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Appendix A:

Note: This is a proposed online supplementary appendix that is available for readers of the article, but not part of the main document

List of 25 FTSE100 Companies (that were FTSE100 constituents in May 2016) Included in Our Study

Anglo American, Astra Zeneca, BAE Systems, BHP Billiton, BP, British American Tobacco, British Telecom Group, Bunzl, Diaego, Easyjet, GlaxoSmithKline, Imperial Brands, Intercontinental Hotels, International Airlines Group, Marks & Spencer, Next, Rangold, Reckitt Benckiser, Rio Tinto, Rolls Royce, Royal Bank of Scotland Group, Royal Dutch Shell, Tesco, Unilever, Vodafone.

Explanation of the evaluation standards applied to the documentary analysis:

This note provides information on the evaluation standards we used in our empirical analysis. As Webley (2010) notes, documentary sources provide ‘a rich source of data’ for empirical legal research. We developed analytical criteria for the evaluation of the documents that enabled us to assess and to compare the approaches of the companies to bribery and forced labor. First, we were interested in the level of stringency that the companies applied to the two issues in their supplier policies and purchase practices. Here, the evaluation standard was based on means of legal interpretation such as wording and purpose. Basing the analysis of the contractual documents on techniques of legal interpretation provided us with an objective standard to measure their legal quality. We assessed how clauses on bribery and forced labor are drafted, how binding they are and which obligations they impose. This approach allowed us, for example, to identify how companies apply due diligence mechanisms. Secondly, we complemented the legal analysis of these documents by an assessment of the way the companies addressed the two issues in the various documents. Here, we focussed on the stringency of the wording as this enabled us to evaluate the expectations of the companies. For example, if companies require ‘compliance’ by suppliers than the tone and language is stricter than if they expect suppliers ‘to work towards improving’ their record in a particular area. The analysis of the words that companies use in their reference to bribery and forced labor therefore complemented the legal assessment of the documents. Thirdly, we evaluated how companies report about bribery and forced labor in their CSR/Sustainability report. We were interested in the emphasis placed on the two issues in terms of the quantity as well as the quality of the reporting. We therefore decided to look at the following aspects: How frequent is the reference to these two issues? How prominent and extensive is the reporting, i.e. are the two issues given their own section or are they part of reporting about a different generic topic? Do the companies mention policies about those two issues that they impose on suppliers and are there any other aspects that demonstrate a difference in approach? We selected these issues as benchmark criteria to assess how seriously the companies deal with bribery and forced labor in their reports. This approach appeared more suitable than, for

example, discourse analysis in order to complement the assessment done under the first two headings of our documentary analysis.