

REPORTING IN ACCORDANCE WITH THE GRI GUIDELINES

This Report is aligned with the Global Reporting Initiative's (GRI) G3.1 Sustainability Reporting Guidelines (please see www.globalreporting.org for further details), and has been checked by GRI to be consistent with an application level of A+. The index below gives full details of reporting against GRI disclosure profiles, including the financial services sector supplement.



Key

- Full reporting
- ◉ Partial reporting
- Don't report, will consider
- ⊗ Don't report, not considered to be of material importance
- ✕ Don't report, confidential information

ARA = The Co-operative Group Annual Report and Accounts 2010 (relevant page numbers in brackets)

FSSS = includes financial services sector supplementary information

ADD = non core, additional indicator

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Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
1 Strategy and Analysis				
1.1	Statement from the most senior decision-maker of the organisation.	●	Chief Executive's overview	2
1.2	Description of key impacts, risks, and opportunities.	●	Sustainable Development Policy, Sustainability management, Materiality and strategy and targets/performance table at the start of each chapter, The Co-operative Group Annual Report and Accounts 2010	10, 11–15, 17, 22–23, 32, 37, 41–42, 50, 55, 61, 73, 78, 81–82, 88, 93–94, 100, 103–104, 113, 119, ARA (42–45)
2 Organisational Profile				
2.1	Name of the organisation.	●	The Co-operative at a glance	Front cover, 4
2.2	Primary brands, products, and/or services.	●	The Co-operative at a glance, The Co-operative Group Annual Report and Accounts 2010	4, ARA (2–3)
2.3	Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.	●	The Co-operative at a glance, The Co-operative Group Annual Report and Accounts 2010	4, ARA (2–3)
2.4	Location of organisation's headquarters.	●	Overview, The Co-operative at a glance	Back cover, 4
2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the Report.	●	The Co-operative at a glance	4
2.6	Nature of ownership and legal form.	●	The Co-operative at a glance, The Co-operative Group Annual Report and Accounts 2010	4, ARA (4)
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	●	The Co-operative at a glance, The Co-operative Group Annual Report and Accounts 2010	4, ARA (10–28, 38–39)
2.8	Scale of the reporting organisation.	●	Employees, Economic impact, The Co-operative Group Annual Report and Accounts 2010	105, 100–101, ARA (38–39, 62–68, 176)
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	●	The Co-operative at a glance, Democratic control and supporting co-operatives, Employees and diversity	4–5, 97–98, 106–107
2.10	Awards received in the reporting period.	●	Sustainability management, Animal welfare, Diet and health, Ethical finance, Social inclusion, Inspiring young people, Climate change, Biodiversity, Employees and diversity, Customers	14, 33, 39, 43–44, 52, 54, 58, 64, 83, 107–109, 115, 118

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3	Report Parameters			
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	●	Sustainability management	11
3.2	Date of most recent previous Report (if any).	●	The Co-operative Group's 2009 Sustainability Report was published in June 2010.	
3.3	Reporting cycle (annual, biennial, etc.)	●	Sustainability reporting is completed on an annual cycle.	
3.4	Contact point for questions regarding the Report or its contents.	●	Overview	Back cover
3.5	Process for defining Report content.		The 'Sustainability management' chapter details the process for defining material content included in the Report and factors which influence this. Further, more specific, information can be found at the start of each of the performance chapters within the Report, in the 'materiality and strategy' paragraphs.	11–15
3.6	Boundary of the Report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	●	This Report was published in June 2011. It is an annual report, which relates to the operations (page 4) and stakeholders (page 13) of The Co-operative. Unless otherwise stated, performance relates to the calendar year 2010, and covers those businesses that make up The Co-operative (page 4). Reporting focuses on the two largest businesses: The Co-operative Food, and The Co-operative Financial Services (CFS), which together make up 76% of Group revenue (page 5). Reporting on the social and environmental impact of products sold focuses on own-brand products. All performance information includes the former Somerfield, acquired by The Co-operative Food in 2009, and the former Britannia Building Society, which merged with CFS in the same year. Due to its announced entry into a joint venture with Thomas Cook in late 2010, reporting on The Co-operative Travel is excluded from financial reporting, (as explained in footnote 7, page 102) in line with the Annual Report and Accounts, however included in all other areas of reporting, for example, GHG emissions, and employees. The Co-operative Pharmacy's joint venture manufacturing facility in China does not fall within the boundary of this Report. The facility became operational during the latter half of 2010, and, as noted in the assurance statement (page 125), its inclusion/exclusion within the reporting boundary will be reviewed for future Sustainability Reports.	4–5, 13, 102, 125
3.7	State any specific limitations on the scope or boundary of the Report (see completeness principle for explanation of scope).	●	The Report is subject to the following completeness limitations: 1) Time boundary: Unless data refers to 'a point in time' (eg, number of employees, number of stores), all performance information includes twelve months' data. In the vast majority of instances, this relates to the calendar year 2010. The following represent exceptions to this: basic bank account provision, and bank accounts for prisoners (page 52), where data is November 2009–November 2010; specific workforce data[1] (pages 105–111), where data is October 2009–October 2010; and The Co-operative Travel waste to landfill data (page 77), where data is extrapolated from one month's data. This is explained clearly in the text (pages 52, 104 and 77), with further explanation provided online for workforce data. In the case of bank account provision, prisoner bank accounts, and workforce data, this reflects a need to access datasets within a timely manner, and to stagger data management and interpretation over a period of time. The aspiration remains to move these datasets to calendar year reporting, and it is intended that this will be achieved for the 2011 or 2012 Report. The extrapolation on The Co-operative Travel's waste to landfill data is due to a resource issue as a result of the announced entry into a joint venture (see 3.6). It is envisaged that this will be resolved for the 2011 Report. 2) Scope: As explained in 3.6, The Co-operative Pharmacy's joint venture manufacturing facility in China does not fall within the boundary of this Report. Initial production began at this site in the latter half of 2010, and will increase in 2011. As such, the inclusion of this site will be reviewed ahead of preparation of the 2011 Sustainability Report, and if deemed appropriate, will be included in relevant areas of reporting, or an explanation provided regarding its exclusion. Due to its announced entry into a joint venture with Thomas Cook in late 2010, reporting on The Co-operative Travel is excluded from financial reporting (as explained in footnote 7, page 102), in line with the Annual Report and Accounts and IFRS requirements, however included in all other areas of reporting, for example, GHG emissions, and employees. This approach will be reviewed during preparation of the 2011 Sustainability Report, and a decision taken as directed by the status of the planned joint venture. As stated on page 78, water accountancy currently covers 63% of the estate, due to the storage of water bills on a number of different systems. 2010 data represents a considerable improvement on 2009 data (40% coverage), and coverage will reach 100% during 2013.	52, 104–111, 77
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	●	Reporting on The Co-operative's operations is comparable with the last reporting cycle for 2009. The exception is that The Co-operative Travel is not included in 'Economic impact' as in the financial accounts it is classed as a discontinued operation due to an impending merger with Thomas Cook.	

