# EXHIBIT 18

## Message

From: Severns, Colette [Colette.Severns@azblue.com]

on behalf of Severns, Colette < Colette. Severns@azblue.com > [Colette. Severns@azblue.com]

Sent: 10/1/2015 4:06:15 PM

To: Yvette Medina (Yvette.Medina@azdoa.gov) [Yvette.Medina@azdoa.gov]

CC: Muth, Ken [Ken.Muth@azblue.com]; Chanelle Bergren (Chanelle.Bergren@azdoa.gov)

[Chanelle.Bergren@azdoa.gov]; Marie Isaacson (marie.isaacson@azdoa.gov) [marie.isaacson@azdoa.gov];

elizabeth.schafer@azdoa.gov

Subject: RE: Transgender Reassignment

Attachments: 0922 - 01-01-15.docx

## Hi Yvette,

This benefit is not common but we do have a few large clients that offer a benefit for transgender services. Attached are the coverage guidelines and below you will find additional information relative to the benefit offered:

- Precertification is required
- Benefits for transgender services include medications, counseling, voice and communications therapy and surgery (including postoperative care and follow-up)
- \$75,000 plan maximum per member applies and all transgender services apply to this maximum
- Reversal of transgender surgical procedures is a benefit exclusion

Please let us know if you have questions.

## Thank you

Colette Severns Client Service Manager, Large Group Market

Blue Cross® Blue Shield® of Arizona 8220 N 23<sup>rd</sup> Avenue, Bldg 2 Mail Stop C608 Phoenix, AZ 85021-4872 (602) 864-4082 | cell: (602) 228-6096 colette.severns@azblue.com | azblue.com





From: Yvette Medina [mailto:Yvette.Medina@azdoa.gov]

Sent: Wednesday, September 30, 2015 12:56 PM

To: Dash, Jay A <DashJ@aetna.com>; Branson Cobb <CobbB@AETNA.com>; Maddalena, Diana M 654

<Diana.Maddalena@Cigna.com>; Emmons, Erica 654 (Erica.Emmons@Cigna.com) <Erica.Emmons@Cigna.com>; Amy Clatterbuck <amy\_h\_clatterbuck@uhc.com>; Heather Gallegos <heather\_gallegos@uhc.com>; Severns, Colette

<Colette.Severns@azblue.com>; Muth, Ken <Ken.Muth@azblue.com>

Cc: Chanelle Bergren < Chanelle. Bergren@azdoa.gov>; Marie Isaacson < Marie. Isaacson@azdoa.gov>; Elizabeth Schafer

<Elizabeth.Schafer@azdoa.gov>
Subject: Transgender Reassignment

Y. Medina EXHIBIT 02

AZSTATE.006325

We are seeking additional information regarding Transgender Reassignment Surgery. Based on your book of business, are other health plans covering this procedure or looking to adding coverage? Please provide your coverage guidelines and response by Monday, October 5<sup>th</sup>. Let me know if you have any questions. Thank you.

**Yvette** 

## **Yvette Medina**

Plan Administrator

ADOA – Benefit Services Division | State of Arizona

100 North 15th Avenue, Suite 103, Phoenix, AZ 85007
p: 602-364-0568 | f: 602-542-4048 | <a href="mailto:yvette.medina@azdoa.gov">yvette.medina@azdoa.gov</a>
<a href="mailto:http://benefitoptions.az.gov/">http://benefitoptions.az.gov/</a>

How am I doing? Please take a few moments to answer a few questions.

https://www.surveymonkey.com/r/BenPlanAdmin

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MEDICAL COVERAGE GUIDELINES SECTION: SURGERY

ORIGINAL EFFECTIVE DATE: LAST REVIEW DATE: LAST CRITERIA REVISION DATE: ARCHIVE DATE: 01/01/15

## SURGICAL PROCEDURES FOR GENDER DYSPHORIA

Coverage for services, procedures, medical devices and drugs are dependent upon benefit eligibility as outlined in the member's specific benefit plan. This Medical Coverage Guideline must be read in its entirety to determine coverage eligibility, if any.

This Medical Coverage Guideline provides information related to coverage determinations only and does not imply that a service or treatment is clinically appropriate or inappropriate. The provider and the member are responsible for all decisions regarding the appropriateness of care. Providers should provide BCBSAZ complete medical rationale when requesting any exceptions to these guidelines.

The section identified as "<u>Description</u>" defines or describes a service, procedure, medical device or drug and is in no way intended as a statement of medical necessity and/or coverage.

The section identified as "Criteria" defines criteria to determine whether a service, procedure, medical device or drug is considered medically necessary or experimental or investigational.

State or federal mandates, e.g., FEP program, may dictate that any drug, device or biological product approved by the U.S. Food and Drug Administration (FDA) may not be considered experimental or investigational and thus the drug, device or biological product may be assessed only on the basis of medical necessity.

Medical Coverage Guidelines are subject to change as new information becomes available.

