

# ORC Global Equality, Diversity, and Inclusion

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**To:** Global Diversity Forum and Workforce Opportunity Network

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**Survey Results:** EEO and Diversity Efforts by US Companies with Overseas Operations

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A member was interested in the EEO and Diversity efforts of US companies with overseas operations. They were trying to determine how companies with overseas operations handle concepts such as EEO and Diversity and corrective action/discipline; how they impose/monitor internal company policy and how they track employee data.

Of the members that responded, all were US Companies with employees working outside the United States. Their US based employee count ranged between 3,500-134,000 and the non US based employee count ranged between 2,000-500,000.

Of the 5 responding companies, all of them have employees in Asia, Canada and Europe. Four respondents have employees in Africa, three have employees in the Middle East and two have employees in Australia, Russia or Latin America.

Three companies responded that they apply US policies overseas regarding, equal employment opportunities, hiring and promotion, corrective action and dispute resolution. Two companies responded that they apply US policies overseas regarding diversity and inclusion and reasonable accommodation.

Three companies reported that they have local-country policies at non US locations covering equal employment opportunity. At least one company reported that they have local-country policies at their non-U.S. locations covering affirmative action, diversity and inclusion and corrective action. Two companies have local-country policies covering dispute resolution.

Most companies reported that non-US policies are administered by local teams. Three companies use their US computer systems to record non-US employment activity. Three companies have non-US diversity strategies that differ from their US diversity strategy and two reported they are the same.

**For the detailed report please see the following pages.**

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**Question 1: Are you a US company with employees working outside the United States?**

Five companies responded they are a US company with employees working outside the US.

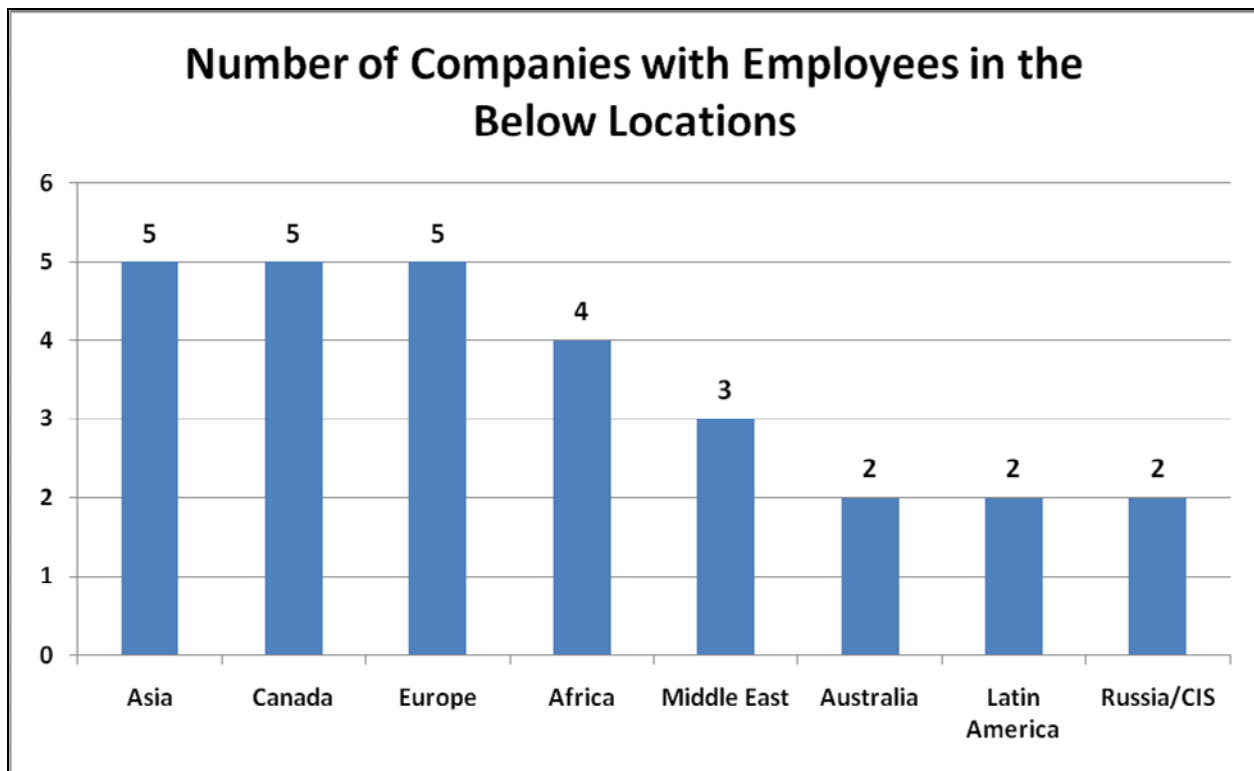
**a. Approximately how many US based employees do you have?**