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3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the Report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	●	Sustainability management Data measurement techniques, and bases of calculations, are detailed throughout the performance chapters in the Report and in the footnotes accompanying presented data.	15
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (eg mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	●	Restatements are marked within performance sections. A full list of reasons for restatements is provided in the online version of the Report.	www.co-operative.coop/sustainabilityreport
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the Report.	●	Sustainability management	11–15
3.12	Table identifying the location of the Standard Disclosures in the Report.	●	GRI Index – information presented in this table	
3.13	Policy and current practice with regard to seeking external assurance for the Report.	●	Sustainability management, Independent assurance statement	11–15, 124–125
4	Governance, Commitments, and Engagement			
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.	●	Sustainability management, Democratic control and supporting co-operatives, The Co-operative Group Annual Report and Accounts 2010	13–14, 95–97, ARA (37, 49–54)
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	●	The Chair of the Group Board, the highest governance body, is a non-executive officer. The Co-operative Group Annual Report and Accounts 2010	ARA (50)
4.3	For organisations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	●	Sustainability management, The Co-operative Group Annual Report and Accounts 2010	13–14, ARA (8–9, 49–50)
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	●	Sustainability management, Democratic control and supporting co-operatives, Employees and diversity, The Co-operative Group Annual Report and Accounts 2010	13, 95–97, 107–108, ARA (49–52)
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	●	The Co-operative Group Annual Report and Accounts 2010	ARA (55–60)
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	●	The Co-operative Group Annual Report and Accounts 2010	ARA (49–53)
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	●	Sustainability management, Democratic control and supporting co-operatives, The Co-operative Group Annual Report and Accounts 2010	13, 95–97, ARA (49–5)
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	●	The Co-operative Group vision and aims, Executive summary, Looking ahead, Sustainable Development Policy, The Co-operative Group Annual Report and Accounts 2010	Inside front cover, 2, 9, 10, 11,13–14, ARA (32–35)

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4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	●	Sustainability management, The Co-operative Group Annual Report and Accounts 2010	11–15, ARA (42–45, 49–53)
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	●	The Co-operative Group Annual Report and Accounts 2010	ARA (49–51)
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	●	Sustainability management, The Co-operative Group Annual Report and Accounts 2010 The Co-operative's approach to risk management and strategy is based on the 'precautionary principle', which means it doesn't take strategic or operational decisions without proper consideration of their potential environmental or social impacts.	11, ARA (42–45, 49–53)
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	●	Business in the Community Corporate Responsibility Index, AA1000 Assurance Standard, Two Tomorrows Value Rating, Global Reporting Initiative, London Benchmarking Group, Fairtrade, Ethical Trading Initiative, Supplier Ethical Data Exchange (Sedex), The Ethical Engagement Policy utilised for shareholder resolutions is committed to The Universal Declaration of Human Rights, Farm assurance standards – Red Tractor Mark, Quality Standard Mark, RSPCA Freedom Food, National Dairy Farm Assured Standard, Quality Standard Pork, Quality Standard Lamb, The British Union for the Abolition of Vivisection (BUAV), Food Standards Agency Salt Reduction Targets, Waste and Resources – Love Food Hate Waste campaign, Drinkaware initiative, Department of Health's Change for Life movement, Combined Code on Corporate Governance, BREEAM, British Consortium's 'A Better Retailing Climate' initiative, Environmental Investigation Agency's Refrigeration Survey, Cancun Communique on Climate Change, Producer Responsibility Obligations (Packaging Waste) Regulations 2007, Waste and Electronic Equipment (WEEE) Regulations, Understanding Assessing and Managing Water in Grocery Supply Chains, Institute of Grocery Distribution (IGD), Marine Stewardship Council, Forest Stewardship Council, Roundtable on Sustainable Palm Oil, Defra's Environmental Stewardship scheme, WWF-UK Forest and Trade Network (FTN), Programme for Endorsement of Forest Certification Scheme (PEFC), Natural England Environmental Stewardship Scheme, Oslo-Paris Convention for the protection of the Marine Environment of the North East Atlantic (OSPAR), REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals), Opportunity Now, Race for Opportunity, Employers' Forum on Disability, The Employers Forum on Age Employers Forum on Belief, Employers for Carers, Stonewall's Workplace Equality Index, Job Centre Plus Two Ticks, Investors in People, Association of British Insurers' (ABI) Customer Impact Scheme for Life Saving products, World Wide Web Consortium (W3C) Web Content Accessibility Guidelines, RNIB See It Right website standard	14, 15, 15, 15, 17–18, 23–24, 25, 25, 29, 45–47, 33, 33–35, 34, 35, 36, 38, 39, 39, 39, 46, 63, 65, 65, 70, 75, 76, 79, 79, 81, 81, 81, 81, 81, 81, 83, 83, 85, 89, 90, 104, 104, 104, 104, 104, 104, 104, 106, 109, 114, 117, 117

