, total assets of RMB 65.1 billion. 'With dedication to the service of society through development and growth, Legend Holdings is committed to be a respected and trusted global holding company that holds interests in leading enterprises worldwide.'
24. China Power Investment Corporation	No group wide CSR report. http://eng.cpicorp.com.cn/ Claims to aspire towards green credentials. In general appears limited, though as a power producer clearly in an area requiring CSR. China Power Investment Corp. contrasts with the State Grid, which has already published several CSR reports (it claims to be among the first corporations in China to do so).
25. Haier Group 海尔集团	No group wide CSR report. www.haier.cn/ (owner: Local government/ employees (similar to Legend) (20 th)), Haier refrigerators and washing machines as among China's "Top Global Brands."Haier is the world's fourth largest white goods. As of 2007, the Haier Group has established a total of 64 trading companies (19 located overseas), 29 manufacturing plants (24 overseas), 8 design centers (5 overseas) and 16 industrial parks (4 overseas).
26. China Metallurgical Group Corp.	No group wide CSR report. http://www.mcc.com.cn/english/ShowArticle.asp?ArticleID=241 A driving force behind the growth of China's steel industry. The company is a leading investor licensed by China's government in natural resources exploitation businesses. MCC has to date invested as much as US\$ 1 billion in mining resources abroad, and owns many production facilities and claims of resources including iron ores, copper, gold, nickel, cobalt, zinc, lead and aluminum, etc. Construction activities also in Africa.
27. Guangzhou	No group wide CSR report. Guangzhou Investment Company Limited (SEHK: 123) is a conglomerate

Yuexiu Holding Limited	engaged in property, newsprint and toll road located in Guangdong, China. Its major shareholder is Yue Xiu Enterprises (Holdings) Limited, the investment corporation of the Guangzhou Government in Hong Kong. It is incorporated in Hong Kong and it was listed on the Hong Kong Stock Exchange as red chip stock in 1992.
28. China National Foreign Trade Transportation (Group) Corporation	No group wide CSR report. www.sinotrans.com Founded in 1950, China National Foreign Trade Transportation (Group) Corporation (SINOTRANS) operates under the direct administration of SASAC. Involved in integrated logistics and shipping. SINOTRANS is China's largest company specializing in international freight forwarding, air cargo and international express and the second largest shipping agency and the third largest shipping company. On CSR: 'Sinotrans is actively involved in social events, environment protection, endeavoring for a better life of the people and a more harmonious community .' It has three listed companies within the group. Very limited mention of CSR in annual reports.
29. Bao Steel Group 宝钢集团有限公司	Yes, group wide CSR report. http://www.baosteel.com/group/ (SASAC (8 th))., 14 subsidiaries. Baosteel Group Corporation is the parent company of BaoSteel Ltd (listed) which owns 55% of Baosight, also listed. Five listed companies in total. Extensive group wide CSR reporting. Report over 100 pages long, published since 2005. Describes activities of 13 main branches/subsidiaries. Among the most detailed published in China.
30. ZTE Corporation	Recent CSR report. http://www.zte.com.cn/ Chinese telecoms equipment provider, first to pursue business in overseas markets. ZTE now has about 50,000 employees and 8,000 of them are working in about 100 representative offices around the world. As a leading global provider of telecommunications equipment and network solutions, ZTE plays an important role in the international telecoms community. Little discussion/mention of CSR in annual report of listed arm until recently when it became a member of the UN Global Compact. It will abide by the Ten Principles of the Global Compact in developing and carrying out its CSR. ZTE is also set to release its first CSR report as part of its 2008 annual financial report in March 09. ZTE has been chosen as the only representative in the communications industry in The Wall Street Journal's '10 Most Respected Enterprises in China'.
31. Shanghai Overseas United Investment Co. Ltd.	No information.
32. 中国华能集团 China Huaneng	Yes, group wide CSR report. www.chng.com.cn/ , SASAC (26 th), 23 China Huaneng Group (CHNG) was reorganized into a Central-Government-administered state-owned enterprise on the foundation of its predecessor by the State Council. CHNG is a state-authorized investment entity and a trial enterprise of state-holding corporations. CHNG is an incorporated business entity primarily focusing on the development of power with a diversified business portfolio. China Huaneng Group has released Sustainable Development Reports since 2006. The report mainly covers six area, showing the achievements Huaneng has obtained in fulfilling security responsibility, environmental responsibility, economic responsibility and social responsibility. Huaneng made satisfactory progress in the year 2007, 'realizing the harmonious development of the enterprise, society, and the environment.'
33. China Unicom	No group wide CSR report.. http://www.chinaunicom-a.com/about/index.html SASAC (25 th) See China