- 3,500
- 13,400
- 55,000
- 90,000 (North and South America)
- 117,846

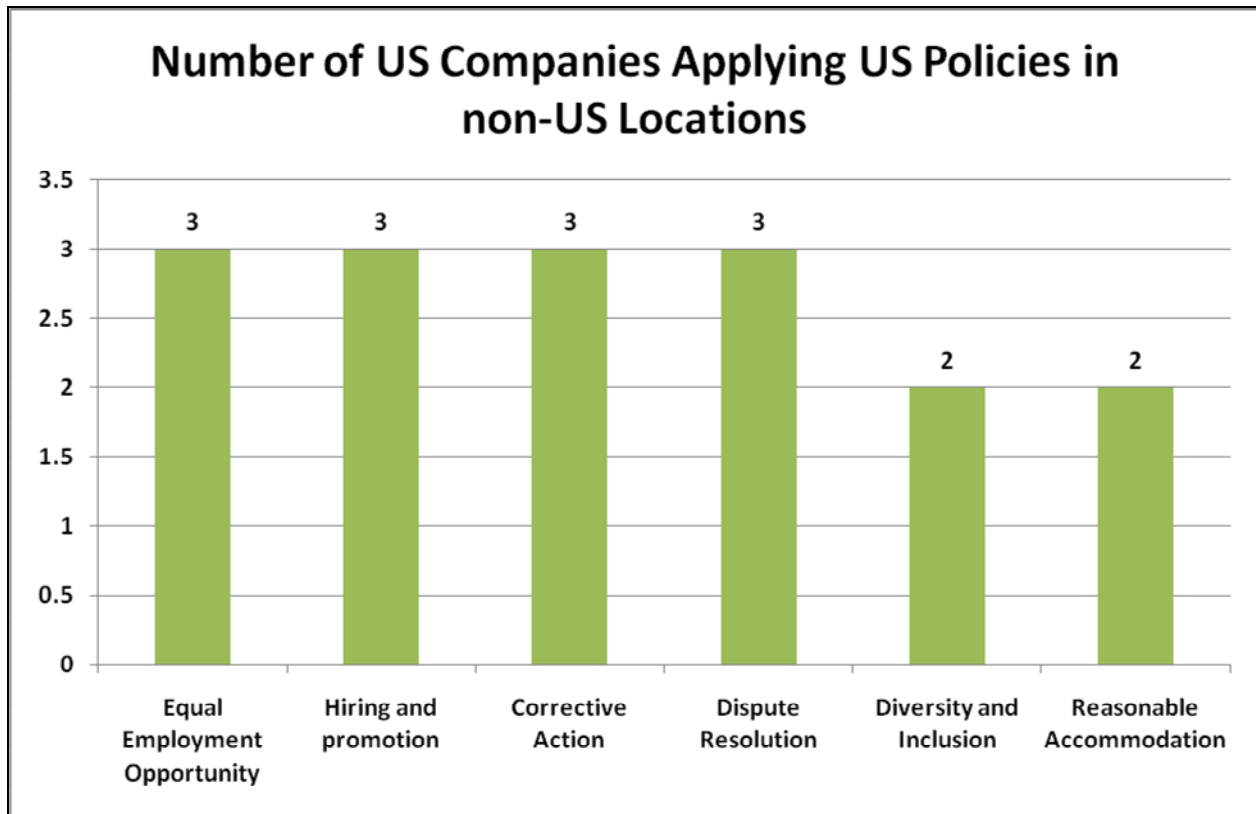
**b. Approximately how many non US employees do you have?**

