

# Corporate Equality Index:

Rating American
Workplaces on Lesbian,
Gay, Bisexual and
Transgender Equality



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### **Letter from the HRC President**

Marking its ninth edition, the Corporate Equality Index 2011: Rating American Workplaces on Lesbian, Gay, Bisexual and Transgender Equality provides us with a chance to see what we have accomplished and to pinpoint the challenges and opportunities that lie ahead.

In nine years, the CEI has helped lead a sea-change in workplaces across the country. When we first began the CEI, 89 companies responded to our call to furnish their employment policies for LGBT employees and they were rated on seven basic criteria. This year, even with the struggling economy, 477 companies actively participated in the system that will rate them on more than 40 specific policies and practices covering nearly every aspect of employment for LGBT workers - from pension benefits to gender transition guidelines to supplier diversity.

But we are not resting on our laurels. Far from it. HRC has primed the corporate community to enact sweeping new policies and programs to promote equality for LGBT people in the workplace. Next year a new set of standards will apply. These stan dards will seek to end benefits discrimination for transgender employees and dependents, provide full equal benefits for samesex partners and spouses and promote organizational competency on LGBT workplace issues that go beyond written policies.

This year we also had an important Supreme Court ruling that removed restrictions on what corporations can spend on certain election activities. The Court's decision in Citizens United v. Federal Election Commission generated significant concern among progressive groups about the possibility that unchecked corporate influence in elections could tilt the outcomes toward more conservative causes and away from fair-minded ideals that include equality for the LGBT community. That concern was immediately realized in July when news broke about contributions from two historically LGBT-friendly companies, Target Corp. and Best Buy Co. Inc., to a group in Minnesota pushing for the election of a gubernatorial candidate who espoused virulently anti-LGBT viewpoints. HRC will continue to ask these companies to take corrective action.

The situation also brought to light confusion in our own community about the purpose of the Corporate Equality Index. The CEI is not an award or overall "seal of approval." It is an effective tool that is designed for a specific purpose: to improve workplace conditions for LGBT people by encouraging corporations to adopt pro-LGBT policies for their workforces. The CEI provides employers with clear standards that they must meet, creates competition (that had previously not existed) to expand LGBT-inclusive policies and progressively raises the bar, pushing corporations to earn their ratings with increased commitment to equality. Ultimately, the strength of this model made the trend toward equal workplaces snowball.

There has been and will continue to be thoughtful discussion about how to harmonize our social justice mission with the practices of corporate America. Deciding not to transform the CEI into a tool for influencing companies' political activities does not mean giving them a complete pass on campaign spending that negatively impacts the LGBT community. In the coming weeks and months, HRC will pursue other strategies to mitigate the negative effects of Citizens United. We will be working with our coalition partners, shareholder advocates and others in that endeavor. And as corporations themselves evaluate their roles in this new campaign finance landscape, HRC is well-positioned to be a part of that dialogue and to ensure that LGBT rights are front and center.

HRC will exploit each opportunity to change LGBT workplace policies for the better that the CEI presents, one company at a time, even as we fight to pass laws to ensure that all LGBT people are protected equally, no matter where they work.

Sincerely,

Joe Solmonese

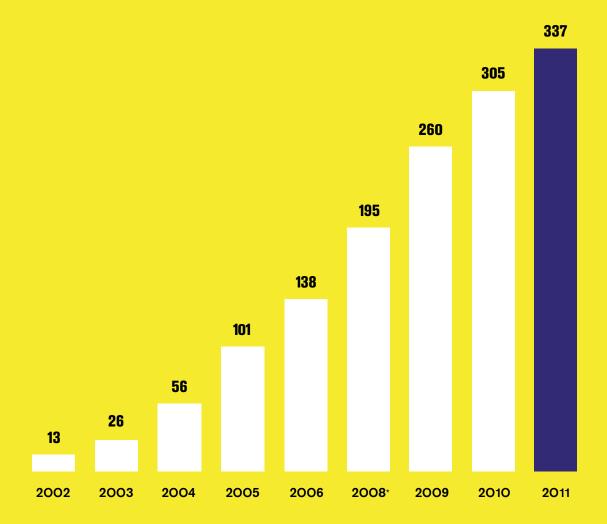
# Overview of Findings

businesses achieved the top rating of 100 percent this year, compared with 305 with top ratings in the 2010 **Corporate Equality Index. Collectively,** these businesses employ over 8.3 million full-time U.S. workers. When the Human **Rights Campaign's Corporate Equality** Index was launched in 2002, only 13 companies received 100 percent.

## **Top 5 Industries for Employers Rated 100 Percent**

35 Employers

27 Employers



(A complete list of rated employers is available as **Appendix A** on p. 37.)



<sup>\*</sup> Because the CEI is typically released in the fall, HRC began naming reports using the subsequent calendar year in 2007. This change ensured that subsequent ratings will remain relevant for the entire timeframe between report releases each year.

#### **OVERVIEW OF FINDINGS**

A total of 615 businesses were rated this year. The average rating across the entire index was 87 percent, compared to 86 percent last year. Twelve businesses' ratings improved by at least 30 points with four of these businesses achieving a 100 percent rating:

	CURRENT RATING	PREVIOUS RATING	PERCENTAGE POINT INCREASE
Land O'Lakes Inc.	100	53	47
Steelcase Inc.	100	. 60	40
Kellogg Co.	400	65	35
Hershey Co., The	IUU	70	30
ITT Corp.	un		30
Union Pacific Corp.	00	. 43	45
Travelers Companies Inc., The	85	- 50	35
R.R. Donnelley & Sons Co.	OÜ	55	30
Jones Apparel Group Inc.			38
Avnet Inc.	65	. 30	35
Cracker Barrel Old Country Store Inc.	00	15	40
Laclede Group Inc., The	48	. 0	48

Last year, two businesses received a rating of zero: energy companies **Exxon Mobil Corp.** and The Laclede Group Inc. The Laclede Group took steps toward equality this past year and implemented a fully inclusive non-discrimination policy among other changes, going from zero last year to 48 percent on the CEI this year.

ExxonMobil continues to score a zero percent and lose points for resisting shareholder pressure to amend its non-discrimination policy. Similarly, two other companies continue to oppose shareholder resolutions to amend their non-discrimination policies to include gender identity and their overall ratings reflect a deduction of 15 points: Verizon Communications Inc. and Wal-Mart Stores Inc.

Two additional companies - Target Corp. and Best Buy Co. Inc. - also received deductions in their scores this year. In July 2010, reports surfaced that Target Corp. and Best Buy Co. Inc. had given significant contributions (\$150,000 and \$100,000, respectively) to Minnesota Forward, an independent expenditure committee, following this year's Supreme Court ruling in Citizens United v. Federal Election Commission that removed restrictions on the amount of money corporations could donate in electoral races. MN Forward supports a candidate who holds extreme anti-LGBT views in his guest for the governor's mansion in that state. HRC immediately reached out to each company to request that they take steps to mend their relationship with the LGBT community. Following significant public outcry and several weeks of good faith efforts to assist the companies with a solution, neither company has taken any corrective action. As such, each company was penalized under Criterion 6 for a large-scale public blemish to their recent records, namely, for failing to take any corrective action in response to significant community concerns. Immediately prior to publication of this report, HRC learned that 3M had donated to MN Forward. They also received a deduction of 15 points. For more information about CEI methodology and political contributions see page 10.

Cracker Barrel Old Country Store Inc., once in the news for delivering pink slips justified by "The employee is gay," has implemented a non-discrimination policy and diversity training that includes sexual orientation and has even gone as far as to provide a cash grant to the Tennessee Equality Project.



# **Progress at the Fortune-Ranked Companies**

This year marked the fifth time the Fortune 1000 was invited to take part in the Corporate Equality Index survey. The Fortune 500 has been invited each year since 2002. For the first time, the CEI features unofficial ratings of the Fortune 500 companies that have not responded to repeated invitations to the survey (see the ratings in black below and in gray in Appendices A and B beginning on page 37). These ratings are based on publicly available information as well as information submitted to HRC from unofficial LGBT employee groups or individual employees. The average rating for non-responders is 17 percent, compared with 85 percent for the responsive Fortune 500 companies.

Eighty-nine percent of the Fortune 500 include "sexual orientation" in their non-discrimination policies and 43 percent include "gender identity." The majority of the Fortune 500 - 57 percent - offer partner benefits and 41 percent offer at least one transgender-inclusive health-related benefit.

Of the 263 Fortune 500-ranked businesses that participated in the CEI, 144 received 100 percent ratings (compared to 123 last year), with an average CEI rating of 86 percent. Of the 66 Fortuneranked businesses between 500 and 1000, 22 (compared to 15 last year) received 100 percent ratings, with an average rating of 78 percent. In total, 329 - or one-third - of Fortune 1000 employers are rated.

#### Eleven of the top 20 Fortune-ranked companies received 100 percent ratings.

	FORTUNE	
	2009 RANK	CEI 2011 RATING
Foren Mahil Com	4	
Exxon Mobil Corp.		0
Wal-Mart Stores Inc.	2	40
Chevron Corp.	3	100
ConocoPhillips	4	70
General Electric Co.	5	80
General Motors Co.	6	100
Ford Motor Co.	7	100
AT&T Inc.	8	100
Hewlett-Packard Co.	9	100
Valero Energy Corp.	10	35
Bank of America Corp.	11	100
Citigroup Inc.	12	100
Berkshire Hathaway Inc.	13	15
International Business Machines Corp. (IBM)	14	100
McKesson Corp.	15	70
JPMorgan Chase & Co.	16	100
Verizon Communications Inc.	17	70
Cardinal Health Inc.	18	100
CVS Caremark Corp.	19	90
Procter & Gamble Co.	20	100

# **Navigating the CEI Rating System** and Methodology

Since the first edition in 2002, the HRC Corporate Equality Index has been both a roadmap and progress report for major U.S. businesses' adoption of inclusive policies, practices and benefits for lesbian, gay, bisexual and transgender employees. In addition to the growing number of top-rated employers, the CEI has seen success in the reach of the survey. The number of employers rated from the first CEI to the present has expanded from 319 to 615, encompassing all major industry sectors and geographic regions of the U.S. In just under a decade, the Corporate Equality Index has become the foremost benchmark for businesses to gauge their level of LGBT workplace inclusion against competitors.

#### **HOW HRC OBTAINS INFORMATION**

The primary source of information for the CEI rating is the CEI survey, available at www.hrc.org/cei. The survey collects key pieces of information to calculate an employer's score and other information that gauge trends and best practices among all businesses or particular industries. Businesses are also required to provide certain documentation for some of the criteria.

Invitations for the CEI 2011 survey were mailed in April 2010. If a business had not previously participated in the CEI, surveys were sent to the chief executive officer or managing partner of the firm, as well as the highest-level executive responsible for human resources or diversity when it was possible to obtain their contact information. If a business had previously participated in the CEI, surveys were first sent to the individuals responsible for previous submissions.

The web-based survey included links to sample policies and other guidance on the HRC website. HRC staff provided additional assistance and advice throughout the process and reviewed submitted documentation for appropriate language and consistency with survey answers. Businesses were able to check their preliminary ratings as they progressed through the online survey and were invited to provide HRC staff with any additional information or updates before this report went to print.

A total of 1,662 businesses received invitations to take part in the survey. Of that number, 476 submitted surveys and 615 were ultimately rated. Last year, 461 submitted surveys and 590 were rated. HRC may occasionally rate businesses that have not submitted a survey this year if the business had submitted a survey in previous years and the information is determined to be accurate, or if HRC has obtained sufficient information to provide a rating. In both cases, HRC notifies the business of the rating and asks for any updates or clarification.

#### RATING SYSTEM AND METHODOLOGY

#### **HOW HRC VERIFIES INFORMATION**

In addition to the self-reporting provided through the CEI survey and documentation that is required to be submitted, HRC employs several methods to assess business practices. A team of researchers investigates and cross-checks the policies and practices of the rated businesses and the implications of those policies and practices for LGBT workers. Employers are not rated until all appropriate information has been gathered and verified to the fullest extent possible.

Following the assignment of individual company scores and the report's publication, HRC also relies on the broad public dissemination of the report to help ensure the report's accuracy and proper enforcement of the criteria. As the nation's largest organization advocating for LGBT equality, with more than 750,000 members and supporters; volunteer structures in more than 26 states; and relationships with local, state and national LGBT organizations and reporters, HRC pays attention to any news or information relating to LGBT businesses that might have an impact on a company's rating. In this way, HRC holds businesses accountable and also give them an opportunity to correct problems as they occur.

#### In total, the sources used to rate businesses include:

- HRC's Corporate Equality Index survey;
- Securities and Exchange Commission filings to track connections between public businesses' significant shareholders and any organizations whose primary mission includes anti-LGBT advocacy;
- Internal Revenue Service 990 tax filings for business foundations' gifts to groups whose primary mission includes anti-LGBT advocacy;
- Case law and news accounts for allegations of discrimination on the basis of sexual orientation and/or gender identity or expression that have been brought against any of these businesses;
- Individuals or unofficial LGBT employee groups that report information to HRC; and
- The HRC Workplace Project, which since 1995 has collected information on U.S. employers and today maintains the most accurate and extensive database of business policies that affect LGBT workers and their families.

#### **NON-RESPONDERS**

In a departure from previous CEI reports, this year HRC has spotlighted those Fortune 500 companies that, after repeated invitations, have never responded to the annual Corporate Equality Index survey. These 229 companies are noted in gray with an unofficial rating in Appendix A and B. HRC commends those employers that have committed to work toward equality through the public and transparent process of the Corporate Equality Index survey and we invite these 229 companies to do the same.

# **Corporate Advocacy** and Political Contributions

In January 2010, the Supreme Court of the United States struck down limitations on corporate spending in political campaigns. This not only opened the door to increased corporate political activity, but it also resulted in intense scrutiny of this activity. Journalists, advocacy groups, bloggers and others pored through campaign finance disclosures in an effort to determine who would be the winners and losers after the Court's decision in Citizens United v. Federal Election Commission. The important lesson is that Citizens United and corporate spending did not create an entirely new problem; there has always been a potential disconnect between a company's employment policies and its other practices or products. The CEI has remained useful in this confusing climate because of its clear purpose and scope.

Although HRC already considers contributions to anti-LGBT ballot measures (which are subject to different state and federal campaign laws) or organizations whose primary mission includes anti-LGBT advocacy, contributions to candidates and committees that support candidates have never been a factor in CEI ratings. The reason is not to make it easier for companies to achieve a score, but rather to design a tool that has maximum impact on workplace policies. The CEI is extraordinarily effective for the job it does: educating employers on the policies and practices that help LGBT employees in the absence of any legal protections and providing a roadmap for them to get there.

Out of this climate, HRC embarked on a strategy to encourage and help employers to embrace equality and increase opportunities for LGBT people across this country even while HRC fights for laws to cover everyone. To do this, HRC laid out clear standards that an employer must meet, made employer practices public, created competition that had previously not existed which in turn created a business value for LGBT policies and progressively raised the bar, pushing corporations to earn their ratings with increased commitment to equality. The CEI is not merely a survey of existing policies. It is a collaborative process in which HRC has demanded more, educated on how to get it done and turned unusual practices into common ones. Over the years, employers have invested in meeting the CEI standards, making their decisions separately from their political activities. Ultimately, the strength of this model made the trend toward equal workplaces snowball.

#### RATING SYSTEM AND METHODOLOGY

This summer, it came to light that **Target Corp.**, **Best Buy Co. Inc.** and **3M Co.** – all of which had outstanding workplace policies and 100 percent scores on the CEI - had donated substantial sums to an independent expenditure committee supporting an anti-LGBT gubernatorial candidate. HRC confronted the companies about their donations, which could help block marriage equality in Minnesota if this candidate is elected. In doing so, HRC highlighted the dangers of a post-Citizens United world and channeled the LGBT community's anger toward what HRC hoped would be a reasonable solution. As of this writing, the companies have chosen to take no corrective action and are being penalized under the existing CEI criteria not for the donation itself, but for failing to respond to significant community concerns. Now, the larger question of how to approach businesses on this issue in the long-term is at hand.

The political spending issue also demonstrates the inherent challenges of HRC's corporate work. Since the CEI began, the report has been a measure of workplace practices without regard to the corporation's business purpose. From fast food establishments to defense contractors to purveyors of nuclear power to tobacco companies, there is ample opportunity to object to a company's practices regardless of their treatment of LGBT employees. The CEI is not designed or intended to create an across-the-board assessment of any corporation's actions, including political activities. Creating a meaningful and uniform standard to assess corporate contributions and expenditures must account for several realities: A corporation can engage in political activities, some of which will not be reported publically; companies may give donations to political committees that expend funds on behalf of a variety of candidates; and, many corporations contribute to multiple campaigns and to more than one party in a single election.

There have been, and will continue to be, thoughtful discussions about how to harmonize HRC's social justice mission with the practices of corporate America. HRC's decision not to transform the CEI into a tool for influencing employers' political activities does not mean giving them a complete pass on campaign spending that negatively impacts the LGBT community. HRC will pursue other strategies effective in achieving the goal, well-suited to the problem and unlikely to dilute HRC's valuable and successful work to expand workplace equality through fair corporate employment practices.

## CEI Rating System

The largest and most successful U.S. employers are invited to participate in the CEI and are identified through the following lists:

- Fortune magazine's 1,000 largest publicly traded businesses (2009 Fortune 1000) and
- American Lawyer magazine's top 200 revenue-grossing law firms (2009 AmLaw 200).

Additionally, any private-sector, for-profit employer with 500 or more full-time U.S. employees can request to participate.

More information about participation is available online at www.hrc.org/issues/cei participate.htm.

#### WHAT DOES A CEI RATING MEAN

The CEI assesses employment policies, benefits and practices and does not purport to assess a corporation in its entirety. The CEI is - at its core - a measure of the workplace policies and practices of an organization. The rating also allows companies to receive a limited number of points for positive engagement with the external LGBT community. These may include sponsorships or advertising that build a company reputation and support its recruitment and retention goals. Furthermore, recognizing that many of the businesses rated in the CEI employ thousands of employees that span most, if not all, of the 50 states, each business's rating should be viewed as a snapshot of its activity. A CEI rating cannot convey all the nuances of a business's particular approach to LGBT workplace issues or the LGBT community at large. As such, readers are encouraged to seek out other sources of information on corporate behaviors that are important to them.

#### **HOW RATINGS ARE USED**

The CEI is the primary source of data for two key HRC resources aimed at LGBT and allied consumers, employees, shareholders and prospective employees.

- HRC Employer Search, a free online database of thousands of private and public sector U.S. employers, available at www.hrc.org/employersearch.
- An annual buyers guide based on LGBT workplace policies, benefits and practices. Distributed every November to coincide with the start of the winter holiday shopping season, the guide offers LGBT consumers - estimated to have a cumulative spending power of \$743 billion in 2010, according to Witeck-Combs market research — an accessible reference to the most recognizable consumer brands and their corresponding CEI rating. The guide is available at www.hrc.org/buyersguide.

#### RATING SYSTEM AND METHODOLOGY

 Businesses that achieve a rating of 100 percent in this report are recognized as "Best Places to Work for LGBT Equality" and are welcome to use this distinction in their recruitment and marketing efforts.



#### **RESPONSIBLE CITIZENSHIP**

The Corporate Equality Index survey and report are largely reliant on self-reporting from the business entity itself about its workplace policies and practices. However, the final criterion of the HRC CEI allows points to be deducted from a company's rating in the event of a significant official or public anti-LGBT blemish on the company's recent record.

This process relies on research conducted by HRC as well as LGBT and allied individuals who work with or for these businesses and who communicate with us about discrepancies or challenges they face with the employer.

When HRC encounters behaviors or actions that seem to run counter to its expectations of a CEI participant, HRC provides the business an opportunity to clarify and correct the situation by first contacting the business and offering a chance to respond and ensure, to the best of its ability, that no such action would occur in the future. Businesses unwilling to do so are penalized 15 points from their overall rating, with a minimum possible CEI rating of zero percent.

#### Possible behaviors or actions that run counter to **HRC's expectations of CEI participants**

Financial relationships with anti-LGBT advocacy organizations.

HRC maintains an ongoing, comprehensive list of organizations whose primary mission is to oppose LGBT equality. Each year, HRC staff review available IRS Form 990s (see GuideStar for more information) for these organizations and for the charitable arms of CEI participants to identify donations to organizations that oppose LGBT equality. Donations to these organizations from an employer's coffers are grounds for a deduction in score. HRC also looks for connections between the largest shareholders or corporate officers of publicly-traded organizations to anti-LGBT organizations, where the information is available. In general, private relationships between company executives or significant shareholders and anti-LGBT organizations do not impact a company's internal policies toward LGBT employees. In these cases, the relationship may be noted in HRC materials, but may not be grounds for a deduction in points.

#### Rolling back protections and benefits.

Each year, HRC reviews recent mergers and acquisitions to ensure that inclusive policies and practices survive changes in leadership or ownership.

#### Court cases and legal proceedings.

Each year, HRC does a comprehensive review of legal cases and proceedings involving LGBT issues and CEI participants, particularly looking for legal defense arguments that go beyond a reasonable defense and could undermine LGBT equality more broadly.

#### RATING SYSTEM AND METHODOLOGY

 Opposing shareholder resolutions to advance LGBT equality. HRC supports the efforts of shareholders in pursuing avenues to advance LGBTinclusive workplace policies. While these efforts have met with considerable success, some companies continue to oppose the simplest efforts to expand equal opportunity to all their employees.

#### **Examples of when a business has lost points on this criterion**

- Exxon Mobil Corp., Wal-Mart Stores Inc. and Verizon Communications Inc. have all lost points on this criterion for their steadfast opposition to adding "sexual orientation" and "gender identity" to their equal employment opportunity policies. Specifically, shareholders have brought resolutions forward to the boards of these companies making the business case for having an inclusive non-discrimination policy, but the boards still explicitly oppose doing so, and stated their opposition in their notice to shareholders. Cracker Barrel Old Country Store Inc. had also opposed a similar resolution, but has since amended its policy.
- Law firm Foley & Lardner LLP lost points on this criterion for its decision to provide substantive legal expertise to organizations working to oppose marriage equality in the District of Columbia. Although the firm has a long history of pro bono support for LGBT causes, it decided not to abandon its representation of the anti-LGBT organization and has not provided HRC with evidence that such clearly discriminatory clients will not be engaged in the future.
- **Perot Systems Inc.** lost points on this criterion for rescinding domestic partner benefits for its employees. The company ultimately reversed course several years later and points were restored.

#### WHAT HAPPENS WHEN AN EMPLOYER HAS LOST POINTS ON THIS CRITERION?

If at any time after losing points on this criterion an employer changes course and satisfies HRC's noted concerns, HRC will re-evaluate the criterion for that employer. The rating change may not be reflected until the following year's Corporate Equality Index report, depending on the situation.

Any employer that chooses to maintain its position against LGBT equality will continue to lose points on this criterion until they make an organizational, firm-wide decision to change course and satisfy HRC's noted concerns. HRC will always seek to improve an organization's rating and seeks resolutions to benefit an organization's LGBT workers, consumers and investors.

# **Current Criteria**

The following rating system has been in effect since the 2006 report through the current, 2011 report. New criteria will go into effect for the CEI 2012 report (calendar year 2011).

	Non-discrimination policy, diversity training – sexual orientation  a. Equal Employment Opportunity policy includes sexual orientation  b. Diversity training covers sexual orientation	15 points 5 points
2.	Non-discrimination policy, diversity training & benefits  – gender identity or expression  a. Equal Employment Opportunity policy includes	
	<ul><li>a. Equal Employment Opportunity policy includes</li><li>gender identity or expression</li><li>b. Gender identity diversity training offered OR</li></ul>	15 points
	<ul> <li>supportive gender transition guidelines in place*</li> <li>Insurance includes access for transitioning individuals for at least one benefit* At least one: Counseling by a mental health professional; pharmacy benefits covering hormone therapy; medical visits to monitor the effects of hormone therapy and other associated lab procedures; medically necessary surgical procedures such as hysterectomy; or short-term disability leave for surgical procedures</li> </ul>	5 points 5 points
3.	Partner benefits  a. Domestic partner health insurance  b. Domestic partner COBRA, dental, vision and legal dependent coverage*  c. Other domestic partner benefits* At least three: FMLA-like leave;†  bereavement leave;† employer-provided supplemental life insurance for  a domestic partner; relocation/travel assistance; adoption assistance; qualified  joint and survivor annuity for domestic partners; qualified pre-retirement  survivor annuity for domestic partners; retiree healthcare benefits;  or employee discounts	15 points 5 points 5 points
4.	LGBT employee resource group / diversity council (half credit) Would support a LGBT employee resource group with employer resources if employees expressed an interest	15 points
5.	Engages in appropriate and respectful advertising and marketing or sponsors LGBT community events or organizations	15 points
6.	Responsible citizenship Employers will have 15 points deducted from their score for a large-scale official or public anti-LGBT blemish on their recent records.	

100 points

- Criterion was added to the Corporate Equality Index in 2006.
- Benefit provided to the employee on behalf of the employee's same-sex domestic partner.

### The Evolution of Criteria

HRC is committed to maintaining a rigorous, fair, achievable and transparent CEI rating system. Apart from the survey process itself, HRC staff work year-round developing tools for employers to meet the criteria through online resources and direct consultation. Resources for each of the criteria are available at www.hrc.org/workplace.

HRC continually examines the criteria and gathers input to guide the future of the criteria. Criteria changes are necessary to account for:

- 1) The changing landscape of legal protections for LGBT employees and their families, both federally and from state to state, and
- 2) Emerging best practices to meet the needs of LGBT employees and ensure that LGBT employees are treated fairly in the workplace.

HRC is committed to providing at least 12 months' advance notice of any criteria changes.

#### **CRITERIA EVOLUTION TIMELINE 1.0 to 3.0**

- 1.0 In 2002, the first CEI rated employers strictly on seven criteria (CEI Criteria 1.0), which remain the basis for today's criteria. The original criteria were guided in part by the Equality Principles, 10 touch points for businesses demonstrating their commitment to equal treatment of employees, consumers and investors, irrespective of their sexual orientation and gender identity or expression. Just 13 businesses received perfect ratings in that first year; by 2005, more than 100 businesses had achieved perfect ratings, with many establishing future CEI best practices, such as spousal-equivalent domestic partner benefits and comprehensive insurance coverage for transgender employees.
- In 2004, HRC released the second and current version of the criteria (CEI Criteria 2.0), with greater weight given to comprehensive domestic partner benefits and to transgender inclusion; these criteria went into effect in 2006 and remain in effect through 2010 (for the current CEI 2011 report).
- In 2009, HRC announced the third version of the criteria (CEI Criteria 3.0), with comprehensive requirements for partner benefits, transgender-inclusive benefits, organizational competency on LGBT issues and external engagement with the LGBT community; these criteria will go into effect in 2011 (for the CEI 2012 report).



