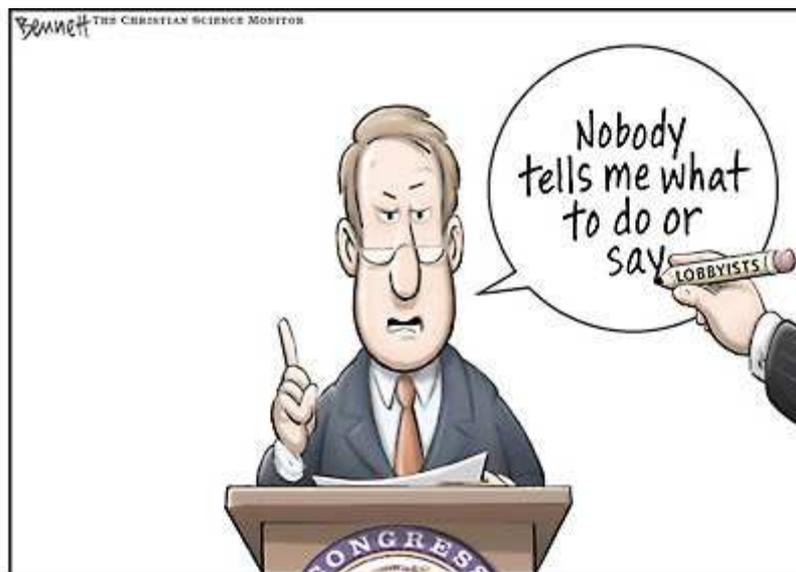


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Lobbying, transparency and CSR – when realities collide



Abstract

Although progress in reporting on CSR strategies can be observed, disclosing of lobbying practises and being transparent on sensitive issues still play a minor role for many corporations. Swiss companies that will be analysed in this paper are no exception to this rule. Based on what they reveal in their GRI reports, we are forced to the conclusion that only a minority gives really relevant information on these subjects. By taking a closer look at the energy supply sector, an internationally operating agribusiness company and an important player in the cocoa industry, examples of negative or irresponsible lobbying can be shown which further illustrate that transparency is not on everyone's agenda yet. In Switzerland, this phenomenon is reinforced by the multiple interests represented by parliamentarians themselves due to the traditional militia system where politicians keep a variety of professional occupations in parallel with their elective mandate. Disclosure of their particular interests and of the interests of lobbyists who gain access to the parliament is only a recent legal requirement. And furthermore, publishing of political parties' accounts is still not mandatory. In a country where this kind of discretion not only enjoys a long lasting tradition but is an essential part of its economic success, the road to more transparency is still long. Maybe the present financial crisis can be a driver for change and help to eradicate inadequacies between the lobbying activities of corporations, professional lobbyists and politicians and the values communicated by those actors.

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Cartoon on title page: Clay Bennett, www.claybennett.com

1. Introduction

Many companies support sustainable development and CSR¹ in public, indeed, they could hardly do otherwise. But the terms by being used and reused by everyone have already started to show signs of wear and various interpretations of what might constitute a good action for our planet and for the people living on it come thick and fast. Professionally presented CSR reports, nicely illustrated with beautiful pictures and well arranged graphs, reflect the progress made by companies in this or that particular field. But can we be sure that negotiations behind closed doors are going in the same direction and that in reality; the company is not trying to lobby against stronger regulations threatening its business?

There is no doubt that progress in reporting and transparency has been made in the last years. But through newspaper articles or NGO reports, we also learn about other realities and see corporations lobbying in an irresponsible way, at least from the point of view of some stakeholders. There are many possible reasons for such behaviour: the tension between short term and long term interests, fighting for survival in a competitive environment, maintaining dominance in the market, and so on. The fact is that lobbying activities are rarely communicated or if they are, are communicated only vaguely or inaccurately and that they sometimes head in a direction diametrically opposed to what is mentioned in a CSR report. In this particular field, the limits of transparency are very narrow.

In the article *Politics and Persuasion* by SustainAbility and Government Policy Consultants (GPC)², the authors underline that *“the conduct and content of corporate lobbying ... is likely to come under particularly close scrutiny”*. They identify several *“areas of potential risks of conflict when there are inconsistencies between public statements and private positions (which become public); a company’s position and those of organisations of which it is a member; what a company says in one part of*

¹ Sustainable development, as defined in “Our common future” also known as the Brundtland Report, is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. <http://www.un-documents.net/ocf-02.htm>.

CSR, defined by Hopkins M. (2003:1) is concerned with treating the stakeholders of the firm ethically or in a responsible manner.

² SustainAbility and GPC (2000:22)

its activities or one part of the world and another; what it does in the short term on specific proposals, and what it says it stands for in the long term..”.

Henriques³ raises the question of *“what kind of transparency or truth we should legitimately expect from companies themselves”*. He first argues that *“transparency is required wherever power is exercised but transparency alone is not enough. For full accountability, action to improve corporate impacts is also necessary, as well as transparency about them”*. He also points out that transparency about both positive and negative impacts of corporations is needed, even if it is not easy to communicate about negative impacts.

This paper will concentrate on the Swiss economic and political environment and on Swiss companies' lobbying and transparency in a national and international context. After an overview of lobbying in Switzerland and a brief outline of lobbying in the European Union, some Swiss corporations will be analysed on the basis of what they declared in their GRI report on Public Policy indicators. Then companies in three sectors will be looked at more closely to show some of the mismatches between corporate communication, transparency and actions taken in reality.

2. Definitions

Henriques⁴ defines lobbying as *“the practice of trying to influence one or more of the various branches of government. Much lobbying practice centres on attempts to influence the legislature and the framing of laws, but effort is also expended on the executive and the judiciary.”* Then he highlights that *“practical techniques employed to influence the legislative process directly include: funding of political parties; meetings with politicians; meetings with civil servants; providing reasoned responses to official consultations; serving on consultation committees and drafting legislation.”*

Another general definition of lobbying is given by Baeriswyl⁵ on Swiss characteristics: *“Early participation in political decision-making processes by influencing policymakers in politics and administration through interest representatives*

³ Henriques A. (2007:2-4)

⁴ Henriques A. (2007:149-150)

⁵ Baeriswyl O. (2005:14)

(representatives of institutions with particular interests) using information and communication". Illustrations of those definitions and different ways of intervening by concerned actors will be shown below.

3. General characteristics of lobbying in Switzerland

3.1 Parliamentarians as lobbyists

Lobbying in Switzerland still suffers from a rather negative image. Lobbying practices of professional lobbyists, politicians, companies, associations, umbrella organisations of different sectors, trade unions and a host of other actors have more than once hit the headlines in the local press during the last few years. Those who act more or less openly in the name of corporations were accused of covering and sometimes even facilitating non ethical behaviour or irresponsible treatment of some stakeholder groups. The lack of communication and transparency makes people in general refer to lobbyists and politicians as some sort of sleazy group of decision makers and influential persons rather than as a well functioning network in Berne. Politicians themselves play an important role, especially in a non professional parliament (also known as the Swiss militia system)⁶ where its members⁷ have in general other occupations besides their political mandate. Because of these other occupations, which may be their principal professional activity, as well as different responsibilities as members of boards in companies or

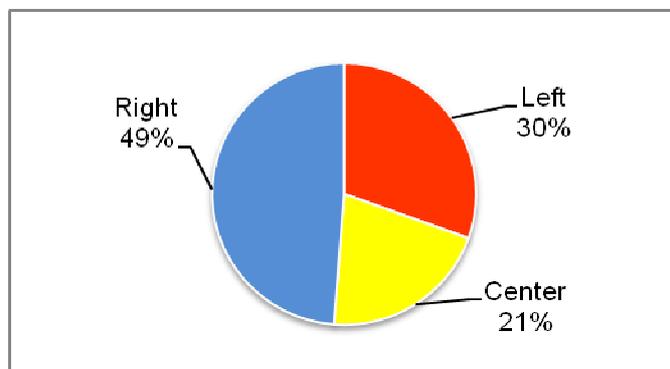


Figure 1: Distribution of seats (%) in the Federal Assembly after 2007 elections

⁶ Switzerland has a firmly anchored tradition of service to the community, under which citizens take on public office which they perform alongside their normal jobs. This is referred to as the militia system. Members of the federal parliament usually do not give up their former jobs when they take their seats. http://www.swissworld.org/en/politics/general_information/the_militia_system/

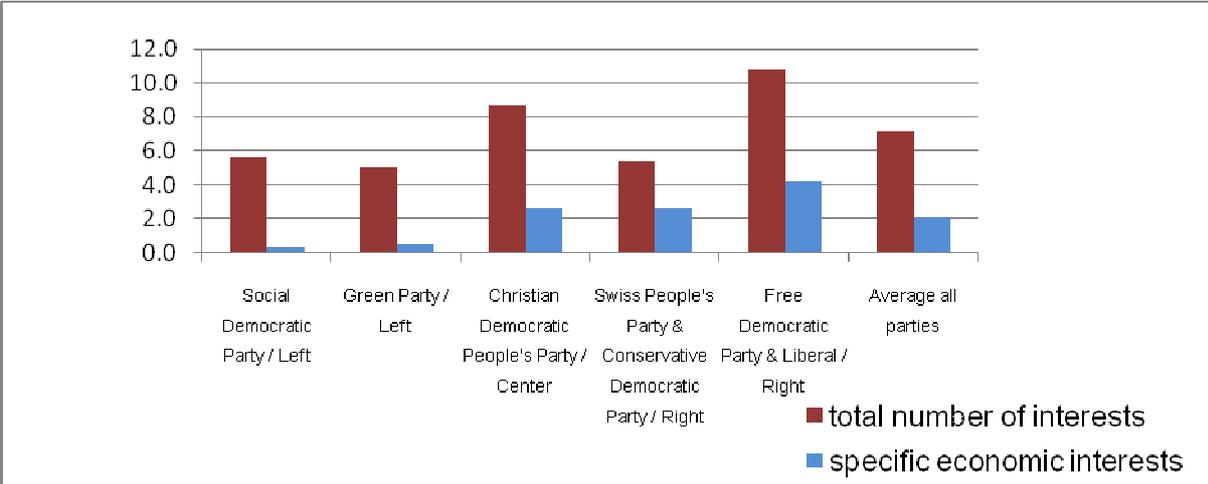
⁷ The two chambers of the Swiss parliament or the Federal Assembly: The National Council is made up of 200 members who represent the Swiss people. The Council of States has 46 members who represent the Swiss cantons. www.parlament.ch

foundations, Swiss politicians are de facto always interest representatives for particular interests. Today, the parliament is composed of around 50% of right wing parties, 30% represent the left and around 20% belong to the centre.

Baeriswyl⁸ mentions that one result of this particular militia system is that Swiss politicians are themselves the most active lobbyists. A senator who recently got a position as head of the Public Affairs department in a big insurance company is just one example to illustrate not only a company’s interest in having close connexions to politicians but also the politicians’ willingness to accept offers of this kind, not considering that acceptance may be incompatible with their function as a politician. Moreover, even former representatives benefit from a lifetime access to the parliament and quite often continue to act behind the scenes.

In December 2002, a new parliamentary law established the mandatory disclosure of political, professional and personal interests. All the data is made publicly available on the internet. Members of the Federal Assembly have to disclose the name and the legal entity of the institution(s) with whom they work; the body they are a member of and the function they occupy. The first column in the following figure shows the

Figure 2 : Declared number of interests by members of parliament



Source: Data compiled of the interest declarations made by all members of Parliament as of January 2009, list published on www.parlament.ch.

average number of interests politicians have declared and the second one gives an idea of how many are linked to a specific interest or position in the economy,

⁸ Baeriswyl O. (2005:16)

acknowledging however that precise attribution to a company or a particular sector is difficult to make and that there is no indication about incomes generated through representing those interests. The highest number of interests declared goes up to 29 and 18 of those are related to the industrial and economic sectors.

It is no surprise to see that politicians on the left are less involved in economic affairs and occupy fewer seats on boards of companies than members of centre and right parties. As in other countries, politicians from all persuasions are actively involved in lobbying activities for various causes. Defending particular interests is also what they are elected for; but electors and the public as a whole should have the right to know who defends whose interests and what resources a politician has at his or her disposal.

3.2 Parliamentarians' guests

Political issues and procedures are increasingly complex and time consuming. Professional lobbyists become more important, their number is now estimated to be between three and four hundred. Rhinow (cited in Baeriswyl, 2005, p.15) sees pursuing and defending its interests as a motor of any democratic social and political development because it reflects important concerns, wishes and fears of a part of the population. He further states that democracy needs to take into account different interests but must also be aware of the fact that all interests do not dispose of the same power that can be brought to bear.

A formal Swiss Public Affairs Society⁹ with some 180 members has existed in Berne since 1999. But unlike journalists, Swiss lobbyists cannot get an accreditation to the houses of parliament and therefore depend either on an invitation from members of the two chambers or can try to register as journalists working for political parties, *economiesuisse*¹⁰, unions or for various pressure groups, such as the very active energy and health insurance sector representatives.

⁹ <http://www.public-affairs.ch/mitglieder.html>

¹⁰ *Economiesuisse is the largest umbrella organisation representing the Swiss economy. It has the support of more than 30,000 businesses of all sizes, employing a total of 1.5 million people. Direct membership includes 100 trade and industry associations, 20 cantonal chambers of commerce and several individual companies representing almost all sectors and industries. Economiesuisse sees it as its task to recognise important economic policy issues at an early stage and to lobby intensively at all stages of the legislative process. This means participating in various commissions and in working*

Actually, also since the application of the above mentioned law, every political representative can give access to the parliament building to two persons. The list of these “privileged” admitted persons can be consulted directly in Berne but is neither available on the internet nor handed out to be photocopied. This kind of discretion shows that lobbying in Switzerland is in fact a common issue but that communication about it is still not freely accepted. It is not surprising therefore that a newspaper like the “Weltwoche” obtained and published the list¹¹. Four categories of “invited” people are officially mentioned: personal assistants, family members, lobbyists and others but naturally, in a small country like Switzerland, beneficiaries of those invitations are often multifunctional and to be found in several categories.

To summarise, one can say that more than 300 persons can be considered as lobbyists of one kind or another, either professionals or direct representatives of associations and corporations. As the table below shows, around 50 persons are family members and personal assistants (who also can play double roles) but the economy in general, with 64 persons, accounts for the majority of the invitations. To this number one can easily add different other sectors such as the pharmaceutical, telecommunications, automotive sectors and so on. It is also worth noticing that insurance companies are often counted both within their specific group and also in the health sector where the stakes are high and where they play a very active role. Berne’s lobbyists, in addition to the politicians, are either employees of a company, a trade or industry sector association, work for NGOs, represent the countries’ agricultural sector or act as independent PR consultants. Gallati, cited in a NZZ¹² article, defines a lobbyist’s job as being first to get information, then to treat it and give it to the right person at the right place at the right time. This obviously needs a profound knowledge of the rules of the political game. All lobbying activities do not take place at the famous “Palais fédéral”, so lobbyists not benefiting from one of those desired invitations have to find other occasions to meet decision makers elsewhere.

groups of experts, preparing legislation, participating in the legislative approval process, continuously monitoring governmental and parliamentary decisions and actively participating in public referenda.
www.economiesuisse.ch

¹¹ *Weltwoche*, March 2009.

¹² *Neue Zürcher Zeitung*, 2004. *Mit Aida auf Stimmenfang: Wie Lobbyisten arbeiten und Anerkennung suchen.* NZZ online

Figure 3 : Activities and interests of persons being given access to parliament by its members in 2009

Economy	64	Workers issues	17	Religion	8
Family, personal assistants	53	Others	13	Media	8
Political parties	37	Federal and regional interests	12	Culture and Sports	5
Social, NGOs	35	Agriculture	11	Education	4
Public Relations, Consultants	35	Telecommunications	10	Automotive sector	4
Environment	27	Insurance	9	Tourism	1
Pharmaceutical/Health sector	25	Energy	9	Consumer org.	1

Source: Data compiled of the lobbying list published in the "Weltwoche" weekly newspaper in March 2009. The table does not reflect the exact number of invitations given by parliamentarians (363) but the number of main interests represented as one person can defend multiple interests. The total number is therefore higher (388).

With the recent financial crisis and the scandals involving major Swiss banks, the topic of lobbying and transparency comes up in the media more and more: not only left wing politicians but also the general public demand more transparency and accountability.

3.3 Funding of political parties

In Switzerland, political parties are not financed by the State and therefore have to raise money amongst their members as well as from private and institutional donors such as corporations. Only parliamentary groups get governmental funding in order to finance their work as legislators. Except for two cantons (Geneva and Ticino), there is no obligation to disclose the parties' budget and accounts. This not only makes the country a special case yet again, but is also perceived as a lack of transparency and a problem not so far resolved by the OSCE and Transparency International Switzerland¹³. Indeed, handling money this way constitutes an increased risk of misuse and corruption. Furthermore, in a democracy, voters should be able to know the financial interests in a party's support. The accounts of the

¹³ *The Global Corruption Report 2004 made by Transparency International focusing on corruption in politics, gave Switzerland a very bad ranking on the issue of transparency in party financing, along with countries such as Albania, the Bahamas, El Salvador, Madagascar, Sri Lanka, Uruguay and others not having particular laws in force. In 2007, the OSCE published a needs assessment report on the question of funding for political parties and election campaigns. Source: www.transparency.ch*

Liberal party were leaked in 2006 and readers of a regional newspaper discovered that UBS, economiessuisse, different insurance companies and other big corporations were to be found on the donors list which had been kept secret until then.

The issue of funding of political parties came up again recently when the UBS announced that it would suspend its donations to any political party as long as the bank is benefiting from government help during the financial crisis. Donations made by two large banks (UBS and Credit Suisse) to three parties are estimated at 2 millions of Swiss francs per year.

A survey carried out by the NGO ACTARES¹⁴ amongst the biggest Swiss companies quoted on the stock exchange showed that, at minimum, 50% of the 20 corporations listed on the SMI (Swiss Market Index) give direct financial support to political parties. Estimated donations of between 10,000 and over 100,000 Swiss francs go mainly to economy friendly parties (see above figure).

Figure 4 : Results of the ACTARES survey on financial contributions to political parties in Switzerland 2007

<i>Financial contributions to political parties</i>	<i>Company</i>
Yes	Bâloise, Credit Suisse, Holcim, Julius Bär, Nestlé, Novartis, Roche, Swiss Re, UBS, Zurich Financial Services
No	ABB, Adecco, Clariant, Nobel Biocare, Richemont, Swatch Group, Swisscom, Syngenta
No answer	Swiss Life, Synthes

Source: http://www.actares.ch/Downloads/080318-Parteienfinanzierung_D.pdf

But ACTARES supposes that even more money goes to industry associations¹⁵, public relations agencies and special action committees as they express their views clearly and in a very visible way through the media. The NGO concludes that those actors are more important to companies than are the political parties and their representatives and gives as an example supporting the argument the fact that only a

¹⁴ Shareholders for a sustainable economy (ACTARES) asks Swiss companies to take into account social and environmental aspects in their business activities. www.actares.ch

¹⁵ e.g. santésuisse, H+(hospitals), interpharma, swissmem (engeneering, electrical and metal industry), telecommunications, economiessuisse

handful of parliamentarians are on the boards of the 100 biggest corporations quoted on the stock exchange. So there seems to be a difference between large multinational companies and the other “important” enterprises (relative to the size of the country) which mainly serve the domestic market: more politicians are actively involved with the latter. This is not really a surprise, as the stakes are different in a globalised economy and many problems have to be solved in the larger context in which multinational companies operate.

4 A quick look at the European Union

At first sight, there appear to be similarities between Switzerland and the EU with respect to lack of knowledge and transparency about the number of lobbyists, their budgets and their clients. As in Switzerland, lobbyists work in all possible fields but are especially preoccupied by environmental legislation, communication and financial services. Some companies have their own public relations office in Brussels. Also, every economic and industry sector is represented in the EU capital via an umbrella organisation. Those industry associations have at least the advantage of announcing quite clearly on whose behalf they are working, whereas a third type of actor, made up of private PR/Public Affairs and communication firms and employing more than a thousand people in Brussels, are much more discrete. Multinationals often use all three of these channels for lobbying.

The Dutch organisation Corporate Europe Observatory (CEO)¹⁶ estimates that about 15,000 lobbyists work in Brussels, an industry representing 60 to 90 million euros. More than 70% of them directly or indirectly work for corporate interests, 20% defend the interests of public authorities such as cities and regions or international institutions and some 10% the interests of different NGOs. CEO, an organisation engaged in working towards more transparency and ethics *“is campaigning for effective EU disclosure and ethic rules for lobbyists with a focus on transparency. At the very minimum, corporations, PR firms and lobby groups should be obliged to submit regular reports providing details on content, clients and budget of their*

¹⁶ CEO is an Amsterdam-based research and campaign group targeting the threats to democracy, equity, social justice and the environment posed by the economic and political power of corporations and their lobby groups. www.corporateeurope.org

lobbying activities. These reports should be fully accessible to the public in an online searchable database. EU lobbying disclosure rules would not solve all problems caused by excessive corporate power. But a European lobbying register would be an effective tool for parliamentarians to know who is lobbying them (and their colleagues!), help journalists scrutinize corporate lobbying campaigns and provide civil society with a potent tool for counter-campaigning.”¹⁷

In May 2008, the European Commission made public the introduction of the “European Transparency Initiative”, a framework for relations with interest representatives including a register and a Code of conduct. One month later it launched an online register¹⁸ where all persons engaged in influencing the decision-making process and policy formulation were invited to register on a voluntary basis in one of four categories: 1) Professional consultancies / law firms; 2) “in-house” lobbyists and trade associations; 3) NGOs/think-tanks and 4) other organisations. Registration goes hand in hand with the respect of the Code of conduct that ensures trustworthy and transparent relations between interest representatives and the Commission. Contrary to ongoing practice in Switzerland, in the EU, lobbyists who wish to access the parliament can and even have to request accreditation and a list of accredited lobbyists and organisations is published. The Swiss Public Affairs Society demands such an official accreditation that would improve the image and the appreciation of its members and contribute to more transparency.

In June 2009, almost one year after the launch of the register, the Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU)¹⁹ published a report²⁰ analysing the first outcomes of this new procedure. The coalition points out several weaknesses and concludes that this way of voluntary disclosure does not produce the expected results and is therefore to be considered as a failure. Their main criticisms can be summarized in the following two points:

¹⁷ CEO: Lobby planet guide - Brussels the EU quarter – explore the corporate lobbying paradise,2005, p. 25, <http://archive.corporateeurope.org/docs/lobbycracy/lobbyplanet.pdf>

¹⁸ <http://ec.europa.eu/transparency/regrin/>

¹⁹ The ALTER-EU is a coalition of over 160 civil society groups, trade unions, academics and public affairs firms calling for: EU lobbying disclosure legislation; an improved code of conduct for European Commission Officials; the European Commission to terminate cases of privileged access and undue influence granted to corporate lobbyists. www.alter-eu.org

²⁰ ALTER-EU, 2009. *The Commission’s Lobby Register One Year on: Success or Failure?*

- Even though the number of registrations has increased, the overall compliance rate for Brussels-based lobby groups is below 25% and therefore far too low. Their calculation is based on the European Parliament's estimate of 2,600 lobby groups with offices in Brussels in 2000. Of the 1488 organisations that had registered within a year, only 583 have offices in Brussels which would imply that in fact only around 23% of the Brussels-based lobby entities have registered. Large law firms and most Brussels-based think tanks seem to boycott the register. ALTER-EU regrets also the absence of certain leading corporations who are according to the authors *"the core of public concern regarding undue corporate influence over the public policy process."*²¹
- ALTER-EU finds the information disclosed questionable, and this in several areas. There is not much information about financial and client disclosure since how lobby expenditure is being calculated is quite arbitrary. It is also difficult or even impossible to compare the information. All categories of lobbyists disclose information on their areas of interest (often couched in very general terms) but nothing is revealed about the concrete issues lobbied on. Key information such as the names of lobbyists is also completely missing. Another problem linked to the information is that after only one year, the register is already full of a large number of irrelevant registrations (organisations that in reality have no real lobbying activity in Brussels).

The report goes much more into detail and makes many recommendations to improve compliance. In conclusion, they find that the registration level is low for all categories and the fact that some categories do not register *"is a very serious problem for the credibility of the register that cannot be overcome without a mandatory approach."*²²

But as of June, 15th, only three weeks after the ALTER-EU research was concluded, almost another hundred new registrations can be counted, bringing the total up to

²¹ ALTER-EU (2009:14)

²² ALTER-EU (2009:4)

1582 registrations. Can this be interpreted as a result of this report having boosted the registrations? Or are registrations just going on at the same cruising speed as before? Will reluctant categories eventually join the others? At this stage it is not possible to answer these questions. Nevertheless, two things seem clear: the first that the number of institutions, corporations, firms, NGOs and individual lobbyists registered still has to grow and the second, of no lesser importance, is that the quality of information has to be improved.

In the next two chapters, we will take a closer look at some big Swiss companies and how they disclose information on lobbying in general, and at whether they are visible and transparent in the country where they have their headquarters and in other regions of the world where their activities and markets are often more important than in Switzerland.

5 Major Swiss companies and their information about lobbying activities

5.1 Swiss companies' reporting against GRI Public Policy indicators

The table in the appendix and the summary of its results in figure 5 show the answers of the 26 Swiss companies²³ that used the GRI reporting guidelines in 2008²⁴ referring to Public Policy performance indicators. The first indicator (SO5) is a core indicator that asks for corporations' public policy positions and participation in public policy development and lobbying. The second (SO6) is additional and gives indications on the total value of financial and in-kind contributions to political parties, politicians, and related institutions by country. The large majority of these big corporations work on a national and an international level; only the different energy and water utilities companies and the two big retailers have their clients mainly in a domestic market but they too depend on international laws and regulations in their supply chain. The table has been completed by the addition of two columns, one giving the answer of those companies asked by ACTARES about their financial

²³ ABB, Adecco, Alliance Boots, Axpo, Clariant, COOP, Credit Suisse, EKZ, Energie Wasser Bern, Hoffmann-La Roche, Geberit, Georg Fischer, Holcim, IWB, Migros, Novartis, Panalpina, Richemont, Ringier, Sarasin, STMicroelectronics, Straumann, Sulzer, Swiss Re, Syngenta, ZKB

²⁴ <http://www.globalreporting.org/GRIReports/GRIReportsList/>. This list contains the reports from 1999-2009 that GRI is aware of.

contributions to political parties in Switzerland and the second concerning indications made in the above mentioned EU register.

Figure 5: Reporting against GRI Public Policy indicators by 26 Swiss companies

	SO5	SO6
<i>Not reported on</i>	8 (31%)	15
<i>Reported on but either irrelevant because not directly linked to the question or too vague (one can understand that lobbying is been done in some way, nothing about the issues)</i>	7 (27%)	1
<i>Relevant information provided linked to the question</i>	11 (42%)	10

Source: Analysis of answers given by companies, for details refer to Appendix

It is not surprising that 15 companies did not report on the additional indicator SO6. Out of the eleven who did, seven did not make any financial contributions at all and four large international companies revealed the amount of money spent (ABB, Roche, Holcim and Novartis). On the core indicator concerning public policy positions, participation and lobbying, 11 companies or 42% provided relevant information. ABB for example, provides information about its lobbying issues in the EU (energy efficiency, integration of the EU market, renewable energy sources in EU energy policy) and in the US (trade issues, sanction legislation, strengthening of power grids, tracking legislation to restrict greenhouse gas emissions where it affects its customer base). They declare a few thousand dollars in contributions to political parties or related institutions even if such payments are not supposed to be made and exceptions have to be approved. They also figure in the EU register.

Seven more companies have reported on SO5 but either their indications are not really related to what is asked for or no concrete information is given. Alliance Boots for instance, a health and beauty group, does indeed report on indicator SO5 but when they declare *“we ensure our views are expressed to governments in an appropriate and effective manner on matters that affect our business and our customers”*, this has more to do with phrase mongering than providing instructive and tangible information. One can conclude that they have lobbying activities and even suppose that they are quite active but nothing more. Panalpina in the logistics sector gave quite contradictory answers to the two questions: *“Panalpina makes no significant donations to parties or politicians, usually makes no political statements*

and is not involved itself in political lobbying. All donations and related commitments are neutral from a party political point of view.” Words like significant, usually and neutral are far from giving an impression of transparency.

The two big health care products corporations, Roche and Novartis both work in a global market under different laws and provide far more information than other companies. More data is available concerning the United States as disclosure of lobbying activities there is much more regulated (Lobbying Disclosure Act 1995) than in Switzerland or the EU. Novartis especially has made considerable efforts since 2005. In the report published by Sustainability and the WWF²⁵, the authors observed that Novartis appeared in their lowest class of companies which failed to provide any information on lobbying activities.

Syngenta, one of the leading agribusiness companies with products in crop protection and seeds, does in fact give quite a range of issues they are working on and sure enough, they are often under fire since they operate in a highly sensitive sector involving food production and have a lot of activities in developing countries. One of the controversial subjects will be taken up in the next chapter.

Amongst the 26 companies listed, we find four energy suppliers (electricity, gas and water). Given their importance in the Swiss economy and their very active and sometimes aggressive way of influencing policy makers, they attract the reader's attention by their Helvetian discretion; in fact, they do either not answer at all or make some kind of neutral and meaningless statement. An explanation for this can be that they are publicly owned and certainly have clear internal codes and rules about public policy positions but this is really in contradiction with their very effective lobbying. More information about this particular sector is also given in the next chapter.

Only a few examples have been looked at more closely, but we can reasonably assume that all these companies have very good connections to industry bodies, political parties and civil servants working in strategic positions. Seven of the 26

²⁵ *SustainAbility and WWF (2005:10)*

companies for example have someone on the board of *economiesuisse*, the very powerful economic umbrella organisation described earlier, and many other businesses are represented indirectly by their trade association.

Almost 70% (19 out of 26) of the corporations reporting on a core indicator is not really a lot. And if out of these 19, 7 did not really provide relevant information, then the score is rather bad and there is definitely room for more transparency. Concerning indicator SO5, it would be useful to know more about the concrete issues lobbied against by companies. Not only questions of financing of political parties should be asked but more explicit information about memberships in trade and industry associations is also needed, as well as the amount of money they put into lobbying activities. But this link might be complicated to make and would not only require full transparency on the part of the associations but also a detailed breakdown of the membership fees and their use, so that companies could report on and all stakeholders easily find the information.

5.2 Examples of negative lobbying and lack of transparency

5.2.1 Energy suppliers

The principal actors of the Swiss energy sector predict an energy scarcity in the country by 2020. Luckily, they also know the solution to the problem, building two new nuclear power plants. But it is the population who will vote on such huge projects and fights against atomic plants have a long tradition in Switzerland. In her article “Plans for new nuclear power plants in Switzerland – a presumed dead lobby rises from death”, Susan Boos²⁶ explains the mechanisms used by the sector leader Axpo and other associated companies. Axpo’s CEO warns of a serious lack of electricity if a new nuclear plant is not built and also argues that it would be irresponsible to produce electricity with gas power stations because of their immensely high CO2 emissions. Problems with energy supply have already been predicted but the country is not aware of that, instead producing too much power. Energy suppliers had to motivate house owners to install electric heating, not a very economic or ecological move. The population is still opposed to atomic plants

²⁶ Boos S (2009), title translated from German

because of the unsolved question of permanent repository. As long as no satisfactory solution is found to this problem, it will be very difficult to get the population's agreement to a new construction. The big energy suppliers are united in a "nuclear forum Switzerland" which has hired the well-known PR agency Burson-Marsteller to promote the cause.

In March 2007, the parliament held a "climate debate" and by a large majority decided that energy suppliers had to compensate the major part of their CO2 emissions due to the use of fossil energy sources in the country. The result might be astonishing but rightist politicians had tactical reasons for accepting the law. They knew that this would open the way for nuclear power plants and compromise the construction of gas power stations because they would not be profitable anymore. Axpo later indeed announced that it would abandon the construction of gas plants because of the CO2 tax. Two politicians, both proponents of nuclear power, had clearly a conflict of interest and were active in convincing their colleagues on the right. One was Rudolf Steiner, then a member of the National council and also President of the association of Swiss electricity companies, and another Caspar Baader, member of the board of a power station near Basel. Others could certainly be found helping the Swiss energy industry to keep control over the whole value chain, from operating its own power plant to distribution in households and enterprises.

Another example concerns a decision taken by the cantonal energy directors in April 2008. They wanted to forbid the installation of new electrical heating and boilers in order to promote environmentally friendlier heating systems but this proposition had to be approved by cantonal parliaments before being integrated in cantonal energy laws. The electric heating lobby is furious and is trying to weaken the prohibition decided upon and to remove articles about a more sustainable and efficient use of electricity in warm water generating.

A third illustration can be given by certain Swiss companies' investment practices. BKW FMB Energie AG (owned by the canton of Berne) boasts of further expanding its leading position in the market for new renewable energies. But the energy supplier also has projects to invest 1.6 billion Swiss francs in the construction of a gas-and

coal power plant in Germany, one of the most climate-damaging energy producing technologies.

These three examples show that the energy sector in Switzerland with its variety of actively involved lobbyists defends its business very well. But is this way of acting responsible and sustainable? Those lobbyists representing a vast group of interests but not belonging to one entity as such do definitely not care about social responsibility concerning environmental issues or the rights of future generations. Is this behaviour good for the stakeholders? What about pushing forward renewable energies? What about innovative solutions encouraging people to reduce energy consumption rather than use more and more? To be sure, diminished energy consumption means fewer sales for those companies and smaller returns for their shareholders. But it would also be a really good (CSR)-strategy and constitute a strong business case for those industries, who could represent themselves as leaders in the areas of development of renewable and cleaner energies, working towards stopping this small country's exposure to the "principle of hope", as Susan Boos calls it, a country which could not possibly survive a nuclear disaster.

5.2.2 Syngenta

As mentioned above, Syngenta, a leading producer of pesticides and seeds (also genetically modified seeds), is regularly a target of NGOs and the media. The Berne Declaration²⁷ in particular, but also ACTARES and Multiwatch,²⁸ criticise the company. One subject is recurrent - Syngenta's toxic herbicide "Gramoxone" based on the chemical substance paraquat. The product is forbidden in Switzerland and in 2007, the EU revoked its license. Paraquat is also one of the chemical pesticides prohibited under the Forest Stewardship Council, the Common Code for the Coffee

²⁷ *The Berne Declaration (BD) is a Swiss NGO. Since 1968, it monitors the role and behaviour of Swiss corporations, banks and government agencies. It addresses the problems of unequal international trade and financial relations, unsustainable consumption patterns and cultural prejudices. It calls on the private sector and the state, citizens and consumers to assume their responsibilities in resolving these problems. In 2000, the BD launched the Public Eye on Davos, a critical counterpoint to the annual World Economic Forum to demonstrate to the big players in the global economy that inhuman and environmentally destructive business practices have consequences – for the victims, obviously, but also for the company image. The worst companies of the year receive shaming awards while the best initiative is honoured with the Public Eye Positive Award. <http://www.evb.ch/en/> <http://www.publiceye.ch/en>*

²⁸ *Multiwatch, a coalition of NGOs, trade unions, political parties and anti-globalisation movements, founded in 2005, observes and makes public human rights violations of Swiss multinationals. <http://www.multiwatch.ch/>*

Community, Fair Trade Labeling Organisation and the Rainforest Alliance. In answer to the EU decision, Syngenta comments that this “*does in no way affect Syngenta’s commitment to maintain and support its paraquat registrations worldwide. Paraquat is an important tool in agriculture and Syngenta commits more than \$15 million annually to global stewardship programmes to assure the safe and sustainable use of paraquat and other Syngenta crop protection products.*”²⁹

The Berne Declaration’s journal
« Solidaire » 189, January 2007:
« Dirty hands and nice words »



WHO studies estimate at 3 millions the cases of intoxications worldwide due to pesticides and the main reason for that is an inappropriate use of the products. Farmers, especially in developing countries, are not always fully aware of the risks and often do not have sufficient means to assure safe transport, purchase protection clothes or masks and store the products safely. How, by the way, would this be possible in a small farmer’s one or two room house with children around? In addition, even where protective clothing is available, the tropical environment does not really encourage farmers to wear it as it is too hot and cumbersome.

At Syngenta’s annual meeting 2009, ACTARES wanted to know if and how the code of conduct is implemented, referring amongst others to a study commissioned by the company carried out by Prof. G. A. Matthews from the International Pesticide Application Research Centre in Ascot. A survey of more than 8500 farmers in 26 countries showed that in Europe, in more than 50% of the cases, paraquat is used without appropriate safety arrangements and in developing countries it is as much as 80%. It is beyond debate that responsible behaviour means avoiding bringing products with harmful effects on people’s health onto the market: results like these are unworthy of a company that claims to be responsible.

²⁹ http://www.syngenta.com/en/corporate_responsibility/syngentathinks_full.html

At a European level, Syngenta is a member of the very active European Seeds Association (ESA)³⁰, part of the biotech lobby. *“ESA wants the EU Seeds Directive, which determines the labelling requirements and limits for genetically modified (GM) seeds, watered down. Initially very successful in getting the policies it wanted, the biotech industry has faced a consumer backlash and national governments have stalled any new products. Now the industry, after bitter and expensive campaigns against environmental groups, has developed several important EU proposals on “coexistence” between GM and conventional and organic agriculture, and the Seeds Directive, which will establish the thresholds above which labelling is required for GM seeds.”* This last illustration shows the important role of industry associations which in this particular case are lobbying for less transparency against consumers interest.

5.2.3 Nestlé, an important player in the chocolate industry

In spring 2009, the Berne Declaration launched a campaign³¹ inviting customers to sign a petition saying “no to Swiss chocolate stemmed from child labour”. More than 17,000 people sent a card to the BD, indicating their favourite chocolate and asking for several points: abolition of child labour in cocoa plantations; higher prices for producers enabling them to pay decent salaries to their employees; guarantee of purchasing the harvest of small producers; development of a supply of fair trade chocolate; respect of ILO conventions on the use of child labour and abolition of slavery; respect of OECD recommendations. A



questionnaire was addressed to 18 Swiss chocolate producers; two of them big international companies (Nestlé and Barry Callebaut). Nestlé did not answer the questionnaire but referred to its website and to the Association of Swiss Chocolate Manufacturers.

*Child labour in your favourite chocolate?
Ask Swiss chocolate concerns now*

³⁰ Jean Shaoul: *European Union: political lobbyists oppose disclosure*, 6 June 2005, <http://www.wsws.org/articles/2005/jun2005/lobb-j06.shtml>

³¹ Picture of BD campaign <http://www.evb.ch/p15102.html>

As many as 250,000 children work on small farms across West Africa with most of them in the Ivory Coast where 40% of the world's cocoa is produced. An estimated 12,000 children have been trafficked into cocoa farms in that country. In 2001, US lawmakers wanted to set up a "child labour free" labelling system but chocolate companies instead signed the Harkin-Engel Protocol, a voluntary agreement leading later to the creation of the International Cocoa Initiative³². *"An initial July 2005 deadline required major chocolate companies, including Nestlé, to establish a public certification system to ensure that their cocoa was grown and/or processed without any of the worst forms of child labour. Nestlé and other companies failed to meet their self-imposed 2005 deadline as well as an extended deadline of July 2008, and to date, Nestlé has not certified any of its cocoa supply as free from child labour."*³³

It is a fact that many cocoa producers in West Africa are small farmers and their children work on the plantations as family labour but their work should not prevent them from going to school and all forms of forced and hazardous work must be banned. By working closely with the cocoa producing communities, the International Cocoa Initiative follows certainly an interesting approach to solving some of the problems but more resources and more commitment from the chocolate industry are necessary; the initiative may help to change some situations but it cannot change the rules of business making in this area.

Nestlé, as one of the largest actors in the cocoa business can and has the responsibility to control its supply chain, play a leading role beyond the Cocoa Initiative to institute higher standards in order to improve local working conditions, guarantee fair prices to cacao producers and more transparency towards its suppliers, clients and NGOs.

³² <http://www.cocoainitiative.org/> - a partnership between NGOs, labour unions, cocoa processors and the major chocolate brands.

³³ International Labor Rights Forum, Update March 2009: Nestlé and Child Labor in the Cocoa Industry, http://www.nestlecritics.org/index.php?option=com_content&task=view&id=59&Itemid=1

6 Conclusion

CSR reports and disclosure of lobbying and financing of political parties have not yet been considered a really important topic by many Swiss companies. Lobbying in Switzerland, maybe more than in other countries, is still seen as a hazy affair of some influential people trying to get what they want. This paper tried to illustrate that the situation is quite complex, with a multitude of actors and particularly politicians themselves playing an important role in the lobbying field. It also demonstrated that whether lobbying activities are carried out very discreetly or in the public eye depends a lot on the kind of corporation and on where its main interests lie. A few cases where companies can and should do much better in terms of transparency have been pointed out - many more examples could have been cited. But it is important too to underline that progress has been made in various fields of reporting, for example on environmental issues.

However, CSR, CR or related acronyms contain the word “responsibility” and companies make claims to responsibility in their different ways of communicating with their stakeholders. Influencing public policies is entirely normal in a democratic process of government and decision making. Nonetheless corporations as well as other categories of lobbyists, in the Swiss militia system politicians but also private lobbying firms and individuals, NGOs, trade unions etc., should respect some basic rules of fair and transparent conduct.

Corporations in particular, as they increase their visibility through the publication of numerous reports and the creation of attractive websites, are exposed to more possibilities of inspection and must avoid inconsistencies between the values published and the interests they defend behind closed doors. Transparency is a key factor, especially in the time of today’s severe financial crisis and revealed scandals. An irresponsible way of doing business has harmful consequences not only on millions of people but also on the image of companies in general, whether they are working in a correct and honest manner or not. With respect to transparency and therefore also responsibility, Henriques³⁴ emphasizes that “Yet

³⁴ *Henriques A. (2007:4-5)*

often the greatest obstacle to transparency is ... a matter of personal pride and embarrassment. While this can be made to appear like a matter of corporate reputations, it is more usually a matter of the personal survival of a number of individuals. He also points out that *“Transparency is part of the moral baseline for business conduct, rather than an optional extra to be adopted when it doesn’t adversely affect the bottom line”*. NGOs, policy makers, employees, the public in general will have to continue to watch closely whether a company’s CSR strategy is linked to its lobbying, so that transparency will become an integral part of doing business, thanks also to responsible individuals occupying key positions in important corporations leading to responsible lobbying.

“Business must restrain itself from taking away, by its lobbying activities, what it offers through corporate responsibility and philanthropy.”
Kofi Annan, United Nations Secretary-General³⁵

³⁵ *AccountAbility and The Global Compact (2005:11)*

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8 Appendix

Reporting against the Public Policy indicators SO5 and SO6 by the 26 Swiss companies/organisations using the GRI guidelines / Answers to ACTARES survey / EU register of interest representatives [I don't remember that this very useful table was referred to in the text?]

Organisation (Sector)	SO5: Public policy positions and participation in public policy development and lobbying (core indicator)	SO6: Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	ACTARES	Register of interest representatives European Commission
ABB Group (Energy)	ABB provided input to the EU on transmission technologies and all aspects of energy efficiency, and lobbied for the integration of the European energy market. ABB strongly supported the inclusion of renewable energy sources in EU energy policy ... In the United States, ABB advances positions at the federal government level concerning trade issues with several countries and continued to monitor and comment on sanction legislation. Also in the United States, ABB has been working with major policy and association groups to support strengthening power grids and to raise the efficiency of electric motors. It is also following the development of legislation to restrict green-house gas emissions in those areas affecting its customer base in the US, primarily automotive, oil and gas, and utilities.	Under ABB's Code of Conduct, contributions to political parties, politicians and related institutions are not to be made. Any exceptions have to be cleared in advance with Group Legal Affairs and Compliance. In 2007, payments totalling approximately \$9,000 were made.	No	Registered in the category: "in-house" lobbyists and trade associations; Estimated costs to the organisation directly related to representing interests to EU institutions: 200'000 - 250'000 € in 2007.
Adecco (Employment Agency)	There are significant legal restrictions on the political activities that corporations can engage in. Adecco Group is committed to full compliance with all such legal restrictions. As a corporate citizen of multiple countries and states, we maintain professional relationships with governments and government officials around the world. Many Adecco Group colleagues maintain frequent contact with regulatory officials so	Laws governing political activities and contributions are very complex and vary substantially from country to country. Nevertheless, it is never permissible to: Make direct financial contributions to political candidates from a corporate treasury account;	No	

	that they can ensure our operations are being carried out lawfully, in addition to obtaining necessary government authorisations. On some occasions, we may also seek to influence government policies by lawfully communicating the Company's views to various government officials and legislators. In this context, we are a member of Ciett and Eurociett, the Confederations of Private Employment Agencies, and an authoritative voice representing the interests of agency work businesses.	reimburse an Adecco group colleague or associate for a political contribution Our Code of Business Conduct does not allow any contributions to political parties, politicians and related institutions.		
Alliance Boots (Pharmacy-led health and beauty group)	Reference to the company's Code of conduct and Business Ethics available on the internet. We do, however, ensure our views are expressed to governments in an appropriate and effective manner on matters that affect our business and our customers.	Political donations & activities: Alliance Boots policy = not to make donations to political parties. No contributions made.		
Axpo (energy supply)	not answered	not answered		
Clariant (Chemicals)	not answered	not answered	No	
COOP-Gruppe (Retailer)	not answered	not relevant to COOP		
Credit Suisse (Financial Services)	Public Policy positions on internet on engagement in dialogue with national and international business associations (Institute of International Finance - the most important international association representing the interests of the banking industry; European Financial Services Roundtable uniting major banks and insurers in Europe to create a unified European financial market; European Banking Federation; Swiss Bankers Association; Int. Chamber of Commerce; economiesuisse... Credit Suisse supports employees in Switzerland who exercise a political function in addition to their work. Each year, the bank organizes a meeting for those members of staff who hold political mandates. These types of activities promote the establishment of networks, while helping	not answered	Yes	Credit Suisse is not registered but is a member of the registered European Banking Federation. Estimated costs to this organisation directly related to representing interests to EU institutions: more than 1 million € in 2008.

	to strengthen the socio-political commitment of each individual.			
Elektrizitäts- werke des Kantons Zürich EKZ (Energy utilities)	A good collaboration with the legislator, politicians, associations and competitors is important to EKZ. EKZ acts in a transparent, reliable and fair way. The company's goal is to communicate clearly and to give neutral and unprejudiced information. For votes on issues related to EKZ activities, only relevant and objective standpoints are given by the company. Beyond those information activities, EKZ does not participate in political lobbying nor support political parties or individual politicians in any way.			
Energie Wasser Bern (Water utilities)	not answered	not answered		
F. Hoffmann-La Roche AG (Health Care Products)	The private sector has a vital role to play in developing laws, regulations and policies that enable the best possible patient care. We take part in such dialogue in an appropriate and professional manner. In 2008 we introduced good practice guidelines for working with government officials. We carry out much of our public policy work through our membership of industry bodies. We also meet directly with policymakers including members of the European Parliament and health bodies. Counterfeit pharmaceutical products are illegal and pose a significant global public health problem. They endanger patients, undermine confidence in healthcare systems and companies, infringe on intellectual property rights and waste valuable healthcare budgets. We continuously monitor and improve product security using technology to quickly identify counterfeits. We participate in national and international industry and governmental efforts to develop stronger laws and improve enforcement, educate the public and train local officials. In 2008 the European Commission held a public consultation on combating counterfeit medicines and developed proposed legislation. We support legislative reform and believe it should focus on the integrity of original packaging throughout the pharmaceutical supply chain. We call for more stringent	Political contributions - US federal law prohibits us from making political contributions to federal candidates, although employees may make personal contributions to the Hoffmann-La Roche Good Government Committee, a voluntary political action committee, or participate in the Roche Action Programme. Employees contributed 416,680 US dollars through these mechanisms in 2008.	Yes	Registered in the category "in-house" lobbyists and trade associations. Estimated costs directly related to representing interests to EU institutions: 350'000 - 400'000 € in 2008. This estimate is based on the EU lobbying activities undertaken by various experts within the company as Roche does not have an EU Public Affairs office in Brussels. Roche is a member of EFPIA, EBE, EDMA, EPPOSI.

	controls during the manufacture, trade and distribution of active pharmaceutical ingredients and medicines.			
Geberit (Water utilities)	Geberit does neither give any donation worth mentioning to political parties or politicians nor make any political statements or carry out any political lobbying. The company is a member of Transparency International.	All donations are "politically neutral".		
Georg Fischer (Conglomerates)	For this indicator only partial information is provided. Political contributions are only given to organisations actively engaged in the interests of economy and industry. These contributions have to comply with local laws. The company's sponsoring and donation policy is regulated in a specific policy paper.	No information is provided for this indicator at present.		
Holcim Ltd / Holcim Switzerland (Construction Materials)	Holcim participates actively in the World Business Council for sustainable Development (WBCSD) and the WBCSD Cement Sustainability Initiative. / Holcim Switzerland is also a member of WBCSD, the Philius foundation and different industry associations.	Holcim Ltd presents a table called "Government relations". Political contributions are publicly disclosed at Group company level as appropriate and required by regulation. In 2007, 24% of Group companies received subsidies from national governments. In 2007, total political contributions were of 415,465 CHF whereas average subsidies from national governments (grants, tax relief and other financial benefits) in the same year were of 4,110,436 CHF. / Holcim Switzerland did not report on this Indicator.	Yes	Holcim has registered in the category "in-house" lobbyists and trade associations. Estimated costs directly related to representing interests to EU institutions: 150'000 - 200'000 € in 2008. Holcim is member of CEMBUREAU, UEPG, EUCOPRO, EPE/REA , GLOBE-EU.
Industrielle Werke Basel IWB (Water utilities)	No contributions to political parties and no political lobbying are permitted. Communication with the public in general and specific stakeholders is made in an active, open and transparent way in order to assure a relevant, honest and fair dialogue.			
Migros (Retailer)	On core issues in particular – agricultural policy and the abolition of the	The indicator is not reported on.		

	<p>'high-price barriers' around Switzerland – it plays an active part in the political debate. Economic policy maintains the dialogue with representatives of the Federal Council, the administration and Parliament, formulates the bases for its arguments and passes these forward selectively. The Directorate, therefore, has its own Public Affairs Office in Berne. Migros does out of principle not support any political parties or individual candidates. On political issues, experts from Migros also cooperate, informally or in work groups, with colleagues from rival companies (e.g. Swiss retail community of interests which aim it is to help convey the concerns of retailers to the public and politicians; Association of Real Estate Investors; the "espace mobilité" community of interests to formulate a joint approach on spatial planning, transport and environmental policy.</p>			
<p>Novartis (Health Care Products)</p>	<p>Novartis endeavours to play an active role in public debates affecting its business. We believe it is our responsibility to share our perspective, scientific knowledge and technical expertise by providing fact-based information to policymakers and regulatory authorities. We strive to engage in constructive partnership with government and other stakeholders to increase access to the best medicines and to health information globally, while preserving incentives for research and innovation through competitive pricing. Much of this work is done through trade associations, which can be a powerful vehicle for raising standards across industry and an effective forum for the exchange of best practice. In our lobbying and advocacy activities we are governed by the Novartis Code of Conduct and we strive for integrity, openness, transparency and consistency in our business activities.</p> <p>We have issued policy positions on the following topics: Access to medicines in the developing world / Animal experimentation / Biodiversity/Bioprospecting / Counterfeit medicines / Disclosure of</p>	<p>In 2007, Novartis spent USD 23 million in support of major international, American and European trade associations (USD 24 million in 2008).</p> <p>In 2007, contributions from Novartis political action committees to US Federal and State candidates amounted to USD 294 350.31.</p>	<p>Yes</p>	<p>Novartis has registered in the category "in-house" lobbyists and trade associations. Estimated costs directly related to representing interests to EU institutions: 650'000 - 700'000 € in 2008. Novartis is member of EFPIA, PhRMA, EBE, EVM, EuropaBio, EGA, AESGP, EUROMCONTACT, CEFIC, Business Europe (EconomieSwiss).</p>

	clinical research information / Ethical promotion of pharmaceuticals / Genetic testing (Employment) / Health Technology Assessment / Human rights / Information to patients / Naming requirements for Biosimilars / Nanotechnology-based medicine / Organ donation / Patient group interaction and support / Pharmaceuticals in the environment / The Right to Health.			
Panalpina Management Ltd (Logistics)	Panalpina makes no significant donations to parties or politicians, usually makes no political statements and is not involved itself in political lobbying.	All donations and related commitments are neutral from a party political point of view. (answer that might be interpreted as no political payments and therefore in contradiction with what has been said on SO5)		
Richemont (Luxury goods)	not answered	not answered	No	
Ringier (Media)	not answered	not answered		
Sarasin (Financial Services)	Exclusively through membership of organisations.	not answered		
STMicro-electronics (Technology Hardware)	ST refers to a Public Policy and two chapters in the report on Human rights issues and their membership of EICC (Electronic Industry Citizenship Coalition). The criterion SO5 is not really reported on.	not answered		
Straumann (Health Care Products)	In our sponsorship activities, we maintain political neutrality and do not provide financial support or contributions in kind to politicians or political parties. Furthermore, we do not make statements on public policy positions, or participate in political lobbying.			
Sulzer (Equipment)	This information is not available on the corporate level.			
Swiss Re (Financial)	There is a reference to their Public Policy Positions, especially to a chapter called "exploring and shaping the risk landscape". No concrete	not answered	Yes	

Services)	information can be found on SO5.			
Syngenta (Agriculture)	Syngenta responds to this criterion in several chapters of its CR webpage: When talking about its stakeholder and multi-stakeholder engagement, the company specifies its industry engagement and participation in associations and initiatives bringing together stakeholders from within the industry (WBCSD / CropLife / International Chamber of Commerce / Biotechnology Industry Organisation). To widen our engagement we actively participate in several multi-stakeholder forums, including the Roundtable on Sustainable Biofuels and the Roundtable on Sustainable Palm Oil. Syngenta collaborates with the European Landowners' Organization in order to discuss how to meet global challenges, such as feeding a growing world population, demand for a higher quality diet and increased demand for renewable sources of energy. The forum aims to work with a range of stakeholders to shape the development of European agricultural and environmental policy.	Additional information – not reported on	No	
Zuercher Kantonalbank (Financial Services)	not answered	not answered		

Sources:

Corporations CR, annual or sustainability reports referenced in the GRI Reports list 2008. <http://www.globalreporting.org/GRIReports/GRIReportsList/>

ACTARES Survey on financial contributions to political parties in Switzerland, end of 2007; only 10 out of those 26 companies have been asked.

<http://ec.europa.eu/transparency/regrin>