- 2,000
- 5,000
- 70,000
- 500,000
- 21,266

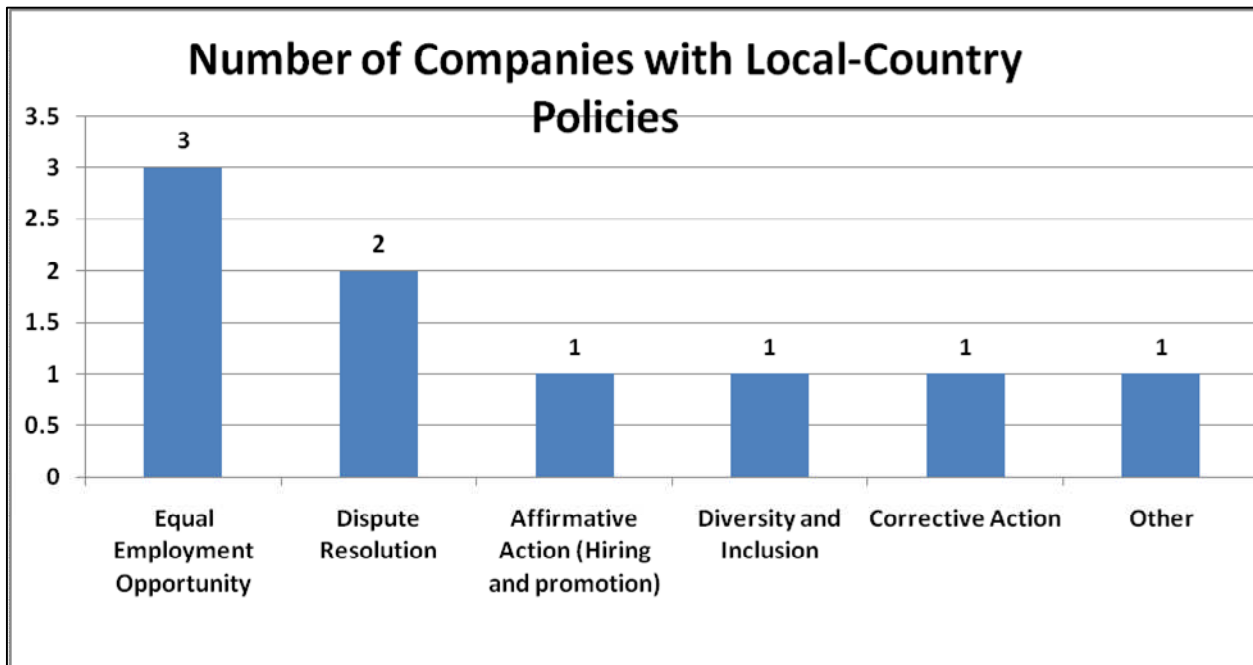
**Question 2: Where are the non-US based employees located?**



**Question 3: US Company policies applied to non-US locations regarding the following:**



**Question 4: Local-country policies at non-U.S. locations covering:**



**Other:**

- The company has a Code of Business Conduct which is global (see below for more detail).

**Question 5: How are your non-US policies administered?**

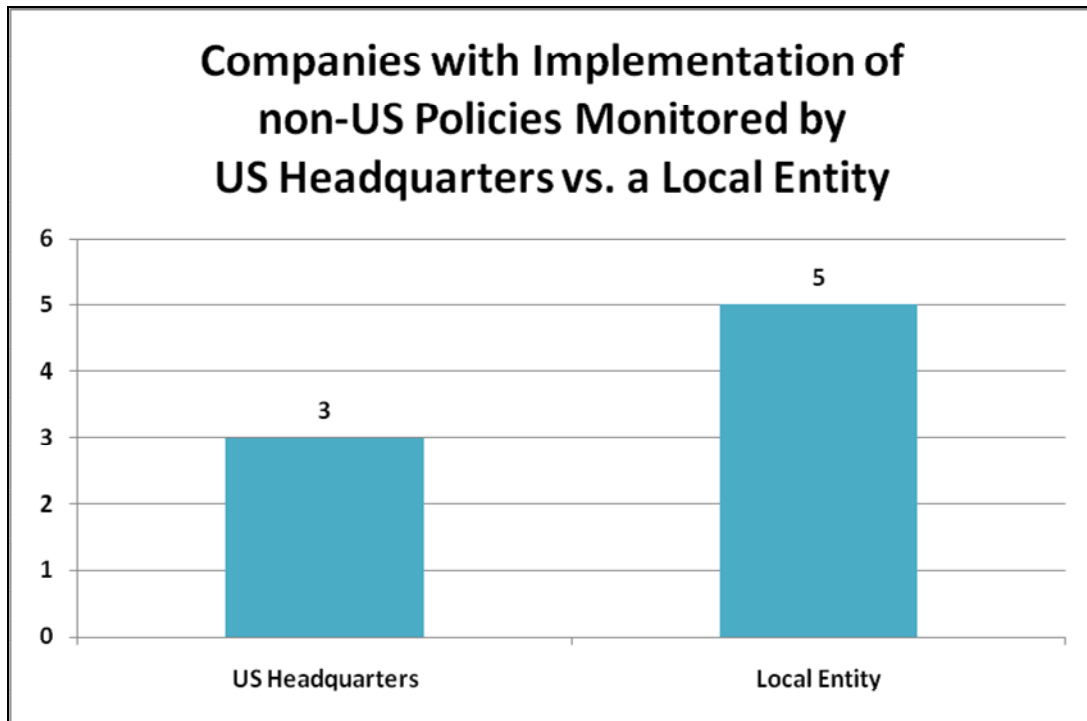
- Local legislations take priority. However, in absence of legislation or best practices, organizational policies apply.
- They are administered by the local teams and leaders.
- They are administered through a center of excellence.
- Policies are generally bespoke for each individual country or business within the country. They are administered by local HR practitioners.
- The Code of Business Conduct (COBC) course covers all company policies, including Zero Means Zero and is required of all employees within their first 30 days. The Zero Means Zero policy prohibits discrimination and harassment based on sex and sexual orientation, as well as other categories.