中国联合通信有限公司	Unicom Holding Ltd. For more information.
34. China Nonferrous Metal Mining and Construction (Group) Co. Ltd.	No group wide CSR report. http://www.cnmc.com.cn/en/jtjj/index.asp CNMC is a state-owned enterprise under direct supervision of SASAC. Its business covers investment in, development and management of mines at home and abroad with its focus on nonferrous metals. CNMC boasts the most overseas nonferrous metal resources in China. At present, the projects both under development and operation include: Chambishi Copper Mine of Zambia (sackings and riots reported), Tumurtin-Ovoo Zinc Mine of Mongolia, Tagaung Taung Nickel project of Myanmar, Thai-China lead-Antimony Alloy Plant, Mongolia Oyu Tolgoi Copper-Gold Project and so on. CNMC successful enters Australian capital market through the purchase of ORD shares of Australia. CNMC cooperates with Iran Mining Enterprise in the development of lead and zinc resources. CNMC invests in North Korea to upgrade the nonferrous metal mines there. CNMC has access to risk exploration areas in Cambodia and Laos. CNMC has been committed to the development of overseas nonferrous metal resources including copper, aluminum, zinc and nickel.
35. Shougang Group 首钢集团	No group wide CSR reporting. http://www.shougang.com.cn/main.html Beijing SASAC (38 th) Large integrated iron and steel works. One listed subsidiary and numerous other member enterprises (over 40 listed). Little mention of CSR. A notorious polluter at one point in time. Global Compact member since 4/20/2005 however and forced to suspend operations during Olympic games. Issues with mineworkers in Peru, among other things.
36. China Poly Group Corporation	Little or no discussion of CSR. http://en.poly.com.cn/newEbiz1/EbizPortalFG/portal/html/about.html Poly Group has two core industries, one is the international trade of Military Products and Civil Products, the other is the Real Estate Developments.
37. TCL Corporation	No. http://www.tcl.com/main_en/index.shtml TCL employs more than 50,000 people in over 80 operations, including 18 R&D centers, 20 manufacturing bases, and more than 40 sales offices around the world. With 2007 global sales of USD 5.8 billion, and serving more than 100 million consumers worldwide.
38. Guangdong Province Navigation Holdings Company Limited	No. http://www.cks.com.hk/images/english/enzzjq.htm Consists of a major listed subsidiary. No mention concern of CSR.
39. Xinjiang Zhongxin Resources Co. Ltd.	No information. Zhongxin Resources is a subsidiary of CITIC. Established in 2006, Zhongxin Resources exploits energy and mineral resources in central Asian countries, especially Kazakhstan. It has become an important destination for China to establish cooperative relations in oil exploration.
40. Shenzhen Investment Holdings Co. Ltd.	No. Shenzhen Investment Limited, through its subsidiaries, engages in the investment and development of real estate properties primarily in Mainland China. It develops residential, industrial, and commercial properties.