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4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	●	Trade and business association membership fees and donations, Top ten community contributions, Mencap and Enable, The Travel Foundation, Action Aid, Christian Aid, Oxfam, Save the Children, Tearfund, WaterAid, Amnesty International UK, UNICEF, RSPB, Shelter, StreetGames Young Volunteers, Koestler Trust, Votes at 16 Coalition, British Youth Film Academy, ClimateCare, Transform UK, Friends of the Earth and the Renewable Energy Association's Feed In Tariff coalition, Woodland Trust, Born Free Foundation, The Co-operative College, The Co-operative Party	126–127, 18, 20, 28, 48, 53, 53, 54, 54, 58, 67, 70, 70, 87, 87, 98, 98
4.14	List of stakeholder groups engaged by the organisation.	●	Sustainability management	13
4.15	Basis for identification and selection of stakeholders with whom to engage.	●	Sustainability management Stakeholder engagement is embedded into each reporting section, and is described in the Materiality and Strategy paragraphs and throughout the chapters.	12–13
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	●	Engagement is conducted at various levels throughout The Co-operative. Key examples for relevant stakeholders identified in disclosure 4.14 include: Members – the democratic structure of the group provides a regular engagement framework. Information is detailed on pages 95–97, and includes monthly Area and Regional Committee meetings at which issues raised can progress right up to the Group Board. Engagement is further enhanced by the voting process in which any member can stand for election, and progress through each tier to a Board Director. This is supplemented with regular member communications and the AGM. Customers – customer engagement is varied across The Group due to the diverse nature of the business. Regular customer panels and surveys ensure engagement and feedback from customers is gathered. Details on the main channels are listed on pages 116–117. Employees – employee engagement is conducted through a confidential bi-annual engagement survey (page 107–108), through management feedback and reviews and via regular issue surveys conducted predominately through the intranet. The Co-operative Movement – engagement with the co-operative movement is conducted via representation and support for a number of co-operative bodies. Details can be found on page 99. Suppliers – supplier engagement is conducted via supplier relationship management. Approaches taken reflect the diverse nature of suppliers across the group, some engagement is conducted at regular review meetings, while others is formally written into supplier contracts. Supplier capacity building also provides a forum for engagement and feedback surrounding specific issues such as labour standards and approaches (page 27). Wider Society – engagement with wider society varies according to issues arising and the groups/individuals in question. Local and national government engagement is detailed on pages 120–121 and also conducted through The Co-operative Party (page 123). Community Panels – for example 'Up for discussion (page 116) – are conducted at weekly intervals to gather feedback from, and engage with, a wide stakeholder audience. NGO engagement is conducted on an issue by issue basis, for example with WWF on GHG reporting (page 71) and Greenpeace/Coalition for Young People (pages 120–121). Other engagement with wider society includes that done in accordance with the The Co-operative Asset Management (TCAM)'s investment strategy (page 45). The Sustainability Report itself forms a part of wider engagement mechanism by reporting on issues in a responsive manner and inviting further comment and feedback (page 13).	95–97, 116–117, 107–108, 99, 27, 120–121, 123, 116, 71, 45, 13