The Code of Business Conduct (COBC) Refresher course covers the above and is required every other year after taking the COBC for all HQ employees, Heads of Stores and DC Managers and above, all globally.

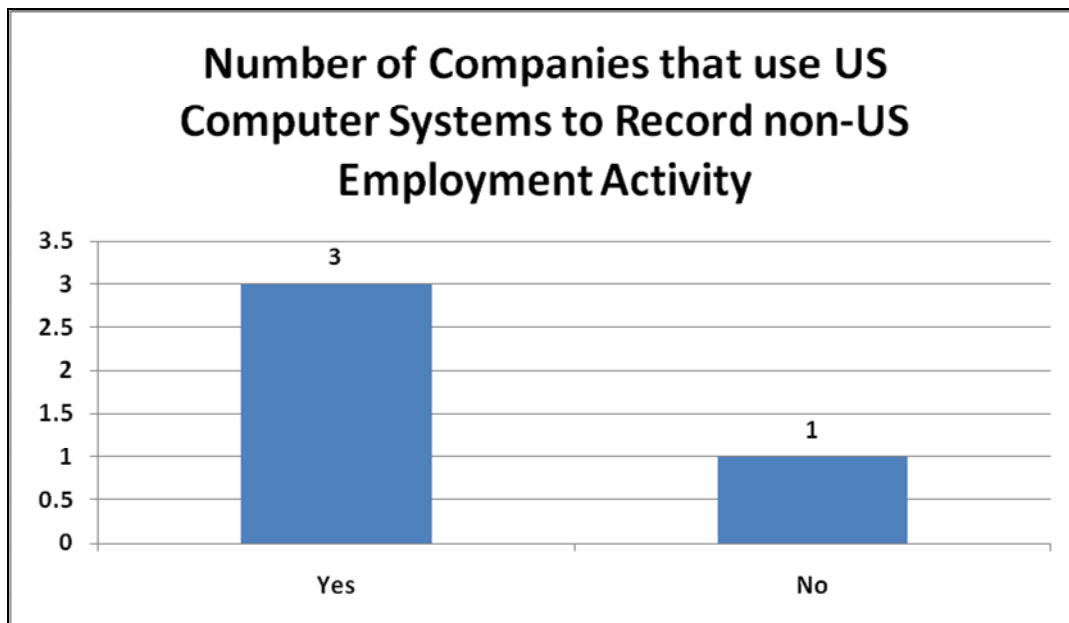
The CPWE (Creating A Positive Work Environment) course discusses respecting all employees and is required for Supervisors and above in 3 states.

The PSH (Preventing Sexual Harassment) training course prohibits gender orientation discrimination or harassment and is required for Supervisors and above for 3 states