Table 2: Summary of international initiative/programmes China's TNCs have joined

Group Company	Country	Latest Report	Listed Participant of UNGC	GRI Rating For Latest Report	Partner of WBCSD	Supporter of EITI/Transparency	(a).	Human Rights	ISO Standards
Petroleum Refining									
Sinopec (China Petochemical Corporation)	China	2007 Sustainability Report	Yes	No, but have sought to apply its reporting principles	Yes, set up CBCSD	No/ Very cursory mention of transparency	No	Section on Human Rights (1 page)	ISO 14001
CNPC (China National Petroleum Corporation)	China	2007 CSR Report	No (But PetroChina are)	No, but do refer/catalogue with reference to GRI Guidelines 2006	No	No	No	Comply with Labour Law of PRC and Host Countries	ISO 14001 OHSAS18001
Exxon Mobil	US	2007 Corporate Citizenship Report	No, but declare themselves to be in agreement with basic principles	Undeclared	No	Yes, mention of support/ One of their five commitments	Yes	Yes. Mention of Voluntary Principles on Security and Human Rights	ISO 14001 OHSAS18001
Royal Dutch Shell	Netherlands	2007 Sustainability Report	Yes	A+ Self Declared	Yes	Yes. Mention that they are Strong Supporters	Yes	Yes. Mention of Voluntary Principles on Security and Human Rights. Mention of ILO	ISO 14001
BP	Britain	Sustainability Review 2008	Yes	A+ Ernst & Young	Yes. No mention in report	Yes. Mention Support/ Jermyn Brooks of TI sits on	Yes	Yes. Brief mention in report.	ISO 14001

						external review committee			
Mining, Crude Oil Production									
CNOOC	China	2006 Sustainability Report	Yes	No	No	No	No	None	ISO14000
Pemex	Mexico	2007 Sustainability Report	Yes	A+ GRI Checked	No	Yes. Mention in report	No	Yes, quite a bit discussed.	ISO 9001; ISO 14001; OSHAS 1800
BHP Billiton	Australia	2008 Sustainability Report	Yes	A+ GRI Checked	Yes	Yes. Mention in report	Yes. Mention in report	Yes, throughout the report.	ISO 14001; OHSAS 18001; SA 8000; ISO 14043
CVRD (Vale)	Brazil	Sustainability Report 2007	Yes	B+ GRI Checked	Yes	Yes. No mention in report	No	Yes. Mention of UDHR, ILO, etc. Throughout the report	ISO 9001; ISO 14001; OSHAS 18001
Shipping									
COSCO (China Ocean Shipping (group) Company)	China	2007 Sustainability Report (Online)	Yes, Clearly Branded	B+ GRI Checked	Yes	N.A.	N.A.	Mention of training with regard to human rights	ISO 9000; AA1000
A.P. Møller-Mærsk Group	Denmark	2007 HSE Report	Yes. No mention in report.	No. Use GRI system though	No	N.A.	N.A.	Mention that future reports will go into human rights	None Mentioned
Nippon Yusen	Japan	CSR Report 2008	Yes. Mention in report.	No. Brief mention of GRI.	No	N.A.	N.A.	Brief mention.	ISO 14001; Mention of ISO 9000, ISO 14000

Mitsui OSK Lines	Japan	2008 Environmental and Social Report	Yes. Mentioned.	No. GRI Guidelines referred to.	No	N.A.	N.A.	Brief mention.	ISO 14001
Telecommunications									
China Mobile Communications Company	China	2008 CSR Report	Yes. Mentioned briefly	B Self Declared. Mentioned in the report.	No	N.A.	N.A.	Mention of human rights, and Hu Jintao's definition: i.e. prioritizing right to meet basic needs and their right to develop	ISO27001
AT&T	US	Citizenship & Sustainability Report 2007/2008	No	No. Very brief mention of GRI in report	No	N.A.	N.A.	No mention.	None Mentioned
Verizon Communications	US	2007 CSR Report	No	No	No	N.A.	N.A.	Very Brief mention	None mentioned
Nippon Telegraph & Telephone	Japan	2008 CSR Report	No.	No. Brief mention of GRI	Yes. One mention	N.A.	N.A.	Brief mention of human rights and discrimination	ISO 9001; Mention of participation in ISO 26000

Notes: (a). Member of Voluntary Principles on Security and Human Rights