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4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	●	Within the Report key stakeholder concerns and topics raised by stakeholders are highlighted. Specific responses, based on engagement from the 2009 Sustainability Report, include the addition of the 'Water' and 'Inspiring young people' chapters as fully assured content, an increased focus on palm oil and soya, and the inclusion of pension details and approach to retailing alcohol. Sustainability management, Community investment, Animal welfare, Diet and health, Ethical finance, Social inclusion, Climate change, Biodiversity, Democratic control and supporting co-operatives, Employees and diversity, Customers, Public policy	12–13, 20, 32, 37, 45–47, 50, 70–71, 86, 95–97, 103, 107–108, 113–118, 119–123
Economic (EC)				
DMA EC (FSSS)	Disclosure on Management Approach	●	Economic impact, Ethical finance, Social inclusion, Community investment, Democratic control and supporting co-operatives Employees and diversity The Co-operative Annual Report and Accounts 2010	100–102, 41–49, 50–59, 17–21, 94, 109, ARA (38–53)
EC1 (FSSS)	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	●	Economic impact, Community investment, Employees and diversity, Democratic control and supporting co-operatives, The Co-operative Group Annual Report and Accounts 2010	100–102, 17–21, 108–111, 94–95, ARA (62–68, 176)
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	●	Sustainable Development Policy, Sustainability management, Climate change	10, 13, 61, 64–67, 69
EC3	Coverage of the organisation's defined benefit plan obligations.	●	Employees, The Co-operative Group Annual Report and Accounts 2010	109–110, ARA (39, 42, 56–57)
EC4	Significant financial assistance received from government.	●	The Co-operative does not receive government financial assistance for normal trading.	
EC5 (ADD)	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	⊗	The Co-operative only operates within the UK and complies with UK minimum wage legislation, as such this indicator is not considered material.	
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	●	Animal welfare, Economic impact The Co-operative continues to support a wide range of British, regional and local sourcing initiatives for food products. The Report details policy and percentage of locally sourced produce for some product categories, however this is not broken down by proportion of overall spend. Following the merger with Somerfield, The Co-operative Food continues to review and implement changes to its supply chain. In 2011 a balanced scorecard will be introduced to influence the selection of suppliers to The Co-operative Food, covering financial, supply chain, technical, ethical trade and environmental measures. Work to provide a detailed breakdown of regional supplier spend will be carried out in the mid-term.	33–35, 101
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	⊗	The Co-operative only operates within the UK and recruits within the UK, as such this indicator is not considered material to Report.	
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	●	Community investment, International development and human rights, Social inclusion, Inspiring young people, Climate change, Water	17–21, 23, 28–30, 50–54, 56–57, 67–68, 70–71, 79–80

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EC9 (ADD)	Understanding and describing significant indirect economic impacts, including the extent of impacts.	●	A number of significant indirect economic impacts are reported on, however not all of these are specifically quantified. Quantification of impacts will be investigated in the mid to long term. Community investment – contributions of pre-tax profits and affinity products. International development and human rights – Fairtrade and Supplier capacity building/training, Ethical finance – TCAM engagements and Affinity cards, Social inclusion Inspiring young people – Co-operative Schools and Colleges, financial education, StreetGames Young Volunteers, apprenticeships. Climate change – Carbon offset, Water – Affinity products, Democratic control and supporting co-operatives – Membership share of profits, Employees and diversity – Salary and benefits, Training	18, 21, 23–24, 27, 45–47, 49, 50–54, 56–58, 67–68, 79, 94, 109
Environmental (EN)				
DMA EN	Disclosure on Management Approach	●	Sustainability management, Ecological sustainability	11–15, 60–91
EN1	Materials used by weight or volume.	●	The Co-operative directly manufactures very few products. As such this indicator is not considered material to the business. However some aspects of material use are covered in the Report when relating to appropriate policy. Waste and packaging, Water, Biodiversity, Chemicals	74–75, 78, 82–85, 90–91
EN2	Percentage of materials used that are recycled input materials.	●	This indicator is concerned primarily with the use of materials in manufacture. As The Co-operative is not a manufacturer the indicator is not considered to be material to the business. Recycled content and recyclability of product packaging is partially covered – see Waste and packaging.	76
EN3	Direct energy consumption by primary energy source.	●	Direct energy consumption for intermediate energy requirements is limited to onsite renewable energy generation and fossil fuel used for transport (Reported fully in EN29). Onsite renewable energy generation is reported in the online version of the Sustainability Report and is reported in kWh and GJ.	www.co-operative.coop/sustainabilityreport
EN4	Indirect energy consumption by primary source.	●	Climate change Total Renewable vs non-renewable consumption = 80.3% renewable, 19.7% non-renewable. Full information, including total consumption in GigaJoules, is available in the online version of the Report.	63–64, www.co-operative.coop/sustainabilityreport
EN5 (ADD)	Energy saved due to conservation and efficiency improvements.	●	Climate change	62–69
EN6 (ADD)	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	●	Climate change	63–71
EN7 (ADD)	Initiatives to reduce indirect energy consumption and reductions achieved.	●	Climate change	63–70
EN8	Total water withdrawal by source.	●	The Co-operative Estates' water consumption data is currently extrapolated from water bills that account for 63% of the estate. The Co-operative Farms data is based on spray records and irrigations figures. Work is continuing to improve water consumption accounting by volume and source. The Co-operative will look to fully Report on water consumption from estates by 2013. Water.	78–80
EN9 (ADD)	Water sources significantly affected by withdrawal of water.	○	While The Co-operative is not a major user of water, it will look to Report on this indicator in the mid to long-term as part of its water accounting and reporting improvements.	
EN10 (ADD)	Percentage and total volume of water recycled and reused.	○	This indicator considers the scale of the impacts associated with the organisation's water use. The Co-operative is not a major user of water, and whilst it is developing its reporting in relation to water, this indicator is not currently considered material to the business.	