For purposes of this Medical Coverage Guideline, the terms "experimental" and "investigational" are considered to be interchangeable.

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## **Description:**

Gender dysphoria refers to the discomfort or distress caused by discrepancy between an individual's gender identity and the gender assigned at birth. Treatments for gender dysphoria include psychosocial therapy, medical hormonal therapy and surgical procedures to change primary and secondary sex characteristics (i.e., breast/chest, genitalia, facial features and body contouring). Surgery, particularly genital surgery, is often the last and the most considered step in the treatment process for gender dysphoria.

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MEDICAL COVERAGE GUIDELINES

SECTION: SURGERY

ORIGINAL EFFECTIVE DATE: LAST REVIEW DATE: LAST CRITERIA REVISION DATE: ARCHIVE DATE:

01/01/15

## SURGICAL PROCEDURES FOR GENDER DYSPHORIA (cont.)

Description: (cont.)

## Female-to-Male (FtM) Surgical Procedures:

- Breast/chest surgery: subcutaneous mastectomy, creation of a male chest
- Genital surgery: hysterectomy/salpingo-oophorectomy, reconstruction of the fixed part of the urethra. which can be combined with a metoidioplasty or with a phalloplasty (employing a pedicled or free vascularized flap), vaginectomy, scrotoplasty, and implantation of erection and/or testicular
- Nongenital, non-breast surgical interventions: voice surgery (rare), liposuction, lipofilling, pectoral implants and various aesthetic procedures

## Male-to-Female (MtF) Surgical Procedures:

- Breast/chest surgery: augmentation mammoplasty (implants/lipofilling)
- Genital surgery: penectomy, orchiectomy, vaginoplasty, clitoroplasty and vulvoplasty
- Nongenital, nonbreast surgical interventions: facial feminization surgery, liposuction, lipofilling, voice surgery, thyroid cartilage reduction, gluteal augmentation (implants/lipofilling), hair reconstruction, and various aesthetic procedures

## Referral for Surgery:

Surgical treatments for gender dysphoria are initiated by a referral (one or two, depending on the type of surgery) from a qualified mental health professional. The mental health professional provides documentation, in the chart and/or referral letter, of the individual's personal and treatment history, progress and eligibility.

## Breast Surgery:

One referral from a qualified mental health professional is needed for breast surgery (i.e., mastectomy, chest reconstruction, or augmentation mammoplasty).

## Genital Surgery:

Two referrals from qualified mental health professionals are needed for genital surgery (i.e., hysterectomy/salpingo-oophorectomy, orchiectomy, genital reconstructive surgeries). If the first referral is from the individual's psychotherapist, the second referral should be from a person who has only had an evaluative role with the individual. Two separate letters, or one letter signed by both (e.g., if practicing within the same clinic) may be sent. Each referral letter, however, is expected to cover the same topics in the areas outlined below.

MEDICAL COVERAGE GUIDELINES SECTION: SURGERY

ORIGINAL EFFECTIVE DATE: LAST REVIEW DATE: LAST CRITERIA REVISION DATE: 01/01/15

ARCHIVE DATE:

## SURGICAL PROCEDURES FOR GENDER DYSPHORIA (cont.)

**Description:** (cont.)

Referral for Surgery: (cont.)

The recommended content of referral letters for surgery is as follows:

- 1. General identifying characteristics
- 2. Psychosocial assessment results, including diagnoses
- 3. Duration of the mental health professional's relationship with the individual, including the type of evaluation and therapy or counseling to date
- 4. Explanation that the criteria for surgery have been met, and a brief description of the clinical rationale for supporting the surgery request
- 5. Statement that informed consent has been obtained from the individual seeking surgery
- 6. Statement that the mental health professional is available for coordination of care.

## Criteria:

COVERAGE FOR SURGICAL PROCEDURES FOR GENDER DYSPHORIA IS DEPENDENT UPON BENEFIT PLAN LANGUAGE. REFER TO MEMBER'S SPECIFIC BENEFIT PLAN BOOKLET TO VERIFY BENEFITS.

If benefit coverage for surgical procedures for gender dysphoria is available, requests for surgical procedures for gender dysphoria will be reviewed by the medical director(s) and/or clinical advisor(s).

If benefit coverage for surgical procedures for gender dysphoria is not available, surgical procedures for gender dysphoria is considered a benefit plan exclusion and not eligible for coverage.

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MEDICAL COVERAGE GUIDELINES

SECTION: SURGERY

ORIGINAL EFFECTIVE DATE: LAST REVIEW DATE: LAST CRITERIA REVISION DATE: ARCHIVE DATE:

01/01/15

## SURGICAL PROCEDURES FOR GENDER DYSPHORIA (cont.)

Criteria: (cont.)

## Female-to-Male Breast/Chest Procedures:

- If benefit coverage for surgical procedures for gender dysphoria is available, mastectomy and creation of a male chest with or without pectoral implants for the treatment of gender dysphoria is considered eligible for coverage with documentation of ALL of the following:
  - 1. One referral from qualified mental health professional
  - 2. Persistent, well-documented gender dysphoria
  - 3. Capacity to make a fully informed decision and to give consent for treatment
  - 4. Age of majority in a given country (if younger, follow the standards of care for children and
  - 5. If significant medical or mental health concerns are present, they must be reasonably well controlled

Hormone therapy is not a prerequisite.

## Male-to-Female Breast/Chest Procedures:

- If benefit coverage for surgical procedures for gender dysphoria is available, breast augmentation (implants/lipofilling) in male-to-female procedures for the treatment of gender dysphoria is considered eligible for coverage with documentation of ALL of the following:
  - 1. One referral from qualified mental health professional
  - 2. Persistent, well-documented gender dysphoria
  - 3. Capacity to make a fully informed decision and to give consent for treatment
  - 4. Age of majority in a given country (if younger, follow the SOC for children and adolescents)
  - 5. If significant medical or mental health concerns are present, they must be reasonably well controlled

Although not an explicit criterion, feminizing hormone therapy (minimum 12 months) prior to breast augmentation surgery is recommended. The purpose is to maximize breast growth in order to obtain better surgical (aesthetic) results.

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ORIGINAL EFFECTIVE DATE: LAST REVIEW DATE: LAST CRITERIA REVISION DATE: ARCHIVE DATE: 01/01/15

## SURGICAL PROCEDURES FOR GENDER DYSPHORIA (cont.)

Criteria: (cont.)

## Female-to-Male and Male-to-Female Genital Procedures:

- ➢ If benefit coverage for surgical procedures for gender dysphoria is available, hysterectomy and salpingo-oophorectomy in female-to male procedures and orchiectomy and penectomy in male-to-female procedures for the treatment of gender dysphoria is considered eligible for coverage with documentation of ALL of the following:
  - 1. Two referrals from qualified mental health professionals
  - 2. Persistent, well documented gender dysphoria
  - 3. Capacity to make a fully informed decision and to give consent for treatment
  - 4. Age of majority in a given country
  - 5. If significant medical or mental health concerns are present, they must be well controlled
  - 6. 12 continuous months of hormone therapy as appropriate to the individual's gender goals (unless hormones are not clinically indicated for the individual)

The aim of hormone therapy prior to gonadectomy is primarily to introduce a period of reversible estrogen or testosterone suppression, prior to irreversible surgical intervention.

These criteria do not apply to individuals having these surgical procedures for medical indications other than gender dysphoria.

- ➢ If benefit coverage for surgical procedures for gender dysphoria is available, metoidioplasty or phalloplasty, vaginectomy and scrotoplasty in female-to-male and vaginoplasty, clitoroplasty, vulvoplasty and implantation of erection and/or testicular prostheses in male-to-female procedures for the treatment of gender dysphoria is considered eligible for coverage with documentation of ALL of the following:
  - 1. Two referrals from qualified mental health professionals
  - 2. Persistent, well documented gender dysphoria
  - 3. Capacity to make a fully informed decision and to consent for treatment
  - 4. Age of majority in a given country
  - 5. If significant medical or mental health concerns are present, they must be well controlled
  - 6. 12 continuous months of hormone therapy as appropriate to the individual's gender goals (unless hormones are not clinically indicated for the individual)
  - 7. 12 continuous months of living in a gender role that is congruent with their gender identity

Although not an explicit criterion, it is recommended that these individuals also have regular visits with a mental health or other medical professional.



MEDICAL COVERAGE GUIDELINES

SECTION: SURGERY

ORIGINAL EFFECTIVE DATE: LAST REVIEW DATE: LAST CRITERIA REVISION DATE: ARCHIVE DATE: 01/01/15

## SURGICAL PROCEDURES FOR GENDER DYSPHORIA (cont.)

Criteria: (cont.)

## NonBreast/Chest and NonGenital Procedures:

➢ If benefit coverage for surgical procedures for gender dysphoria is available, nonbreast/chest and nongenital procedures for the treatment of gender dysphoria are considered cosmetic, not eligible for coverage and not medically necessary.

These procedures include, but are not limited to:

- Facial feminization/masculinization surgery
- Gluteal augmentation (implants/lipofilling)
- Hair reconstruction
- Thyroid cartilage reduction
- Voice surgery

## Resources:

1. The World Professional Association for Transgender Health (WPATH). Standards of Care for the Health of Transsexual, Transgender, and Gender-Nonconforming People. 2012, Version 7.

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# EXHIBIT 19

Emmons, Erica 654 [Erica.Emmons@Cigna.com] Message

Emmons, Erica 654 < Erica. Emmons@Cigna.com > [Erica. Emmons@Cigna.com] From:

Yvette Medina [Yvette.Medina@azdoa.gov]; Maddalena, Diana M 646 [Diana.Maddalena@Cigna.com] on behalf of Sent: To:

Chanelle Bergren [Chanelle.Bergren@azdoa.gov]; Marie Isaacson [Marie.Isaacson@azdoa.gov]; Elizabeth Schafer

mm\_0266\_coveragepositioncriteria\_gender\_reassignment\_surgery.pdf; DRAFT Gender Transition Coverage Rider CC: Subject: Attachments:

v2.docx; CEI-2015-rev.pdf; ATT00004.txt

Good afternoon. I've attached our Cigna coverage policy for gender reassignment surgery. The medical director at Cigna who wrote and manages this coverage policy, Renee McLaughlin, is extremely knowledgeable on the process of gender reassignment and would be happy to discuss with you all on what to expect when adding coverage, communicating the change, and just educating on the processes and procedures involved for a patient undergoing gender reassignment.

Gender reassignment surgery is an optional benefit that our ASO clients can choose to include coverage for with no additional administrative cost if the standard coverage policy is followed. We also have a buy-up to the transgender coverage available. The attached sample policy details the additional services that can be included with the buy-up coverage. To add this additional layer of coverage beyond the standard Cigna coverage policy is an additional admin fee of \$0.25 per member per month (PMPM).

At this time, the majority of our clients do not cover these services under their plans; however, we have seen momentum in certain markets with groups choosing to extend this coverage. For example, in Colorado, insured public colleges are required to offer coverage. Many of the self-funded public and private colleges in Colorado have opted to also offer coverage. Many clients are looking to meet the World Professional Association for Transgender Health (WPATH) guidelines for their Corporate Equality Index score (see guidelines attached as FYI). If the goal of the State is to offer coverage for purposes of the equality score, the standard Cigna coverage policy allows employers to "check the box" and the additional buy-up isn't necessary. I thought you might find this list of employers offering transgender healthcare coverage helpful as well. This list appears to be only private employers; however, there are some public employer plans that also offer this coverage.

Finally, I thought it may be of interest to you that Maricopa County also inquired about this topic and our coverage position. I would be happy to let you know if they choose to move forward with covering these services.

Erica Emmons | Sr. Client Manager | Government and Education | Cigna | 5310 East High Street, Suite 200 | Phoenix, AZ 85054 | Direct. 480.426.6761 | Mobile: 480.622.0899 | erica.emmons@cigna.com



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From: Yvette Medina [mailto:Yvette.Medina@azdoa.gov]

To: Dash, Jay A; Branson Cobb; Maddalena, Diana M 646; Emmons, Erica 654; Amy Clatterbuck; Heather Gallegos;

Severns, Colette (Colette.Severns@azblue.com); Muth, Ken (Ken.Muth@azblue.com)

Cc: Chanelle Bergren; Marie Isaacson; Elizabeth Schafer

Subject: Transgender Reassignment

We are seeking additional information regarding Transgender Reassignment Surgery. Based on your book of business, are other health plans covering this procedure or looking to adding coverage? Please provide your coverage guidelines and response by Monday, October 5th. Let me know if you have any questions. Thank you.

## **Yvette**

## Yvette Medina

Plan Administrator

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## **Cigna Medical Coverage Policy**



## Subject Gender Reassignment Surgery

## Coverage Policy 1 General Background 3 Coding/Billing Information 7 References 10

Effective Date1/15/2015
Next Review Date1/15/2016
Coverage Policy Number0266

## Hyperlink to Related Coverage Policies

Panniculectomy and Abdominoplasty
Blepharoplasty, Reconstructive Eyelid Surgery,
and Brow Lift
Rhinoplasty, Ventibular Stenosis Repair, and
Septoplasty
Redundant Skin Surgery
Speech Therapy

## INSTRUCTIONS FOR USE

**Table of Contents** 

The following Coverage Policy applies to health benefit plans administered by Cigna companies. Coverage Policies are intended to provide guidance in interpreting certain standard Cigna benefit plans. Please note, the terms of a customer's particular benefit plan document [Group Service Agreement, Evidence of Coverage, Certificate of Coverage, Summary Plan Description (SPD) or similar plan document] may differ significantly from the standard benefit plans upon which these Coverage Policies are based. For example, a customer's benefit plan document may contain a specific exclusion related to a topic addressed in a Coverage Policy. In the event of a conflict, a customer's benefit plan document always supersedes the information in the Coverage Policies. In the absence of a controlling federal or state coverage mandate, benefits are ultimately determined by the terms of the applicable benefit plan document. Coverage determinations in each specific instance require consideration of 1) the terms of the applicable benefit plan document in effect on the date of service; 2) any applicable laws/regulations; 3) any relevant collateral source materials including Coverage Policies and; 4) the specific facts of the particular situation. Coverage Policies relate exclusively to the administration of health benefit plans. Coverage Policies are not recommendations for treatment and should never be used as treatment guidelines. In certain markets, delegated vendor guidelines may be used to support medical necessity and other coverage determinations. Proprietary information of Cigna. Copyright ©2015 Cigna

## **Coverage Policy**

Coverage for gender reassignment surgery and related services, including pre and post-surgical hormonal therapy is specifically addressed under many health benefit plans. In addition, procedures associated with gender reassignment surgery that are performed solely for the purpose of improving or altering appearance or self-esteem related to one's appearance, are considered cosmetic in nature and not medically necessary. Please refer to the applicable benefit plan document to determine benefit availability and the terms, conditions and limitations of coverage.

If coverage for gender reassignment surgery is available, the following conditions of coverage apply.

Cigna covers the following gender reassignment surgery, including pre- and post-surgical hormone therapy, as medically necessary when the individual is age 18 or older, has confirmed gender dysphoria, and is an active participant in a recognized gender identity treatment program:

- Female-to-male gender reassignment
  - breast surgery (i.e., initial mastectomy, breast reduction) when there is one letter of support from a qualified mental health professional
  - hysterectomy and salpingo-oophorectomy when BOTH of the following additional criteria are met:
    - o documentation of at least 12 months of continuous hormonal\* sex reassignment therapy
    - o recommendation for sex reassignment surgery (i.e., genital surgery) by two qualified mental health professionals with written documentation submitted to the physician performing the genital surgery (At least one letter should be a comprehensive report. Two separate letters

Page 1 of 12 Coverage Policy Number: 0266 or one letter with two signatures is acceptable. One letter from a Master's degree mental health professional is acceptable if the second letter is from a psychiatrist or Ph.D. clinical psychologist)

- vaginectomy (including colpectomy, metoidioplasty with initial phalloplasty, urethroplasty, urethromeatoplasty) when ALL of the following criteria are met:
  - documentation of at least 12 months of continuous hormonal\* sex reassignment therapy (May be simultaneous with real life experience.)
  - the individual has lived within the desired gender role for at least 12 continuous months and which includes a wide range of life experiences and events (e.g., family events, holidays, vacations, season-specific work or school experiences), including notification to partners, family, friends, and community members (e.g., at school, work, other settings) of their identified gender
  - o recommendation for sex reassignment surgery (i.e., genital surgery) by two qualified mental health professionals with written documentation submitted to the physician performing the genital surgery (At least one letter should be a comprehensive report. Two separate letters or one letter with two signatures is acceptable. One letter from a Master's degree mental health professional is acceptable if the second letter is from a psychiatrist or Ph.D. clinical psychologist.)
- Male-to-female gender reassignment
  - > orchiectomy when BOTH of the following additional criteria are met:
    - o documentation of at least 12 months of continuous hormonal\* sex reassignment therapy
    - recommendation for sex reassignment surgery (i.e., genital surgery) by two qualified mental
      health professionals with written documentation submitted to the physician performing the
      genital surgery (At least one letter should be a comprehensive report. Two separate letters or
      one letter with two signatures is acceptable. One letter from a Master's degree mental health
      professional is acceptable if the second letter is from a psychiatrist or Ph.D. clinical
      psychologist.)
  - vaginoplasty (including colovaginoplasty, penectomy, labiaplasty, clitoroplasty, vulvoplasty, penile skin inversion, repair of introitus, construction of vagina with graft, coloproctostomy), when ALL of the following criteria are met:
    - documentation of at least 12 months of continuous hormonal\* sex reassignment therapy,(May be simultaneous with real life experience.)
    - the individual has lived within the desired gender role for at least 12 continuous months, and which includes a wide range of life experiences and events (e.g., family events, holidays, vacations, season-specific work or school experiences), including notification to partners, family, friends, and community members (e.g., at school, work, other settings) of their identified gender
    - o recommendation for sex reassignment surgery (i.e., genital surgery) by two qualified mental health professionals with written documentation submitted to the physician performing the genital surgery (At least one letter should be a comprehensive report. Two separate letters or one letter with two signatures is acceptable. One letter from a Master's degree mental health professional is acceptable if the second letter is from a psychiatrist or Ph.D. clinical psychologist.)

\*Note: For individuals considering hysterectomy/salpingo-oophorectomy, orchiectomy, vaginectomy or vaginoplasty procedures a total of 12 months continuous hormonal sex reassignment therapy is required. An additional 12 months of hormone therapy is not required for vaginectomy or vaginoplasty procedures.

Cigna does not cover procurement, cryopreservation or storage of ANY of the following as part of gender reassignment for the preservation of fertility because it is excluded under many benefit plans and considered not medically necessary:

- embryo
- sperm

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oocytes

Cigna does not cover cryopreservation, storage, and thawing of reproductive tissue (i.e., ovaries, testicular tissue) because each is considered experimental, investigational, or unproven.

Cigna considers the following cosmetic in nature and not medically necessary when performed as a component of a gender reassignment, even when there is a benefit for gender reassignment surgery (this list may not be all-inclusive):

- abdominoplasty
- blepharoplasty
- breast enlargement procedures, including augmentation mammoplasty, implants, and silicone injections of the breast
- calf implants
- cheek/malar implants
- chin/nose implants
- collagen injections
- electrolysis
- · face/forehead lift
- brow lift
- hair removal/hair transplantation
- penile prosthesis (noninflatable /inflatable)
- testicular expanders
- · jaw shortening/sculpturing/facial bone reduction
- larvngoplastv
- lip reduction/enhancement
- liposuction
- mastopexy
- neck tightening
- nipple/areola reconstruction
- pectoral implants
- removal of redundant skin
- replacement of tissue expander with permanent prosthesis testicular insertion
- rhinoplasty
- scrotoplasty
- second stage phalloplasty
- skin resurfacing (e.g., dermabrasion, chemical peels)
- surgical correction of hydraulic abnormality of inflatable (multi-component) prosthesis including pump and/or cylinders and/or reservoir
- testicular prostheses
- trachea shave/reduction thyroid chondroplasty
- voice modification surgery
- voice therapy/voice lessons

## General Background

Gender reassignment therapy is an umbrella term for all medical procedures relating to gender reassignment of both transgender (i.e., internal gender identity is incongruent with genetic sex) and people with disorders of sexual development (DSD) (formerly known as "intersex"). The term "gender reassignment surgery," also known as sexual reassignment surgery, may be used to mean either the reconstruction of male or female genitals, specifically, or the reshaping, by any surgical procedure, of a male body into a body with female appearance, or vice versa. Gender reassignment surgery is part of a treatment plan for gender dysphoria. The causes of gender dysphoria and the developmental factors associated with them are not well-understood. The individual who is genetically male but whose gender identity is female, and who assumes a female gender presentation and role

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is known as a transwoman; and the individual who is genetically female but whose gender identity is male, and who assumes a male gender presentation and role is known as a transman.

Individuals that are transsexual, transgender, or gender nonconforming (i.e., gender identity differs from the cultural norm) may experience gender dysphoria. Gender dysphoria is defined as discomfort or distress that is caused by a discrepancy between a person's gender identity and the person's assigned sex at birth (World Professional Association for Transgender Health [WPATH], 2012), including the associated gender role and/or primary and secondary sex characteristics. Gender dysphoria can be alleviated through various treatments, some of which involve a change in gender expression or body modifications, such as hormones and/or surgery. The term "transsexual" refers to an individual whose gender identity is not congruent with their genetic and/or assigned sex and usually seeks hormone replacement therapy (HRT) and possibly gender-affirmation surgery to feminize or masculinize the body and who may live full-time in the crossgender role. Transsexualism is a form of gender dysphoria. Other differential diagnoses include, but are not limited to, partial or temporary disorders as seen in adolescent crisis, transvestitism, refusal to accept a homosexual orientation, psychotic misjudgments of gender identity and severe personality disorders (Becker, et al., 1998).

Gender reassignment surgery is intended to be a permanent change, establishing congruency between an individual's gender identity and physical appearance and is not easily reversible. Therefore, a careful and accurate diagnosis is essential for treatment and can be made only as part of a long-term diagnostic process involving a multidisciplinary specialty approach that includes an extensive case history; gynecological, endocrine and urological examination, and a clinical psychiatric/psychological examination. A patient's self-assessment and desire for sex reassignment cannot be viewed as reliable indicators of gender dysphoria.

Mental health professionals play a strong role in working with individuals with gender dysphoria as they need to diagnose the gender disorder and any co-morbid psychiatric conditions accurately, counsel the individual regarding treatment options, and provide psychotherapy (as needed) and assess eligibility and readiness for hormone and surgical therapy. Once the individual is evaluated, the mental health professional provides documentation and formal recommendations to medical and surgical specialists. Documentation recommending hormonal or surgical treatment should be comprehensive and include all of the following:

- individual's general identifying characteristics
- the initial and evolving gender, sexual and psychiatric diagnoses
- details regarding the type and duration of psychotherapy or evaluation the individual recieved
- documentation of the extent to which eligibility criteria have been met
- the mental health professional's rationale for hormone therapy or surgery
- the degree to which the individual has followed the standards of care and likelihood of continued compliance
- whether or not the mental health professional is a part of a gender team

Psychiatric care may need to continue for several years after gender reassignment surgery, as major psychological adjustments may continue to be necessary. Other providers of care may include a family physician or internist, endocrinologist, urologist, plastic surgeon, general surgeon and gynecologist. The overall success of the surgery is highly dependent on psychological adjustment and continued support.

After diagnosis, the therapeutic approach is individualized but generally includes three elements: sex hormone therapy of the identified gender, real life experience in the desired role, and surgery to change the genitalia and other sex characteristics.

Prior to gender reassignment surgery, patients usually undergo hormone replacement therapy, which plays an important role in the gender transition process. Biological males are often treated with estrogens and anti-androgens to increase breast size, redistribute body fat, soften skin, decrease body hair, and decrease testicular size and erections. Biological females are treated with testosterone to deepen voice, increase muscle and bone mass, decrease breast size, increase clitoris size, and increase facial and body hair. In both sexes HRT may be effective in reducing the adverse psychologic impact of gender dysphoria. Hormone therapy must be administered by a physician and requires ongoing medical management, including physical examination and laboratory evaluation studies to manage dosage, side effects, etc. Lifelong maintenance is usually required. Hormone therapy also limits fertility, and individuals should be informed of sperm preservation options and cryopreservation of fertilized embryos prior to starting hormone therapy.

Page 4 of 12 Coverage Policy Number: 0266 The individual identified with gender dysphoria also undergoes what is referred to as a "real life experience," prior to irreversible genital surgery, in which he/she adopts the new or evolving gender role and lives in that role as part of the transition pathway. This process assists in confirming the person's desire for gender role change, ability to function in this role long-term, as well as the adequacy of his/her support system. During this time, a person would be expected to maintain their baseline functional lifestyle, participate in community activities, and provide an indication that others are aware of the change in gender role.

## Surgery for Disorders of Sexual Development

Surgery for disorders of sexual development consists of a series of staged procedures where the physician removes portions of the genitalia and creates either male genitalia or female genitalia.

**Female-to-Male Transsexuals:** Gender reassignment surgery from female to male (FTM) transsexual people includes genital surgical procedures that reshape a female body into the appearance of a male body.

Breast or chest surgery, which may include subcutaneous mastectomy and/or creation of a male chest may also be performed. Other nongenital nonbreast related surgeries include voice surgery, liposuction, lipoprofiling, pectoral implants and other masculinizing procedures.

**Male-to-Female Transsexuals:** Gender reassignment surgery from male-to-female (MTF) transsexuals includes genital procedures that shape a male body into the appearance of and, to the maximum extent possible, the function of a female body.

Breast augmentation may be considered when 12 months of hormone treatment fails to result in breast enlargement that is sufficient for the individual's comfort in the female gender role. Breast surgery, which includes augmentation mammoplasty (implants/lipofilling) is a surgical procedure that may also be performed. In addition, other nongenital, nonbreast related surgeries, often considered feminization procedures, may be performed.

## Other Associated Surgical Procedures

**Preservation of Fertility:** Procedures aimed at preservation of fertility (e.g., procurement, cryopreservation, and storage of sperm, oocytes and/or embryos) performed prior to gender reassignment surgery are considered not medically necessary.

**Cosmetic Procedures:** Various other surgical procedures may be performed as part of gender reassignment surgery. When performed as part of gender reassignment surgery these associated procedures, aimed primarily at improving personal appearance, are performed to assist with improving culturally appropriate male or female appearance characteristics and hence are considered cosmetic and are not medically necessary. Procedures that are considered cosmetic and not medically necessary include, but are not limited to, the following:

- abdominoplasty
- blepharoplasty
- breast enlargement procedures, including augmentation mammoplasty, implants, and silicone injections of the breast
- brow lift
- calf implants
- cheek/malar implants
- chin/nose implants
- collagen injections
- electrolysis
- face/forehead lift
- gamete preservation in anticipation of future infertility
- hair removal/hair transplantation
- insertion of penile prosthesis (noninflatable /inflatable)
- · insertion of testicular expanders
- jaw shortening/sculpturing/facial bone reduction
- larvngoplasty
- lip reduction/enhancement

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- liposuction
- mastopexy
- nipple/areola reconstruction
- pectoral implants
- · removal of redundant skin
- replacement of tissue expander with permanent prosthesis testicular insertion
- rhinoplasty
- scrotoplasty
- second stage phalloplasty
- skin resurfacing (e.g., dermabrasion, chemical peels)
- surgical correction of hydraulic abnormality of inflatable (multi-component) prosthesis including pump and/or cylinders and/or reservoir
- testicular prostheses
- trachea shave/reduction thyroid chondroplasty
- voice modification surgery
- · voice therapy/voice lessons

## **Professional Society/Organization**

**WPATH Guidelines:** The World Professional Association for Transgender Health (WPATH) promotes standards of health care for individuals through the articulation of "Standards of Care for the Health of Transsexual, Transgender, and Gender Nonconforming People" (WPATH, 2012). WPATH recommendations for standards of care are based on scientific evidence and expert consensus and are commonly utilized as guidelines for individuals seeking treatment of gender disorders. In addition to breast surgeries (e.g., augmentation mammoplasty, mastectomy), according to the guidelines the following genital surgeries are considered procedures that may be performed for the treatment of gender dysphoria:

- hysterectomy
- salpingo-oophorectomy (ovariectomy)
- vaginectomy (i.e., removal of the vagina)
- metoidioplasty (i.e., clitoral tissue is released and moved forward to approximate the position of a penis, skin from the labia minora is used to create a penis)
- urethroplasty
- scrotoplasty
- insertion of erection and/or testicular prosthesis (i.e., the labia majora is dissected forming cavities allowing for placement of testicular implants)
- phalloplasty (i.e., skin tissue graft is used to form a penis, the objective for which is standing micturation, improved sexual sensation, function and/or appearance).
- penectomy
- orchiectomy
- vaginoplasty/colovaginoplasty (the objective for which is improved sexual sensation, function and appearance)
- clitoroplasty
- vulvoplasty
- colovaginoplasty (penile inversion to create a vagina and clitoris, or creation of a vagina from the sigmoid colon)

**Endocrine Society Guidelines**: In 2009 the Endocrine Society published a clinical practice guideline for endocrine treatment of transsexual persons (Hembree, et al., 2009). As part of this guideline, the endocrine society recommends that transsexual persons consider genital sex reassignment surgery only after both the physician responsible for endocrine transition therapy and the mental health professional find surgery advisable; that surgery be recommended only after completion of at least one year of consistent and compliant hormone treatment; and that the physician responsible for endocrine treatment medically clear the individual for sex reassignment surgery and collaborate with the surgeon regarding hormone use during and after surgery.

Use Outside of the US: No relevant information found.

## Summary

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Sex reassignment surgical procedures, including pre and post-surgery hormone therapy, for diagnosed cases of gender dysphoria should be recommended only after a comprehensive evaluation by a qualified mental health professional. The surgeon should have a demonstrated competency and extensive training in sexual reconstructive surgery. Long-term follow-up is highly recommended for the enduringly successful outcome of surgery.

## **Coding/Billing Information**

Note: 1) This list of codes may not be all-inclusive.

2) Deleted codes and codes which are not effective at the time the service is rendered may not be eligible for reimbursement.

## Intersex Surgery: Male to Female

## Covered when medically necessary:

CPT®*	Description
Codes	
55970†	Intersex surgery; male to female
	†Includes only the following procedures:
54125	Amputation of penis; complete
54520	Orchiectomy, simple (including subcapsular), with or without testicular
	prosthesis, scrotal or inguinal approach
54690	Laparoscopy, surgical; orchiectomy
56800	Plastic repair of introitus
56805	Clitoroplasty for intersex state
57291	Construction of artificial vagina; without graft
57292	Construction of artificial vagina; with graft
57335	Vaginoplasty for intersex state

## Intersex Surgery: Female to Male

## Covered when medically necessary:

CPT <sup>®</sup> *	Description	
Codes		
55980 <sup>T</sup>	Intersex surgery, female to male	
	<sup>†</sup> Includes only the following procedures:	
19303	Mastectomy, simple, complete	
19304	Mastectomy, subcutaneous	
53430	Urethroplasty, reconstruction of female urethra	
56625	Vulvectomy simple; complete	
57110	Vaginectomy, complete removal of vaginal wall	
58150	Total abdominal hysterectomy (corpus and cervix), with or without removal of tube(s), with or without removal of ovary(s);	
58262	Vaginal hysterectomy, for uterus 250 g or less; with removal of tube(s), and/or ovary(s)	
58291	Vaginal hysterectomy, for uterus greater than 250 g; with removal of tube(s) and/or ovary(s)	
58552	Laparoscopy, surgical, with vaginal hysterectomy, for uterus 250 g or less; with removal of tube(s) and/or ovary(s)	
58554	Laparoscopy, surgical, with vaginal hysterectomy, for uterus greater than 250 g; with removal of tube(s) and/or ovary(s)	
58571	Laparoscopy, surgical, with total hysterectomy, for uterus 250 g or less; with removal of tube(s) and/or ovary(s)	

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58573	Laparoscopy, surgical, with total hysterectomy, for uterus greater than 250 g;
	with removal of tube(s) and/or ovary(s)
58661	Laparoscopy, surgical; with removal of adnexal structures (partial or total
	oophorectomy and/or salpingectomy)
58999 <sup>TT</sup>	Unlisted procedure, female genital system (nonobstetrical)

<sup>&</sup>lt;sup>††</sup>NOTE: Covered when medically necessary when used to report metoidioplasty with initial phalloplasty.

## **Not Covered**

## Generally Excluded/Not Medically Necessary/Not Covered:

CPT®*	Description
Codes	
89258	Cryopreservation; embryo(s)
89259	Cryopreservation; sperm
89337	Cryopreservation, mature oocyte(s)(Code effective 01/01/2015)
89342	Storage (per year); embryo(s)
89343	Storage (per year); sperm/semen
89346	Storage (per year); oocyte(s)
0059T	Cryopreservation; oocyte(s) (Code deleted 12/31/2014)
0357T	Cryopreservation; immature oocyte(s) (Code effective 07/01/2014)
S4027	Storage of previously frozen embryos
\$4030	Sperm procurement and cryopreservation services; initial visit
S4031	Sperm procurement and cryopreservation services; subsequent visit
S4040	Monitoring and storage of cryopreserved embryos, per 30 days

## Experimental/Investigational/Unproven/Not Covered:

CPT®* