A comparative study of CSR-strategies in the oil and gas industry

By Alexander Dahlsrud PhD-student

Department of Industrial Economy and Technology Management
Faculty of Social Sciences and Technology Management
Norwegian University of Science and Technology
Trondheim, Norway

e-mail: <u>alexander.dahlsrud@iot.ntnu.no</u>

Introduction

The global production chain requires reliable and cost-efficient transportation across vast distances, and a continued globalized economic growth is literally fueled by the products of the oil and gas industry.

However, oil and gas resources are not renewables, and extraction simply cannot continue indefinitely. Access to the yet unextracted oil and gas resources are associated to financial, environmental or social problems. Further, the extraction, and more importantly, the use of oil and gas resources are causing significant emissions contributing to an increased global warming; the most challenging environmental issue in today's society. This may influence the attitudes in society towards oil and gas based products, thus influencing the future markets for these companies (Goldman & Sachs, 2004).

The future of globalization will in a long term perspective be influenced by the financial, environmental and social challenges of the oil and gas industry, and their ability to find and implement sustainable solutions. At present, the business' effort to find these solutions are termed corporate social responsibility (CSR); most widely defined as (Dahlsrud, 2003)

"A concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis" (Commission of the European Communities, 2001)

Based on publicly available information, this study analyses which issues the world's largest oil and gas companies themselves identify as their corporate social responsibility, and which explicit strategies they choose in order to deal with these issues. Further, it investigates what tools the oil and gas companies apply to implement their CSR strategies. The paper presents the preliminary results of an ongoing study.

Characteristics of the oil and gas industry

The oil and gas industry is here used as a description of companies whose primary operations include extraction and refining of oil and gas resources. These companies have some similarities, which can be used to characterize the industry.

All production processes require input of some sort energy, making all industrial sectors dependent of the energy sector. Delivering 56 % of the world's energy supplies and constituting 4 out of the 17 largest companies in the world, the oil and gas industry is vastly important in a global perspective, fuelling the world economy (IEA, 2002; Forbes, 2004).

Oil and gas resources are energy intensive materials, and establishing high concentration of energy seems unavoidable when extracting and refining them. According to Haddon (1980) concentrations of energy is a prerequisite for accidents, and should be minimized in order to reduce the potential risk. Thus, the oil and gas industry is a high risk industry.

Oil and gas are associated with substantial environmental impact, both when produced and used (SFT, 2005; Olje- og energidepartementet, 2005). Of particular concern is the release of greenhouse gases contributing to the climate change (IGPCC, 2001). In addition, crude oil constitute of substances with high toxicity and eco-toxicity potentials i.e. benzene (Hertwich, et al., 2001; Jenssen, 2005; EPA, 2004) Thus, the oil and gas industry is a high risk industry, both in a safety and environmental perspective.

All extraction have to take place where the resources is bound, thus making the extraction process geographically bounded. Further, as all easily available oil and gas resources have been claimed, most new extraction fields are associated with large environmental, economic and/or social

challenges (Tebebba, 2003). Once a new field is started, the extraction may last for decades, so the extraction company will face a long term relationship with these challenges.

Extracting and refining oil and gas resources will in most cases be capital and knowledge intensive. The extraction field "Snøhvit" in the Barents sea, is estimated to cost 45,3 billion NOK and will employ 1200 during the construction phase and 160 in the operation phase (OLF, 2002; Statoil, 2005)

Method

The 4 largest oil and gas companies were selected as case companies. According to Forbes (2004), that was

- BP¹
- Shell²
- ExxonMobil³
- Total⁴

The data have been found through the companies non-financial reports (CnFR), supplemented by information on their CSR website available at the time of the analysis (BP, 2005; ExxonMobil, 2004; Shell, 2004; Total, 2004). It is almost never possible to analyze the entire amount of information available through a website. First, the companies' dedicated CSR website usually contains a lot of different reports etc., second it usually contain links to other dedicated websites either internally in the company or externally.

Easy access to information should be considered indicative of its importance. The information was excluded from the analysis was:

- External websites linked to by the companies dedicated CSR-website.
- Separate reports in pdf-files.
- Other information on the company website, unless directly linked to from the CSRwebsite.

The information varied in depth between the companies. ExxonMobil have a CnFR consisting of 26 pages, while Totals CnFR consists of a staggering 157 pages.

The primary objective in the analysis was to gather information on what activities the companies ascribed to CSR, what the incentives, objectives, and targets for these activities were, and how they planned to achieve this. As it turned out, the information in CnFRs were not particularly well structured and there was little consistency in reporting between the companies and how the company reported on the different issues. For most issues there was possible to gather information regarding the incentives, objectives, targets and plans, but often not from all case companies, thus making the comparative analysis more difficult.

The information was attempted to be triangulated with other available information, particularly regarding regulations and collaborative efforts.

1

¹ http://www.bp.com/genericsection.do?categoryId=4445&contentId=7005392

² http://www.shell.com/home/Framework?siteId=royal-en&FC2=/royal-en/html/iwgen/leftnavs/zzz_lhn7_0_0.html&FC3=/royal-en/html/iwgen/environment_and_society/dir_environment_and_society.html

³ http://exxonmobil.com/corporate/Citizenship/CCR4/ccr_home.asp

⁴ http://www.total.com/csr2003/en/

Analysis

The case companies

The case companies are in many respects quite similar. Table 1 presents some key information about the 4 case companies.

Table 1: Key information on the 4 case companies

	BP	Shell	ExxonMobil	Total
Location of h.q.	UK	UK/The	UK/The USA F	
		Netherlands		
Number of	102 900	119 000	88 000	110 000
employees				
Turnover	\$ 285 billions	\$ 88 billions	\$ 212 billions	Euro 104,7
				billions

Further, they all own a large part of the value chain of oil and gas resources; they are involved from extraction to retailing. In addition, the companies have a large petro-chemical activity.

The issues

A list of which issues the companies address in their CnFRs is presented in appendix 1. Included in the list are also relevant regulations and collaborative initiatives among the case companies. Further, the list indicates whether the issue is dealt with context specific or as a company wide effort and the incentive for dealing with the issue.

There is reason to believe that most issues are addressed by all 4 companies, even if they do not included information on this in their CnFR. I.e. BP is addressing flaring and Shell is addressing education and development, although they do not mention it in their CnFR (BP, 2005b, Shell, 2005b).

Environment

Out of the 21 environmental (sub-) issues, 10 of the issues are covered by all 4 companies report, 8 issues by 3 companies, 2 issues by 2 companies and 1 issue is covered by only 1 company.

Most of the environmental issues are possible to model through input-output analysis, i.e. LCA, EIA, etc. Improving the environmental performance is simply a task of reducing the relevant material flows. Most of these flows may also be characterized as expected flows; it is known more or less how big these flows are, relevant to the desired output. This applies to issues like discharges to water, waste and air emissions. Some of these flows have an almost linear relationship to costs, i.e. waste disposal, energy and water consumption, making it easy to understand the economic benefit of reducing these flows and thus the environmental impact. These flows are closely connected to the output of the production process.

However, some of these flows are associated to unexpected incidents, i.e. spills. In deed, managing spills have much in common with safety management, differing primarily in that the consequences are impacting the environment.

The biodiversity issue differs from the other issues. First, impact on the biodiversity can be caused by a number of the other issues, i.e. spills, water consumption, GHG emissions. Second, biodiversity is not easily modeled through input-output analysis, thus making it significantly more complex to deal with.

Most of the environmental issues are indeed associated to some regulations. However, it is a demanding task to map all the national regulations regarding these issues, but it is well known that national regulations exists for most of these issues, at least within the EEC countries (OSPAR

Commission, 2003). Many of these issues are also subject to international agreements (Olje- og energidepartementet, 2005; CIA, 2005).

The 4 companies are no strangers to collaboration on envrionmental issues. This may take the form of a regional, multi-issue organization like CONCAWE⁵ or more global, but single issue collaborations like the Global Gas Flaring Reduction Partnership⁶. There are also joint research projects, where all four companies are participating, i.e. the IEA greenhouse gas R&D programme⁷. Thus it seems fair to claim that there is a high degree of information sharing between the companies on the environmental issues.

As information is somewhat limited, it is difficult to present a description of how the companies actually address the environmental issues. But the companies are claiming to use much of the same tools and principles in their approach to manage these issues. This similarity between the companies might be because the approaches are to a certain degree structured by regulatory frameworks and/or collaborative efforts.

A further explanation of the similarities might be that the companies to a large degree have the same stakeholders and thus are facing much of the same stakeholder pressure. Finally, the similarities may, particularly regarding those flows that have an almost linear relationship to costs, be explained by that there is a proven business case for a certain approach.

Social

Out of the 14 social (sub-) issues, 6 of the issues are covered by all 4 companies report, 4 issues by 3 companies, 1 issue by 2 companies and 3 issues is covered by only 1 company

The social issues are not easily modeled through simple material flows, and have complex cause-effect chains. This makes it difficult to delimit social issues of the companies and thus more complicated to manage. Further, since the social impact of a company can not be described through a single material flow, it is more difficult to allocate costs of the social impacts. This makes it more difficult to calculate the direct economic benefit of improving the performance in a social issue, thus the social issues are often described as intangibles.

For the issues security, safety and human resources, the companies communicated strategy is rather similar. Security and safety are basically concerning efforts to avoid unexpected incidents, which could prove to be rather costly if they do occur. Thus, it is a risk-based approach to reducing costs. When it comes to human resources, all four companies argue along the line that they are only seeking the best candidates and want to enable them to perform their best for the company. For these issues, the companies seem to be aligning demands for business efficiency and social responsibility.

Further, the companies are involved in extensive collaborative efforts on issues like security, driving safety and employee health.

For the remaining social issues the business case is to be primarily related to the companies' image. Further, the companies' communicated strategies appear to be more diversified.

Human rights is an issue covering several of the other issues. The companies deal with this by adhering to the 10 Global Compact principles. Many of these principles are incorporated in national laws i.e. abolishing child labor. In their CnFR, the companies emphasize their

 $http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/EXTOGMC/EXTGGFR/0,, menuPK:578075 \sim pagePK:64168427 \sim piPK:64168435 \sim the SitePK:578069, 00. html$

⁵ http://www.concawe.be

nttp.// w w w.concaw

⁷ http://www.ieagreen.org.uk/

commitments to human rights and describe their approach, which is primarily based on developing different business principles regarding the subject.

The issue of stakeholder dialogue is how the companies are engaging with their stakeholders. This engagement could be regarding all of the other CSR-issues and usually involves different stakeholder groups and techniques. Contrary to many of the environmental issues, it is difficult to set sound targets regarding stakeholder dialogue, simply because the measure of success is qualitative rather then quantitative. The companies claim their primary reason to engage in stakeholder dialogue is to understand the concerns of people outside their businesses.

Both ExxonMobil and Total have philanthropic programs coordinated by a corporate foundation. BP is involved in charitable donation and Shell claim to avoid philantrophic activity and rather prefer to do community investments that are more related to their impact on society as an energy company.

Only Total is covering operation in politically sensitive areas in their CnFR, primarily because of the criticism against their involvement in Myanmar (Burma).

It is uncertain what incentives regulatory requirements have for the companies' approach to these issues. Although human rights are supposed to be implemented through national legislations, the controversy starts where there is a discrepancy between national legislation and how the companies' stakeholders perceive human rights compliance. Thus, although human rights issues are regulated by national laws in many countries, the companies incentives to put this issue on their agenda, often has more to do with responding to stakeholders' concern than fulfilling regulatory requirements.

Economic

Out of the 13 economic (sub-) issues, 3 of the issues are covered by all 4 companies report, 3 issues by 3 companies, 5 issues by 2 companies and 2 issue is covered by only 1 company

The issues grouped under as economic share their complexity with the social issues and there are 2 broad economic issues covered by all case companies; corruption and local development.

The most important tool to combat corruption is the transparency of cash flows. A great deal of attention has been paid to this issue by campaigners, which efforts are coordinated by the "publish what you pay" campaign⁸. The most important business response is the Extractive industries transparency initiative⁹, to which all the companies adhere.

Both BP and Shell have stopped contributing to political parties. However, they still preserve their rights to speak out on policy issues impacting their business and participate in lobbying.

Both BP and Shell have a formal approach to whistle blowing through their OpenTalk and TellShell programmes. There is currently national laws protecting the rights of the whistle blower in a range of countries, including USA, South Africa and the UK (Drew, 2003)

Because some of the exploration fields are remotely located, the local community may not be able to provide the oil and gas companies with all their needs, i.e. infrastructure, qualified employees and service providers. So, the companies are engaged in facilitating the development of this. The degree of involvement seems to be dependent on the context in which this takes place, and seem to be undertaken to the extent they serve the efficiency needs of the company.

6

⁸ http://pwyp.gn.apc.org/english/

http://www.eitransparency.org/

Corporate governance is a term used to describe how the companies are directed and controlled, that is "the distribution of rights and responsibilities among different participants in the organization"..."and"...the rules and procedures for making decisions on corporate affairs" (Total, 2004). This term gained momentum after corporate scandals like Enron, and where corporate leaders benefited themselves rather then the company. The companies deal with this issue in their CnFR by giving a description of formal decision making procedure and the economic interests of those making these decisions, i.e. stock options, involvement in other companies etc.

Extended producer responsibility is concerning the responsibility for the products after they have been sold, usually for the use and disposal phase of the life cycle. BP focuses on enabling their customers to use their products safely by providing material safety data sheets (MSDS). This is required in many countries by national law. Shell explains their approach as a commitment to reduce any product health effects. Primarily this involves developing cleaner fuels; an activity all four companies are involved with. On this issue the companies are claiming to fulfil current and are preparing to meet future regulatory requirements, i.e. the euro 4 and euro 5 standard (Commission of the European Communities, 2005). In addition, Shell has a section on managing crop protection legacy.

Under the issue of business benefits, the companies are basically arguing that the world needs energy in order to develop.

There seems to be fewer economic (sub-) issues covered by regulations compared to the environmental and social issues.

Discussion

Overall, the communicated strategies are remarkably similar between the companies. To a large degree the case companies emphasis the same issues in their CnFR and for these issues the objectives are comparable. Further, the principle approach and tools used to reach these objectives are rather similar.

These observations could be explained theoretically by the concept of institutional isomorphism as explained by DiMaggio and Powell (1991). The companies are exposed to much the same regulatory requirements, which are a key incentive for many of the issues. Because the companies are so similar, the stakeholders to the companies are to a large degree the same, particularly regarding global NGO's or multilateral organizations like OECD etc. Further, the information sharing on CSR-issues are high among these companies. In fact, they all participate in different collaborative efforts on several of the CSR issues.

An important question to ask is whether or not the companies are willing to compete on CSR-issues and thus make CSR a competitive factor. One would not expect a large degree of collaboration if the issues in fact are an important competitive factor.

The issues included in the CnFRs seem to be managed rather independent of each other. And the performance improvement processes undertaken do not seem to be primarily motivated by the companies' commitment to be a socially responsible corporation, but rather by reasons much closer aligned to the business' efficiency needs.

For many of the issues mentioned in the corporate's sustainability reports, the challenges are significantly different from context to context. This makes it tricky to make sound corporate wide strategies for some of the issues. So, there is reason to question whether the companies actually have a strategy for their CSR-performance improvement process.

For the issues where the business case is rather weak, the companies seem less eager to take action, unless they have a common framework to base their approach on. This is rather apparent when it comes to transparency. All companies proclaim they support more transparency, as far as

this does not reduce their competitive advantage. So, the solution is to develop a common framework in which all competing companies adhere to.

To the extent the companies are dealing with these issues, they seem to be aligning their efficiency needs with their needs to appear responsible. Not because there necessarily is a synergy between the two, but rather because efficiency is used as a decision criteria for those processes described in their CnFR. Thus, those advocating against CSR is simply wrong; CSR is not spending other people's money, contrary it is just good management.

Hypothesis

Based on the analysis and the discussion, the following hypothesis is put forward

- The companies do not approach CSR in a holistic, systematic manner.
- The companies CSR approach is comprised of partly independent processes
- The incentives for these processes are
 - 1. Enhancing business efficiency
 - 2. Fulfilling expected or current regulatory requirements and/or international agreements/commitments
 - 3. Responding to stakeholders concerns
- The communicated objectives for the issues are more or less the same for all companies, but vary the most for those issues where the primary incentive is responding to stakeholders concerns and least for those issues where the primary incentive is fulfilling regulatory requirements.

Further research

Strategies are all well and fine, but having a rather similar explicit strategy and using the same tools, is by no means a guarantee for similar performance. After all, using a hammer doesn't make you a master carpenter.

If in fact the strategies are similar, why do the companies have different CSR-performance? How does business organize to fulfill their CSR-strategy? Why are the companies engaged in those issues reported on in their CnFRs? How can civic society, public authority and the business itself use this knowledge to enhance the CSR-performance of business?

These questions should be further research upon, and the suggested hypothesis should be further validated through empirical findings.

References

BP, 2005. Making the right choices – Sustainability report 2004. BP

BP, 2005. *BP Global/Press/Adressing Global Climate Change (part 1)*. URL: http://www.bp.com/genericarticle.do?categoryId=98&contentId=2000427 (15.06.05)

CIA, 2002. *The World Factbook* – 2005. Central Intelligence Agency. URL: http://www.cia.gov/cia/publications/factbook/ (16.06.05)

Commission of the European Communities, 2001. *Promoting a european framework for Corporate Social Responsibilities.* Green paper. COM(2001) 366 final. Brussel

Commission of the European Communities, 2005. *Commission staff working paper Fiscal incentives for motor vehicles in advance of euro 5*. Commission of the European Communities, SEC(2005 43)

Dahlsrud, A., 2003. *Elaborating a working definition of "Corporate Social Responsibility"*. Essay submitted in the Phd-course DIS 1061 Industrial Ecology at NTNU

Drew, K., 2003. Whistle blowing and corruption – an initial and comparative review. Public service international research unit. URL: http://www.psiru.org/reports/2002-08-C-whistle.doc

EG Hertwich, SF Mateles, WS Pease, TE McKone (2001), <u>Human Toxicity Potentials for Life Cycle Assessment and Toxics Release Inventory Risk Screening</u>. *Environmental Toxicology and Chemistry* **20**(4):928–939.

EPA, 2004. *Types of petroleum oils, oil program, US EPA*. URL: http://www.epa.gov/oilspill/oiltypes.htm (15.06.05)

ExxonMobil, 2004. 2003 Corporate Citizenship Report. ExxonMobil

Forbes 2000, 2004. *The worlds leading companies: selection by rank.* [01.02.2005] URL: <a href="http://www.forbes.com/lists/results.jhtml?passListId=18&passYear=2004&passListType=Company&searchParameter1=unset&searchParameter2=unset&resultsStart=1&resultsHowMany=100&resultsSortProperties=%2Bnumberfield1%2C%2Bstringfield2&resultsSortCategoryName=rank&passKeyword=&category1=category&category2=category&fromColumnClick=true

Goldman Sachs, 2004. *Global energy: Introducing the Goldman Sachs Energy Environmental and Social Index.* Global Investment Research

Haddon, W. 1980. *The Basic Strategies for Reducing Damage from Hazards of All Kinds*. Hazard Prevention, Sept./Oct. 1980.

IEA, 2002. World energy outlook 2002. OECD/IEA. Paris

IGPCC, 2001. *Climate Change 2001: Synthesis Report – Summary for Policymakers*. Intergovernmental Panel on Climate Change. URL: http://www.ipcc.ch/pub/un/syreng/spm.pdf

Jenssen, B.M, 2005. *Generelle effekter av oljeforurensing*.URL: http://www.biologi.no/Oljeforurensing/generelle_effekter.htm (15.06.05)

OLF, 2002. *OLF – Tillit til Fjell tross milliardsprekk på Snøhvit*. URL: http://www.olf.no/nyheter/ntb/2002/12/?16737 (15.06.05)

Olje- og energidepartementet, 2005. $Milj\phi$ – Norsk petroleumvirksomhet – 2005. Olje- og energidepartementet, Oslo.

OSPAR Commission, 2003. Background document on the legal regulations and legal instruments to achieve the management objectives in OSPAR Marine Protected Areas. Biodiversity Series, OSPAR. URL:

http://www.ospar.org/documents/dbase/publications/p00187_Legal%20regulations%20and%20instruments%20to%20achieve%20objectives%20in%20MPAs.pdf (15.06.05)

SFT, 2005. *State of the environment in Norway – oil and gas activities.* URL: http://www.environment.no/templates/themepage____2129.aspx (15.06.05)

Shell, 2004. The Shell Report 2003: Meeting the energy challenge – our progress in contributing to sustainable development. Royal Dutch/Shell Group

Shell, 2005. *Jobs and Career – Experienced Professionals – Training and development.* URL: <a href="http://www.shell.com/home/Framework?siteId=careers-en&FC2=/careers-en&FC2

en/html/iwgen/leftnavs/zzz lhn4 6 0.html&FC3=/careersen/html/iwgen/experienced professionals/training development/dir xptraining development_091 2.html (16.06.05)

Statoil, 2005. www.statoil.com/snohvit. URL: http://www.statoil.com/STATOILCOM/snohvit/svg02699.nsf?opendatabase&lang=no&artid=8B http://www.statoil.com/STATOILCOM/snohvit/svg02699.nsf?opendatabase&lang=no&artid=8B https://www.statoil.com/STATOILCOM/snohvit/svg02699.nsf?opendatabase&lang=no&artid=8B <a href="https://www.statoil.com/

Tebtebba, 2003. *Indigenous Peoples' Declaration on Extractive Industries*. Oxford URL: http://www.tebtebba.org/tebtebba_files/susdev/mining/eir/eirdec.html (15.06.05)

Total, 2004. Corporate Social Responsibility Report 2003: Sharing Our Energies. Total.

Appendix 1

Environment

Issue	Sub-Issue	Main incentive	Context	Collaborative initiatives	Regulation
Biodiversity		Regulatory	Specific	Energy and Biodiversity Initiative (BP, Shell) International Petroleum Industry Environmental Conservation Association (BP, Shell, ExxonMobil, Total) 'Speaking a Common Language' (BP,	The Convention on Biological Diversity Ramsar Convention
Water	Consumption	Business efficiency	Specific	Shell) CONCAWE	The Millennium Development Goals
	Discharges	Regulatory	General		OSPAR 01/1 OSPAR 00/3
Waste	End-of-Life	Regulatory	General		OSPAR 98/3 MSC/Circ. 490, 4 May 1988
	Operation	Business efficiency			Basel convention
Spills		Regulatory	General	Oil Spill Response Limited (BP, Shell, ExxonMobil, Total) Clean Caribbean Cooperative (BP, Shell, ExxonMobil, Total) East Asia Response Limited (Total, ??) IMO (IPIECA (BP, Shell, ExxonMobil, Total)	SOLAS MARPOL 73/78 International Convention on Oil Pollution Preparedness, Response and Co-operation, 1990
Air emission (Excl. GHG)	Operation (NOx, VOC, SOx) Operation	Regulatory Regulatory			OSPAR Montreal
	- P-Immon	1 115 01111101 9		1	

	(Halocarbons)				Protocol
	Products				Euro 4 and Euro
					5 standards
Climate	GHG		General		Kyoto Protocol
change	emissions				
	Energy	Business			N/A
	efficiency	efficiency			
	Flaring			Global Gas Flaring	
				Reduction	
				Partnership (BP,	
				Shell, ExxonMobil,	
				Total)	
	Emissions				
	trading				
	Carbon capture				N/A
	and storage				
	Cleaner/more				Euro 4 and Euro
	efficient oil-				5 standards
	based fuels				
	Fuel Cells				N/A
	Bio-Fuels				N/A
	Natural gas				
	Renewable				N/A
	energy				

Social

Issue	Sub-Issue	Main incentive	Context	Collaborative initiatives	Regulation
Security		Business efficiency	Specific	Voluntary Principles on Security and Human Rights (BP, Shell, ExxonMobil, Total)	
Safety	Occupational safety	Business efficiency			ILO conventions "Seveso" Directive National regulations
	Driving safety	Business efficiency		Global Road Safety Partnership (BP; Shell) Oil and Gas Producers forum on road safety (Shell, ??)	National regulations

Human	Recruitment	Business efficiency	
resources	Education	Business efficiency	
	and		
	Development		
	Diversity	Stakeholder	
	Health		CONCAWE
			(BP, Shell,
			ExxonMobil,
			Total)
Human		Stakeholder	UN Global
rights			Compact
Stakeholder		Stakeholder	
dialogue	Reporting	Stakeholder	
Politically			
sensitive			
areas			
Philantrophy			

Economic

Issue	Sub-Issue	Main incentive	Context	Collaborative initiatives	Regulation
Corruption	Bribery and Corruption	Regulatory	General	Business Principles for Countering Bribery (BP, Shell)	National regulations
	Revenue Management	Stakeholder	Context	Extractive Industries Transparency Initiative (BP, Shell, ExxonMobil, Total)	
	Political activity	Stakeholder	General		
	Fines & penalties	Stakeholder			
	Whistle blowing	Business efficiency	General		
Local development	Education & Training	Business efficiency	Context		
_	Economic support	Business efficiency	Context		
	Health care initiatives	Business efficiency	Context		
Corporate Governance			General		
Business benefits					
Extended producer responsibility		Regulatory		ACC-GCMP (BP, Shell, ExxonMobil, Total)	REACH