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EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	●	<p>Biodiversity, Chemicals</p> <p>The main area where The Co-operative could potentially have an impact on biodiversity in relation to land it owns, leases or manages is through The Co-operative Farms. The Co-operative Farms managed a total of 17,541 hectares (ha) of land in 2010, of this land, 11,133 ha were owned by The Co-operative. There are three farms that include or are adjacent to Sites of Special Scientific Interest (SSSIs): Blairgowrie has an SSSI on the farm; Goole is adjacent to the Humber Estuary SSSI; and Normanby is adjacent to the Humber Estuary SSSI.</p> <p>The Co-operative Farms operates an environmental management system and implements a number of projects to promote biodiversity. The Co-operative Group also has a market leading Pesticides Policy with 32 banned and 89 prohibited pesticides at the start of 2011.</p>	85–87, 88–91, Further information on responsible farming practices on The Co-operative Farms is available at www.co-operative.coop/farms/responsible-farming
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	●	<p>Biodiversity</p> <p>The impacts on marine and farm wildlife are considered to be The Co-operative's most significant potential impact on biodiversity as a result of fishing and farming respectively. As outlined in EN11, there are a number of measures in place to reduce impacts as a result of farming. Potential impacts on fish species are managed through the implementation of The Co-operative Food's Sustainable Fish Sourcing Policy and Checklist.</p>	82, 84–87, Information on the sustainable sourcing of fish is also available online www.co-operative.coop/food/food-and-drink/food/Own-brand-fish
EN13 (ADD)	Habitats protected or restored.	●	Biodiversity	81–87
EN14 (ADD)	Strategies, current actions, and future plans for managing impacts on biodiversity.	●	Biodiversity, Chemicals	81–87, 88–91
EN15 (ADD)	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	⊗	<p>The majority of The Co-operative's sites are located in urban areas where potential biodiversity impacts would not be considered significant. Only a small number of sites are relevant to this indicator, most notably those owned/managed by The Co-operative Farms, but in terms of overall business impact, the issue is not considered to be material.</p> <p>Although not reported, in 2010 Habitat Heroes, a new wildlife initiative, was launched at selected Co-operative Farm sites. This initiative looks to improve habitats to support endangered and protected species – details can be found on page 85.</p>	
EN16 (FSSS)	Total direct and indirect greenhouse gas emissions by weight.	●	Climate change	62, 64, 65, 67
EN17	Other relevant indirect greenhouse gas emissions by weight.	●	Climate change	64–67
EN18 (ADD)	Initiatives to reduce greenhouse gas emissions and reductions achieved.	●	Climate change	61–72
EN19	Emissions of ozone-depleting substances by weight.	●	Climate change	64–65
EN20	NOx, SOx, and other significant air emissions by type and weight.	●	Significant air emissions are available in the Ecological sustainability section of the online Sustainability Report.	www.co-operative.coop/sustainabilityreport
EN21	Total water discharge by quality and destination.	⊗	This indicator considers the scale of impacts associated with the organisation's discharge. The Co-operative is not a major user of water, and whilst it is developing its reporting in relation to water, this indicator is not currently considered material to the business.	
EN22 (FSSS)	Total weight of waste by type and disposal method.	●	Waste and packaging	73–77
EN23	Total number and volume of significant spills.	⊗	The Co-operative does not possess significant quantities of hazardous material. This indicator is therefore not considered material to the business.	
EN24 (ADD)	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	⊗	The Co-operative does not possess significant quantities of hazardous material. This indicator is therefore not considered material to the business.	
EN25 (ADD)	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff.	⊗	This indicator considers the scale of impacts associated with the organisation's discharge. The Co-operative is not a major user of water, and whilst it is developing its reporting in relation to water, this indicator is not currently considered material to the business.	

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EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	●	Climate change, Biodiversity, Chemicals, Water, Waste and packaging Information on impacts in relation to effluents and noise are not reported, as they are not considered to be significant environmental impacts for the business	61–72, 81–87, 88–91, 78–80, 73–77
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	●	Waste and packaging	75–77
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	●	The Co-operative has not received any significant fines or non-monetary sanctions for non-compliance with environmental laws and regulations during the reporting year.	
EN29 (ADD)	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	●	Climate change	65–66
EN30 (ADD)	Total environmental protection expenditures and investments by type.	●	Investments and initiatives are detailed by content rather than explicit expenditure. The Co-operative will review reporting by explicit expenditure in the mid-long term as reporting develops. Climate change – new head office, energy programme, cleaner technologies, external services, personnel for environmental management, research and development, carbon offset, 'Toxic Fuels' campaigning, Waste and packaging – waste reduction initiatives, Biodiversity – Moors for the Future, Habitat Heroes, Plan Bee, Chemicals – branch refurbishments, Employees – interest free loans for public transport season tickets	63–69, 74–76, 85–87, 89
Social: Labour Practices and Decent Work (LA)				
DMA LA	Disclosure on Management Approach	●	Sustainability management, Employees and diversity, The Co-operative Group Annual Report and Accounts 2010	14, 103–112, ARA (12, 43, 53)
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	●	Employees and diversity The Co-operative Group only operates in the UK, Workforce by employment contract type can be found in the online version of the Report.	105, 109, 111, www.co-operative.coop/sustainabilityreport
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	●	Employees and diversity Supplemental information available in the online Report. Regional data is not material as The Co-operative only operates in the UK.	108, www.co-operative.coop/sustainabilityreport
LA3 (ADD)	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	●	Employees and diversity	109–110
LA4	Percentage of employees covered by collective bargaining agreements.	●	Employees and diversity	108
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	●	The Co-operative only employs people in the UK and complies with UK labour laws. The Trading Group and CFS agree consultation periods with the trade unions prior to any significant organisational change.	108
LA6 (ADD)	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	●	The Co-operative reports representation in formal joint management-worker health and safety committees that advise on occupational health and safety programs, however this is not presented as a percentage of total workforce. Sustainability management, Employees and diversity, The Co-operative Group Annual Report and Accounts 2010 CSF has a well-being Forum that meets four times per year to review/discuss and make decisions on matters relating to colleagues' well-being, diversity and health and safety. The whole of CFS workforce is represented by the committee.	14, 110, ARA (12, 43, 53)

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Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	●	The Co-operative only operates within the UK, recording and reporting of accidents and injuries complies with National law, including that on contractor liabilities. As such, Lost days are reported as a part of the overall absentee rate and data is not recorded specifically by gender. The data collection system will be reviewed and this information collected to Report by 2020. Employees and diversity First-aid-level injuries are included in the data presented on page 114–115, occupational disease rates are available in the online version of the Report.	105, 110–111, www.co-operative.coop/sustainabilityreport
LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	●	Employees and diversity	110–111
LA9 (ADD)	Health and safety topics covered in formal agreements with trade unions.	●	CFS has agreed a joint framework 'Working Together' with the unions. The framework is made up of a number of forums including the Well-being Forum which reviews, discusses and makes decisions on matters relating to colleagues' well-being, diversity and health and safety. Representatives from trades unions attend the meetings held once every quarter. The Trading Group has a Health and Safety Policy statement, which is included within its trade union agreements with both Usdaw and Unite.	
LA10	Average hours of training per year per employee by gender, and by employee category.	●	The Co-operative only employs people in the UK and complies fully with UK law, including that on equal opportunities. Due to the diverse and varied nature of the business, reporting training by gender and category is not considered material. Employees and diversity Full details relating to training per business are available online.	108–109, www.co-operative.coop/sustainabilityreport
LA11 (ADD)	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	●	Employees and diversity The Co-operative has an 'Education and Vocational Qualifications Policy' that promotes studying for a professional or educational qualification. Whilst The Co-operative does not provide its own in-house pre-retirement planning for intended retirees, it does offer employees the opportunity to attend sessions organised by the Pre-retirement Association of Greater Manchester.	108–109
LA12 (ADD)	Percentage of employees receiving regular performance and career development reviews, by gender.	⊗	Employees do receive regular performance and career development reviews and the process is managed at a local level. Data is not collected centrally on this and it is not considered material to collate data at this level.	
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	●	Employees and diversity, Democratic control and supporting co-operatives, The Co-operative Group Annual Report and Accounts 2010 Management Executive composition (The Co-operative Group Annual Report and Accounts 2010): Gender: 80% male, 20% female Age: 18–29: 0%, 30–50: 30%, 51–64: 70%, 65+: 0% Ethnicity: White British 100% Group Board composition (The Co-operative Group Annual Report and Accounts 2010): Gender: 85% male, 15% female Age: 18–29: 0%, 30–50: 25%, 51–64: 60%, 65+: 15% Ethnicity: White British 100%	105–106, 109, 97, ARA (30–31, 37)
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	⊗	The Co-operative reports the proportion of staff in basic salary bands and the proportion of employees and management by gender (page 105, 109). Men and women can receive the same low/high range of pay within each band. As there are such diverse job roles within the business it is not material to compare the basic salary for men and women within the categories of managers/non-managers.	
LA15	Return to work and retention rates after parental leave, by gender.	⊗	The Co-operative only employs people in the UK and complies with all UK labour laws, including those relating to maternity and paternity leave. All employees are encouraged to take their entitlements to parental leave and to return to work following this. The Co-operative works with employees as far as is possible to remove barriers to their return to work, for example by offering a comprehensive flexible working policy. Employees taking parental leave are entitled to return to work in the same position and with the same contractual benefits as they held prior to their leave. As such, return to work and retention rates, by gender, are not collated.	

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Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
Social: Human Rights (HR)				
DMA HR	Disclosure on Management Approach	●	International development and human rights, Employees and diversity, Ethical finance, Online	22–31, 103–112, 41–49, www.co-operative.coop/corporate/Sustainability09/soundsourcing codeofconduct
HR1 (FSSS)	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	●	Ethical finance, International development and human rights, All corporate bank customers and investments underpinning insurance products are screened against the bank Ethical Policy, which includes statements on human rights.	47, 28–29
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	●	International development and human rights	25–28
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	⦿	The Co-operative only operates in the UK, as such Human Rights training is focused on staff engaged with the supply chain, is it not material to give a percentage of employees trained. International development and human rights. Information regarding training on policies and procedures concerning aspects of human rights relates to sound sourcing.	27
HR4	Total number of incidents of discrimination and corrective actions taken.	⦿	The Co-operative has a Diversity Strategy in place which states, amongst other things, that the organisation will not tolerate bullying or harassment in any form; and people are valued for their contribution and diversity is encouraged in all aspects of the business. The Co-operative complies with all government laws on discrimination including the Sex Discrimination Act 1975, the Race Relations Act 1976, and the Disability Discrimination Act 2005. As reported in the Sustainability Report, the Trading Group operates a 'Respect works' policy to help guide what is considered appropriate behaviour in the workplace. A Respect works diversity training programme has been designed to complement this policy. Figures on incidents of discrimination within the workforce are considered to be business confidential.	26, 109
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	●	International development and human rights, Ethical finance, Employees and diversity The Co-operative Group's Sound Sourcing Code of Conduct, which applies to all suppliers of Co-operative brand products and covers the freedom of association and collective bargaining, can be found online. As The Co-operative Group operates only in the UK, this is not considered material; therefore, the response relates to suppliers and CFS' management of investments and UK trade union recognition.	25–27, 42–43, 108, www.co-operative.coop/corporate/Sustainability09/soundsourcing codeofconduct/
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour.	●	International development and human rights, Ethical finance The Co-operative Group's Sound Sourcing Code of Conduct, which applies to all suppliers of Co-operative brand products and covers child labour, can be found online. As The Co-operative Group operates only in the UK, and complies with UK labour law, it is unlikely to have to deal with forced child labour in its workforce. The response relates solely to suppliers and CFS' management of investments.	25–28, 42–43, www.co-operative.coop/corporate/Sustainability09/soundsourcing codeofconduct/
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of all forms of forced or compulsory labour.	●	International development and human rights, Ethical finance The Co-operative's Sound Sourcing Code of Conduct, which applies to all suppliers of Co-operative brand products and covers forced labour, can be found online. As The Co-operative operates only in the UK, and complies with UK labour law, it is unlikely to have to deal with forced labour in its workforce. The response relates solely to suppliers and CFS' management of investments.	25–28, 42–43, www.co-operative.coop/corporate/Sustainability09/soundsourcing codeofconduct/
HR8 (ADD)	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations.	⊗	This indicator is not considered to be material as The Co-operative only operates in the UK and security personnel make up a very small percentage of the total workforce.	
HR9 (ADD)	Total number of incidents of violations involving rights of indigenous people and actions taken.	●	International development and human rights, Ethical finance As The Co-operative operates only in the UK, and complies with UK labour law, it is unlikely to have to deal with incidents of violations involving rights of indigenous people in its workforce and this indicator is, therefore, not material. The response relates solely to suppliers and CFS' management of investments.	25–28, 42–43

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Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	●	The Co-operative operates only in the UK, but reports on own-brand suppliers' compliance to its Sound Sourcing Code of Conduct and CFS' screening and engagement relating to human rights.	25–29
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	●	The Co-operative operates only in the UK, but reports on own-brand suppliers' compliance to its Sound Sourcing Code of Conduct and CFS' screening and engagement relating to human rights.	25–29
Social: Society (S0)				
DMA S0	Disclosure on Management Approach	●	The Co-operative operates a Code of Conduct, which sets out how it expects all employees to conduct themselves in a manner consistent with the Group's policies. Breaches of this code are investigated at an appropriate level to the suspected breach, disciplinary action is taken when required in line with the Code of Conduct. Community investment, International development and human rights, Social inclusion, Inspiring young people, Democratic control and supporting co-operatives, Customers	www.co-operative.coop/estates/operational%20risk/anti-bribery/code%20of%20business%20conduct.pdf, 17–21, 22–31, 50–54, 55–59, 93–99, 113–118
S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	●	The Co-operative only operates in the UK and the nature of the business means that this indicator is not considered to be fully applicable, with specific regard to impact assessments. The Co-operative does operate a range of community engagement initiatives notably through its democratic business structure, and invests in a range of community initiatives around its bases of operation. Community investment, International development and human rights – Fairtrade and Beyond Fairtrade, Microfinance, Social inclusion, Inspiring young people, Democratic control and supporting co-operatives.	17–21, 23–25, 29, 50–54, 56–57, 97–99
S02	Percentage and total number of business units analyzed for risks related to corruption.	⊗	This indicator is not material as The Co-operative operates only in the UK and complies with all UK policies on anti-bribery. The Co-operative's Code of Business Conduct, which applies to all employees, covers policy on hospitality, gifts and conflicts of interest www.co-operative.coop/estates/operational%20risk/anti-bribery/code%20of%20business%20conduct.pdf The business has in place a whistle-blowing policy and procedure, to provide employees with a confidential route for raising complaints and breaches to the code of conduct (page 110). As such this indicator is not considered to be material to the business.	
S03	Percentage of employees trained in organisation's anti-corruption policies and procedures.	⊗	The Co-operative only operates in the UK and aligns practices to UK law. The Co-operative's Code of Business conduct, which applies to all employees, covers policy on hospitality, gifts and conflicts of interest www.co-operative.coop/estates/operational%20risk/anti-bribery/code%20of%20business%20conduct.pdf. It is not considered material to Report the percentage of total employees given specific anti-corruption training.	
S04	Actions taken in response to incidents of corruption.	×	The Co-operative only operates in the UK and aligns practices to UK law. Incidences of corruption are dealt with as specified in the Code of Business Conduct, such information is considered business confidential.	
S05	Public policy positions and participation in public policy development and lobbying.	●	Public policy	119–123
S06 (ADD)	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	●	Public policy	119–123
S07 (ADD)	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes.	●	The Co-operative only operates in the UK and complies with all legislation on monopoly practices. No significant fines or legal actions have been issued for the reporting period.	
S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	●	During 2010 The Co-operative was fined £210,000 under the UK's Regulatory Reform (Fire Safety) Order 2005, in respect of a single food store. No other significant fines or non-monetary sanctions were received during the reporting period.	
S09	Operations with significant potential or actual negative impacts on local communities.	⊗	The nature of the business, as primarily a local UK retailer, means this indicator is not considered to be of material importance.	
S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	⊗	The nature of the business, as primarily a local UK retailer, means this indicator is not considered to be of material importance.	

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Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
Social: Product Responsibility (PR)				
DMA PR	Disclosure on Management Approach	●	Own-brand products accounted for 47% of The Co-operative Food's sales during 2010. Across these products The Co-operative addresses: International development and human rights Diet and health, Chemicals, Animal welfare, Waste and packaging, Ethical finance, Social inclusion	23–31, 37–40, 88–93, 32–36, 73–77, 41–49, 50–54
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	◉	There are few Co-operative products/services considered to have a high health and safety risk. All health and safety process and assessment complies with UK Health and Safety Law. As such reporting on the percentage, development and R&D, and storage of products/services subject to a comprehensive risk review is not considered to be a material. International development and human rights, Diet and health, Chemicals	25–27, 38, 89–90
PR2 (ADD)	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	○	Data is not currently available to Report on this indicator, but The Co-operative will consider reporting on it in the long term.	
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	●	Labelling varies across the diverse businesses within The Co-operative Group, all labelling complies with UK law surrounding safety and ingredients/ components. Due to the diverse range of products offered, and the corresponding diversity of information requirements and procedures, information is presented by type of product but not by percentage of significant products. International development and human rights, Animal welfare, Diet and health, Waste and packaging	23, 33–36, 38–39, 76
PR4 (ADD)	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	○	Data is not currently available to report on this indicator, but The Co-operative will consider reporting on it in the long term.	
PR5 (ADD)	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	●	Customers	113–118
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	●	Diet and health All marketing materials are reviewed in accordance with the Advertising Standards Authority (ASA) codes. Compliance with the ASA codes is continuously monitored through approval of advertising campaigns by The Co-operative's Corporate and Commercial Solicitors. Issues on specific products can be raised by stakeholders through the democratic forums available, such as area committee meetings.	39
PR7 (ADD)	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	○	Data is not currently available to report on this indicator, but The Co-operative will consider reporting on it in the mid to long term.	
PR8 (ADD)	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	○	Data is not currently available to report on this indicator, but The Co-operative will consider reporting on it in the mid to long term.	
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	●	There have not been any significant non-compliances with laws and regulations concerning the provision and use of products and services during 2010.	

REPORTING IN ACCORDANCE WITH THE GRI GUIDELINES

Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
Financial Services (FS)				
DMA FS	Disclosure on Management Approach	●	Sustainable Development Policy, Sustainability management, International development and human rights, Animal welfare, Diet and health, Ethical finance, Climate change, Waste and packaging, Water, Biodiversity, Chemicals, Democratic control and supporting co-operatives Further information on specific business policies is available online.	10, 11–15, 28–29, 33–36, 38, 41–45, 61–69, 73, 79, 82–87, 88–90, 120–123 www.co-operative.coop/corporate/ethicsinaction/ethicalpolicies
FS1	Policies with specific environmental and social components applied to business lines.	●	Sustainable Development Policy, Sustainability management, International development and human rights, Animal welfare, Diet and health, Ethical finance, Climate change, Waste and packaging, Water, Biodiversity, Chemicals Further information on specific business policies is available online.	10, 13–14, 28–29, 33–36, 38, 41–45, 61, 66, 69, 73, 79, 82, 84, 87, 88–90 www.co-operative.coop/corporate/ethicsinaction/ethicalpolicies
FS2	Procedures for assessing and screening environmental and social risks in business lines.	●	International development and human rights, Animal welfare, Ethical finance, Social inclusion, Climate change, Biodiversity, Chemicals, Employees and diversity, Public policy	29, 36, 41–49, 53, 69–70, 87, 91, 112, 120–121
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	●	Sustainability management, Ethical finance, Assurance	11–15, 41–49, 124–125
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	●	Ethical finance Customer-facing bank staff are required to undertake computer based Ethical Policy Training to ensure that Policy compliance is integrated into new business account opening processes; this training is made available to all staff. Additionally, bespoke training on the Ethical Policy is provided to business development and relationship managers in corporate banking teams.	43
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities.	●	International development and human rights, Animal welfare, Ethical finance, Social inclusion, Climate change, Waste and packaging, Water, Biodiversity, Chemicals, Democratic control and supporting co-operatives, Employees and diversity, Public policy	27, 29–31, 36, 41–49, 53–54, 69–71, 75–76, 79, 87, 91, 97, 112, 120–121, 123
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	●	Ethical finance, Social inclusion	41–44, 48, 50–52
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	●	Community investment, International development and human rights, Ethical finance, Social inclusion	18, 29–30, 41–45, 51–53
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	●	International development and human rights, Ethical finance, Climate change, Biodiversity	28–29, 41–45, 67–69, 87

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Profile Disclosure	Description	Level of Reporting	Cross-reference/direct answer	Page reference
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	●	Sustainability management, Ethical finance, Assurance	13–15, 41–44, 124–125
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues.	●	Ethical finance – ethical and sustainability engagement; notification on intent to vote against or abstain from management resolution. Total number of interactions and resolutions voted on are reported, however not as a percentage of total portfolio.	45–47
FS11	Percentage of assets subject to positive and negative environmental or social screening.	●	All corporate and business assets are subject to negative screening via the Bank Ethical Policy. This has been extended to investments underpinning motor and home insurance products.	41–43
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organisation holds the right to vote shares or advises on voting.	●	Ethical finance Further information is available online.	45–47, www.goodwithmoney.co.uk/ethical-insurance-and-investments
FS13	Access points in low-populated or economically disadvantaged areas by type.	●	International development and human rights, Social inclusion	29, 51–54
FS14	Initiatives to improve access to financial services for disadvantaged people.	●	Social inclusion, Customers	51–54, 117–118
FS15	Policies for the fair design and sale of financial products and services.	●	Social inclusion, Customers, Ethical finance	51–53, 113–118, 41
FS16	Initiatives to enhance financial literacy by type of beneficiary.	●	Community investment, Social inclusion	21, 51–53