## **New Criteria**

There are four main objectives of the 3.0 criteria changes set for calendar year 2011:

- End benefits discrimination for transgender employees and dependents
- Provide equal benefits for same-sex partners and spouses
- Demonstrate firm-wide organizational competency on LGBT issues
- Demonstrate firm-wide public engagement with the LGBT community

#### 1. Equal employment opportunity policy includes

- a. Gender identity or expression
- b. Sexual orientation

15 points

15 points

#### 2. Employment benefits

- a. Equivalent spousal and partner benefits
  - Equivalent medical benefits

15 points

 Includes parity between employees with different-sex spouses and same-sex partners or spouses in the provision of the following benefits: COBRA; dental; vision; legal dependent coverage; bereavement leave; employer-provided supplemental life insurance for a partner; relocation/travel assistance; adoption assistance; qualified joint and survivor annuity for partners; qualified pre-retirement survivor annuity for partners; retiree healthcare benefits; and employee discounts

10 points

b. Equal health coverage for transgender individuals without exclusion for medically necessary care

10 points

#### **BASELINE CRITERIA**

- Insurance contract explicitly affirms coverage
- Plan documentation is readily available to employees and clearly communicates inclusive insurance options to employees and their eligible dependents
- Benefits available to other employees must extend to transgender individuals. Where available for employees, the following benefits should all extend to transgender individuals, including for services related to transgender transition (e.g., medically necessary services related to sex reassignment):
  - Short term medical leave
  - Mental health benefits
  - Pharmaceutical coverage (e.g., for hormone replacement therapies)
  - Coverage for medical visits or laboratory services
  - Coverage for reconstructive surgical procedures related to sex reassignment

#### RATING SYSTEM AND METHODOLOGY/ NEW CRITERIA

- Overage of routine, chronic, or urgent non-transition services (e.g., for a transgender individual based on their sex or gender. For example, prostate exams for women with a transgender history and pelvic/gynecological exams for men with a transgender history must be covered)
- Existing plan features should extend equally to transitionrelated care, e.g., provisions for "adequacy of network," access to specialists, travel or expense reimbursement
- Dollar caps on this area of coverage must meet or exceed \$75,000 per individual

#### **FULL CRITERIA**

- Coverage available for full range of services indicated. by World Professional Association for Transgender Health's (WPATH) Standards of Care, including the Medical **Necessity Clarification Statement**
- No Lifetime or Annual Dollar caps on this area of coverage
- Benefit administration covers treatment plans that adhere to the WPATH diagnostic and assessment process.
- Eliminates barriers to coverage:
  - No separate dollar maximums or deductibles
  - Explicit adequacy of network provisions
  - No other serious limitations

#### 3. Organizational LGBT competency

- a. Competency training, resources or accountability measures Businesses must demonstrate a firm-wide, sustained and accountable commitment to diversity and cultural competency, including at least three of the following elements:
  - New hire training clearly states that the nondiscrimination policy includes gender identity and sexual orientation and provides definitions or scenarios illustrating the policy for each
  - Supervisors undergo training that includes gender identity and sexual orientation as discrete topics (may be part of a broader training), and provides definitions or scenarios illustrating the policy for each
  - Integration of gender identity and sexual orientation in professional development, skills-based or other leadership training that includes elements of diversity and/or cultural competency
  - Gender transition guidelines with supportive restroom, dress code and documentation guidance
  - Anonymous employee engagement or climate surveys conducted on an annual or biennial basis allow employees the option to identify as LGBT

10 points



#### RATING SYSTEM AND METHODOLOGY/ NEW CRITERIA

- Data collection forms that include employee race. ethnicity, gender, military and disability status typically recorded as part of employee records include optional questions on sexual orientation and gender identity
- Senior management/executive performance measures include LGBT diversity metrics
- b. Employee group -or- Diversity council

10 points

#### Public engagement

15 points

Businesses must demonstrate ongoing LGBT-specific engagement that extends across the firm, including at least three of the following:

- LGBT employee recruitment efforts with demonstrated reach of LGBT applicants (required documentation may include a short summary of the event or an estimation of the number of candidates reached)
- Supplier diversity program with demonstrated effort to include certified LGBT suppliers
- Marketing or advertising to LGBT consumers (e.g.: advertising with LGBT content, advertising in LGBT media or sponsoring LGBT organizations and events)
- Philanthropic support of at least one LGBT organization or event (e.g.: financial, in kind or pro bono support)
- Demonstrated public support for LGBT equality under the law through local, state or federal legislation or initiatives

#### 5. Responsible citizenship

-25 points

Employers will have 25 points deducted from their score for a large-scale official or public anti-LGBT blemish on their recent records. Scores on this criterion are based on information that has come to HRC's attention related to topics including but not limited to: undue influence by a significant shareholder calculated to undermine a business's employment policies or practices related to its LGBT employees; directing corporate charitable contributions to organizations whose primary mission includes advocacy against LGBT equality; opposing shareholder resolutions reasonably aimed at encouraging the adoption of inclusive workplace policies; revoking inclusive LGBT policies or practices; or engaging in proven practices that are contrary to the business's written LGBT employment policies

100 points

Questions pertaining to these criteria were included in the CEI 2010 and 2011 surveys to help prepare participants for the changes. In addition, a preliminary 3.0 scorecard was provided to participants. The CEI 2012 survey and report will be the first to utilize the 3.0 criteria.

More information about the new criteria is available online at www.hrc.org/newcei.

# Findings

# Non-Discrimination Policies and **Diversity Training**

Currently federal law bars workplace discrimination on the basis of race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability and genetic information. There are no federal laws barring workplace discrimination on the basis of sexual orientation and gender identity.

Some states have passed laws and ordinances to establish workplace protections for lesbian, gay, bisexual and transgender employees, but it remains legal in 29 states to discriminate against job applicants and employees because of their sexual orientation, and in 38 states because of their gender identity.

Despite this patchwork of state laws, private employers have implemented fully inclusive nondiscrimination polices at rates that are leaps and bounds ahead of lawmakers.

#### **Anti-Harassment Policies**

While non-discrimination policies establish the foundation of workplace legal protections, anti-harassment policies further elaborate on behaviors that contribute to discriminatory or hostile work environments for any number or group of employees. In lieu of federal protections for LGBT employees, many businesses have taken proactive steps to ensure LGBT workers have robust protections from discrimination and hostility. Of the CEI-rated



22

# **Sexual Orientation**

#### **CRITERION 1a**

#### **Businesses That Prohibit Discrimination Based on Sexual Orientation**

of CEI-rated employers provide employment protections on the basis of sexual orientation.



These 612 businesses account for 15,390,645 U.S. employees that are afforded protections by their employer instead of the federal government.

#### **CRITERION 1b**

#### **Businesses That Provide Diversity Training Covering Sexual Orientation**

of CEI-rated employers further elaborate on the topic of sexual orientation in the workplace through diversity training.

businesses with fully inclusive non-discrimination/ EEO policies, 78 percent include sexual orientation and gender identity in their anti-harassment policies as well. The deliberate inclusion of these terms in anti-harassment policies (along with accompanying training) equips human resource professionals, managers and other potential mediators with the necessary language and concepts to resolve conflicts.

Resources on non-discrimination policies, anti-harassment policies and gender transition quidelines are available at www.hrc.org/issues/equal opportunity.asp.

# **Gender Identity**

#### **CRITERION 2a**

#### **Businesses That Prohibit Discrimination Based on Gender Identity**

of CEI-rated employers provide employment protections on the basis of gender identity or expression, the highest figure to date. This is the biggest success story of any single criterion in the CEI. The proportion of employers offering these protections has increased dramatically since the first CEI 2002, when just five percent of rated businesses included gender identity in their non-discrimination policies. Now more than three-quarters of all rated businesses afford workplace protections on the basis of gender identity.



These 472 businesses account for 11,167,296 U.S. employees that are afforded protections by their employer instead of the federal government.



#### **CRITERION 2b**

#### **Businesses That Provide Diversity Training Covering Gender Identity OR Have Supportive Gender Transition Guidelines**

of this year's rated businesses have written gender transition guidelines and/or cover gender identity as a topic in diversity training, up from 72 percent last year. A total of 172 employers have transition guidelines, up from 141 last year.

Gender transition guidelines are a tool for human resources and managers to understand the needs of transitioning employees. Successful guidelines clearly delineate responsibilities and expectations of transitioning employees, their supervisors, colleagues and other staff. Should an employee approach a manager or human resource professional with the intention to transition, having gender transition guidelines on file will help to equip all affected parties with necessary information and protocols for a safe and respectful transition.

# **Organizational Competency**

#### **DIVERSITY TRAINING AND METRICS**

Diversity training programs are an important way for employers to elaborate on expectations of fair treatment of employees and to clearly state their individual business case for diversity and inclusion. Trainings may be in-person or webbased modules; credit is given to employers that include "sexual orientation" and "gender identity or expression" as discrete subjects within broader training or as standalone training (criterion 1b and 2b, respectively).

While some employers meet this requirement with basic new-hire training, others have developed fully integrated diversity and inclusion programs that combine lessons on diversity with other trainings that are skills or policybased. For example, a training focused on the professional development of new managers may cover a range of topics including jobrelated software skills, ethics training, and organizational values with respect to promoting diversity and inclusion. Fifty-one percent of this year's rated businesses indicated that they offer such integrated training programs.

Another growing trend in organizational competency is around senior leadership performance evaluations that include diversity and inclusion efforts. Eighteen percent of CEIrated employers allow senior leaders to submit LGBT-focused diversity efforts as part of their annual review of overall leadership on diversity and inclusion goals.

#### **COUNTING LGBT EMPLOYEES**

Unlike other diversity categories such as race and gender, employers are not required by law to collect data on the LGBT people they employ.

But, as the business maxim states: "If you can't measure it, you can't manage it."

Adding LGBT demographic questions to internal surveys allows employers to better understand where they have LGBT employees, and how they perceive their work environment and their engagement levels. Depending on the intended use of the data and the survey norms of the employer, LGBT metrics may be part of anonymous employee engagement or satisfaction surveys or, in more limited instances, confidential HR surveys.

Some employers attempt to gauge their numbers of LGBT employees through employee group participation or domestic partner benefits enrollment, but these methods are inherently limited.

Many employers have begun to quantify the extent to which their LGBT-inclusion efforts have yielded positive results in terms of recruitment and retention. Employers have leveraged these results to strengthen their diversity and inclusion programming.

of CEI-rated employers allow employees to voluntarily disclose their sexual orientation and gender identity on anonymous surveys or confidential HR records.

More information about self-identification programs for LGBT employees is at www.hrc.org/LGBTselfid.

# Health Insurance **Benefits**

Health insurance benefits make up roughly 20 percent of employees' overall compensation. As such, equal benefits are, to many, an issue of equal pay for equal work.

When denied equal coverage, the cost to LGBT workers and their families is profound. HRC rates and gives guidance on two key components of equal health insurance benefits:

- Parity between benefits for different-sex spouses and same-sex partners and
- Health insurance coverage of medically necessary, transition-related treatment and care, and removal of transgender-related exclusions.

Since the 1990s, partner benefits have become standard among top employers; the majority of Fortune 500 companies - 57 percent - provide them. Partner benefits remain an overall low-cost, high-return benefit for businesses. More recently, large employers have started to address health insurance discrimination against transgender individuals, and most have experienced little to no premium increases as a result.

**CRITERION 2c Businesses That** Offer at Least One Transgender-**Inclusive Benefit** 

of CEI-rated employers provide at least one transgender-inclusive health-related benefit. However, 65 percent of those 487 employers meeting criterion 2c do not provide coverage for medical services or treatments related to transition. 319 employers reported either inclusive short-term leave coverage (which generally does not fall under health insurance and its exclusions) or inclusive mental health counseling, or both of these together.

# **Transgender-Inclusive Benefits**

HRC has made working with employers to end health insurance discrimination against transgender people a primary goal. Transgender people are often categorically denied health insurance coverage for medically necessary treatment, irrespective of whether treatment is related to sex affirmation/reassignment.

Up until the last few years, nearly all U.S. employer-based health insurance plans contained "transgender exclusions" that limited insurance coverage for transition-related treatment and other care. For any employee, the denial of coverage for medically necessary services and treatments can be devastating.

Since 2004, CEI survey participants have been asked to examine their insurance policies for transgender exclusions and to ensure that at least one of five general categories of insurance coverage was available without exclusion for transition-related treatment (shortterm leave, counseling by a mental health professional, hormone therapy, medical visits to monitor hormone therapy and surgical procedures). Starting in 2008, participants were required to provide supporting documentation showing that the coverage is available without exclusion, such as:

- a complete list of exclusions (typically found only in the plan contract itself) that does not indicate a transgender exclusion;
- clinical guidelines and/or contract language indicating that treatment would be considered medically necessary (usually under circumstances resembling current or previous versions of the WPATH Standards of Care); or
- other plan documents or employee communications indicating medically necessary treatments would be covered.

Transgender-**Inclusive Benefits:** Proaress

This year marks a change in the overall picture of transition-related health insurance coverage. Twenty-five percent, or 120 employers, do provide coverage for transition-related medical services or treatments, including coverage for hormone replacement therapies and medical visits, as well as short term medical leave. However, 35 of these 120 employers still retain narrow exclusions that do not allow for transition-related surgical procedures to be covered.

# **Ending Benefits Discrimination** and Ensuring Access to **Medically Necessary Care**

As part of HRC's commitment to ending discrimination against transgender people, beginning in calendar year 2011 full credit will be given only to employers offering all benefits-eligible employees (and their dependents) at least one health insurance plan that

- 1. Covers medically necessary treatments without exclusions or limitations specific to transgender individuals or to transition-related care, and
- 2. Conforms to current medical standards of care in determining eligibility and treatment coverage for transition-related services.

See "Rating System & Methodology" on page 17 for more information about the new criteria.

In making these changes HRC's goal remains unchanged. We seek to highlight workplace practices that effectively eliminate discrimination against transgender employees. For the past three years HRC has undertaken a comprehensive review of employer insurance policies and documented tremendous progress. Many businesses have taken significant and substantial steps to remove discrimination from at least one of their health insurance plans for employees and their dependents: Employers of varying size and across industry sectors have successfully introduced coverage inclusive of services related to transgender transition, either at no cost or at a negligible cost. HRC attempts to provide the most accurate information possible with regard to employer benefits. However, HRC is only able to report on information as provided by employers in response to our initial survey and subsequent requests for supplementary information. HRC cannot attest that insurance coverage or other reported benefits will be applied in the same way from business to business or among multiple insurance plans used by the same business.



businesses offer at least one health plan option to all employees that covers many medically necessary transitionrelated services, including both hormone therapies and surgeries related to sex affirmation/reassignment, covering a total of 2,605,819 employees. These businesses are highlighted in the appendices with a "\(\nu\)" under column 2c+.

# Caps and Transition-Related **Coverage: Unnecessary** and Uncommon

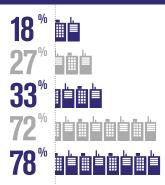
Dollar caps on areas of coverage are often utilized to control for perceived risk. However, such caps also represent insurmountable barriers to care in many cases, and when they limit care for an entire class of people, they are discriminatory. HRC research on utilization has shown that claims costs are extremely low, and therefore risk is low. Only 16 of the 85 businesses (19 percent) reported a financial cap, ranging from \$10,000 to \$150,000, and half of these reported caps of \$75,000 or greater. All of these 16 businesses reporting dollar maximums self-insure this coverage.

Many of the first businesses to implement inclusive coverage place no separate dollar limits on this area of coverage. Of the 85 businesses that reported many transition-related treatments would be covered, 69 businesses (81 percent) had no dollar caps on this coverage.

Although risk of adverse selection is much greater for smaller employers, and those employers are more likely to be fully insured and have less flexibility in plan design, HRC found that numerous smaller fully insured employers have negotiated inclusive benefits with no caps. Of those with caps, the smaller employers tend to have more generous caps while the largest employers tend to have most restrictive caps.

 In-depth interviews with a subset of employers indicated that there had been little or no initial increase in premiums, that both absolute and annual per employee costs attributed to benefit utilization had been minimal, and that there had been no impact on subsequent premiums.

**Companies** that Offer Transgender- 33<sup>16</sup> **Inclusive Benefits** 



85 Offer health benefits for surgical procedures

133 Offer medical visits and lab procedures related to hormone therapy

161 Offer pharmacy benefits for hormone therapy

350 Offer mental health benefits for counseling by a mental health professional

378 Offer short-term leave for surgical procedures

## **Partner Benefits**

Offering partner benefits is a low-cost way for employers to remain competitive by attracting and retaining LGBT and other fair-minded employees. The majority of employers offering partner benefits experience a total financial impact of less than one percent of total benefits cost.

HRC provides extensive resources relating to domestic partner benefits on its website at www.hrc.org/issues/ domestic partner benefits.htm.

#### **CRITERION 3a**

**Businesses That Offer Domestic Partner Health Insurance** 

of CEI-rated employers provide partner health coverage to employees. Of these employers, 66 percent provide them to both same and different-sex partners of employees. Collectively CEI-rated businesses with partner benefits available employ 14,270,268 workers.

HRC looks to employers to provide equal benefits to LGBT employees and their families across the complete package of benefits offered, not just basic health care coverage. HRC does not penalize an employer if a particular benefit is not offered to any employees.

**CEI-Rated Businesses that** Offer COBRA/ **COBRA-Like Continuation** Coverage

Job loss is devastating for all employees and their families. For LGBT employees and their families, the loss of a job can have a doubly devastating impact since the federal mandates under the Consolidated Omnibus Budget Reconciliation Act (COBRA) do not cover same-sex partners and their dependents. However, 87 percent of CEI-rated employers have implemented COBRA-equivalent coverage to ensure that LGBT workers and their families can still access continued healthcare coverage.

#### **FINDINGS / Health Insurance Benefits**

#### **CRITERION 3b**

**Businesses That Offer Domestic Partners Dental,** Vision, COBRA and **Dependent Coverage Benefits** 

The percent of companies providing comprehensive health benefits such as dental, vision, dependent medical and COBRAequivalent continuation coverage, increased to 86 percent this year.

#### **CRITERION 3c**

**Businesses That Offer** at Least Three Other "Soft" Benefits for **Domestic Partners** 

Similarly, the extension of other "soft" benefits such as Family and Medical Leave Act (FMLA)-equivalent leave benefits, bereavement leave, retirement benefits and employee discounts, increased to 92 percent this year. The CEI requires that at least three benefits be offered equally to partners as they are to different-sex spouses. Those "soft" benefits most often extended to partners include bereavement leave (89 percent of rated employers), employee assistance programs (88 percent), FMLA-like leave (82 percent), employee discounts



Employers offer partner health insurance

Employers offer partner dental, vision, COBRA and dependent coverage benefits

Employers offer at least three other "soft" benefits for partners

## **Retirement Benefits**

Forty-seven percent of CEI-rated employers extend retiree health care coverage to domestic partners.

The Pension Protection Act of 2006 (PPA) changed the way that retirement plan benefits may be paid after a participant passes away. The PPA allows non-spouse beneficiaries, including employees' partners, to roll their inherited retirement benefits directly to an individual retirement account or annuity (an "IRA"). The Worker, Retiree and Employer Recovery Act of 2008 (WRERA) contained technical corrections to the PPA – as a result, all qualifying retirement plans must implement the non-spouse rollover provision as of Jan. 1, 2010. More information about implementing the PPA and WRERA is available at www.hrc.org/issues/8606.htm.

Businesses were asked about their retirement plan distribution options for informational purposes this year. Forty-two percent of CEI-rated employers indicated that they have made their rollover provisions available to samesex partners.

HRC continued to survey employers with pensions on whether they provided survivor options for domestic partners of employees, either in the form of Qualified Joint and Survivor Annuities (QJSAs) or Qualified Pre-retirement Survivor Annuities (QPSAs). Thirty-seven percent of CEIrated employers volunteered data indicating that they offer QJSAs to their employees' domestic partners, while 28 percent offer QPSAs.



of CEI-rated employers extend retiree health care coverage to domestic partners

of employers provided data indicating that they have made their rollover provision available to same-sex partners

# LGBT Employee Groups and **Diversity Councils**

Having a formally recognized employee resource group (also known as an ERG, employee network group or affinity group) for lesbian, gay, bisexual and transgender workers is a cornerstone of visible LGBT inclusion.

LGBT ERGs can foster a sense of community within an employer's walls as well as provide leadership opportunities for LGBT employees to better their own work environments. In addition, many ERGs' reach extends beyond the everyday affairs of an employer to policymaking, representing the employer at professional events and external activities, participating in prospective employee recruitment efforts, mentoring and other retention-focused programming.

Businesses usually provide these groups with a budget and access to resources, such as meeting rooms and e-mail networks. The groups provide a clear line of communication between employees and management, ensuring that policies and practices have their intended effect. LGBT ERGs also help to provide a sense of safety and acceptance for LGBT employees within the workplace.

Recognizing the differences in businesses rated in the CEI, criterion 4 can also be met with an organizationwide diversity council or working group with a mission that specifically includes LGBT diversity.

More information on ERGs and helpful tips on forming them are available at www.hrc.org/issues/workplace/diversity/GLBT\_employee\_groups.htm.

#### **CRITERION 4**

**Businesses That Have Employer-Supported Employee Resource Groups OR Firm-Wide Diversity Councils** 



of CEI-rated employers have an employee resource group or diversity council that includes LGBT issues. 62 percent have employee groups, 33 percent have diversity councils and 37 percent of rated employers have both. 93 percent of employee groups are sponsored by an executive champion.

# **Public Engagement**

The CEI recognizes employers that "come out" and demonstrate their commitment to LGBT inclusion by publicly engaging with the broader LGBT community. Efforts such as positive, direct marketing and advertising; philanthropic activities; and event sponsorships send a clear message to current and prospective LGBT employees that they are not only accepted by the organization, but valued.

Many businesses engage LGBT consumers directly through local or national marketing and advertising in LGBT media. LGBT-specific messages in general media and sponsorships of LGBT organizations or events reflect how consumer-facing businesses are vying to capture a portion of the ever-growing LGBT marketplace. For example, businesses supporting Pride celebrations are establishing connections with LGBT consumers in strategic geographic markets.

Corporate philanthropic activities ranging from financial support to in-kind donations of products or services can bolster a business's profile in the LGBT community. Corporate giving to organizations promoting LGBT health, education or political efforts further demonstrates this commitment to broader LGBT equality.

Typically, these efforts have a strategic connection to the core mission of a business, such as a law firm's pro bono legal support of organizations tasked with direct legal representation of LGBT individuals, or travel and entertainment organizations contributing to LGBT tourism efforts.

Businesses have also stepped up their support of the LGBT community by joining HRC's Business Coalition for Benefits Tax Equity and The Business Coalition for Workplace Fairness, among other efforts to promote

**CRITERION 5** 

**Businesses That Positively Engage** the External **LGBT Community** 



of CEI-rated businesses report some form of external engagement with the LGBT community, through marketing, advertising and recruitment efforts or philanthropic contributions to LGBT organizations.

#### **FINDINGS / Public Engagement**

LGBT equality under the law. These two groups of leading U.S. employers have signified their support of legislative efforts to end discrimination of LGBT employees and treat them the same as other workers across the country.

#### SUPPLIER DIVERSITY PROGRAMS

Supplier diversity programs ensure that the procurement process includes specific opportunities for minorityowned businesses, including women-owned, veteran-owned and, more recently, LGBT-owned businesses.

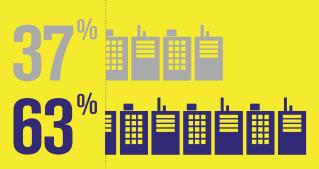
Supplier diversity initiatives have existed in the business community for at least three decades, going back to the inception of such nationwide groups as the National Association of Women Business Owners and the National Minority Business Council, both founded in the early 1970s to promote the inclusion of these underutilized entrepreneurial groups. Furthermore federal initiatives exist to give more equitable opportunities to those would-be small business owners who are more likely to face social and practical barriers to success. For example, the Center for Veterans Enterprise is designed to assist U.S. veterans in starting their own private business.

The National Gay and Lesbian Chamber of Commerce began certifying LGBT-owned small businesses in 2002, a process that requires substantiation of majority LGBT ownership in a business and verification of a business's good standing in the community.

Supplier diversity initiatives are a win-win relationship for both the LGBT-owned small businesses and the businesses that contract them. By courting LGBT-owned businesses, 21 percent of this year's rated companies and law firms demonstrated their commitment to LGBT inclusion, and now reap the benefits of working with businesses in the diverse communities in which they operate.

There has been a steady increase in the number of organizations with supplier diversity programs that include LGBT-owned businesses. This year's CEI saw a seven percent rise in LGBT-specific supplier diversity efforts.

HRC provides extensive resources on external engagement on its website at http://www.hrc.org/issues/workplace/diversity/external-engagement.htm.



129 Employers include LGBT businesses in their supplier diversity program

223 Employers do not include LGBT businesses in their supplier diversity program

Pages 38 - 63

Criterion 1a	Prohibits Discrimination Based on Sexual Orientation (15 points)
Criterion 1b	Provides Diversity Training Covering Sexual Orientation (5 points)
Criterion 2a	Prohibits Discrimination Based on Gender Identity or Expression (15 points)
Criterion 2b	Provides Diversity Training Covering Gender Identity OR Has Supportive Gender Transition Guidelines (5 points)
Criterion 2c	Offers Transgender-Inclusive Insurance Coverage for at Least One Type of Benefit (5 points
Criterion 2c+	Offers Transgender-Inclusive Insurance Coverage, Including Surgical Procedures (🗸)
Criterion 3a	Offers Partner Health Insurance (15 points)
Criterion 3b	Offers Partner Dental, Vision, COBRA and Dependent Coverage Benefits (5 points)
Criterion 3c	Offers at Least Three Other "Soft" Benefits for Partners (5 points)
Criterion 4	Has Employer-Supported Employee Resource Group OR Firm-Wide Diversity Council (15 points) Would Support ERG if Employees Express Interest (half credit ▶)
Criterion 5	Positively Engages the External LGBT Community (15 points)
Criterion 6	<b>Responsible Citizenship</b> Employers will have 15 points deducted from their score for a large-scale official or public anti-LGBT blemish on their recent records (-15 points)

Ratings in Gray: Unofficial rating of the Fortune 500 companies that have not responded to repeated invitations to the CEI survey. These ratings are based on publicly available information as well as information submitted to HRC from unofficial LGBT employee groups or individual employees.

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	stuiod 51 a	1b 5 points	2 15 points	2b Spoints	2c 5 points	<b>√</b> 2c+	<b>8</b> 15 points	<b>qp</b> 5 points	S 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
3M Co.	St. Paul, MN	•	•	•	•	•	V	•	•	•	•	•	-15	85	100	95	
A.T. Kearney Inc.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
AAA Northern California, Nevada and Utah	Walnut Creek, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Abbott Laboratories	Abbott Park, IL	•	•		•	•		•	•	•	•	•		85	80	80	
Abercrombie & Fitch Co.	New Albany, OH	•	•	•	•	•		•	•	•	•	•		100	100	607	
AbitibiBowater Inc.	Greenville, SC													o		379	
Accenture Ltd.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Acer Inc.	Irvine, CA	•	•			•		•	•	•				50	50		
Adecco North America LLC	Melville, NY	•	•	•	•	•		•	•	•		•		85	85		
Adobe Systems Inc.	San Jose, CA	•	•	•	•			•	•	•	•	•		95	95	601	
Advance Auto Parts (Advance Holding)	Roanoke, VA	•		•										30		461	
Advanced Micro Devices Inc.	Sunnyvale, CA	•	•	•	•	•		•	•	•	•	•		93	75	418	
AECOM Technology Corp.	Los Angeles, CA	•						•						30		458	
AEGON USA Inc.	Cedar Rapids, IA		•		•	•		•	•	•				40	40		
AES Corp., The	Arlington, VA	•												15		158	
Aetna Inc.	Hartford, CT	•	•	•	•	•	V	•	•	•	•	•		100	100	77	
Affiliated Computer Services	Dallas, TX	•	•					•	•	•		•		60	60	401	
AFLAC Inc.	Columbus, GA	•		•										30		152	
Agco	Duluth, GA	•												15		306	
Agilent Technologies Inc.	Santa Clara, CA	•	•	•	•	•		•	•	•	•	•		100	100	425	
Ahold USA Inc.	Quincy, MA	•	•	•	•	•		•	•	•	•			78	78		
AIG	New York, NY	•	•	•	•	•		•	•	•	•	•		100	85		
Air Products & Chemicals Inc.	Allentown, PA	•	•	•	•	•		•	•	•	•	•		100	75	248	
AK Steel Holding Corp.	West Chester, OH													0		334	
Akin, Gump, Strauss, Hauer & Feld LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		31
Alaska Air Group Inc.	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100	591	
Alcatel-Lucent	Murray Hill, NJ	•	•	•	•	•	V	•	•	•	•	•		100	100		
Alcoa Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	90	
Aleris International Inc.	Beachwood, OH													0		413	
Allegheny Energy Inc.	Greensburg, PA	•	•		•			•		•				45	45	630	
Allegheny Technologies Inc.	Pittsburgh, PA	•		•										30		448	
Alliant Energy Corp.	Madison, WI	•	•		•			•	•	•	•	•		80	80	588	
Alliant Techsystems Inc.	Minneapolis, MN	•	•	•		•		•	•	•				65	65	539	

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	15 points	<b>1b</b> 5 points	15 points	5 points	2c Spoints	<b>√</b> 2c+	3a 15 points	3b 5 points	3C 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Allianz Life Insurance Co. of North America	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Allscripts-Misys Healthcare Solutions Inc.	Chicago, IL	•						•		•	•			43			
Allstate Corp., The	Northbrook, IL		•	•	•	•		•	•	•	•	•		100	100	81	
Alston & Bird LLP	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		50
Altria Group Inc.	Richmond, VA	•	•					•						35		160	
Amazon.com Inc.	Seattle, WA	•	•	•		•		•	•	•	•	•		95	95	130	
AMC Entertainment Inc.	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100	777	
Ameren Corp.	St. Louis, MO	•	•		•	•			•	•	•	•		70	70	327	
American Eagle Outfitters Inc.	Pittsburgh, PA	•	•	•	•	•		•	•	•	)	•		93		690	
American Electric Power Co. Inc.	Columbus, OH	•												15		180	
American Express Co.	New York, NY	•	•	•	•	•	v	•	•	•	•	•		100	100	74	
American Family Insurance Group	Madison, WI	•	•	•	•	•		•		•	•	•		88	88	388	
Ameriprise Financial Inc.	Minneapolis, MN	•	•	•	•	•	V	•	•	•	•	•		100	100	348	
AmerisourceBergen Corp.	Chesterbrook, PA	•						•						30		26	
Amgen Inc.	Thousand Oaks, CA	•	•		•	•		•	•	•	•			70	70	168	
AMR Corp. (American Airlines)	Fort Worth, TX	•	•	•	•	•		•	•	•	•	•		100	100	104	
AmTrust Bank	Cleveland, OH	•	•	•	•	•		•			Þ	•		83	83		
Anadarko Petroleum	The Woodlands, TX													0		162	
Andrews Kurth LLP	Houston, TX	•	•	•	•	•		•		•	•	•		95	70		104
Anheuser-Busch Companies Inc.	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100		
Anixter International Inc.	Glenview, IL	•		•										30		404	
Aon Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	307	
Apache Corp.	Houston, TX	•		•										30		217	
Apple Inc.	Cupertino, CA	•	•	•	•	•		•	•	•	•	•		100	100	71	
Applied Materials Inc.	Santa Clara, CA	•	•	•	•	•		•	•	•	•	•		100	100	315	
Aramark Corp.	Philadelphia, PA	•	•	•				•	•	•	•	•		90	75	198	
Archer Daniels Midland Co.	Decatur, IL	•						•	•	•				40		27	
Arent Fox LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		122
Arnold & Porter LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		56
Arrow Electronics	Melville, NY	•												15		151	
ArvinMeritor Inc.	Troy, MI	•						•						30		346	
Asbury Automotive Group	Duluth, GA	•												15		486	
Ashland Inc.	Covington, KY	•						•						30		310	

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	1b 5 points	2 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>3p</b> 5 points	3c 5 points	. 15 pts 7.5 pts	<b>9</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Assurant	New York, NY	•												15		299	
Astellas Pharma US, Inc.	Deerfield, IL	•	•		•	•		•	•	•	Þ			63			
AstraZeneca PLC	Wilmington, DE	•	•			•		•	•	•	•	•		80	80		
AT&T Inc.	Dallas, TX	•	•	•	•	•	v	•	•	•	•	•		100	100	8	
Atmos Energy Corp.	Dallas, TX	•		•										30		343	
Austin Radiological Assn.	Austin, TX	•				•		•	•	•	Þ			53	53		
Autoliv Inc.	Auburn Hills, MI	•		•										30		386	
Automatic Data Processing Inc.	Roseland, NJ	•	•	•	•	•		•	•	•	•	•		100	100	297	
AutoNation Inc.	Fort Lauderdale, FL	•												15		182	
Auto-Owners Insurance Group	Lansing, MI													0		476	
AutoZone Inc.	Memphis, TN	•	•		•									25	25	380	
Avaya Inc.	Basking Ridge, NJ	•	•	•	•	•	V	•	•	•	•			85	85		
Avery Dennison	Pasadena, CA	•												15		376	
Avis Budget Group Inc.	Parsippany, NJ	•	•		•	•		•		•	•	•		80	80	411	
Avnet Inc.	Phoenix, AZ	•	•			•		•	•	•	•			65	30	144	
Avon Products Inc.	New York, NY	•		•		•		•	•	•	•	•		90	90	255	
B J's Wholesale Club	Natick, MA	•												15		269	
Bain & Co. Inc. (& Bridgespan Group Inc.)	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Baker & Daniels LLP	Indianapolis, IN	•	•	•	•	•		•	•	•	•	•		100	100		172
Baker & McKenzie	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	95		2
Baker Botts LLP	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		43
Baker Hughes Inc.	Houston, TX	•												15		227	
Baker, Donelson, Bearman, Caldwell & Berkowitz PC	Memphis, TN	•	•		•			•			•	•		70	70		115
Baldor Electric Co.	Fort Smith, AR	•	•											20	20	910	
Ball Corp.	Broomfield, CO		•			•		•	•	•	Þ			43	43	336	
Ballard Spahr LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		96
Bank of America Corp.	Charlotte, NC	•	•	•	•	•	V	•	•	•	•	•		100	100	11	
Bank of New York Mellon Corp., The (BNY Mellon)	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	156	
Barclays Capital	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	95		
Barnes & Noble Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	455	
BASF Corp.	Florham Park, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Bausch & Lomb Inc.	Rochester, NY	•	•	•	•	•		•	•	•	•	•		100	100		

						C	riterio	n (see	page	37)							
Employer	Headquarters Location	12 points	d 5 points	stuiod £1. 2a	2b spoints	5 points	<b>√</b> 2c+	<b>38</b> 15 points	<b>qs</b> 5 points	S 5 points	♣ 15 pts № 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Baxter International Inc.	Deerfield, IL	•	•			•		•	•	•	•	•		80	80	219	
Bayer Corp.	Pittsburgh, PA	•	•		•	•		•	•	•	•	•		85	80		
BB&T Corp.	Winston-Salem, NC	•	•	•		•		•	•	•	•	•		88	73	260	
Becton, Dickinson and Co.	Franklin Lakes, NJ	•						•		•				35		347	
Bed Bath & Beyond Inc.	Union, NJ	•		•										30		355	
Berkshire Hathaway Inc.	Omaha, NE	•												15		13	
Best Buy Co. Inc.	Richfield, MN	•	•	•	•	•		•	•	•	•	•	-15	85	100	56	
Big Lots	Columbus, OH	•												15		498	
Bingham McCutchen LLP	Boston, MA	•	•	•	•	•	V	•	•	•	•	•		100	100		32
BJ Services Company	Houston, TX													o		438	
Black & Decker Corp., The	Towson, MD	•	•		•	•		•		•				50	50	408	
BlackRock	New York, NY													0		469	
Blockbuster Inc.	Dallas, TX	•	•					•	•	•				45		450	
Blue Cross Blue Shield of Florida Inc.	Jacksonville, FL	•	•	•	•	•		•	•	•	•	•		100	100		
Blue Cross Blue Shield of Minnesota	Eagan, MN	•	•	•	•			•	•	•	•	•		95			
Blue Cross Blue Shield of North Carolina	Durham, NC	•	•	•		•		•		•	•	•		90	90		
BMC Software Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100	994	
BNP Paribas	New York, NY	•	•	•	•	•		•	•	•	•	•		100			
Boehringer Ingelheim USA Corp.	Ridgefield, CT	•	•	•	•	•		•	•	•	•	•		100	100		
Boeing Co.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	34	
Bon-Ton Stores, Inc.	York, PA	•	•	•	•	•		•	•	•	•	•		100		654	
Booz Allen Hamilton Inc.	McLean, VA	•	•	•	•	•	V	•	•	•	•	•		100	100		
Borders Group Inc.	Ann Arbor, MI	•	•	•	•	•		•	•	•	•	•		100	100	639	
BorgWarner Inc.	Auburn Hills, MI	•		•										30		453	
Boston Consulting Group	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Boston Scientific Corp.	Natick, MA	•						•						30		320	
BP America Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		
Bridgestone Americas Holding Inc.	Nashville, TN	•	•	•	•	•				•	•	•		80	80		
Bright Horizons Family Solutions Inc.	Watertown, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Brightpoint, Inc.	Indianapolis, IN	•												15		496	
Brinker International Inc.	Dallas, TX	•	•	•	•	•		•	•	•	•	•		100	100	533	
Bristol-Myers Squibb Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	120	
Broadcom Corp.	Irvine, CA	•												15		495	

						C	riterio	n (see	page	37)							
Employer	Headquarters Location	12 points	1b	2a 15 points	spoints	stuiod 9 CC	<b>√</b> 2c+	3a 15 points	gb 5 points	3c 5 points	♣ 15 pts	<b>GI</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Broadridge Financial Solutions Inc.	Lake Success, NY	•	•	•				•	•	•	•	•		83		835	
Brown Rudnick LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		166
Brown Shoe Company, Inc.	St. Louis, MO	•	•			•		•		•	•	•		75		828	
Brown-Forman Corp.	Louisville, KY	•	•	•	•	•		•	•	•	•	•		100	85	758	
Brunswick Corp.	Lake Forest, IL	•												15		491	
Bryan Cave LLP	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100		58
Burger King Corp.	Miami, FL	•	•			•		•	•	•	Þ	•		73	68	790	
Burlington Northern Santa Fe Corp.	Fort Worth, TX	•	•											20	20	142	
C&S Wholesale Grocers Inc.	Keene, NH	•				•		•	•					40	40		
C. H. Robinson Worldwide	Eden Prairie, MN	•												15		300	
Cablevision Systems Corp.	Bethpage, NY	•						•						30		342	
Cadwalader, Wickersham & Taft LLP	New York, NY	•	•	•	•			•	•	•	•	•		95	95		57
Calpine Corp.	Houston, TX	•						•	•	•	Þ			48	48	272	
Cameron International Corp.	Houston, TX													0		421	
Campbell Soup Co.	Camden, NJ	•	•	•	•	•	V	•	•	•	•	•		100	100	309	
Canadian Imperial Bank of Commerce	New York, NY	•	•	•	•			•	•	•	•	•		95	95		
Capgemini U.S.	New York, NY	•	•					•	•	•	•			60	60		
Capital One Financial Corp.	McLean, VA	•	•	•	•	•		•	•	•	•	•		100	100	145	
Cardinal Health Inc.	Dublin, OH	•	•	•	•	•	V	•	•	•	•	•		100	100	18	
CareFusion Corp.	San Diego, CA	•	•	•		•		•		•	•			75			
Cargill Inc.	Wayzata, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Carlson Companies Inc.	Minnetonka, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Carlton Fields PA	Tampa, FL	•	•	•	•	•	~	•	•	•	•	•		100	100		162
Carmax Inc.	Richmond, VA	•	•	•	•	•		•	•	•	•	•		100	100	311	
Caterpillar Inc.	Peoria, IL	•	•	•	•					•	•	•		75	75	44	
CBS Corp.	New York, NY	•		•				•						45		186	
CC Media Holdings Inc. (Clear Channel)	San Antonio, TX	•	•	•	•	•		•	•	•	•	•		100	100	372	
CDW Corp.	Vernon Hills, IL	•	•	•	•	•		•	•	•	•	•		100	88		
Celanese Corp.	Dallas, TX	•												15		368	
CenterPoint Energy Inc.	Houston, TX	•												15		238	
Centex Corp.	Dallas, TX	•												15		308	
Cerner Corp.	Kansas City, MO	•	•	•	•			•	•	•	Þ			73	73		
CH2M HILL Companies Ltd.	Englewood, CO	•	•		•			•	•	•	•	•		80	80	436	

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	a 15 points	d 5 points	stuiod 51 2a	stuiod 2 <b>2b</b>	5 points	<b>√</b> 2c+	<b>38</b> 15 points	<b>qg</b> 5 points	S 5 points	♣ 15 pts № 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Chadbourne & Parke LLP	New York, NY	•	•	•	•			•	•	•	•	•		95	90		95
Chamberlin Edmonds & Associates Inc.	Atlanta, GA	•				•		•	•	•	•			53	53		
Chapman and Cutler LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		168
Charles Schwab Corp., The	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	440	
Charter Communications	St. Louis, MO	•												15		385	
Chesapeake Energy Corp.	Oklahoma City, OK	•												15		230	
Chevron Corp.	San Ramon, CA	•	•	•	•	•		•	•	•	•	•		100	100	3	
Choate, Hall & Stewart LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100			158
Choice Hotels International Inc.	Silver Spring, MD	•	•	•	•	•		•		•	•	•		95	90		
Chrysler Group LLC	Auburn Hills, MI	•	•	•	•	•	V	•	•	•	•	•		100	100		
CHS Inc.	Inver Grove Hts, MN													0		72	
Chubb Corp.	Warren, NJ	•	•	•	•	•		•	•	•	•	•		100	100	203	
CIGNA Corp.	Philadelphia, PA	•	•	•	•			•	•	•	•	•		95	95	132	
Cisco Systems Inc.	San Jose, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	57	
CIT Group Inc.	New York, NY	•						•						30		397	
Citigroup Inc.	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100	12	
Cleary, Gottlieb, Steen & Hamilton LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		18
Clifford Chance US LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		
Clorox Co.	Oakland, CA	•	•	•	•	•		•	•	•	•	•		100	100	452	
CMS Energy Services	Jackson, MI	•												15		369	
CNA Insurance	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Coca-Cola Co., The	Atlanta, GA	•	•	•	•	•	V	•	•	•	•	•		100	100	73	
Coca-Cola Enterprises Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	116	
Colgate-Palmolive Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	95	166	
Comcast Corp.	Philadelphia, PA	•	•	•	•			•	•	•	•	•		95	95	68	
Comerica Inc.	Dallas, TX	•	•	•	•	•		•		•	•	•		95	80	559	
Commercial Metals	Irving, TX													0		251	
Community Health Systems Inc.	Franklin, TN													0		243	
Compass Group USA Inc.	Charlotte, NC	•	•		•			•	•	•				50	50		
Computer Sciences Corp. (CSC)	Falls Church, VA	•	•	•	•	•		•	•	•	•			85	85	153	
Compuware Corp.	Detroit, MI	•	•	•	•	•		•	•	•	•	•		93	93		
ConAgra Foods Inc.	Omaha, NE	•	•	•		•		•	•	•	•	•		95	90	188	
ConocoPhillips	Houston, TX	•	•		•	•		•	•	•	•			70	70	4	

						Cı	riterio	n (see	page (	37)							
Employer	Headquarters Location	12 points	1b 5 points	22 15 points	<b>5</b> points	2c 5 points	<b>√</b> 2c+	3a 15 points	<b>qs</b> 5 points	3C 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
CONSOL Energy Inc.	Canonsburg, PA	•												15		497	
Consolidated Edison Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	95	191	
Constellation Energy Group Inc.	Baltimore, MD	•	•	•	•	•		•	•	•	•	•		100	100	125	
Continental Airlines Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100	167	
Convergys Corp.	Cincinnati, OH	•	•		•	•		•		•	•	•		80	80	721	
Con-way Inc.	San Mateo, CA	•												15		470	
Cooper Tire & Rubber Co.	Findlay, OH		•	•	•						Þ			33	33	707	
Corbis Corp.	Seattle, WA	•	•	•		•		•	•	•		•		80	80		
CoreLogic	Westlake, TX	•	•	•	•	•		•	•	•	•	•		100		398	
Corning Inc.	Corning, NY	•	•	•	•	•		•	•	•	•	•		100	100	414	
Costco Wholesale Corp.	Issaquah, WA	•	•	•	•	•		•	•	•	•	•		100	100	24	
Coventry Health Care	Bethesda, MD	•												15		226	
Covington & Burling LLP	Washington, DC	•	•	•	•	•	V	•	•	•	•	•		100	100		54
Cox Enterprises Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		
Cracker Barrel Old Country Store Inc.	Lebanon, TN	•	•			•					•	•		55	15	807	
Cravath, Swaine & Moore LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		52
Credit Suisse USA Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Crosstex Energy, Inc.	Dallas, TX													o		479	
Crowell & Moring LLP	Washington, DC	•	•	•	•	•	V	•	•	•	•	•		100	95		91
Crown Holdings	Philadelphia, PA	•												15		312	
CSX Corp.	Jacksonville, FL	•	•	•	•			•	•	•	•	•		95	75	240	
Cummins Inc.	Columbus, IN	•	•	•	•	•	V	•	•	•	•	•		100	100	181	
CUNA Mutual Insurance Group	Madison, WI	•						•		•	•	•		65	65	792	
CVR Energy Inc.	Sugar Land, TX	•												15		472	
CVS Caremark Corp.	Woonsocket, RI	•	•	•				•	•	•	•	•		90	90	19	
Dana Holding Corp.	Toledo, OH	•	•											20	20	316	
Danaher Corp.	Washington, DC	•												15		213	
Darden Restaurants Inc.	Orlando, FL	•	•			•		•	•	•	•	•		80	80	374	
Davis Wright Tremaine LLP	Seattle, WA	•	•	•	•	•		•		•	•	•		95	95		109
Davis, Polk & Wardwell LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		30
DaVita Inc.	El Segundo, CA	•						•						30		433	
Dean Foods Co.	Dallas, TX	•	•			•		•	•	•	Þ	•		73	73	216	
Debevoise & Plimpton LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		33

						C	riterio	n (see	page	37)							
Employer	Headquarters Location	15 points	1b 5 points	22 15 points	2b Spoints	stuiod 9	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	<b>36</b> 5 points	♣ 15 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Deere & Co.	Moline, IL	•	•						•	•	)			38	33	87	
Dell Inc.	Round Rock, TX	•	•	•	•	•		•	•	•	•	•		100	100	33	
Deloitte LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		
Delphi Corp.	Troy, MI	•						•						30		121	
Delta Air Lines Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	111	
Deutsche Bank	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		
Devon Energy Corp.	Oklahoma City, OK	•		•										30		163	
Dewey & LeBoeuf LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		13
Diageo North America	Norwalk, CT	•	•	•	•	•	V	•	•	•	•	•		100	100		
Dickstein Shapiro LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		87
Dillard's Inc.	Little Rock, AR	•												15		358	
DIRECTV	El Segundo, CA	•												15		126	
Discover Financial Services	Riverwoods, IL	•		•		•		•			•			58	58	352	
DISH Network Corp.	Englewood, CO													o		231	
DLA Piper	Baltimore, MD	•	•	•	•	•	V	•	•	•	•	•		100	100		11
Dole Food Co. Inc.	Westlake Village, CA	•	•		•			•	•					45	45	329	
Dollar General Corp.	Goodlettsville, TN													0		259	
Dollar Thrifty Automotive Group Inc.	Tulsa, OK	•	•	•	•	•		•	•	•	Þ	•		93	93		
Dollar Tree Stores, Inc.	Chesapeake, VA	•												15		499	
Dominion Resources Inc.	Richmond, VA	•	•	•	•			•	•	•	•	•		95	95	157	
Domino's Pizza Inc.	Ann Arbor, MI	•	•			•				•	•	•		60	60		
Domtar Corp.	Fort Mill, SC	•												15		390	
Dorsey & Whitney LLP	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100		73
Dover Corp.	New York, NY	•												15		333	
Dow Chemical Co., The	Midland, MI	•	•	•	•	•		•	•	•	•	•		100	100	38	
DR Horton Inc.	Fort Worth, TX	•		•										30		378	
Dr Pepper Snapple Group Inc.	Plano, TX	•												15		427	
Drinker Biddle & Reath LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	95		71
DTE Energy Co.	Detroit, MI	•	•			•		•		•	•	•		75	75	285	
Duane Morris LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		72
Duke Energy Corp.	Charlotte, NC	•	•		•			•	•	•	•	•		80	80	204	
Dun & Bradstreet Corp., The	Short Hills, NJ	•						•	•					35	35	995	
Dykema Gossett PLLC	Detroit, MI	•				•		•	•	•	•	•		75	80		145

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	1b 2 boints	2a 15 points	2b Spoints	spoints 20	<b>√</b> 2c+	3a 15 points	ds 5 points	3C 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
E&J Gallo Winery	Modesto, CA	•	•	•	•	•		•		•	•	•		95			
E*TRADE Financial Corp.	New York, NY	•	•	•	•	•		•	•	•	Þ	•		93	93	659	
E. I. du Pont de Nemours and Co. (DuPont)	Wilmington, DE	•	•	•	•	•	v	•	•	•	•	•		100	100	75	
EarthLink Inc.	Atlanta, GA	•	•	•	•			•	•	•	Þ	•		88	88		
Eastman Chemical Co.	Kingsport, TN	•												15		364	
Eastman Kodak Co.	Rochester, NY	•	•	•	•	•	V	•	•	•	•	•		100	100	284	
Eaton Corp.	Cleveland, OH	•						•						30		164	
eBay Inc.	San Jose, CA	•	•	•	•	•		•	•	•	•	•		100	100	303	
Ecolab Inc.	St. Paul, MN	•	•	•	•	•		•	•	•	•	•		100	100	403	
Edison International	Rosemead, CA	•	•	•				•						50		184	
Edwards Angell Palmer & Dodge LLP	Boston, MA	•	•	•	•	•	V	•	•	•	•	•		100	100		85
El Paso Corp.	Houston, TX	•						•						30		443	
Electronic Arts Inc.	Redwood City, CA	•	•	•	•	•		•	•	•	•	•		100	100	590	
Eli Lilly & Co.	Indianapolis, IN	•	•	•	•	•		•	•	•	•	•		100	100	122	
Embarq Corp.	Overland Park, KS	•		•										30		405	
EMC Corp.	Hopkinton, MA	•	•	•	•			•	•	•	•	•		95	95	172	
EMCOR Group Inc.	Norwalk, CT	•						•						30		370	
Emerson Electric Co.	St. Louis, MO	•	•		•	•						•		45	45	94	
Enbridge Energy Partners	Houston, TX	•												15		268	
Energy Future Holdings Corp.	Dallas, TX	•												15		237	
Energy Transfer Partners, LP	Dallas, TX													0		286	
Entergy Corp.	New Orleans, LA	•	•	•	•			•	•	•	•	•		95	95	205	
Enterprise GP Holdings LP	Houston, TX	•												15		65	
Enterprise Rent-A-Car Co.	St. Louis, MO	•	•		•			•	•	•	•	•		80	80		
EOG Resources	Houston, TX	•												15		350	
Epstein Becker & Green PC	New York, NY	•	•			•		•	•	•	•	•		80	80		136
Ernst & Young LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		
Estee Lauder Companies	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	325	
Esurance Inc.	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Exelon Corp.	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	95	134	
Expedia Inc.	Bellevue, WA	•	•			•		•	•	•	•	•		80	65	699	
Expeditors International of Washington, Inc.	Seattle, WA	•												15		434	
Express Scripts Inc.	St. Louis, MO	•						•						30		115	

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	stuiod St. a	1b 5 points	2 15 points	5 points	5 points	<b>√</b> 2c+	<b>3a</b> 15 points	<b>qp</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Exxon Mobil Corp.	Irving, TX		•		•								-15	0	0	1	
Faegre & Benson LLP	Minneapolis, MN	•	•	•	•	•	V	•		•	•	•		95	100		86
Family Dollar Stores	Matthews, NC													0		359	
Federal Home Loan Mortgage Corp. (Freddie Mac)	McLean, VA	•	•	•	•	•	~	•	•	•	•	•		100	100	220	
Federal National Mortgage Association (Fannie Mae)	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100	112	
FedEx Corp.	Memphis, TN	•	•	•	•	•				•	•	•		80	70	59	
Fenwick & West LLP	Mountain View, CA	•	•	•	•	•		•	•	•	•	•		100	100		134
Fifth Third Bancorp	Cincinnati, OH	•	•			•		•		•	•	•		75	80	302	
Finnegan, Henderson, Farabow, Garrett & Dunner LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		74
First Data Corp.	Greenwood Village, CO	•												15		295	
FirstEnergy Corp.	Akron, OH	•												15		194	
Fiserv Inc.	Brookfield, Wl	•												15		482	
Fish & Richardson PC	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	95		70
Fluor Corp.	Irving, TX	•												15		114	
FMC Technologies Inc.	Houston, TX	•												15		460	
Foley & Lardner LLP	Milwaukee, WI	•	•	•	•	•		•	•	•	•	•	-15	85	85		35
Foley Hoag LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		157
Food Lion LLC	Salisbury, NC	•	•	•	•	•		•	•	•	•	•		100	100		
Foot Locker	New York, NY	•												15		454	
Ford Motor Co.	Dearborn, MI	•	•	•	•	•	~	•	•	•	•	•		100	100	7	
Fortune Brands Inc.	Deerfield, IL	•												15		351	
FPL Group Inc.	Juno Beach, FL	•												15		154	
Franklin Resources Inc.	San Mateo, CA	•	•			•		•	•	•				50	50	410	
Freeport-McMoRan Copper & Gold Inc.	Phoenix, AZ	•												15		146	
Freescale Semiconductor Inc.	Austin, TX	•	•	•	•	•		•	•	•	•	•		100	100	457	
Fried, Frank, Harris, Shriver & Jacobson LLP	New York, NY	•	•	•	•	•	~	•	•	•	•	•		100	100		60
Frontier Oil Corp.	Houston, TX													0		383	
Frost Brown Todd LLC	Cincinnati, OH	•	•	•	•			•	•	•	•	•		95	85		167
Fulbright & Jaworski LLP	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		36
GameStop Corp.	Grapevine, TX	•	•	•	•	•		•	•	•	•	•		100	100	296	
Gannett Co. Inc.	McLean, VA	•	•			•		•	•	•	•			65	65	371	
Gap Inc.	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	178	I

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	a 15 points	d 5 points	stuod St. 2a	2b Spoints	5 points	<b>√</b> 2c+	3a 15 points	<b>qg</b> 5 points	S 5 points	♣ 15 pts ₱ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Gastronomy Inc.	Salt Lake City, UT	•	•	•				•	•		)	•		78	63		
Genentech Inc.	South San Francisco, CA	•	•	•	•	•	V	•	•	•	•	•		100	100		
General Cable Corp.	Highland Heights., KY	•												15		396	
General Dynamics Corp.	Falls Church, VA	•	•	•	•									40	40	83	
General Electric Co.	Fairfield, CT	•	•		•			•	•	•	•	•		80	80	5	
General Mills Inc.	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100	193	
General Motors Co.	Detroit, MI	•	•	•	•	•	V	•	•	•	•	•		100	100	6	
Genuine Parts Co.	Atlanta, GA	•												15		247	
Genworth Financial Inc.	Richmond, VA	•		•										30		271	
Gibson, Dunn & Crutcher LLP	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	100		20
Gilead Sciences Inc.	Foster City, CA	•						•						30		444	
GlaxoSmithKline plc	Research Triangle Park, NC	•	•	•	•	•		•	•	•	•	•		100	100		
Global Partners	Waltham, MA													o		291	
GMAC LLC	Detroit, MI	•												15		66	
Goldman Sachs Group Inc., The	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100	40	
Goodrich Corp.	Charlotte, NC	•						•						30		354	
Goodwin Procter LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		38
Goodyear Tire & Rubber Co.	Akron, OH	•												15		127	
Google Inc.	Mountain View, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	117	
Gordon & Rees LLP	San Francisco, CA	•	•	•	•			•	•	•	•	•		95	95		155
Graybar Electric Company, Inc.	St. Louis, MO	•						•						30		439	
Great Atlantic & Pacific Tea Co. Inc., The	Montvale, NJ													0		360	
Greenberg Traurig LLP	Miami, FL	•	•	•	•	•		•	•	•	•	•		100	83		10
Group 1 Automotive	Houston, TX	•												15		428	
Group Health Cooperative	Seattle, WA	•	•	•	•	•		•	•	•	Þ	•		93	88		
Group Health Permanente	Seattle, WA	•		•		•		•	•	•	•	•		90	85		
Guardian Life Insurance Co. of America, The	New York, NY	•	•					•	•	•				45		279	
H&R Block Inc.	Kansas City, MO	•	•		•			•	•	•		•		65	65	556	
H.E. Butt Grocery Co.	San Antonio, TX	•	•			•		•	•		•	•		75	75		
H.J. Heinz Co.	Pittsburgh, PA	•	•	•				•	•	•	)			68	68	267	
Hain Celestial Group Inc.	Melville, NY	•	•		•	•		•	•	•	•	•		85	70		
Halliburton Co.	Houston, TX	•												15		141	

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	de 5 points	stuiod 91 2a	stuiod 9	stuints 2c	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	3C 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Hallmark Cards Inc.	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		
Hannaford Brothers	Scarborough, ME	•	•	•	•			•		•	Þ	•		83	83		
Hanover Direct Inc.	Weehawken, NJ	•	•	•	•			•	•		Þ	•		83	75		
Harley-Davidson Inc.	Milwaukee, WI	•												15		412	
Harrah's Entertainment Inc.	Las Vegas, NV	•	•	•	•	•		•	•	•	•	•		100	100	263	
Harris Bankcorp Inc.	Chicago, IL	•	•	•	•	•	v	•	•	•	•	•		100	100		
Harris Corp.	Melbourne, FL	•		•										30		447	
Harris Interactive Inc.	New York, NY	•	•	•	•	•		•	•	•	Þ	•		93	93		
Harry & David Holdings Inc.	Medford, OR	•		•		•		•	•	•	Þ	•		83	83		
Hartford Financial Services Group Inc., The	Hartford, CT	•	•	•	•	•		•	•	•	•	•		100	100	287	
Harvard Pilgrim Health Care Inc.	Wellesley, MA	•	•	•	•	•		•	•	•	Þ	•		93	93		
Hasbro Inc.	Pawtucket, RI	•	•					•			•			50	50	552	
Haynes and Boone LLP	Dallas, TX	•	•	•	•	•		•	•	•	•	•		100	100		94
HCA - Hospital Corporation of America	Nashville, TN	•						•						30		88	
Health Care Service Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Health Net Inc.	Woodland Hills, CA	•	•	•	•	•		•	•	•	Þ	•		93	93	165	
Henry Schein	Melville, NY	•												15		389	
Herman Miller Inc.	Zeeland, MI	•	•	•	•	•	V	•	•	•	•	•		100	100	897	
Herrick Feinstein LLP	New York, NY	•	•	•	•			•	•	•	•	•		95	95		164
Hershey Co., The	Hershey, PA	•	•	•	•	•		•	•	•	•	•		100	70	463	
Hertz Global Holdings Inc.	Park Ridge, NJ	•	•	•	•	•		•	•	•				70	70	305	
Hess Corp.	New York, NY	•												15		55	
Hewitt Associates	Lincolnshire, IL	•	•	•	•	•		•	•	•	•	•		100	100	653	
Hewlett-Packard Co.	Palo Alto, CA	•	•	•	•	•		•	•	•	•	•		100	100	9	
Hexion Specialty Chemicals Inc.	Columbus, OH													o		407	
Hilton Hotels Corp.	Beverly Hills, CA	•	•	•	•			•		•	•	•		90	90		
Hinshaw & Culbertson LLP	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	100		137
Hogan Lovells US LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		22
Holland & Hart LLP	Denver, CO	•		•		•		•	•	•	•	•		90	75		142
Holland & Knight LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		44
Holly Corp.	Dallas, TX													0		420	
Holme Roberts & Owen LLP	Denver, CO	•	•					•	•	•	•			60	60		185
Home Depot Inc., The	Atlanta, GA	•	•		•	•		•	•	•	•	•		85	85	25	

						Cı	riterio	n (see	page 3	37)							
Employer	Headquarters Location	12 points	1b 5 points	<b>2a</b> 15 points	2b spoints	2c Spoints	<b>√</b> 2c+	3a 15 points	dS 5 points	3C 5 points	4 15 pts 7.5 pts	G 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Honeywell International Inc.	Morris Township, NJ	•	•	•	•	•		•	•	•	•	•		100	100	63	
Hormel Foods Corp.	Austin, MN	•												15		373	
Hospira Inc.	Lake Forest, IL	•	•	•	•	•		•	•	•	•	•		100	100	597	
Host Hotels & Resorts Inc.	Bethesda, MD	•	•		•			•	•					45	45	449	
Houghton Mifflin Harcourt Publishing Co.	Boston, MA	•						•		•				35			
Howard & Howard Attorneys PLLC	Kalamazoo, MI	•						•	•	•	Þ			48	48		
Howrey LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		49
HSBC - North America Holdings Inc.	Mettawa, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Humana Inc.	Louisville, KY	•				•		•	•	•				45	45	85	
Huntington Bancshares Inc.	Columbus, OH	•	•					•	•	•	•	•		75	75	611	
Hunton & Williams LLP	Richmond, VA	•	•	•	•	•		•	•	•	•	•		100	100		39
Huntsman Corp.	Salt Lake City, UT													0		262	
Husch Blackwell Sanders LLP	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		89
Hyatt Hotels Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Icahn Enterprises LP	New York, NY													0		466	
Illinois Tool Works Inc.	Glenview, IL	•	•	•	•	•		•	•		Þ			73	73	148	
Imation Corp.	Oakdale, MN	•	•	•	•			•	•	•	Þ	•		88	88	860	
ING North America Insurance Corp.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		
Ingram Micro	Santa Ana, CA	•	•	•	•	•		•		•	Þ	•		88		67	
Insight Enterprises, Inc.	Tempe, AZ													0		484	
Integrys Energy Group Inc.	Chicago, IL	•		•										30		185	
Intel Corp.	Santa Clara, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	61	
InterContinental Hotels Group Americas	Atlanta, GA	•	•		•	•		•	•	•	•	•		85	85		
International Assets Holding Corp.	Altamonte Springs, FL													0		140	
International Business Machines Corp. (IBM)	Armonk, NY	•	•	•	•	•	~	•	•	•	•	•		100	100	14	
International Paper Co.	Memphis, TN	•	•		•			•	•	•	•			65	65	97	
Interpublic Group of Companies Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	361	
Intuit Inc.	Mountain View, CA	•	•	•	•	•		•	•	•	•	•		100	100	678	
ITT Corp.	White Plains, NY	•	•	•				•	•	•	•	•		90	60	229	
J.C. Penney Co. Inc.	Plano, TX	•	•	•	•	•		•	•	•	•	•		100	95	139	
Jabil Circuit Inc.	St. Petersburg, FL	•												15		212	
Jacobs Engineering Group Inc.	Pasadena, CA		•		•			•	•	•				35	35	241	
Jarden Corp.	Rye, NY	•		•										30		442	

						Cı	riterio	n (see	page (	37)							
Employer	Headquarters Location	15 points	1b 5 points	stuiod 51 2a	spoints 2b	2c Spoints	<b>√</b> 2c+	3a 15 points	<b>gp</b> 5 points	3C 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Jenner & Block LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		81
JetBlue Airways Corp.	Forest Hills, NY	•	•	•	•	•		•	•	•	•	•		100	100	629	
John Hancock Financial Services Inc.	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	73		
Johnson & Johnson	New Brunswick, NJ	•	•	•	•	•	v	•	•	•	•	•		100	100	29	
Johnson Controls Inc.	Milwaukee, WI	•		•				•						45		58	
Jones Apparel Group Inc.	New York, NY	•		•		•		•	•	•	•	•		83	45	598	
JPMorgan Chase & Co.	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100	16	
K&L Gates LLP	Pittsburgh, PA	•	•	•	•	•	V	•	•	•	•	•		100			19
Kaiser Permanente	Oakland, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Katten Muchin Rosenman LLP	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	100		64
Kaye Scholer LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		65
KB Home	Los Angeles, CA	•		•				•	•	•		•		70	70	682	
KBR Inc.	Houston, TX													0		234	
Keane Inc.	Boston, MA	•	•					•			•			50	50		
Kelley Drye & Warren LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	95		118
Kellogg Co.	Battle Creek, MI	•	•	•	•	•		•	•	•	•	•		100	65	210	
Kelly Services Inc.	Troy, MI	•		•										30		437	
Kenneth Cole Productions Inc.	New York, NY	•	•	•	•			•	•	•	•	•		95	95		
KeyCorp	Cleveland, OH	•	•	•	•	•		•	•	•	•	•		100	100	382	
Kilpatrick Stockton LLP	Atlanta, GA	•	•	•		•		•	•	•	•	•		95	95		100
Kimberly-Clark Corp.	Irving, TX	•	•	•	•	•		•	•	•	•	•		100	100	128	
Kimpton Hotel & Restaurant Group Inc.	San Francisco, CA	•	•	•	•	•	V	•	•	•	•	•		100	100		
Kinder Morgan Inc.	Houston, TX	•						•						30		223	
King & Spalding LLP	Atlanta, GA	•	•	•	•			•	•	•	•	•		95	95		40
Kirkland & Ellis LLP	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	100		7
KLA-Tencor Corp.	Milpitas, CA	•	•		•			•	•	•	•			58	58	774	
Kohl's Corp.	Menomonee Falls, WI	•												15		155	
KPMG LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		
Kraft Foods Inc.	Northfield, IL	•	•	•	•	•	V	•		•	•	•		95	95	53	
Kramer Levin Naftalis & Frankel LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		90
Kroger Co., The	Cincinnati, OH	•	•					•	•	•	•	•		75	75	22	
Kutak Rock LLP	Omaha, NE	•		•				•	•	•	•	•		85	70		150
L.L. Bean Inc.	Freeport, ME	•	•	•	•	•		•	•	•	Þ			78	78		

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	15 points	1b 5 points	<b>2a</b> 15 points	2 boints	2c Spoints	<b>✓</b> 2c+	38 15 points	<b>3b</b> 5 points	36 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
L-3 Communications Holdings	New York, NY	•												15		171	
Laclede Group Inc., The	St. Louis, MO	•	•	•	•						Þ			48	0	829	
Land O'Lakes Inc.	Arden Hills, MN	•	•	•	•	•		•	•	•	•	•		100	53	224	
Latham & Watkins LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		3
Lear Corp.	Southfield, MI	•	•											20	20	195	
Legg Mason, Inc.	Baltimore, MD	•						•						30		500	
Leggett & Platt Inc.	Carthage, MO													o		493	
Levi Strauss & Co.	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	518	
LexisNexis Group	Miamisburg, OH	•	•	•	•	•		•	•	•	•	•		100	100		
Lexmark International Inc.	Lexington, KY	•	•	•	•	•		•	•	•	•	•		100	100	507	
Liberty Global Inc.	Englewood, CO													0		257	
Liberty Media Corp.	Englewood, CO	•												15		265	
Liberty Mutual Group	Boston, MA							•						15		86	
Limited Brands Inc.	Columbus, OH	•	•	•	•			•	•	•	•	•		95	95	290	
Lincoln National Corp.	Radnor, PA	•	•	•	•			•	•	•	•	•		95	95	274	
Lindquist & Vennum PLLP	Minneapolis, MN	•	•			•		•	•	•	•	•		80			
Littler Mendelson PC	San Francisco, CA	•	•	•	•	•	V	•	•	•	•	•		100	100		76
Live Nation Inc.	Beverly Hills, CA	•	•	•	•	•		•		•		•		80	80	524	
Liz Claiborne Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	549	
Locke Lord Bissell & Liddell LLP	Chicago, IL	•	•					•	•	•	•	•		75	75		69
Lockheed Martin Corp.	Bethesda, MD	•	•	•	•	•		•	•	•	•	•		100	100	54	
Loews Corp.	New York, NY	•	•					•	•	•				45	45	174	
Lowe's Companies, Inc.	Mooresville, NC	•						•						30		47	
Lubrizol Corporation	Wickliffe, OH	•												15		471	
Luce Forward Hamilton & Scripps LLP	San Diego, CA	•	•	•	•			•			•	•		85	85		192
Macy's Inc.	Cincinnati, OH	•	•	•	•	•		•	•	•	•	•		100	100	96	
Manatt, Phelps & Phillips LLP	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	100		106
Manitowoc Company, Inc.	Manitowoc, WI													0		480	
Manpower Inc.	Milwaukee, WI	•												15		119	
Marathon Oil Corp.	Houston, TX	•	•											20		23	
Marriott International Inc.	Bethesda, MD	•	•	•	•	•		•	•	•	•	•		100	100	208	
Mars Inc.	Mt. Olive, NJ	•	•	•		•		•	•	•	•			73	73		
Marsh & McLennan Companies Inc.	New York, NY	•	•	•	•	•	~	•	•	•	•	•		100	100	232	

						Cı	riterio	n (see	page (	37)							
Employer	Headquarters Location	a 15 points	1b 5 points	22 15 points	stuiod 2 b	5 points	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Masco Corp.	Taylor, MI	•												15		277	
Massachusetts Mutual Life Insurance Co.	Springfield, MA	•	•	•	•	•		•	•	•	•	•		100	100	135	
MasterCard Inc.	Purchase, NY	•	•	•	•	•		•	•	•	•	•		100	100	474	
Mattel Inc.	El Segundo, CA	•	•	•	•	•		•	•	•	•	•		100	95	415	
Mayer Brown LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		8
Mayo Clinic	Rochester, MN	•	•		•			•	•	•	•	•		80			
McAfee Inc.	Santa Clara, CA	•	•			•		•		•	Þ			53	53		
McCarter & English LLP	Newark, NJ	•		•		•		•	•	•	•	•		90	90		124
McDermott Will & Emery LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		17
McDonald's Corp.	Oak Brook, IL	•	•		•	•		•	•	•	•	•		85	85	107	
McGraw-Hill Companies Inc., The	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	80	391	
McGuireWoods LLP	Richmond, VA	•	•	•	•	•		•		•	•	•		95	95		61
McKenna, Long & Aldridge LLP	Atlanta, GA	•		•				•		•	•	•		80	80		107
McKesson Corp.	San Francisco, CA	•						•	•	•	•	•		70	83	15	
McKinsey & Co. Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
MDU Resources Group, Inc.	Bismarck, ND													0		473	
MeadWestvaco Corp.	Glen Allen, VA	•				•		•	•	•		•		60	60	365	
Medco Health Solutions	Franklin Lakes, NJ	•						•						30		45	
Medtronic Inc.	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100	196	
Meijer Inc.	Grand Rapids, MI	•				•								20	20		
Men's Wearhouse Inc., The	Houston, TX	•	•	•				•						50	50	905	
Merck & Co. Inc.	Whitehouse Station, NJ	•	•	•	•	•		•	•	•	•	•		100	100	103	
MetLife Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	39	
MGM Mirage	Las Vegas, NV	•	•		•	•		•	•	•	•	•		85	85	344	
Micron Technology Inc.	Boise, ID	•												15		423	
Microsoft Corp.	Redmond, WA	•	•	•	•	•	V	•	•	•	•	•		100	100	35	
Milbank, Tweed, Hadley & McCloy LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		42
MillerCoors LLC	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	487	
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo PC	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		97
Mirant Corp.	Atlanta, GA	•	•					•	•	•				45	45	660	
Mitchell Gold + Bob Williams	Taylorsville, NC	•	•	•	•	•		•	•	•	•	•		100	100		
Mohawk Industries Inc.	Calhoun, GA	•	•			•		•	•	•				50	50	367	

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	a 15 points	d 5 points	stuiod St. 2a	2b spoints	2c 5 points	<b>√</b> 2c+	<b>8</b> 15 points	<b>qg</b> 5 points	S 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Monsanto Co.	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100	235	
Moody's Corp.	New York, NY	•	•	•	•			•	•	•	•	•		95	90	984	
Morgan Lewis & Bockius LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		12
Morgan Stanley	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100	30	
Morningstar Inc.	Chicago, IL	•	•	•		•		•	•	•	•	•		95	95		
Morrison & Foerster LLP	San Francisco, CA	•	•	•	•	•	V	•	•	•	•	•		100	100		23
Mosaic Company	Plymouth, MN	•		•										30		276	
Motorola Inc.	Schaumburg, IL	•	•	•	•	•		•	•	•	•	•		100	100	78	
Murphy Oil	El Dorado, AR	•												15		92	
Mutual of Omaha Insurance	Omaha, NE	•	•		•			•	•	•	•	•		80	80	525	
Mylan Laboratories Inc.	Canonsburg, PA	•												15		462	
Nash Finch	Minneapolis, MN	•												15		492	
National Grid USA	Brooklyn, NY	•	•	•	•	•		•	•	•	•	•		100	100		
National Oilwell Varco, Inc.	Houston, TX	•												15		200	
Nationwide	Columbus, OH	•	•	•	•	•		•	•	•	•	•		100	100	124	
Navigant Consulting Inc.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Navistar International Corp.	Warrenville, IL	•									•			30	30	175	
NCR Corp.	Dayton, OH	•	•	•	•	•		•	•	•	•	•		100	100	446	
Nelson Mullins Riley & Scarborough LLP	Columbia, SC	•	•					•	•	•	•	•		75	70		139
Nestle Purina PetCare Co.	St. Louis, MO	•	•		•			•		•	•	•		75	75		
NetApp Inc.	Sunnyvale, CA	•	•	•	•	•		•	•	•	•	•		100	100	647	
New York Life Insurance Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	76	
New York Times Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Newell Rubbermaid Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	387	
Newmont Mining Corporation	Greenwood Village, CO	•												15		400	
News Corp.	New York, NY	•						•						30		70	
Nielsen Co., The	New York City, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Nike Inc.	Beaverton, OR	•	•	•	•	•	V	•	•	•	•	•		100	100	136	
NiSource Inc.	Merrillville, IN	•												15		289	
Nissan North America Inc.	Franklin, TN	•	•		•	•		•	•					50	50		
Nixon Peabody LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		63
Nokia Corp.	Irving, TX	•	•		•	•		•		•				50	50		
Nordstrom Inc.	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100	301	

						C	riterio	n (see	page	37)							
Employer	Headquarters Location	12 points	1b 5 points	2a 15 points	spoints 2b	2c 5 points	<b>√</b> 2c+	3a 15 points	gb 5 points	3c 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Norfolk Southern Corp.	Norfolk, VA	•	•		•			•	•	•	)			58	58	256	
Nortel Networks Corp.	Richardson, TX	•	•		•	•		•	•	•	•	•		85	85		
Northeast Utilities	Berlin, CT	•	•		•	•		•		•	•			65	65	424	
Northern Trust Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	430	
Northrop Grumman Corp.	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	100	69	
Northwestern Mutual Life Insurance	Milwaukee, WI	•						•						30		118	
Novartis Pharmaceuticals Corp.	East Hanover, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
NRG Energy Inc.	Princeton, NJ	•												15		363	
Nucor Corp.	Charlotte, NC	•												15		106	
NuStar Energy LP	San Antonio, TX													0		485	
NV Energy Inc.	Las Vegas, NV	•	•	•				•		•	•	•		85	70	608	
NYSE Euronext Inc.	New York, NY	•												15		477	
Occidental Petroleum	Los Angeles, CA	•		•										30		98	
Office Depot Inc.	Boca Raton, FL	•	•					•	•	•				45	45	179	
OfficeMax Inc.	Naperville, IL	•	•	•	•			•	•	•	•	•		95	90	313	
O'Melveny & Myers LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		24
Omnicare	Covington, KY	•												15		392	
Omnicom Group	New York, NY	•	•	•		•		•	•	•	•	•		95	95	202	
ONEOK Inc.	Tulsa, OK	•												15		159	
Oracle Corp.	Redwood City, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	113	
Orbitz Worldwide Inc.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Orrick, Herrington & Sutcliffe LLP	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100		27
Oshkosh Corp.	Oshkosh, WI	•												15		349	
Owens & Minor Inc.	Mechanicsville, VA	•	•		•	•		•		•				50	50	339	
Owens Corning	Toledo, OH	•	•	•	•	•		•	•	•	•	•		100	100	422	
Owens-Illinois Inc.	Perrysburg, OH	•												15		326	
Paccar Inc.	Bellevue, WA	•												15		170	
Pacific Life Insurance Co.	Newport Beach, CA	•	•	•	•	•		•	•	•	•	•		100	100	551	
PacifiCorp	Portland, OR	•	•	•	•	•		•	•	•	)	•		93	93		
Palm Management Corp.	Washington, DC	•	•		•	•		•	•	•	•	•		78	78		
Pantry Inc., The	Sanford, NC													0		317	
Parker Hannifin Corp.	Cleveland, OH	•												15		221	
Patterson Belknap Webb & Tyler LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		160

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	a 15 points	1b 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	8 15 points	<b>3p</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Patterson Companies (Patterson Dental Supply)	St. Paul, MN	•		•		•		•	•		•			63		687	
Patton Boggs LLP	Washington, DC	•	•			•		•	•	•	•	•		80			80
Paul, Hastings, Janofsky & Walker LLP	Los Angeles, CA	•	•	•	•	•	V	•	•	•	•	•		100	100		14
Paul, Weiss, Rifkind, Wharton & Garrison LLP	New York, NY	•	•	•	•			•		•	•	•		90	80		37
Peabody Energy Corp.	St. Louis, MO	•												15		353	
Pearson Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	75		
Penske Automotive Group	Bloomfield Hills, MI	•												15		225	
Pepco Holdings Inc.	Washington, DC	•	•		•			•	•	•	•	•		80	80	254	
Pepper Hamilton LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		82
PepsiCo Inc.	Purchase, NY	•	•	•	•	•	V	•	•	•	•	•		100	100	52	
Perini Corporation	Framingham, MA													0		432	
Perkins + Will Inc.	Chicago, IL	•						•	•	•	•			55	55		
Perkins Coie LLP	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100		67
Perot Systems Corp.	Plano, TX	•	•					•	•	•	•			53	53	723	
Peter Kiewit Sons' Inc.	Omaha, NE	•												15		321	
PetSmart Inc.	Phoenix, AZ	•						•						30		468	
Pfizer Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	46	
PG&E Corp.	San Francisco, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	176	
Philip Morris International Inc.	New York, NY													0		93	
Pilgrim's Pride Corporation	Pittsburg, TX													0		304	
Pillsbury Winthrop Shaw Pittman LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		48
Pinnacle West Capital	Phoenix, AZ	•		•								•		45	45	621	
Pitney Bowes Inc.	Stamford, CT	•	•	•	•	•		•	•	•				70	70	395	
Plains All American Pipeline, LP	Houston, TX													0		79	
PNC Financial Services Group Inc., The	Pittsburgh, PA	•	•	•	•	•		•	•	•	•	•		100	85	278	
PNM Resources Inc.	Albuquerque, NM	•	•	•							•			43	43	789	
Polaroid Corp.	Waltham, MA	•	•					•	•	•	•			60	60		
Polo Ralph Lauren Corp.	New York, NY	•						•						30		481	
Polsinelli Shughart PC	Kansas City, MO	•	•	•		•		•	•	•	•	•		95	95		187
Portland General Electric Co.	Portland, OR	•	•	•	•	•		•		•	•	•		95		987	
PPG Industries Inc.	Pittsburgh, PA	•	•		•						•			40	45	161	
PPL Corp.	Allentown, PA	•	•			•					•	•		55	55	314	

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	1b 5 points	stuiod 91 2a	2b spoints	5 points	<b>√</b> 2c+	<b>3a</b> 15 points	ds 5 points	3C 5 points	♣ 15 pts ₱ 7.5 pts	G 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Praxair Inc.	Danbury, CT	•	•			•		•	•	•	•			65	45	249	
Precision Castparts Corp.	Portland, OR	•		•										30		362	
PricewaterhouseCoopers LLP	New York, NY	•	•	•	•	•	V	•	•	•	•	•		100	100		
Principal Financial Group	Des Moines, IA	•	•	•	•			•	•	•	•	•		95	95	273	
Procter & Gamble Co.	Cincinnati, OH	•	•	•	•	•		•	•	•	•	•		100	100	20	
Progress Energy Inc.	Raleigh, NC	•	•					•	•	•	•	•		68	68	288	
Progressive Corp., The	Mayfield Village, OH	•	•	•	•	•		•	•	•	•	•		100	100	209	
ProLogis	Denver, CO													0		426	
Proskauer Rose LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		41
Prudential Financial Inc.	Newark, NJ	•	•	•	•	•		•	•	•	•	•		100	100	84	
Public Service Enterprise Group	Newark, NJ	•	•	•	•	•		•	•	•	•	•		100	100	190	
Publix Super Markets	Lakeland, FL	•												15		101	
Pulte Homes Inc.	Bloomfield Hills, MI	•												15		393	
QUALCOMM Inc.	San Diego, CA	•	•	•	•	•		•	•	•	•	•		100	95	244	
Quarles & Brady LLP	Milwaukee, WI	•	•	•	•	•		•	•	•	•	•		100	100		126
Quest Diagnostics Inc.	Madison, NJ	•	•		•	•		•	•	•	•	•		85	85	341	
Qwest Communications International Inc.	Denver, CO	•	•		•	•		•	•	•	•	•		85	85	197	
R.R. Donnelley & Sons Co.	Chicago, IL	•	•	•	•	•			•	•	•	•		85	55	233	
RadioShack Corp.	Fort Worth, TX	•						•	•	•				40	40	534	
Raymond James Financial Inc.	St. Petersburg, FL	•	•	•	•	•		•	•	•	•	•		100	100	657	
Raytheon Co.	Waltham, MA	•	•	•	•	•		•	•	•	•	•		100	100	108	
RBC Wealth Management	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Realogy Corp.	Parsippany, NJ	•	•		•	•		•		•	•	•		80	80	489	
Recreational Equipment Inc.	Kent, WA	•	•	•	•	•		•	•	•	•	•		100	100		
Reed Smith LLP	Pittsburgh, PA	•	•	•		•		•	•	•	•	•		95	75		16
Regions Financial	Birmingham, AL	•												15		280	
Regis Corp.	Edina, MN	•	•					•	•	•	•	•		68	68	730	
Reliance Steel & Aluminum Co.	Los Angeles, CA	•												15		298	
Replacements Ltd.	McLeansville, NC	•	•	•	•	•	V	•	•	•	•	•		100	100		
Reynolds American Inc.	Winston-Salem, NC	•	•	•	•			•	•	•	•	•		88	88	294	
Rite Aid Corp.	Camp Hill, PA	•	•		•	•		•	•	•	•	•		85	85	100	
Robert Half International Inc.	Menlo Park, CA	•	•	•	•	•		•	•	•	•	•		93	93	503	
Robert W. Baird & Co. Incorporated	Milwaukee, WI	•	•	•		•		•		•	•	•		90	90		

						C	riterio	n (see	page	37)							
Employer	Headquarters Location	12 points	1b 5 points	22 15 points	2b spoints	stuiod 9 2c	<b>√</b> 2c+	3a 15 points	gb 5 points	3C 5 points	♣ 15 pts	GI 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Robins, Kaplan, Miller & Ciresi LLP	Minneapolis, MN	•	•	•	•	•	V	•	•	•	•	•		100	100		135
Rockwell Automation Inc.	Milwaukee, WI	•												15		429	
Rockwell Collins Inc.	Cedar Rapids, IA	•	•	•		•		•	•	•	•	•		95	75	488	
Ropes & Gray LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		29
Ross Stores	Pleasanton, CA	•												15		384	
Royal Caribbean Cruises Ltd.	Miami, FL	•	•	•	•			•	•	•	•			80	70		
RRI Energy Inc.	Houston, TX	•	•					•	•	•	•	•		75	75	214	
Ryder System Inc.	Miami, FL	•	•	•	•	•		•	•	•	)	•		93	93	399	
Ryland Group Inc., The	Calabasas, CA	•	•		•	•								30	30	902	
S.C. Johnson & Son Inc.	Racine, WI	•	•	•	•	•		•	•	•	•	•		100	100		
Sabre Holdings Inc.	Southlake, TX	•	•	•	•	•		•	•	•	•	•		100	100		
Safeway Inc.	Pleasanton, CA	•	•	•	•					•	•	•		75	75	50	
Sanmina-SCI	San Jose, CA	•												15		292	
Sanofi-Aventis U.S. LLC	Bridgewater, NJ	•	•			•		•	•	•	•			65	65		
SAP America Inc.	Newtown Square, PA	•	•	•	•	•		•	•	•	•	•		100	100		
Sara Lee Corp.	Downers Grove, IL	•	•	•	•	•		•	•	•	•	•		100	75	199	
Saul Ewing LLP	Philadelphia, PA	•	•			•		•		•	Þ	•		68	68		181
SCANA Corp.	Columbia, SC	•												15		445	
Schering-Plough Corp.	Kenilworth, NJ	•	•	•	•	•		•	•	•	•	•		100	100	138	
Schiff Hardin LLP	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	80		120
Scholastic Corp.	New York, NY	•	•					•			•			50	50	801	
Schulte, Roth & Zabel LLP	New York, NY	•	•		•			•	•	•	•	•		80	80		68
Science Applications International Corp.	San Diego, CA	•						•						30		266	
Seagate Technology LLC	Scotts Valley, CA	•	•					•	•	•	•			60	60		
Sealed Air Corp.	Elmwood Park, NJ	•												15		483	
Sears Holdings Corp.	Hoffman Estates, IL	•	•	•	•	•	V	•	•	•	•	•		100	100	49	
Sedgwick, Detert, Moran & Arnold LLP	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100		132
Selective Insurance Group	Branchville, NJ	•	•	•	•	•		•	•	•	•			85	85		
Sempra Energy	San Diego, CA	•	•	•	•	•		•	•	•	•	•		100	100	252	
Severn Trent Services Inc.	Fort Washington, PA	•	•	•		•		•	•	•				65	65		
Seyfarth Shaw LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		62
Shaw Group Inc., The	Baton Rouge, LA	•												15		357	
Shearman & Sterling LLP	New York, NY	•	•	•	•	•	~	•	•	•	•	•		100	100		26

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	1b 2 boints	2a 15 points	2b Spoints	2c 5 points	<b>√</b> 2c+	3a 15 points	ds 5 points	36 5 points	♣ 15 pts № 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Shell Oil Co.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		
Sheppard, Mullin, Richter & Hampton LLP	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	95		77
Sherwin-Williams Co., The	Cleveland, OH	•												15		322	
Shook, Hardy & Bacon LLP	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		83
Sidley Austin LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		5
Simpson, Thacher & Bartlett LLP	New York, NY	•	•	•		•		•	•	•	•	•		95			25
SIRIUS XM Radio Inc.	New York, NY	•	•	•	•			•	•		•	•		90	80		
Skadden, Arps, Slate, Meagher & Flom LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		1
SLM Corp. (Sallie Mae)	Reston, VA	•	•					•	•	•	•			60	60	331	
Smith International Inc.	Houston, TX	•												15		250	
Smithfield Foods Inc.	Smithfield, VA	•												15		183	
Smurfit-Stone Container Corp.	Chicago, IL	•						•						30		356	
Sodexo Inc.	Gaithersburg, MD	•	•	•	•	•		•	•	•	•	•		100	100		
Software House International	Somerset, NJ	•	•		•			•						40	40		
Sonic Automotive Inc.	Charlotte, NC	•												15		337	
Sonnenschein, Nath & Rosenthal LLP	Chicago, IL	•	•	•	•	•	V	•	•	•	•	•		100	100		59
Sony Electronics Inc.	San Diego, CA	•	•	•		•		•	•	•	•	•		95			
Southern California Edison Co.	Rosemead, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Southern Co.	Atlanta, GA	•	•					•	•	•	Þ	•		68	48	149	
Southwest Airlines Co.	Dallas, TX	•	•	•	•			•	•	•	•	•		95	95	246	
Spectra Energy Corp.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	80	459	
Sprint Nextel Corp.	Overland Park, KS	•	•	•	•	•		•	•	•	•	•		100	100	64	
SPX Corp.	Charlotte, NC													0		402	
Squire, Sanders & Dempsey LLP	Cleveland, OH	•	•	•	•	•	V	•	•	•	•	•		100	100		47
SRA International Inc.	Fairfax, VA	•	•					•	•	•	•	•		75	75		
Staples Inc.	Framingham, MA	•	•	•	•	•		•	•	•	•	•		100	93	109	
Starbucks Corp.	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100	261	
Starcom MediaVest Group	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Starwood Hotels & Resorts Worldwide	White Plains, NY	•	•	•	•	•		•	•	•	•	•		100	100	417	
State Farm Group	Bloomington, IL	•	•	•	•	•	V			•	•	•		80	80	31	
State Street Corp.	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100	206	
Steel Dynamics, Inc.	Fort Wayne, IN													0		318	
Steelcase Inc.	Grand Rapids, MI	•	•	•	•	•		•	•	•	•	•		100	60	625	

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	1b 5 points	2a 15 points	2b Spoints	spoints 20	<b>√</b> 2c+	3a 15 points	ds 5 points	3C 5 points	♣ 15 pts ▶ 7.5 pts	<b>61</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Steptoe & Johnson LLP	Washington, DC	•		•		•		•	•	•	•	•		90	85		75
Stinson Morrison Hecker LLP	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		154
Stoel Rives LLP	Portland, OR	•	•	•	•	•		•	•	•	•	•		100	100		140
Stryker Corp.	Kalamazoo, MI	•												15		375	
Subaru of America Inc.	Cherry Hill, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Sullivan & Cromwell LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		15
Sun Life Financial Inc. (U.S.)	Wellesley Hills, MA	•	•	•	•	•		•	•	•	•	•		100	100		
SunGard Data Systems Inc.	Wayne, PA	•						•						30		435	
Sunoco Inc.	Philadelphia, PA	•												15		41	
SunTrust Banks Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	211	
Supervalu Inc.	Eden Prairie, MN	•	•	•	•	•		•	•	•	•	•		100	100	51	
Sutherland Asbill & Brennan LLP	Atlanta, GA	•	•	•	•	•	V	•	•	•	•	•		100	100		93
Symantec Corp.	Mountain View, CA	•	•	•	•	•		•	•	•	•	•		100	100	419	
SYNNEX Corp.	Fremont, CA													0		328	
SYSCO Corp.	Houston, TX	•												15		62	
Targa Resources Partners LP	Houston, TX													0		323	
Target Corp.	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•	-15	85	100	28	
TD Bank, N.A.	Wilmington , DE	•	•	•	•	•	V	•	•	•	•	•		100	100		
Teachers Insurance and Annuity Association - College Retirement Equities Fund	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	82	
Tech Data Corp.	Clearwater, FL	•	•	•	•	•		•	•	•	•	•		100	100	102	
Telephone & Data Systems Inc. (U.S. Cellular)	Chicago, IL	•												15		465	
Tenet Healthcare	Dallas, TX	•						•	•	•	Þ			48	40	283	
Tenneco Inc.	Lake Forest, IL	•												15		416	
Terex Corporation	Westport, CT	•		•										30		275	
Tesoro Corp.	San Antonio, TX	•												15		91	
Texas Instruments Inc.	Dallas, TX	•	•	•	•	•		•	•	•	•	•		100	100	215	
Textron Inc.	Providence, RI	•						•		•				35		173	
Thermo Fisher Scientific Inc.	Waltham, MA	•						•						30		258	
Thompson Coburn LLP	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100		151
Thomson Reuters	New York, NY	•	•		•	•	V	•	•	•	•	•		85	75		
Thrivent Financial for Lutherans	Minneapolis, MN	•												15		409	
Tiffany & Co.	New York, NY	•	•	•	•	•		•	•	•	Þ	•		93	73	709	

						C	riterio	n (see	page :	37)							
Employer	Headquarters Location	15 points	1b 5 points	72 Te points	5 points	5 points	✓ 2c+	3a 15 points	<b>3b</b> 5 points	3c 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Time Warner Cable Inc.	New York, NY	•		•	•			_				•		95			
Time Warner Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	48	
Timken Co., The	Canton, OH			•										30		431	
TJX Companies Inc., The	Framingham, MA	•	•	•	•	•		•	•	•	•	•		100	100	131	
T-Mobile USA Inc.	Bellevue, WA	•	•			•		•	•	•				50	50		
Townsend and Townsend and Crew LLP	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100			14
Toyota Financial Services Corp.	Torrance, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Toyota Motor Sales USA Inc.	Torrance, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Toys 'R' Us Inc.	Wayne, NJ	•	•	•	•	•		•	•	•				70	70	192	
Travel Impressions Ltd.	Farmingdale, NY	•	•	•	•			•	•	•	•	•		88	88		
TravelCenters of America LLC	Westlake, OH	•												15		332	
Travelers Companies Inc., The	New York, NY	•	•	•	•	•		•	•	•		•		85	50	99	
Travelport Ltd.	Parsippany, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Troutman Sanders LLP	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		78
TRW Automotive Holdings Corp.	Livonia, MI	•						•						30		169	
Tyson Foods, Inc.	Springdale, AR	•												15		89	
U.S. Bancorp	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100	129	
U.S. Foodservice Inc.	Rosemont, IL	•	•			•		•	•	•	Þ			58	58		
UAL Corp. (United Airlines)	Chicago, IL	•	•	•		•	V	•	•	•	Þ	•		88	88	123	
UBS AG	Stamford, CT	•	•	•	•	•		•	•	•	•	•		100	100		
UGI Corp.	King of Prussia, PA	•												15		377	
Unilever	Englewood Cliffs, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Union Pacific Corp.	Omaha, NE	•	•	•	•	•		•		•	Þ	•		88	43	143	
Unisys Corp.	Blue Bell, PA	•	•	•	•			•			•			70	70	456	
United Business Media LLC	Manhasset, NY	•	•	•	•	•		•	•	•	•	•		100	100		
United Parcel Service Inc. (UPS)	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	43	
United Services Automobile Association	San Antonio, TX													0		207	
United States Steel Corp.	Pittsburgh, PA	•												15		105	
United Stationers Inc.	Deerfield, IL	•												15		475	
United Technologies Corp.	Hartford, CT	•	•	•	•	•		•	•	•	•	•		100	80	37	
UnitedHealth Group Inc.	Minnetonka, MN	•	•	•	•	•		•	•	•	•	•		100	100	21	
Universal American Corp.	Rye Brook, NY													0		494	
Universal Health Services	King of Prussia, PA	•												15		467	

						Cı	riterio	n (see	page :	37)							
Employer	Headquarters Location	12 points	de 5 points	2a 15 points	spoints 2b	stuints 2c	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	3C 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Unum Group	Chattanooga, TN	•	•	•	•			•	•	•	)	•		88	88	270	
URS Corp.	San Francisco, CA	•						•						30		264	
US Airways Group Inc.	Tempe, AZ	•	•	•	•	•		•	•	•	•	•		100	100	222	
Valassis Communications Inc.	Livonia, MI	•	•		•	•		•		•	•	•		80		809	
Valero Energy Corp.	San Antonio, TX	•						•		•				35		10	
Verizon Communications Inc.	New York, NY	•	•		•	•		•	•	•	•	•	-15	70	70	17	
Vertis Inc.	Baltimore, MD	•						•						30	30		
VF Corp.	Greensboro, NC	•												15		335	
Viacom Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	177	
Vinson & Elkins LLP	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		45
Virgin America	Burlingame, CA	•	•	•	•	•		•	•	•	•	•		100	80		
Virgin Media Inc.	New York, NY	•												15		338	
Visa	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	394	
Vision Service Plan	Rancho Cordova, CA	•	•			•		•	•	•	•			65	65		
Visteon Corp.	Van Buren Township, MI	•	•	•	•	•		•	•	•	•	•		100	100	282	
Volkswagen of America Inc.	Herndon, VA	•	•	•	•	•		•	•	•	•	•		100	100		
Vorys, Sater, Seymour & Pease LLP	Columbus, OH	•	•		•	•		•	•	•	•	•		85	80		156
W.R. Berkley	Greenwich, CT													0		490	
W.W. Grainger	Lake Forest, IL	•												15		366	
Wachtell, Lipton, Rosen & Katz LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		55
Walgreen Co.	Deerfield, IL	•	•	•	•	•		•	•	•	•	•		100	100	36	
Wal-Mart Stores Inc.	Bentonville, AR	•	•							•	•	•	-15	40	40	2	
Walt Disney Co., The	Burbank, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	60	
Waste Management Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	85	201	
Weil, Gotshal & Manges LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		9
WellCare Health Plans, Inc.	Tampa, FL													0		381	
WellPoint Inc.	Indianapolis, IN	•	•	•	•			•	•	•	•	•		95	95	32	
Wells Fargo & Co.	San Francisco, CA	•	•	•	•	•	V	•	•	•	•	•		100	100	41	
WESCO International Inc.	Pittsburgh, PA	•		•										30		406	
Western & Southern Financial Group	Cincinnati, OH	•		•				•						45		441	
Western Digital Corp.	Lake Forest, CA	•						•						30		319	
Western Refining Inc.	El Paso, TX													o		253	
Western Union Co., The	Englewood, CO	•		•										30		451	

						Cı	riterio	n (see	page (	37)							
	Headquarters	15 points	1b 5 points	15 points	5 points	5 points	<b>V</b>	3a 15 points	<b>qt</b> 5 points	36 5 points	4 15 pts 7.5 pts	<b>9</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Employer	Location	ıa	ID	2a	20	20	2c+	3a	30	30	4	5	0				N
Weyerhaeuser Co.	Federal Way, WA	•	•		•	•		•	•	•	•	•		85	70	236	
Whirlpool Corp.	Benton Harbor, MI	•	•	•	•	•		•	•	•	•	•		100	100	133	
White & Case LLP	New York, NY	•	•	•	•	•	~	•	•	•	•	•		100	100		6
Whole Foods Market Inc.	Austin, TX	•	•	•	•			•			•	•		85	85	324	
Wildman, Harrold, Allen & Dixon LLP	Chicago, IL	•	•		•	•		•		•	•	•		80	80		
Williams Companies Inc.	Tulsa, OK	•	•		•	•		•	•	•	•	•		85	80	218	
Williams Mullen PC	Richmond, VA	•	•	•	•			•	•	•	•			80			159
Willkie Farr & Gallagher LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		46
Wilmer Cutler Pickering Hale & Dorr LLP	Washington, DC	•	•	•	•	•	V	•	•	•	•	•		100	100		21
Wilson Sonsini Goodrich & Rosati PC	Palo Alto, CA	•	•	•	•	•		•	•	•	•	•		100	100		53
Winn-Dixie Stores Inc.	Jacksonville, FL	•												15		340	
Winston & Strawn LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		34
Wisconsin Energy Corp.	Milwaukee, WI	•	•			•					•	•		55	55	515	
Womble Carlyle Sandridge & Rice PLLC	Winston-Salem, NC	•						•		•	•	•		65	65		98
World Fuel Services	Miami, FL	•		•										30		137	
WPP Group USA	New York, NY	•	•	•	•	•		•	•	•	•	•		93	93		
Wyeth	Madison, NJ	•	•			•		•	•	•	•	•		80	80	110	
Wyndham Worldwide Corp.	Parsippany, NJ	•	•	•	•	•		•		•	•	•		95	95	528	
Wynn Resorts Ltd.	Las Vegas, NV	•	•	•	•	•		•	•	•	•	•		100	100	691	
Xcel Energy Inc.	Minneapolis, MN	•	•	•	•	•		•		•	•	•		95	95	242	
Xerox Corp.	Norwalk, CT	•	•	•	•	•		•	•	•	•	•		100	100	147	
XTO Energy, Inc.	Fort Worth, TX	•												15		330	
Yahoo! Inc.	Sunnyvale, CA	•	•	•	•	•	v	•	•	•	•	•		100	100	345	
YRC Worldwide Inc.	Overland Park, KS	•	•		•	•								30	30	293	
Yum! Brands Inc.	Louisville, KY	•	•		•			•	•	•	•			65	65	239	
Zurich North America	Schaumburg, IL	•	•	•		•		•	•	•	•			80	65		
Zurich North America	Schaumburg, IL	•	•	•		•		•	•	•	•			80	65		

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Criterion 1a	Prohibits Discrimination Based on Sexual Orientation (15 points)
Criterion 1b	Provides Diversity Training Covering Sexual Orientation (5 points)
Criterion 2a	Prohibits Discrimination Based on Gender Identity or Expression (15 points)
Criterion 2b	Provides Diversity Training Covering Gender Identity OR Has Supportive Gender Transition Guidelines (5 points)
Criterion 2c	Offers Transgender-Inclusive Insurance Coverage for at Least One Type of Benefit (5 points)
Criterion 2c+	Offers Transgender-Inclusive Insurance Coverage, Including Surgical Procedures (🗸)
Criterion 3a	Offers Partner Health Insurance (15 points)
Criterion 3b	Offers Partner Dental, Vision, COBRA and Dependent Coverage Benefits (5 points)
Criterion 3c	Offers at Least Three Other "Soft" Benefits for Partners (5 points)
Criterion 4	Has Employer-Supported Employee Resource Group OR Firm-Wide Diversity Council (15 points) Would Support ERG if Employees Express Interest (half credit ))
Criterion 5	Positively Engages the External LGBT Community (15 points)
Criterion 6	<b>Responsible Citizenship</b> Employers will have 15 points deducted from their score for a large-scale official or public anti-LGBT blemish on their recent records (-15 points)

Ratings in Gray: Unofficial rating of the Fortune 500 companies that have not responded to repeated invitations to the CEI survey. These ratings are based on publicly available information as well as information submitted to HRC from unofficial LGBT employee groups or individual employees.

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	15 points	1b 5 points	72 To points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>3p</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Advertising and Marketing						2 v	vith 10	00% <b>T</b> c	otal					83 A	verage		
Interpublic Group of Companies Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	361	
Starcom MediaVest Group	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Omnicom Group	New York, NY	•	•	•		•		•	•	•	•	•		95	95	202	
WPP Group USA	New York, NY	•	•	•	•	•		•	•	•	Þ	•		93	93		
Valassis Communications Inc.	Livonia, MI	•	•		•	•		•		•	•	•		80		809	
Vertis Inc.	Baltimore, MD	•						•						30	30		
Aerospace and Defense						5 v	vith 10	00% To	otal					88 A	verage	:	
Boeing Co.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	34	
Honeywell International Inc.	Morris Township, NJ	•	•	•	•	•		•	•	•	•	•		100	100	63	ı
Lockheed Martin Corp.	Bethesda, MD	•	•	•	•	•		•	•	•	•	•		100	100	54	
Northrop Grumman Corp.	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	100	69	
Raytheon Co.	Waltham, MA	•	•	•	•	•		•	•	•	•	•		100	100	108	
Rockwell Collins Inc.	Cedar Rapids, IA	•	•	•		•		•	•	•	•	•		95	75	488	
Alliant Techsystems Inc.	Minneapolis, MN	•	•	•		•		•	•	•				65	65	539	
General Dynamics Corp.	Falls Church, VA	•	•	•	•									40	40	83	
Goodrich Corp.	Charlotte, NC	•						•						30		354	
L-3 Communications Holdings	New York, NY	•												15		171	
Precision Castparts Corp.	Portland, OR	•		•										30		362	
Textron Inc.	Providence, RI	•						•		•				35		173	
Airlines						7 v	vith 10	00% <b>T</b> c	otal					98 A	verage		
Alaska Air Group Inc.	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100	591	
AMR Corp. (American Airlines)	Fort Worth, TX	•	•	•	•	•		•	•	•	•	•		100	100	104	
Continental Airlines Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100	167	ı
Delta Air Lines Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	111	
JetBlue Airways Corp.	Forest Hills, NY	•	•	•	•	•		•	•	•	•	•		100	100	629	
US Airways Group Inc.	Tempe, AZ	•	•	•	•	•		•	•	•	•	•		100	100	222	
Virgin America	Burlingame, CA	•	•	•	•	•		•	•	•	•	•		100	80		
Southwest Airlines Co.	Dallas, TX	•	•	•	•			•	•	•	•	•		95	95	246	
UAL Corp. (United Airlines)	Chicago, IL	•	•	•		•	1	•	•	•	)	•		88	88	123	
Apparel, Fashion, Textiles, Dept. Stores						3 v	vith 10	00% <b>T</b> c	otal					93 A	verage		
Levi Strauss & Co.	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	518	
Macy's Inc.	Cincinnati, OH	•	•	•	•	•		•	•	•	•	•		100	100	96	
															'		

						Crite	erion (	see pa	ge 65)								
Employer	Headquarters Location	12 points	1b 5 points	stuiod 91 a	stuiod 9 <b>2b</b>	stuiod 9 20	<b>√</b> 2c+	<b>3a</b> 15 points	gp 5 points	36 5 points	♣ 15 pts № 7.5 pts	<b>9</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Nike Inc.	Beaverton, OR	•	•	•	•	•	1	•	•	•	•	•		100	100	136	
Kenneth Cole Productions Inc.	New York, NY	•	•	•	•			•	•	•	•	•		95	95		
Jones Apparel Group Inc.	New York, NY	•		•		•		•	•	•	•	•		83	45	598	
L.L. Bean Inc.	Freeport, ME	•	•	•	•	•		•	•	•	)			78	78		
Polo Ralph Lauren Corp.	New York, NY	•						•						30		481	
VF Corp.	Greensboro, NC	•												15		335	
Automotive						7 \	with 1	00% T	otal					70 <i>A</i>	verage		
Chrysler Group LLC	Auburn Hills, MI	•	•	•	•	•	1	•	•	•	•	•		100	100		
Ford Motor Co.	Dearborn, MI	•	•	•	•	•	1	•	•	•	•	•		100	100	7	
General Motors Co.	Detroit, MI	•	•	•	•	•	1	•	•	•	•	•		100	100	6	
Subaru of America Inc.	Cherry Hill, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Toyota Motor Sales USA Inc.	Torrance, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Visteon Corp.	Van Buren Town- ship, MI	•	•	•	•	•		•	•	•	•	•		100	100	282	
Volkswagen of America Inc.	Herndon, VA	•	•	•	•	•		•	•	•	•	•		100	100		
Bridgestone Americas Holding Inc.	Nashville, TN	•	•	•	•	•				•	•	•		80	80		
Hertz Global Holdings Inc.	Park Ridge, NJ	•	•	•	•	•		•	•	•				70	70	305	
Nissan North America Inc.	Franklin, TN	•	•		•	•		•	•					50	50		
Cooper Tire & Rubber Co.	Findlay, OH		•	•	•						Þ			33	33	707	
Navistar International Corp.	Warrenville, IL	•									•			30	30	175	
Dana Holding Corp.	Toledo, OH	•	•											20	20	316	
Lear Corp.	Southfield, MI	•	•											20	20	195	
ArvinMeritor Inc.	Troy, MI	•						•						30		346	
Asbury Automotive Group	Duluth, GA	•												15		486	
Autoliv Inc.	Auburn Hills, MI	•		•										30		386	
AutoNation Inc.	Fort Lauderdale, FL	•												15		182	
BorgWarner Inc.	Auburn Hills, MI	•		•										30		453	
Delphi Corp.	Troy, MI	•						•						30		121	
Goodyear Tire & Rubber Co.	Akron, OH	•												15		127	
Group 1 Automotive	Houston, TX	•												15		428	
Johnson Controls Inc.	Milwaukee, WI	•		•				•						45		58	
Paccar Inc.	Bellevue, WA	•												15		170	
Penske Automotive Group	Bloomfield Hills, MI	•												15		225	
Sonic Automotive Inc	Charlotte, NC	•												15		337	

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	15 points	<b>1p</b> 5 points	72 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qg</b> 5 points	3c 5 points	♣ 15 pts ♦ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Tenneco Inc.	Lake Forest, IL	•												15		416	
TRW Automotive Holdings Corp.	Livonia, MI	•						•						30		169	
Banking and Financial Services						35	with 1	00% 1	otal					91 A	verage		
American Express Co.	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	74	
Ameriprise Financial Inc.	Minneapolis, MN	•	•	•	•	•	1	•	•	•	•	•		100	100	348	
Aon Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	307	
Bank of America Corp.	Charlotte, NC	•	•	•	•	•	1	•	•	•	•	•		100	100	11	
Bank of New York Mellon Corp., The (BNY Mellon)	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	156	
Barclays Capital	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	95		
BNP Paribas	New York, NY	•	•	•	•	•		•	•	•	•	•		100			
Capital One Financial Corp.	McLean, VA	•	•	•	•	•		•	•	•	•	•		100	100	145	
Charles Schwab Corp., The	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	440	
Citigroup Inc.	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	12	
CoreLogic	Westlake, TX	•	•	•	•	•		•	•	•	•	•		100		398	
Credit Suisse USA Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Deutsche Bank	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		
Federal Home Loan Mortgage Corp. (Freddie Mac)	McLean, VA	•	•	•	•	•	1	•	•	•	•	•		100	100	220	
Federal National Mortgage Association (Fannie Mae)	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100	112	
Goldman Sachs Group Inc., The	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	40	
Harris Bankcorp Inc.	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	100		
HSBC - North America	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
JPMorgan Chase & Co.	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	16	
KeyCorp	Cleveland, OH	•	•	•	•	•		•	•	•	•	•		100	100	382	
MasterCard Inc.	Purchase, NY	•	•	•	•	•		•	•	•	•	•		100	100	474	
Morgan Stanley	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	30	
Northern Trust Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	430	
PNC Financial Services Group Inc., The	Pittsburgh, PA	•	•	•	•	•		•	•	•	•	•		100	85	278	
Raymond James Financial Inc.	St. Petersburg, FL	•	•	•	•	•		•	•	•	•	•		100	100	657	
RBC Wealth Management	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100		
State Street Corp.	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100	206	
SunTrust Banks Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	211	
TD Bank, N.A.	Wilmington , DE	•	•	•	•	•	1	•	•	•	•	•		100	100		

						Crite	erion (e	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	1b 5 points	2a 15 points	2b oints	5 points	<b>√</b> 2c+	8 15 points	<b>gp</b> 5 points	S 5 points	♣ 15 pts ♦ 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Teachers Insurance and Annuity Association - College Retirement Equities Fund	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	82	
Toyota Financial Services Corp.	Torrance, CA	•	•	•	•	•		•	•	•	•	•		100	100		
U.S. Bancorp	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100	129	
UBS AG	Stamford, CT	•	•	•	•	•		•	•	•	•	•		100	100		
Visa	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	394	
Wells Fargo & Co.	San Francisco, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	41	
Canadian Imperial Bank of Commerce	New York, NY	•	•	•	•			•	•	•	•	•		95	95		
Comerica Inc.	Dallas, TX	•	•	•	•	•		•		•	•	•		95	80	559	
Moody's Corp.	New York, NY	•	•	•	•			•	•	•	•	•		95	90	984	
Morningstar Inc.	Chicago, IL	•	•	•		•		•	•	•	•	•		95	95		
E*TRADE Financial Corp.	New York, NY	•	•	•	•	•		•	•	•	•	•		93	93	659	
Robert W. Baird & Co. Incorporated	Milwaukee, WI	•	•	•		•		•		•	•	•		90	90		
BB&T Corp.	Winston-Salem, NC	•	•	•		•		•	•	•	•	•		88	73	260	
AmTrust Bank	Cleveland, OH	•	•	•	•	•		•			Þ	•		83	83		
Fifth Third Bancorp	Cincinnati, OH	•	•			•		•		•	•	•		75	80	302	
Huntington Bancshares Inc.	Columbus, OH	•	•					•	•	•	•	•		75	75	611	
H&R Block Inc.	Kansas City, MO	•	•		•			•	•	•		•		65	65	556	
SLM Corp. (Sallie Mae)	Reston, VA	•	•					•	•	•	•			60	60	331	
Discover Financial Services	Riverwoods, IL	•		•		•		•			•			58	58	352	
Chamberlin Edmonds & Associates Inc.	Atlanta, GA	•				•		•	•	•	Þ			53	53		
Franklin Resources Inc.	San Mateo, CA	•	•			•		•	•	•				50	50	410	
Dun & Bradstreet Corp., The	Short Hills, NJ	•						•	•					35	35	995	
CIT Group Inc.	New York, NY	•						•						30		397	
BlackRock	New York, NY													0		469	
First Data Corp.	Greenwood Village, CO	•												15		295	
Fiserv Inc.	Brookfield, WI	•												15		482	
GMAC LLC	Detroit, MI	•												15		66	
International Assets Holding Corp.	Altamonte Springs, FL													o		140	
Legg Mason, Inc.	Baltimore, MD	•						•						30		500	
NYSE Euronext Inc.	New York, NY	•												15		477	
Regions Financial	Birmingham, AL	•												15		280	
SunGard Data Systems Inc.	Wayne, PA	•						•						30		435	
Western Union Co., The	Englewood, CO	•		•										30		451	

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	<b>1b</b> 5 points	2a 15 points	2b spints	2c 5 points	<b>√</b> 2c+	<b>3a</b> 15 points	<b>3p</b> 5 points	36 5 points	♣ 15 pts № 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Chemicals and Biotechnology						7 v	with 10	00% T	otal				i	89 A	verage		
Air Products & Chemicals Inc.	Allentown, PA	•	•	•	•	•		•	•	•	•	•		100	75	248	
BASF Corp.	Florham Park, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Dow Chemical Co., The	Midland, MI	•	•	•	•	•		•	•	•	•	•		100	100	38	
E. I. du Pont de Nemours and Co. (DuPont)	Wilmington, DE	•	•	•	•	•	1	•	•	•	•	•		100	100	75	
Ecolab Inc.	St. Paul, MN	•	•	•	•	•		•	•	•	•	•		100	100	403	
Genentech Inc.	South San Francisco, CA	•	•	•	•	•	1	•	•	•	•	•		100	100		
Monsanto Co.	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100	235	
Bayer Corp.	Pittsburgh, PA	•	•		•	•		•	•	•	•	•		85	80		
Praxair Inc.	Danbury, CT	•	•			•		•	•	•	•			65	45	249	
PPG Industries Inc.	Pittsburgh, PA	•	•		•						•			40	45	161	
Ashland Inc.	Covington, KY	•						•						30		310	
Avery Dennison	Pasadena, CA	•												15		376	
Celanese Corp.	Dallas, TX	•												15		368	
Eastman Chemical Co.	Kingsport, TN	•												15		364	
Hexion Specialty Chemicals Inc.	Columbus, OH													o		407	
Huntsman Corp.	Salt Lake City, UT													0		262	
Lubrizol Corporation	Wickliffe, OH	•												15		471	
Mosaic Company	Plymouth, MN	•		•										30		276	
Sherwin-Williams Co., The	Cleveland, OH	•												15		322	
Computer and Data Services						<b>2</b> v	vith 10	00% T	otal					77 A	verage	:	
Automatic Data Processing Inc.	Roseland, NJ	•	•	•	•	•		•	•	•	•	•		100	100	297	
LexisNexis Group	Miamisburg, OH	•	•	•	•	•		•	•	•	•	•		100	100		
EMC Corp.	Hopkinton, MA	•	•	•	•			•	•	•	•	•		95	95	172	
Computer Sciences Corp. (CSC)	Falls Church, VA	•	•	•	•	•		•	•	•	•			85	85	153	
Broadridge Financial Solutions Inc.	Lake Success, NY	•	•	•				•	•	•	Þ	•		83		835	
SRA International Inc.	Fairfax, VA	•	•					•	•	•	•	•		75	75		
Unisys Corp.	Blue Bell, PA	•	•	•	•			•			•			70	70	456	
Affiliated Computer Services	Dallas, TX	•	•					•	•	•		•		60	60	401	
Perot Systems Corp.	Plano, TX	•	•					•	•	•	•			53	53	723	
Keane Inc.	Boston, MA	•	•					•			•			50	50		
Science Applications International Corp.	San Diego, CA	•						•						30		266	

						Crite	rion (	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	1b 5 points	2 15 points	stuiod g	2c S points	<b>√</b> 2c+	<b>38</b> 15 points	<b>qp</b> 5 points	3c 5 points	♣ 15 pts № 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Computer Hardware and Office Equip	oment					10	with 1	00% 1	<b>Total</b>					88 <i>A</i>	verage		
Apple Inc.	Cupertino, CA	•	•	•	•	•		•	•	•	•	•		100	100	71	
CDW Corp.	Vernon Hills, IL	•	•	•	•	•		•	•	•	•	•		100	88		
Cisco Systems Inc.	San Jose, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	57	
Dell Inc.	Round Rock, TX	•	•	•	•	•		•	•	•	•	•		100	100	33	
Hewlett-Packard Co.	Palo Alto, CA	•	•	•	•	•		•	•	•	•	•		100	100	9	
Lexmark International Inc.	Lexington, KY	•	•	•	•	•		•	•	•	•	•		100	100	507	
NCR Corp.	Dayton, OH	•	•	•	•	•		•	•	•	•	•		100	100	446	
NetApp Inc.	Sunnyvale, CA	•	•	•	•	•		•	•	•	•	•		100	100	647	
Tech Data Corp.	Clearwater, FL	•	•	•	•	•		•	•	•	•	•		100	100	102	
Xerox Corp.	Norwalk, CT	•	•	•	•	•		•	•	•	•	•		100	100	147	
Ingram Micro	Santa Ana, CA	•	•	•	•	•		•		•	Þ	•		88		67	
Avaya Inc.	Basking Ridge, NJ	•	•	•	•	•	1	•	•	•	•			85	85		
Pitney Bowes Inc.	Stamford, CT	•	•	•	•	•		•	•	•				70	70	395	
Avnet Inc.	Phoenix, AZ	•	•			•		•	•	•	•			65	30	144	
Seagate Technology LLC	Scotts Valley, CA	•	•					•	•	•	•			60	60		
Acer Inc.	Irvine, CA	•	•			•		•	•	•				50	50		
Software House International	Somerset, NJ	•	•		•			•						40	40		
Arrow Electronics	Melville, NY	•												15		151	
Brightpoint, Inc.	Indianapolis, IN	•												15		496	
Harris Corp.	Melbourne, FL	•		•										30		447	
Insight Enterprises, Inc.	Tempe, AZ													0		484	
SYNNEX Corp.	Fremont, CA													0		328	
United Stationers Inc.	Deerfield, IL	•												15		475	
Western Digital Corp.	Lake Forest, CA	•						•						30		319	
Computer Software						7 v	vith 10	00% To	otal		,			88 A	verage	•	
BMC Software Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100	994	
Electronic Arts Inc.	Redwood City, CA	•	•	•	•	•		•	•	•	•	•		100	100	590	
Intuit Inc.	Mountain View, CA	•	•	•	•	•		•	•	•	•	•		100	100	678	
Microsoft Corp.	Redmond, WA	•	•	•	•	•	1	•	•	•	•	•		100	100	35	
Oracle Corp.	Redwood City, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	113	
SAP America Inc.	Newtown Square, PA	•	•	•	•	•		•	•	•	•	•		100	100		
Symantec Corp.	Mountain View, CA	•	•	•	•	•		•	•	•	•	•		100	100	419	

						Crite	rion (s	see pa	ge 65)								l
Employer	Headquarters Location	15 points	1b 5 points	2a 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qg</b> 5 points	3c 5 points	♣ 15 pts ₱ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Adobe Systems Inc.	San Jose, CA	•	•	•	•			•	•	•	•	•		95	95	601	
Compuware Corp.	Detroit, MI	•	•	•	•	•		•	•	•	•	•		93	93		
Cerner Corp.	Kansas City, MO	•	•	•	•			•	•	•	•			73	73		
McAfee Inc.	Santa Clara, CA	•	•			•		•		•	•			53	53		
Allscripts-Misys Healthcare Solutions Inc.	Chicago, IL	•						•		•	Þ			43			
Consulting and Business Services						15	with 1	00% T	otal					95 A	verage		
A.T. Kearney Inc.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Accenture Ltd.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Bain & Co. Inc. (& Bridgespan Group Inc.)	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Booz Allen Hamilton Inc.	McLean, VA	•	•	•	•	•	1	•	•	•	•	•		100	100		ı
Boston Consulting Group	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Deloitte LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		ı
Ernst & Young LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		
Hewitt Associates	Lincolnshire, IL	•	•	•	•	•		•	•	•	•	•		100	100	653	ı
International Business Machines Corp. (IBM)	Armonk, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	14	
KPMG LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		
Marsh & McLennan Companies Inc.	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	232	
McKinsey & Co. Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Navigant Consulting Inc.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Nielsen Co., The	New York City, NY	•	•	•	•	•		•	•	•	•	•		100	100		l
PricewaterhouseCoopers LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		
Harris Interactive Inc.	New York, NY	•	•	•	•	•		•	•	•	Þ	•		93	93		
Robert Half International Inc.	Menlo Park, CA	•	•	•	•	•		•	•	•	Þ	•		93	93	503	
Aramark Corp.	Philadelphia, PA	•	•	•				•	•	•	•	•		90	75	198	l
Adecco North America LLC	Melville, NY	•	•	•	•	•		•	•	•		•		85	85		
Convergys Corp.	Cincinnati, OH	•	•		•	•		•		•	•	•		80	80	721	
Capgemini U.S.	New York, NY	•	•					•	•	•	•			60	60		
Kelly Services Inc.	Troy, MI	•		•										30		437	
Manpower Inc.	Milwaukee, WI	•												15		119	
Education and Child Care						1 v	with 10	00% <b>T</b>	otal					100 Å	Average	•	
Bright Horizons Family Solutions Inc.	Watertown, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Energy and Utilities						8 v	with 10	00% <b>T</b> c	otal					76 A	verage	:	
Consolidated Edison Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	95	191	

						Crite	rion (s	see pag	ge 65)								
Employer	Headquarters Location	a 15 points	<b>1b</b> 5 points	2a 15 points	stuiod 9	2c 5 points	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Constellation Energy Group Inc.	Baltimore, MD	•	•	•	•	•		•	•	•	•	•		100	100	125	I
Exelon Corp.	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	95	134	
National Grid USA	Brooklyn, NY	•	•	•	•	•		•	•	•	•	•		100	100		
PG&E Corp.	San Francisco, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	176	
Public Service Enterprise Group	Newark, NJ	•	•	•	•	•		•	•	•	•	•		100	100	190	
Sempra Energy	San Diego, CA	•	•	•	•	•		•	•	•	•	•		100	100	252	
Southern California Edison Co.	Rosemead, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Dominion Resources Inc.	Richmond, VA	•	•	•	•			•	•	•	•	•		95	95	157	
Entergy Corp.	New Orleans, LA	•	•	•	•			•	•	•	•	•		95	95	205	
Portland General Electric Co.	Portland, OR	•	•	•	•	•		•		•	•	•		95		987	
Xcel Energy Inc.	Minneapolis, MN	•	•	•	•	•		•		•	•	•		95	95	242	
PacifiCorp	Portland, OR	•	•	•	•	•		•	•	•	•	•		93	93		
NV Energy Inc.	Las Vegas, NV	•	•	•				•		•	•	•		85	70	608	
Williams Companies Inc.	Tulsa, OK	•	•		•	•		•	•	•	•	•		85	80	218	
Alliant Energy Corp.	Madison, WI	•	•		•			•	•	•	•	•		80	80	588	
Duke Energy Corp.	Charlotte, NC	•	•		•			•	•	•	•	•		80	80	204	
Pepco Holdings Inc.	Washington, DC	•	•		•			•	•	•	•	•		80	80	254	
DTE Energy Co.	Detroit, MI	•	•			•		•		•	•	•		75	75	285	
RRI Energy Inc.	Houston, TX	•	•					•	•	•	•	•		75	75	214	
Ameren Corp.	St. Louis, MO	•	•		•	•			•	•	•	•		70	70	327	
Progress Energy Inc.	Raleigh, NC	•	•					•	•	•	•	•		68	68	288	ı
Southern Co.	Atlanta, GA	•	•					•	•	•	•	•		68	48	149	
Northeast Utilities	Berlin, CT	•	•		•	•		•		•	•			65	65	424	ı
Severn Trent Services Inc.	Fort Washington, PA	•	•	•		•		•	•	•				65	65		
PPL Corp.	Allentown, PA	•	•			•					•	•		55	55	314	l
Wisconsin Energy Corp.	Milwaukee, WI	•	•			•					•	•		55	55	515	
Calpine Corp.	Houston, TX	•						•	•	•	Þ			48	48	272	
Laclede Group Inc., The	St. Louis, MO	•	•	•	•						•			48	0	829	
Allegheny Energy Inc.	Greensburg, PA	•	•		•			•		•				45	45	630	
Mirant Corp.	Atlanta, GA	•	•					•	•	•				45	45	660	
Pinnacle West Capital	Phoenix, AZ	•		•								•		45	45	621	
PNM Resources Inc.	Albuquerque, NM	•	•	•							)			43	43	789	
Edison International	Rosemead, CA	•	•					•						35	35	184	 I

						Crite	rion (s	see pa	ge 65)								l
Employer	Headquarters Location	15 points	1b 5 points	Te points	5 points	5 points	<b>√</b> 2c+	<b>39</b> 15 points	<b>3p</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
AES Corp., The	Arlington, VA	•												15		158	
American Electric Power Co. Inc.	Columbus, OH	•												15		180	
Atmos Energy Corp.	Dallas, TX	•		•										30		343	
CenterPoint Energy Inc.	Houston, TX	•												15		238	
CMS Energy Services	Jackson, MI	•												15		369	
Edison International	Rosemead, CA	•	•	•				•						50		184	
Energy Future Holdings Corp.	Dallas, TX	•												15		237	
Energy Transfer Partners, LP	Dallas, TX													o		286	
FirstEnergy Corp.	Akron, OH	•												15		194	
FPL Group Inc.	Juno Beach, FL	•												15		154	ı
Global Partners	Waltham, MA													o		291	
Integrys Energy Group Inc.	Chicago, IL	•		•										30		185	
NiSource Inc.	Merrillville, IN	•												15		289	
NRG Energy Inc.	Princeton, NJ	•												15		363	ı
ONEOK Inc.	Tulsa, OK	•												15		159	
SCANA Corp.	Columbia, SC	•												15		445	ı
Targa Resources Partners LP	Houston, TX													o		323	
UGI Corp.	King of Prussia, PA	•												15		377	
Engineering and Construction						0 1	with 10	00% T	otal					54 A	verage		
CH2M HILL Companies Ltd.	Englewood, CO	•	•		•			•	•	•	•	•		80	80	436	
KB Home	Los Angeles, CA	•		•				•	•	•		•		70	70	682	
Perkins + Will Inc.	Chicago, IL	•						•	•	•	•			55	55		
Jacobs Engineering Group Inc.	Pasadena, CA		•		•			•	•	•				35	35	241	
Ryland Group Inc., The	Calabasas, CA	•	•		•	•								30	30	902	
AECOM Technology Corp.	Los Angeles, CA	•						•						30		458	
Centex Corp.	Dallas, TX	•												15		308	
DR Horton Inc.	Fort Worth, TX	•		•										30		378	
EMCOR Group Inc.	Norwalk, CT	•						•						30		370	
Fluor Corp.	Irving, TX	•												15		114	
KBR Inc.	Houston, TX													o		234	
Perini Corporation	Framingham, MA													o		432	
Peter Kiewit Sons' Inc.	Omaha, NE	•												15		321	
Pulte Homes Inc.	Bloomfield Hills, MI	•												15		393	

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	d 5 points	stuiod 91 2a	2b spoints	2c 5 points	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	S 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Shaw Group Inc., The	Baton Rouge, LA	•												15		357	I
URS Corp.	San Francisco, CA	•						•						30		264	
Entertainment and Electronic Media						6 v	vith 10	00% <b>T</b> o	otal				:	94 A	verage		
AMC Entertainment Inc.	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100	777	
CC Media Holdings Inc. (Clear Channel)	San Antonio, TX	•	•	•	•	•		•	•	•	•	•		100	100	372	
Cox Enterprises Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		
Time Warner Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	48	
Viacom Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	177	
Walt Disney Co., The	Burbank, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	60	
Comcast Corp.	Philadelphia, PA	•	•	•	•			•	•	•	•	•		95	95	68	
SIRIUS XM Radio Inc.	New York, NY	•	•	•	•			•	•		•	•		90	80		
Thomson Reuters	New York, NY	•	•		•	•	1	•	•	•	•	•		85	75		
Corbis Corp.	Seattle, WA	•	•	•		•		•	•	•		•		80	80		
Live Nation Inc.	Beverly Hills, CA	•	•	•	•	•		•		•		•		80	80	524	
CBS Corp.	New York, NY	•		•				•						45		186	
News Corp.	New York, NY	•						•						30		70	
Food, Beverages and Groceries						19	with 1	00% T	otal					83 A	verage		
Anheuser-Busch Companies Inc.	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100		
Brinker International Inc.	Dallas, TX	•	•	•	•	•		•	•	•	•	•		100	100	533	ı
Brown-Forman Corp.	Louisville, KY	•	•	•	•	•		•	•	•	•	•		100	85	758	
Campbell Soup Co.	Camden, NJ	•	•	•	•	•	1	•	•	•	•	•		100	100	309	
Cargill Inc.	Wayzata, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Coca-Cola Co., The	Atlanta, GA	•	•	•	•	•	1	•	•	•	•	•		100	100	73	ı
Coca-Cola Enterprises Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	116	
Diageo North America	Norwalk, CT	•	•	•	•	•	1	•	•	•	•	•		100	100		l
Food Lion LLC	Salisbury, NC	•	•	•	•	•		•	•	•	•	•		100	100		
General Mills Inc.	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100	193	l
Hershey Co., The	Hershey, PA	•	•	•	•	•		•	•	•	•	•		100	70	463	
Kellogg Co.	Battle Creek, MI	•	•	•	•	•		•	•	•	•	•		100	65	210	
Land O'Lakes Inc.	Arden Hills, MN	•	•	•	•	•		•	•	•	•	•		100	53	224	
MillerCoors LLC	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100	487	
PepsiCo Inc.	Purchase, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	52	
Sara Lee Corp.	Downers Grove, IL	•	•	•	•	•		•	•	•	•	•		100	75	199	

						Crite	rion (s	see pag	ge 65)								
Employer	Headquarters Location	15 points	1b 5 points	2a 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qp</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Sodexo Inc.	Gaithersburg, MD	•	•	•	•	•		•	•	•	•	•		100	100		
Starbucks Corp.	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100	261	
Supervalu Inc.	Eden Prairie, MN	•	•	•	•	•		•	•	•	•	•		100	100	51	
ConAgra Foods Inc.	Omaha, NE	•	•	•		•		•	•	•	•	•		95	90	188	
E&J Gallo Winery	Modesto, CA	•	•	•	•	•		•		•	•	•		95			
Kraft Foods Inc.	Northfield, IL	•	•	•	•	•	1	•		•	•	•		95	95	53	
Hain Celestial Group Inc.	Melville, NY	•	•		•	•		•	•	•	•	•		85	70		
McDonald's Corp.	Oak Brook, IL	•	•		•	•		•	•	•	•	•		85	85	107	
Rite Aid Corp.	Camp Hill, PA	•	•		•	•		•	•	•	•	•		85	85	100	
Whole Foods Market Inc.	Austin, TX	•	•	•	•			•			•	•		85	85	324	
Hannaford Brothers	Scarborough, ME	•	•	•	•			•		•	•	•		83	83		
Darden Restaurants Inc.	Orlando, FL	•	•			•		•	•	•	•	•		80	80	374	
Ahold USA Inc.	Quincy, MA	•	•	•	•	•		•	•	•	•			78	78		
Gastronomy Inc.	Salt Lake City, UT	•	•	•				•	•		•	•		78	63		
Palm Management Corp.	Washington, DC	•	•		•	•		•	•	•	•	•		78	78		
H.E. Butt Grocery Co.	San Antonio, TX	•	•			•		•	•		•	•		75	75		
Kroger Co., The	Cincinnati, OH	•	•					•	•	•	•	•		75	75	22	
Nestle Purina PetCare Co.	St. Louis, MO	•	•		•			•		•	•	•		75	75		
Safeway Inc.	Pleasanton, CA	•	•	•	•					•	•	•		75	75	50	
Burger King Corp.	Miami, FL	•	•			•		•	•	•	Þ	•		73	68	790	
Dean Foods Co.	Dallas, TX	•	•			•		•	•	•	•	•		73	73	216	
Mars Inc.	Mt. Olive, NJ	•	•	•		•		•	•	•	•			73	73		
H.J. Heinz Co.	Pittsburgh, PA	•	•	•				•	•	•	•			68	68	267	
Yum! Brands Inc.	Louisville, KY	•	•		•			•	•	•	•			65	65	239	
Domino's Pizza Inc.	Ann Arbor, MI	•	•			•				•	•	•		60	60		
U.S. Foodservice Inc.	Rosemont, IL	•	•			•		•	•	•	•			58	58		
Cracker Barrel Old Country Store Inc.	Lebanon, TN	•	•			•					•	•		55	15	807	
Compass Group USA Inc.	Charlotte, NC	•	•		•			•	•	•				50	50		
Dole Food Co. Inc.	Westlake Village, CA	•	•		•			•	•					45	45	329	
C&S Wholesale Grocers Inc.	Keene, NH	•				•		•	•					40	40		
Archer Daniels Midland Co.	Decatur, IL	•						•	•	•				40		27	
CHS Inc.	Inver Grove Heights, MN													0		72	
Dr Pepper Snapple Group Inc.	Plano, TX	•												15		427	

						Crite	rion (s	see pag	ge 65)								
Employer	Headquarters Location	15 points	1b 5 points	2 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>3p</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Great Atlantic & Pacific Tea Co. Inc., The	Montvale, NJ													0		360	l
Hormel Foods Corp.	Austin, MN	•												15		373	
Nash Finch	Minneapolis, MN	•												15		492	
Pilgrim's Pride Corporation	Pittsburg, TX													0		304	
Publix Super Markets	Lakeland, FL	•												15		101	
Smithfield Foods Inc.	Smithfield, VA	•												15		183	
SYSCO Corp.	Houston, TX	•												15		62	
Tyson Foods, Inc.	Springdale, AR	•												15		89	
Winn-Dixie Stores Inc.	Jacksonville, FL	•												15		340	
Forest and Paper Products						0 v	vith 10	00% <b>T</b> c	otal					75 A	verage		
Weyerhaeuser Co.	Federal Way, WA	•	•		•	•		•	•	•	•	•		85	70	236	
International Paper Co.	Memphis, TN	•	•		•			•	•	•	•			65	65	97	
Domtar Corp.	Fort Mill, SC	•												15		390	
Healthcare/ Health Insurance						7 v	vith 10	00% <b>T</b> c	otal					83 <i>A</i>	verage		
Aetna Inc.	Hartford, CT	•	•	•	•	•	1	•	•	•	•	•		100	100	77	
Bausch & Lomb Inc.	Rochester, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Blue Cross Blue Shield of Florida Inc.	Jacksonville, FL	•	•	•	•	•		•	•	•	•	•		100	100		
Cardinal Health Inc.	Dublin, OH	•	•	•	•	•	1	•	•	•	•	•		100	100	18	
Health Care Service Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Kaiser Permanente	Oakland, CA	•	•	•	•	•		•	•	•	•	•		100	100		
UnitedHealth Group Inc.	Minnetonka, MN	•	•	•	•	•		•	•	•	•	•		100	100	21	ı
Blue Cross Blue Shield of Minnesota	Eagan, MN	•	•	•	•			•	•	•	•	•		95			
CIGNA Corp.	Philadelphia, PA	•	•	•	•			•	•	•	•	•		95	95	132	
WellPoint Inc.	Indianapolis, IN	•	•	•	•			•	•	•	•	•		95	95	32	
Group Health Cooperative	Seattle, WA	•	•	•	•	•		•	•	•	Þ	•		93	88		
Harvard Pilgrim Health Care Inc.	Wellesley, MA	•	•	•	•	•		•	•	•	•	•		93	93		
Health Net Inc.	Woodland Hills, CA	•	•	•	•	•		•	•	•	Þ	•		93	93	165	
Blue Cross Blue Shield of North Carolina	Durham, NC	•	•	•		•		•		•	•	•		90	90		
Group Health Permanente	Seattle, WA	•		•		•		•	•	•	•	•		90	85		
Abbott Laboratories	Abbott Park, IL	•	•		•	•		•	•	•	•	•		85	80	80	
Quest Diagnostics Inc.	Madison, NJ	•	•		•	•		•	•	•	•	•		85	85	341	_ <del></del>
Baxter International Inc.	Deerfield, IL	•	•			•		•	•	•	•	•		80	80	219	
Mayo Clinic	Rochester, MN	•	•		•			•	•	•	•	•		80			

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	15 points	<b>1p</b> 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	28 15 points	<b>qg</b> 5 points	3c 5 points	♣ 15 pts ♦ 7.5 pts	<b>61</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
CareFusion Corp.	San Diego, CA	•	•	•		•		•		•	•			75			
McKesson Corp.	San Francisco, CA	•						•	•	•	•	•		70	83	15	
Vision Service Plan	Rancho Cordova, CA	•	•			•		•	•	•	•			65	65		
Patterson Companies (Patterson Dental Supply)	St. Paul, MN	•		•		•		•	•		,			63		687	
Austin Radiological Assn.	Austin, TX	•				•		•	•	•	•			53	53		
Owens & Minor Inc.	Mechanicsville, VA	•	•		•	•		•		•				50	50	339	
Tenet Healthcare	Dallas, TX	•						•	•	•	•			48	40	283	
Humana Inc.	Louisville, KY	•				•		•	•	•				45	45	85	
AmerisourceBergen Corp.	Chesterbrook, PA	•						•						30		26	
Community Health Systems Inc.	Franklin, TN													0		243	
Coventry Health Care	Bethesda, MD	•												15		226	
DaVita Inc.	El Segundo, CA	•						•						30		433	
Express Scripts Inc.	St. Louis, MO	•						•						30		115	
HCA - Hospital Corporation of America	Nashville, TN	•						•						30		88	
Henry Schein	Melville, NY	•												15		389	
Medco Health Solutions	Franklin Lakes, NJ	•						•						30		45	
Omnicare	Covington, KY	•												15		392	
Universal Health Services	King of Prussia, PA	•												15		467	
WellCare Health Plans, Inc.	Tampa, FL													o		381	
High-Tech/Photo/Science Equip.						7 v	with 10	00% T	otal					88 <i>A</i>	verage	•	
Agilent Technologies Inc.	Santa Clara, CA	•	•	•	•	•		•	•	•	•	•		100	100	425	
Applied Materials Inc.	Santa Clara, CA	•	•	•	•	•		•	•	•	•	•		100	100	315	
Eastman Kodak Co.	Rochester, NY	•	•	•	•	•	1	•	•	•	•	•		100	100	284	
Freescale Semiconductor Inc.	Austin, TX	•	•	•	•	•		•	•	•	•	•		100	100	457	
Intel Corp.	Santa Clara, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	61	
Medtronic Inc.	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100	196	
Texas Instruments Inc.	Dallas, TX	•	•	•	•	•		•	•	•	•	•		100	100	215	
Advanced Micro Devices Inc.	Sunnyvale, CA	•	•	•	•	•		•	•	•	•	•		93	75	418	
ITT Corp.	White Plains, NY	•	•	•				•	•	•	•	•		90	60	229	
Polaroid Corp.	Waltham, MA	•	•					•	•	•	•			60	60		
KLA-Tencor Corp.	Milpitas, CA	•	•		•			•	•	•	•			58	58	774	
Nokia Corp.	Irving, TX	•	•		•	•		•		•				50	50		
Agco	Duluth, GA	•												15		306	

						Crite	erion (s	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	d 5 points	stuiod 91 a	stuiod 9 <b>2b</b>	20 5 points	✓ 2c+	3a 15 points	<b>gp</b> 5 points	S 5 points	♣ 15 pts ▶ 7.5 pts	<b>9</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Becton, Dickinson and Co.	Franklin Lakes, NJ	•						•		•				35		347	
Boston Scientific Corp.	Natick, MA	•						•						30		320	
Broadcom Corp.	Irvine, CA	•												15		495	
Dover Corp.	New York, NY	•												15		333	
Eaton Corp.	Cleveland, OH	•						•						30		164	
General Cable Corp.	Highland Heights, KY	•												15		396	
Graybar Electric Company, Inc.	St. Louis, MO	•						•						30		439	
Manitowoc Company, Inc.	Manitowoc, WI													o		480	
Micron Technology Inc.	Boise, ID	•												15		423	
Parker Hannifin Corp.	Cleveland, OH	•												15		221	
Rockwell Automation Inc.	Milwaukee, WI	•												15		429	
Sanmina-SCI	San Jose, CA	•												15		292	
SPX Corp.	Charlotte, NC													0		402	
Stryker Corp.	Kalamazoo, MI	•												15		375	
Terex Corporation	Westport, CT	•		•										30		275	
Thermo Fisher Scientific Inc.	Waltham, MA	•						•						30		258	
Timken Co., The	Canton, OH	•		•										30		431	
WESCO International Inc.	Pittsburgh, PA	•		•										30		406	
Home Furnishing						11	with 10	00% To	otal					100 /	lverag	9	
Mitchell Gold + Bob Williams	Taylorsville, NC	•	•	•	•	•		•	•	•	•	•		100	100		
Fortune Brands Inc.	Deerfield, IL	•												15		351	
Jarden Corp.	Rye, NY	•		•										30		442	
Leggett & Platt Inc.	Carthage, MO													0		493	
Masco Corp.	Taylor, MI	•												15		277	
Hotels, Resorts and Casinos						7 \	with 10	00% <b>T</b> c	otal					92 A	verage	•	
Carlson Companies Inc.	Minnetonka, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Harrah's Entertainment Inc.	Las Vegas, NV	•	•	•	•	•		•	•	•	•	•		100	100	263	
Hyatt Hotels Corp.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Kimpton Hotel & Restaurant Group Inc.	San Francisco, CA	•	•	•	•	•	1	•	•	•	•	•		100	100		
Marriott International Inc.	Bethesda, MD	•	•	•	•	•		•	•	•	•	•		100	100	208	
Starwood Hotels & Resorts Worldwide	White Plains, NY	•	•	•	•	•		•	•	•	•	•		100	100	417	
Wynn Resorts Ltd.	Las Vegas, NV	•	•	•	•	•		•	•	•	•	•		100	100	691	
Choice Hotels International Inc.	Silver Spring, MD	•	•	•	•	•		•		•	•	•		95	90		l

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	1b 5 points	2a 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	S 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Wyndham Worldwide Corp.	Parsippany, NJ	•	•	•	•	•		•		•	•	•		95	95	528	
Hilton Hotels Corp.	Beverly Hills, CA	•	•	•	•			•		•	•	•		90	90		
InterContinental Hotels Group Americas	Atlanta, GA	•	•		•	•		•	•	•	•	•		85	85		
MGM Mirage	Las Vegas, NV	•	•		•	•		•	•	•	•	•		85	85	344	
Host Hotels & Resorts Inc.	Bethesda, MD	•	•		•			•	•					45	45	449	
Insurance						18	with 1	00% T	otal					91 A	verage		
AAA Northern California, Nevada and Utah	Walnut Creek, CA	•	•	•	•	•		•	•	•	•	•		100	100		
AIG	New York, NY	•	•	•	•	•		•	•	•	•	•		100	85		
Allianz Life Insurance Co. of North America	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100		
Allstate Corp., The	Northbrook, IL	•	•	•	•	•		•	•	•	•	•		100	100	81	
Chubb Corp.	Warren, NJ	•	•	•	•	•		•	•	•	•	•		100	100	203	
CNA Insurance	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Esurance Inc.	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100		
Hartford Financial Services Group Inc., The	Hartford, CT	•	•	•	•	•		•	•	•	•	•		100	100	287	
ING North America Insurance Corp.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		
John Hancock Financial Services Inc.	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	73		
Massachusetts Mutual Life Insurance Co.	Springfield, MA	•	•	•	•	•		•	•	•	•	•		100	100	135	
MetLife Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	39	
Nationwide	Columbus, OH	•	•	•	•	•		•	•	•	•	•		100	100	124	
New York Life Insurance Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	76	
Pacific Life Insurance Co.	Newport Beach, CA	•	•	•	•	•		•	•	•	•	•		100	100	551	
Progressive Corp., The	Mayfield Village, OH	•	•	•	•	•		•	•	•	•	•		100	100	209	
Prudential Financial Inc.	Newark, NJ	•	•	•	•	•		•	•	•	•	•		100	100	84	
Sun Life Financial Inc. (U.S.)	Wellesley Hills, MA	•	•	•	•	•		•	•	•	•	•		100	100		
Lincoln National Corp.	Radnor, PA	•	•	•	•			•	•	•	•	•		95	95	274	
Principal Financial Group	Des Moines, IA	•	•	•	•			•	•	•	•	•		95	95	273	
American Family Insurance Group	Madison, WI	•	•	•	•	•		•		•	•	•		88	88	388	
Unum Group	Chattanooga, TN	•	•	•	•			•	•	•	•	•		88	88	270	
Selective Insurance Group	Branchville, NJ	•	•	•	•	•		•	•	•	•			85	85		
Travelers Companies Inc., The	New York, NY	•	•	•	•	•		•	•	•		•		85	50	99	
Mutual of Omaha Insurance	Omaha, NE	•	•		•			•	•	•	•	•		80	80	525	
State Farm Group	Bloomington, IL	•	•	•	•	•	1			•	•	•		80	80	31	
Zurich North America	Schaumburg, IL	•	•	•		•		•	•	•	•			80	65		

						Crite	<b>rion (</b> s	ee pa	ge 65)								
Employer	Headquarters Location	a 15 points	<b>1b</b> 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qp</b> 5 points	3c 5 points	♣ 15 pts ♦ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
CUNA Mutual Insurance Group	Madison, WI	•						•		•	•	•		65	65	792	l
Guardian Life Insurance Co. of America, The	New York, NY	•	•					•	•	•				45		279	
Loews Corp.	New York, NY	•	•					•	•	•				45	45	174	
AEGON USA Inc.	Cedar Rapids, IA		•		•	•		•	•	•				40	40		
AFLAC Inc.	Columbus, GA	•		•										30		152	
Assurant	New York, NY	•												15		299	
Auto-Owners Insurance Group	Lansing, MI													0		476	
Berkshire Hathaway Inc.	Omaha, NE	•												15		13	
Genworth Financial Inc.	Richmond, VA	•		•										30		271	
Liberty Mutual Group	Boston, MA	•												15		86	
Northwestern Mutual Life Insurance	Milwaukee, WI	•						•						30		118	
Thrivent Financial for Lutherans	Minneapolis, MN	•												15		409	
United Services Automobile Association	San Antonio, TX													0		207	
Universal American Corp.	Rye Brook, NY													0		494	
W.R. Berkley	Greenwich, CT													0		490	
Western & Southern Financial Group	Cincinnati, OH	•		•				•						45		441	
Internet Services and Retailing						3 v	vith 10	00% To	otal					93 A	verage	•	
eBay Inc.	San Jose, CA	•	•	•	•	•		•	•	•	•	•		100	100	303	
Google Inc.	Mountain View, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	117	l
Yahoo! Inc.	Sunnyvale, CA	•	•	•	•	•	1	•	•	•	•	•		100	100	345	
Amazon.com Inc.	Seattle, WA	•	•	•		•		•	•	•	•	•		95	95	130	l
Hanover Direct Inc.	Weehawken, NJ	•	•	•	•			•	•		•	•		83	75		
Expedia Inc.	Bellevue, WA	•	•			•		•	•	•	•	•		80	65	699	l
Liberty Media Corp.	Englewood, CO	•												15		265	
Law Firms						97	with 1	00% 1	otal					96 A	verage	·	
Akin, Gump, Strauss, Hauer & Feld LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		31
Alston & Bird LLP	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		50
Arent Fox LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		122
Arnold & Porter LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		56
Baker & Daniels LLP	Indianapolis, IN	•	•	•	•	•		•	•	•	•	•		100	100		172
Baker & McKenzie	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	95		2
Baker Botts LLP	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		43
Ballard Spahr LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		96

						Crite	rion (s	see pag	ge 65)								
Employer	Headquarters Location	15 points	<b>1p</b> 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>ap</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Bingham McCutchen LLP	Boston, MA	•	•	•	•	•	1	•	•	•	•	•		100	100		32
Brown Rudnick LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		166
Bryan Cave LLP	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100		58
Carlton Fields PA	Tampa, FL	•	•	•	•	•	1	•	•	•	•	•		100	100		162
Chapman and Cutler LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		168
Choate, Hall & Stewart LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100			158
Cleary, Gottlieb, Steen & Hamilton LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		18
Clifford Chance US LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		
Covington & Burling LLP	Washington, DC	•	•	•	•	•	1	•	•	•	•	•		100	100		54
Cravath, Swaine & Moore LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		52
Crowell & Moring LLP	Washington, DC	•	•	•	•	•	1	•	•	•	•	•		100	95		91
Davis, Polk & Wardwell LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		30
Debevoise & Plimpton LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		33
Dewey & LeBoeuf LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		13
Dickstein Shapiro LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		87
DLA Piper	Baltimore, MD	•	•	•	•	•	1	•	•	•	•	•		100	100		11
Dorsey & Whitney LLP	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•		100	100		73
Drinker Biddle & Reath LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	95		71
Duane Morris LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		72
Edwards Angell Palmer & Dodge LLP	Boston, MA	•	•	•	•	•	1	•	•	•	•	•		100	100		85
Fenwick & West LLP	Mountain View, CA	•	•	•	•	•		•	•	•	•	•		100	100		134
Finnegan, Henderson, Farabow, Garrett & Dunner LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		74
Fish & Richardson PC	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	95		70
Foley Hoag LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		157
Fried, Frank, Harris, Shriver & Jacobson LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		60
Fulbright & Jaworski LLP	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		36
Gibson, Dunn & Crutcher LLP	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	100		20
Goodwin Procter LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		38
Greenberg Traurig LLP	Miami, FL	•	•	•	•	•		•	•	•	•	•		100	83		10
Haynes and Boone LLP	Dallas, TX	•	•	•	•	•		•	•	•	•	•		100	100		94
Hinshaw & Culbertson LLP	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	100		137
Hogan Lovells US LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		22
Holland & Knight LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		44

						Crite	rion (s	see pa	ge 65)								l
Employer	Headquarters Location	15 points	<b>1b</b> 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qp</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Howrey LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		49
Hunton & Williams LLP	Richmond, VA	•	•	•	•	•		•	•	•	•	•		100	100		39
Husch Blackwell Sanders LLP	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		89
Jenner & Block LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		81
K&L Gates LLP	Pittsburgh, PA	•	•	•	•	•	1	•	•	•	•	•		100			19
Katten Muchin Rosenman LLP	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	100		64
Kaye Scholer LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		65
Kelley Drye & Warren LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	95		118
Kirkland & Ellis LLP	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	100		7
Kramer Levin Naftalis & Frankel LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		90
Latham & Watkins LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		3
Littler Mendelson PC	San Francisco, CA	•	•	•	•	•	1	•	•	•	•	•		100	100		76
Manatt, Phelps & Phillips LLP	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	100		106
Mayer Brown LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		8
McDermott Will & Emery LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		17
Milbank, Tweed, Hadley & McCloy LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		42
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo PC	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		97
Morgan Lewis & Bockius LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		12
Morrison & Foerster LLP	San Francisco, CA	•	•	•	•	•	1	•	•	•	•	•		100	100		23
Nixon Peabody LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		63
O'Melveny & Myers LLP	Washington, DC	•	•	•	•	•		•	•	•	•	•		100	100		24
Orrick, Herrington & Sutcliffe LLP	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100		27
Patterson Belknap Webb & Tyler LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		160
Paul, Hastings, Janofsky & Walker LLP	Los Angeles, CA	•	•	•	•	•	1	•	•	•	•	•		100	100		14
Pepper Hamilton LLP	Philadelphia, PA	•	•	•	•	•		•	•	•	•	•		100	100		82
Perkins Coie LLP	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100		67
Pillsbury Winthrop Shaw Pittman LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		48
Proskauer Rose LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		41
Quarles & Brady LLP	Milwaukee, WI	•	•	•	•	•		•	•	•	•	•		100	100		126
Robins, Kaplan, Miller & Ciresi LLP	Minneapolis, MN	•	•	•	•	•	1	•	•	•	•	•		100	100		135
Ropes & Gray LLP	Boston, MA	•	•	•	•	•		•	•	•	•	•		100	100		29
Schiff Hardin LLP	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	80		120
Sedgwick, Detert, Moran & Arnold LLP	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100		132

						Crite	rion (s	see pag	ge 65)								
Employer	Headquarters Location	15 points	1b 5 points	72 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qp</b> 5 points	3C 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Seyfarth Shaw LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		62
Shearman & Sterling LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		26
Sheppard, Mullin, Richter & Hampton LLP	Los Angeles, CA	•	•	•	•	•		•	•	•	•	•		100	95		77
Shook, Hardy & Bacon LLP	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		83
Sidley Austin LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		5
Skadden, Arps, Slate, Meagher & Flom LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		1
Sonnenschein, Nath & Rosenthal LLP	Chicago, IL	•	•	•	•	•	1	•	•	•	•	•		100	100		59
Squire, Sanders & Dempsey LLP	Cleveland, OH	•	•	•	•	•	1	•	•	•	•	•		100	100		47
Stinson Morrison Hecker LLP	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		154
Stoel Rives LLP	Portland, OR	•	•	•	•	•		•	•	•	•	•		100	100		140
Sullivan & Cromwell LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		15
Sutherland Asbill & Brennan LLP	Atlanta, GA	•	•	•	•	•	1	•	•	•	•	•		100	100		93
Thompson Coburn LLP	St. Louis, MO	•	•	•	•	•		•	•	•	•	•		100	100		151
Townsend and Townsend and Crew LLP	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100			148
Troutman Sanders LLP	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100		78
Vinson & Elkins LLP	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		45
Wachtell, Lipton, Rosen & Katz LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		55
Weil, Gotshal & Manges LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		9
White & Case LLP	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	100		6
Willkie Farr & Gallagher LLP	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		46
Wilmer Cutler Pickering Hale & Dorr LLP	Washington, DC	•	•	•	•	•	1	•	•	•	•	•		100	100		21
Wilson Sonsini Goodrich & Rosati PC	Palo Alto, CA	•	•	•	•	•		•	•	•	•	•		100	100		53
Winston & Strawn LLP	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		34
Andrews Kurth LLP	Houston, TX	•	•	•	•	•		•		•	•	•		95	70		104
Cadwalader, Wickersham & Taft LLP	New York, NY	•	•	•	•			•	•	•	•	•		95	95		57
Chadbourne & Parke LLP	New York, NY	•	•	•	•			•	•	•	•	•		95	90		95
Davis Wright Tremaine LLP	Seattle, WA	•	•	•	•	•		•		•	•	•		95	95		109
Faegre & Benson LLP	Minneapolis, MN	•	•	•	•	•	1	•		•	•	•		95	100		86
Frost Brown Todd LLC	Cincinnati, OH	•	•	•	•			•	•	•	•	•		95	85		167
Gordon & Rees LLP	San Francisco, CA	•	•	•	•			•	•	•	•	•		95	95		155
Herrick Feinstein LLP	New York, NY	•	•	•	•			•	•	•	•	•		95	95		164
Kilpatrick Stockton LLP	Atlanta, GA	•	•	•		•		•	•	•	•	•		95	95		100
King & Spalding LLP	Atlanta, GA	•	•	•	•			•	•	•	•	•		95	95		40

						Crite	rion (s	see pa	ge 65)								l
Employer	Headquarters Location	a 15 points	<b>1b</b> 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>qs</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
McGuireWoods LLP	Richmond, VA	•	•	•	•	•		•		•	•	•		95	95		61
Polsinelli Shughart PC	Kansas City, MO	•	•	•		•		•	•	•	•	•		95	95		187
Reed Smith LLP	Pittsburgh, PA	•	•	•		•		•	•	•	•	•		95	75		16
Simpson, Thacher & Bartlett LLP	New York, NY	•	•	•		•		•	•	•	•	•		95			25
Holland & Hart LLP	Denver, CO	•		•		•		•	•	•	•	•		90	75		142
McCarter & English LLP	Newark, NJ	•		•		•		•	•	•	•	•		90	90		124
Paul, Weiss, Rifkind, Wharton & Garrison LLP	New York, NY	•	•	•	•			•		•	•	•		90	80		37
Steptoe & Johnson LLP	Washington, DC	•		•		•		•	•	•	•	•		90	85		75
Foley & Lardner LLP	Milwaukee, WI	•	•	•	•	•		•	•	•	•	•	-15	85	85		35
Kutak Rock LLP	Omaha, NE	•		•				•	•	•	•	•		85	70		150
Luce Forward Hamilton & Scripps LLP	San Diego, CA	•	•	•	•			•			•	•		85	85		192
Vorys, Sater, Seymour & Pease LLP	Columbus, OH	•	•		•	•		•	•	•	•	•		85	80		156
Epstein Becker & Green PC	New York, NY	•	•			•		•	•	•	•	•		80	80		136
Lindquist & Vennum PLLP	Minneapolis, MN	•	•			•		•	•	•	•	•		80			
McKenna, Long & Aldridge LLP	Atlanta, GA	•		•				•		•	•	•		80	80		107
Patton Boggs LLP	Washington, DC	•	•			•		•	•	•	•	•		80			80
Schulte, Roth & Zabel LLP	New York, NY	•	•		•			•	•	•	•	•		80	80		68
Wildman, Harrold, Allen & Dixon LLP	Chicago, IL	•	•		•	•		•		•	•	•		80	80		
Williams Mullen PC	Richmond, VA	•	•	•	•			•	•	•	•			80			159
Dykema Gossett PLLC	Detroit, MI	•				•		•	•	•	•	•		75	80		145
Locke Lord Bissell & Liddell LLP	Chicago, IL	•	•					•	•	•	•	•		75	75		69
Nelson Mullins Riley & Scarborough LLP	Columbia, SC	•	•					•	•	•	•	•		75	70		139
Baker, Donelson, Bearman, Caldwell & Berkowitz PC	Memphis, TN	•	•		•			•			•	•		70	70		115
Saul Ewing LLP	Philadelphia, PA	•	•			•		•		•	•	•		68	68		181
Womble Carlyle Sandridge & Rice PLLC	Winston-Salem, NC	•						•		•	•	•		65	65		98
Holme Roberts & Owen LLP	Denver, CO	•	•					•	•	•	•			60	60		185
Howard & Howard Attorneys PLLC	Kalamazoo, MI	•						•	•	•	)			48	48		L
Mail and Freight Delivery						1 1	with 10	00% <b>T</b> c	otal					63 A	verage		
United Parcel Service Inc. (UPS)	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	43	
Union Pacific Corp.	Omaha, NE	•	•	•	•	•		•		•	Þ	•		88	43	143	
FedEx Corp.	Memphis, TN	•	•	•	•	•				•	•	•		80	70	59	
Norfolk Southern Corp.	Norfolk, VA	•	•		•			•	•	•	•			58	58	256	
YRC Worldwide Inc.	Overland Park, KS	•	•		•	•								30	30	293	

						Crite	erion (s	see pa	ge 65)								
Employer	Headquarters Location	12 points	1b 5 points	stuiod 91 2a	spoints 2b	spoints 5 co	✓ 2c+	3a 15 points	<b>3b</b> 5 points	36 5 points	♣ 15 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Burlington Northern Santa Fe Corp.	Fort Worth, TX	•	•											20	20	142	
Manufacturing					:	7 1	with 10	00% <b>T</b>	otal			:	:	75 <i>l</i>	verage		
Corning Inc.	Corning, NY	•	•	•	•	•		•	•	•	•	•		100	100	414	
Cummins Inc.	Columbus, IN	•	•	•	•	•	1	•	•	•	•	•		100	100	181	
Herman Miller Inc.	Zeeland, MI	•	•	•	•	•	1	•	•	•	•	•		100	100	897	
Owens Corning	Toledo, OH	•	•	•	•	•		•	•	•	•	•		100	100	422	
Steelcase Inc.	Grand Rapids, MI	•	•	•	•	•		•	•	•	•	•		100	60	625	
United Technologies Corp.	Hartford, CT	•	•	•	•	•		•	•	•	•	•		100	80	37	
Whirlpool Corp.	Benton Harbor, MI	•	•	•	•	•		•	•	•	•	•		100	100	133	
R.R. Donnelley & Sons Co.	Chicago, IL	•	•	•	•	•			•	•	•	•		85	55	233	
General Electric Co.	Fairfield, CT	•	•		•			•	•	•	•	•		80	80	5	
Caterpillar Inc.	Peoria, IL	•	•	•	•					•	•	•		75	75	44	
Illinois Tool Works Inc.	Glenview, IL	•	•	•	•	•		•	•		Þ			73	73	148	
MeadWestvaco Corp.	Glen Allen, VA	•				•		•	•	•		•		60	60	365	
Mohawk Industries Inc.	Calhoun, GA	•	•			•		•	•	•				50	50	367	
Emerson Electric Co.	St. Louis, MO	•	•		•	•						•		45	45	94	
Ball Corp.	Broomfield, CO		•			•		•	•	•	Þ			43	43	336	
Deere & Co.	Moline, IL	•	•						•	•	•			38	33	87	
Baldor Electric Co.	Fort Smith, AR	•	•											20	20	910	
Crown Holdings	Philadelphia, PA	•												15		312	
Danaher Corp.	Washington, DC	•												15		213	
Jabil Circuit Inc.	St. Petersburg, FL	•												15		212	
Oshkosh Corp.	Oshkosh, WI	•												15		349	
Owens-Illinois Inc.	Perrysburg, OH	•												15		326	
Sealed Air Corp.	Elmwood Park, NJ	•												15		483	
Mining and Metals						1 v	with 10	00% T	otal					100	Average	9	
Alcoa Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	90	
AK Steel Holding Corp.	West Chester, OH													o		334	
Aleris International Inc.	Beachwood, OH													o		413	
Allegheny Technologies Inc.	Pittsburgh, PA	•		•										30		448	
Anadarko Petroleum	The Woodlands, TX													o		162	
Apache Corp.	Houston, TX	•		•										30		217	
Chesapeake Energy Corp.	Oklahoma City, OK	•												15		230	

						Crite	erion (s	see pa	ge 65)								
Employer	Headquarters Location	12 points	<b>1p</b> 5 points	2 15 points	5 points	5 points	✓ 2c+	8 15 points	<b>3p</b> 5 points	S 5 points	♣ 15 pts ₱ 7.5 pts	<b>9</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Commercial Metals	Irving, TX													0		251	
CONSOL Energy Inc.	Canonsburg, PA	•												15		497	
Devon Energy Corp.	Oklahoma City, OK	•												15		163	
EOG Resources	Houston, TX	•		•										30		350	
Freeport-McMoRan Copper & Gold Inc.	Phoenix, AZ	•												15		146	
Icahn Enterprises LP	New York, NY													o		466	
MDU Resources Group, Inc.	Bismarck, ND													o		473	
Newmont Mining Corporation	Greenwood Village, CO	•												15		400	
Nucor Corp.	Charlotte, NC	•												15		106	
Occidental Petroleum	Los Angeles, CA	•		•										30		98	
Peabody Energy Corp.	St. Louis, MO	•												15		353	
Reliance Steel & Aluminum Co.	Los Angeles, CA	•												15		298	
Steel Dynamics, Inc.	Fort Wayne, IN													o		318	
United States Steel Corp.	Pittsburgh, PA	•												15		105	
XTO Energy Inc.	Fort Worth, TX	•												15		330	
Miscellaneous						0 v	with 10	00% <b>T</b>	otal					87 <i>A</i>	verage	•	
3M Co.	St. Paul, MN	•	•	•	•	•	1	•	•	•	•	•	-15	85	100	95	
Imation Corp.	Oakdale, MN	•	•	•	•			•	•	•	•	•		88	88	860	
Anixter International Inc.	Glenview, IL	•		•										30		404	
Genuine Parts Co.	Atlanta, GA	•												15		247	
Smurfit-Stone Container Corp.	Chicago, IL	•						•						30		356	
W.W. Grainger	Lake Forest, IL	•												15		366	
Oil and Gas						4 v	with 10	00% T	otal	·				70 <i>A</i>	verage	•	
BP America Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		
Chevron Corp.	San Ramon, CA	•	•	•	•	•		•	•	•	•	•		100	100	3	
Shell Oil Co.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	100		
Spectra Energy Corp.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	80	459	
ConocoPhillips	Houston, TX	•	•		•	•		•	•	•	•			70	70	4	
Marathon Oil Corp.	Houston, TX	•	•											20		23	
Exxon Mobil Corp.	Irving, TX		•		•								-15	0	0	1	
Baker Hughes Inc.	Houston, TX	•												15		227	
BJ Services Company	Houston, TX													0		438	
Cameron International Corp.	Houston, TX													0		421	

						Crite	erion (s	see pa	ge 65)								
Employer	Headquarters Location	15 points	<b>1b</b> 5 points	<b>5</b> 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>gp</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Crosstex Energy, Inc.	Dallas, TX	П												0		479	
CVR Energy Inc.	Sugar Land, TX	•												15		472	
El Paso Corp.	Houston, TX	•						•						30		443	
Enbridge Energy Partners	Houston, TX	•												15		268	
Enterprise GP Holdings LP	Houston, TX	•												15		65	
FMC Technologies Inc.	Houston, TX	•												15		460	
Frontier Oil Corp.	Houston, TX													0		383	
Halliburton Co.	Houston, TX	•												15		141	
Hess Corp.	New York, NY	•												15		55	
Holly Corp.	Dallas, TX													0		420	
Kinder Morgan Inc.	Houston, TX	•						•						30		223	
Murphy Oil	El Dorado, AR	•												15		92	
National Oilwell Varco, Inc.	Houston, TX	•												15		200	
NuStar Energy LP	San Antonio, TX													o		485	
Plains All American Pipeline, LP	Houston, TX													0		79	
Smith International Inc.	Houston, TX	•												15		250	
Sunoco Inc.	Philadelphia, PA	•												15		41	
Tesoro Corp.	San Antonio, TX	•												15		91	
Valero Energy Corp.	San Antonio, TX	•						•						35		10	
Western Refining Inc.	El Paso, TX													0		253	
World Fuel Services	Miami, FL	•		•										30		137	
Pharmaceuticals						10	with 1	00% 1	Total					91 A	verage		
Boehringer Ingelheim USA Corp.	Ridgefield, CT	•	•	•	•	•		•	•	•	•	•		100	100		
Bristol-Myers Squibb Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	120	
Eli Lilly & Co.	Indianapolis, IN	•	•	•	•	•		•	•	•	•	•		100	100	122	
GlaxoSmithKline plc	Research Triangle Park, NC	•	•	•	•	•		•	•	•	•	•		100	100		
Hospira Inc.	Lake Forest, IL	•	•	•	•	•		•	•	•	•	•		100	100	597	
Johnson & Johnson	New Brunswick, NJ	•	•	•	•	•	1	•	•	•	•	•		100	100	29	
Merck & Co. Inc.	Whitehouse Sta- tion, NJ	•	•	•	•	•		•	•	•	•	•		100	100	103	
Novartis Pharmaceuticals Corp.	East Hanover, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Pfizer Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	46	
Schering-Plough Corp.	Kenilworth, NJ	•	•	•	•	•		•	•	•	•	•		100	100	138	

						Crite	rion (s	see pag	ge 65)								
Employer	Headquarters Location	15 points	1b 5 points	2 15 points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>3p</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
CVS Caremark Corp.	Woonsocket, RI	•	•	•				•	•	•	•	•		90	90	19	
AstraZeneca PLC	Wilmington, DE	•	•			•		•	•	•	•	•		80	80		
Wyeth	Madison, NJ	•	•			•		•	•	•	•	•		80	80	110	
Amgen Inc.	Thousand Oaks, CA	•	•		•	•		•	•	•	•			70	70	168	
Sanofi-Aventis U.S. LLC	Bridgewater, NJ	•	•			•		•	•	•	•			65	65		
Astellas Pharma US, Inc.	Deerfield, IL	•	•		•	•		•	•	•	Þ			63			
Gilead Sciences Inc.	Foster City, CA	•						•						30		444	
Mylan Laboratories Inc.	Canonsburg, PA	•												15		462	
Publishing and Printing						4 v	vith 10	00% <b>T</b> c	otal					79 A	verage	;	
McGraw-Hill Companies Inc., The	New York, NY	•	•	•	•	•	1	•	•	•	•	•		100	80	391	
New York Times Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Pearson Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	75		
United Business Media LLC	Manhasset, NY	•	•	•	•	•		•	•	•	•	•		100	100		
Gannett Co. Inc.	McLean, VA	•	•			•		•	•	•	•			65	65	371	
Scholastic Corp.	New York, NY	•	•					•			•			50	50	801	
Houghton Mifflin Harcourt Publishing Co.	Boston, MA	•						•		•				35			
AbitibiBowater Inc.	Greenville, SC													0		379	
Real Estate, Residential						0 v	vith 10	00% <b>T</b> c	otal					80 A	verage	·	
Realogy Corp.	Parsippany, NJ	•	•		•	•		•		•	•	•		80	80	489	
ProLogis	Denver, CO													0		426	
Retail and Consumer Products						27	with 1	00% T	otal					84 A	verage	;	
Abercrombie & Fitch Co.	New Albany, OH	•	•	•	•	•		•	•	•	•	•		100	100	607	
Barnes & Noble Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	455	
Bon-Ton Stores, Inc.	York, PA	•	•	•	•	•		•	•	•	•	•		100		654	
Borders Group Inc.	Ann Arbor, MI	•	•	•	•	•		•	•	•	•	•		100	100	639	
Carmax Inc.	Richmond, VA	•	•	•	•	•		•	•	•	•	•		100	100	311	
Clorox Co.	Oakland, CA	•	•	•	•	•		•	•	•	•	•		100	100	452	
Colgate-Palmolive Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	95	166	
Costco Wholesale Corp.	Issaquah, WA	•	•	•	•	•		•	•	•	•	•		100	100	24	
Estee Lauder Companies	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	325	
GameStop Corp.	Grapevine, TX	•	•	•	•	•		•	•	•	•	•		100	100	296	
Gap Inc.	San Francisco, CA	•	•	•	•	•		•	•	•	•	•		100	100	178	
Hallmark Cards Inc.	Kansas City, MO	•	•	•	•	•		•	•	•	•	•		100	100		

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	12 points	d 5 points	stuiod 51 a	stuiod 9 <b>2b</b>	stuiod 9 26	<b>√</b> 2c+	<b>38</b> 15 points	<b>3b</b> 5 points	S 5 points	♣ 15 pts ▶ 7.5 pts	<b>91</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
J.C. Penney Co. Inc.	Plano, TX	•	•	•	•	•		•	•	•	•	•		100	95	139	
Kimberly-Clark Corp.	Irving, TX	•	•	•	•	•		•	•	•	•	•		100	100	128	
Liz Claiborne Inc.	New York, NY	•	•	•	•	•		•	•	•	•	•		100	100	549	
Mattel Inc.	El Segundo, CA	•	•	•	•	•		•	•	•	•	•		100	95	415	
Newell Rubbermaid Inc.	Atlanta, GA	•	•	•	•	•		•	•	•	•	•		100	100	387	
Nordstrom Inc.	Seattle, WA	•	•	•	•	•		•	•	•	•	•		100	100	301	
Procter & Gamble Co.	Cincinnati, OH	•	•	•	•	•		•	•	•	•	•		100	100	20	
Recreational Equipment Inc.	Kent, WA	•	•	•	•	•		•	•	•	•	•		100	100		
Replacements Ltd.	McLeansville, NC	•	•	•	•	•	1	•	•	•	•	•		100	100		
S.C. Johnson & Son Inc.	Racine, WI	•	•	•	•	•		•	•	•	•	•		100	100		
Sears Holdings Corp.	Hoffman Estates, IL	•	•	•	•	•	1	•	•	•	•	•		100	100	49	
Staples Inc.	Framingham, MA	•	•	•	•	•		•	•	•	•	•		100	93	109	
TJX Companies Inc., The	Framingham, MA	•	•	•	•	•		•	•	•	•	•		100	100	131	
Unilever	Englewood Cliffs, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
Walgreen Co.	Deerfield, IL	•	•	•	•	•		•	•	•	•	•		100	100	36	
Limited Brands Inc.	Columbus, OH	•	•	•	•			•	•	•	•	•		95	95	290	
OfficeMax Inc.	Naperville, IL	•	•	•	•			•	•	•	•	•		95	90	313	
Sony Electronics Inc.	San Diego, CA	•	•	•		•		•	•	•	•	•		95			
American Eagle Outfitters Inc.	Pittsburgh, PA	•	•	•	•	•		•	•	•	•	•		93		690	
Tiffany & Co.	New York, NY	•	•	•	•	•		•	•	•	•	•		93	73	709	
Avon Products Inc.	New York, NY	•		•		•		•	•	•	•	•		90	90	255	
Best Buy Co. Inc.	Richfield, MN	•	•	•	•	•		•	•	•	•	•	-15	85	100	56	
Home Depot Inc., The	Atlanta, GA	•	•		•	•		•	•	•	•	•		85	85	25	
Target Corp.	Minneapolis, MN	•	•	•	•	•		•	•	•	•	•	-15	85	100	28	
Harry & David Holdings Inc.	Medford, OR	•		•		•		•	•	•	•	•		83	83		
Brown Shoe Company, Inc.	St. Louis, MO	•	•			•		•		•	•	•		75		828	
Toys 'R' Us Inc.	Wayne, NJ	•	•	•	•	•		•	•	•				70	70	192	
Regis Corp.	Edina, MN	•	•					•	•	•	•	•		68	68	730	
Black & Decker Corp., The	Towson, MD	•	•		•	•		•		•				50	50	408	
Hasbro Inc.	Pawtucket, RI	•	•					•			•			50	50	552	
Men's Wearhouse Inc., The	Houston, TX	•	•	•				•						50	50	905	
Office Depot Inc.	Boca Raton, FL	•	•					•	•	•				45	45	179	
RadioShack Corp.	Fort Worth, TX	•						•	•	•				40	40	534	

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	1b 5 points	72 To points	5 points	5 points	<b>√</b> 2c+	3a 15 points	<b>3p</b> 5 points	3c 5 points	♣ 15 pts ▶ 7.5 pts	<b>G</b> 15 points	9 (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
Wal-Mart Stores Inc.	Bentonville, AR	•	•							•	•	•	-15	40	40	2	
AutoZone Inc.	Memphis, TN	•	•		•									25	25	380	
Meijer Inc.	Grand Rapids, MI	•				•								20	20		
Kohl's Corp.	Menomonee Falls, WI	•												15		155	
Advance Auto Parts (Advance Holding)	Roanoke, VA	•		•										30		461	
B J's Wholesale Club	Natick, MA	•												15		269	
Bed Bath & Beyond Inc.	Union, NJ	•		•										30		355	
Big Lots	Columbus, OH	•												15		498	
Blockbuster Inc.	Dallas, TX	•	•					•	•	•				45		450	
Dillard's Inc.	Little Rock, AR	•												15		358	
Dollar General Corp.	Goodlettsville, TN													0		259	
Dollar Tree Stores, Inc.	Chesapeake, VA	•												15		499	
Family Dollar Stores	Matthews, NC													0		359	
Foot Locker	New York, NY	•												15		454	
Lowe's Companies, Inc.	Mooresville, NC	•						•						30		47	
Pantry Inc., The	Sanford, NC													0		317	
PetSmart Inc.	Phoenix, AZ	•						•						30		468	
Ross Stores	Pleasanton, CA	•												15		384	
TravelCenters of America LLC	Westlake, OH	•												15		332	
Telecommunications						5 v	with 10	00% To	otal					88 A	verage		
Alcatel-Lucent	Murray Hill, NJ	•	•	•	•	•	1	•	•	•	•	•		100	100		
AT&T Inc.	Dallas, TX	•	•	•	•	•	1	•	•	•	•	•		100	100	8	
Motorola Inc.	Schaumburg, IL	•	•	•	•	•		•	•	•	•	•		100	100	78	
QUALCOMM Inc.	San Diego, CA	•	•	•	•	•		•	•	•	•	•		100	95	244	
Sprint Nextel Corp.	Overland Park, KS	•	•	•	•	•		•	•	•	•	•		100	100	64	
Time Warner Cable Inc.	New York, NY	•	•	•	•			•	•	•	•	•		95			
EarthLink Inc.	Atlanta, GA	•	•	•	•			•	•	•	•	•		88	88		
Nortel Networks Corp.	Richardson, TX	•	•		•	•		•	•	•	•	•		85	85		
Qwest Communications International Inc.	Denver, CO	•	•		•	•		•	•	•	•	•		85	85	197	
Verizon Communications Inc.	New York, NY	•	•		•	•		•	•	•	•	•	-15	70	70	17	
T-Mobile USA Inc.	Bellevue, WA	•	•			•		•	•	•				50	50		
Cablevision Systems Corp.	Bethpage, NY	•						•						30		342	
Charter Communications	St. Louis, MO	•												15		385	

						Crite	rion (s	see pa	ge 65)								
Employer	Headquarters Location	a 15 points	1b 5 points	2a 15 points	2b points	5 points	<b>√</b> 2c+	3a 15 points	<b>3b</b> 5 points	3c 5 points	4 15 pts 7.5 pts	<b>9</b> 15 points	<b>9</b> (-15 points)	2011 CEI Rating	2010 CEI Rating	2009 Fortune 1000	2009 AmLaw 200
DIRECTV	El Segundo, CA	•												15		126	
DISH Network Corp.	Englewood, CO													o		231	
Embarq Corp.	Overland Park, KS	•		•										30		405	
Liberty Global Inc.	Englewood, CO													0		257	
Telephone & Data Systems Inc. (U.S. Cellular)	Chicago, IL	•												15		465	
Virgin Media Inc.	New York, NY	•												15		338	
Tobacco						0 v	with 10	00% <b>T</b> c	otal					88 A	verage		
Reynolds American Inc.	Winston-Salem, NC	•	•	•	•			•	•	•	•	•		88	88	294	
Altria Group Inc.	Richmond, VA	•	•					•						35		160	
Philip Morris International Inc.	New York, NY													0		93	
Transportation and Travel						3 1	with 10	00% To	otal					91 A	verage	:	
Orbitz Worldwide Inc.	Chicago, IL	•	•	•	•	•		•	•	•	•	•		100	100		
Sabre Holdings Inc.	Southlake, TX	•	•	•	•	•		•	•	•	•	•		100	100		
Travelport Ltd.	Parsippany, NJ	•	•	•	•	•		•	•	•	•	•		100	100		
CSX Corp.	Jacksonville, FL	•	•	•	•			•	•	•	•	•		95	75	240	
Dollar Thrifty Automotive Group Inc.	Tulsa, OK	•	•	•	•	•		•	•	•	•	•		93	93		
Ryder System Inc.	Miami, FL	•	•	•	•	•		•	•	•	•	•		93	93	399	
Travel Impressions Ltd.	Farmingdale, NY	•	•	•	•			•	•	•	•	•		88	88		
Avis Budget Group Inc.	Parsippany, NJ	•	•		•	•		•		•	•	•		80	80	411	
Enterprise Rent-A-Car Co.	St. Louis, MO	•	•		•			•	•	•	•	•		80	80		
Royal Caribbean Cruises Ltd.	Miami, FL	•	•	•	•			•	•	•	•			80	70		
Brunswick Corp.	Lake Forest, IL	•												15		491	
C. H. Robinson Worldwide	Eden Prairie, MN	•												15		300	
Con-way Inc.	San Mateo, CA	•												15		470	
Expeditors International of Washington, Inc.	Seattle, WA	•												15		434	
Harley-Davidson Inc.	Milwaukee, WI	•												15		412	
Waste Management						1 1	with 10	00% <b>T</b> c	otal					100 /	verage	•	
Waste Management Inc.	Houston, TX	•	•	•	•	•		•	•	•	•	•		100	85	201	

# **Corporate Equality Index 2011:** Rating American Workplaces on Lesbian, **Gay, Bisexual and Transgender Equality**

**Daryl Herrschaft**, Editor **Deena Fidas**, Author

#### **About HRC's Workplace Project**

HRC's Workplace Project is a nationally recognized source of expert information and advice on lesbian, gay, bisexual and transgender workplace issues. It provides decision makers with cutting-edge research, expert counsel, online resources, best practices information and on-site training and education. Project staff serve as trusted consultants to diversity professionals and other executives seeking to position their business as welcoming workplaces that respect all employees, regardless of sexual orientation and gender identity or expression. The Project also makes available the expertise of the HRC Business Council for invaluable peer-to-peer advice.

#### **Project staff**

#### **Daryl Herrschaft**

**Director, HRC Workplace Project** 

Since 1998, Daryl Herrschaft has overseen the Workplace Project of the Human Rights Campaign. In this capacity, he monitors and evaluates corporate policies surrounding lesbian, gay, bisexual and transgender employees, consumers and investors. He is the editor of the HRC's annual Corporate Equality Index and The State of the Workplace for Lesbian, Gay, Bisexual and Transgender Americans.

Herrschaft has consulted with dozens of major corporations on the full range of LGBT-related workplace policies. He has presented HRC findings to diverse audiences, including Fortune company executives, the Society for Human Resource Management and the New York City Council. He is frequently called upon by national and local media, including Time and The Wall Street Journal as well as CNN, National Public Radio and Voice of America. Before joining HRC, Herrschaft was a research associate at the Urban Institute. He holds a bachelor's degree from the George Washington University.

#### **Eric Bloem**

**Deputy Director, HRC Workplace Project** 

Eric Bloem has directly consulted with dozens of major corporations on lesbian, gay, bisexual and transgender-related workplace policies. Before joining the Human Rights Campaign's Workplace Project in 2005, he spent six years as a manager with Accenture, where he provided change management consulting services to many Fortune 500 companies, including Best Buy Co. Inc., Fidelity, Walgreens and Citigroup. Bloem brings with him notable experience helping companies adapt to strategic change. Bloem developed the HRC Corporate Equality Series, a group of workshops designed to help human resources and diversity professionals better understand LGBT workplace issues. He conducts these workshops in strategic locations across the country. Bloem holds a bachelor's degree in business administration from Bucknell University.



#### **Deena Fidas**

#### Manager, HRC Workplace Project

Deena Fidas consults directly with employers on the implementation of inclusive policies and benefits related to lesbian, gay, bisexual and transgender employees. She works one-on-one with company representatives to help them identify areas of potential improvement and how to work with their key stakeholders to effect change within their organization. Fidas manages the Corporate Equality Index survey administration and authors the Corporate Equality Index report. She led the Degrees of Equality published research on assessing and improving the workplace climate for LGBT employees in large businesses. Fidas has traveled around the country presenting the Degrees of Equality work before business and professional conference audiences and develops teaching toolkits on LGBT workforce diversity for employers. Formerly working in political fundraising, she joined the Workplace Project staff in 2007. Fidas holds a master's degree in sociology from American University in Washington, D.C.

#### **Liz Cooper**

#### Coordinator, HRC Workplace Project

Liz Cooper, the newest member of the Workplace team, engages employers to identify inclusive policies and practices for lesbian, gay, bisexual, and transgender employees. After first joining the Human Rights Campaign in January as an intern, Cooper now brings her background in academic and sales marketing research to the project's most established and valued resources for employers, employees, and consumers. Cooper holds a bachelor's degree in political science from Davidson College where her advocacy helped to elevate the role of allies in the LGBT community.

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# **HRC Business Council**

The Human Rights Campaign Business Council was founded in 1997. Members provide expert advice and counsel to the HRC Workplace Project on lesbian, gay, bisexual and transgender workplace issues based on their business experience and knowledge.

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