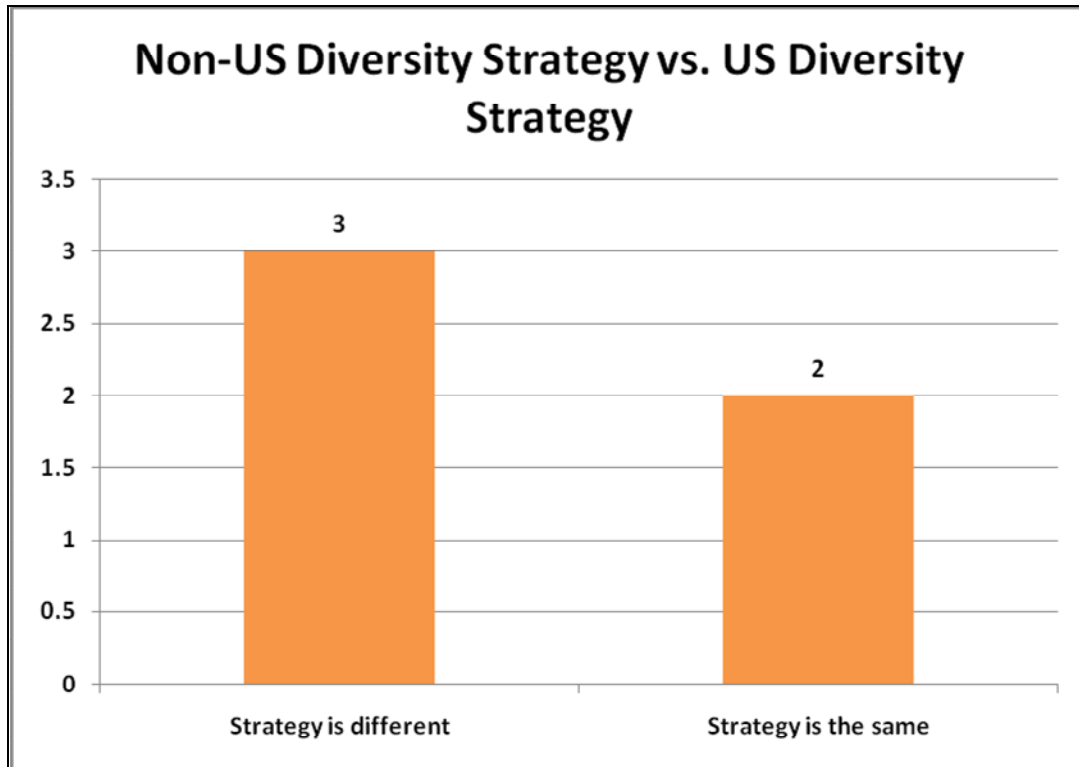
**Question 6: Who Monitors the Implementation of non-US policies?**



**Question 7: Are your company's US computer systems used to record non-US employment activity?**



**Question 8: Do you have non-US diversity strategy that differs from your US diversity strategy, or are they the same?**



**a. How do you define diversity at your non-US locations?**

- Concept of diversity and inclusion varies by location. It needs to be tailored to the reality of each location, although there are general policies that are core values and thus common
- We are focusing on developing a strategy in 2011
- Compliance, talent management and acquisition tied to the business initiatives
- All the unique ways in which we are different
- Diversity -We celebrate diversity and inclusion. It's at the core of what we do. Diversity is essential to our culture and business success. That's why we embrace a diversity of styles, ideas and people.

Our Approach -Diversity and inclusion supports our business priorities. It helps fuel our creativity, and drives the innovation we require to create the amazing products our customers love and have come to expect from our brands. It's about

creating an inclusive environment that fosters great ideas and encourages employees to "wear their passion." We need people who draw inspiration from their varied experiences and the world around them — and step forward to challenge the status quo. We want people who can anticipate and meet our customers' increasingly diverse needs.

We're committed to maintaining an engaging and inclusive culture that values each employee's unique ideas and contributions. This means respecting and encouraging diversity — so that our employees can be their best every day.

**Our Culture -Diversity is central to our culture.** We bring these principles to life every day. That means thinking about our diverse customer base in everything we do and inspiring creativity by encouraging new ideas that represent the diverse perspectives and experiences of all our employees. It means doing what's right by treating every customer, supplier and employee with respect — and delivering results by striving to create an environment where employees thrive and generate top performance.

**Our Policies -Our commitment to diversity is reinforced by workplace policies that are essential to how we do business.**

**Equal Opportunity Employer -All employment decisions are made without regard to race, color, age, gender, gender identity, sexual orientation, religion, marital status, pregnancy, national origin/ancestry, citizenship, physical/mental disabilities, military status or any other basis prohibited by law.** Every employee is responsible for helping prevent discrimination and harassment in the workplace.

**Zero Means Zero -We work hard to make sure that we treat our customers — and each other — with integrity and respect, regardless of appearance, skin color, gender, or any other such distinction.** We have zero tolerance for discrimination of any kind.

**b. What are some specific elements of your non-US diversity efforts?**

- Inclusion is largely the topic, since non-US locations need to adapt to corporate and local practices
- Multicultural training
- We encourage all businesses to focus on diversity and inclusion using a self-assessment toolkit to help identify areas where they can improve and drive change. The toolkit has 5 levels starting with zero which indicates no focus or effort is being placed on diversity and inclusion (D&I), to 100% which is indicative of a business that is leading the industry or sector on D&I and has best practice policies and procedures in place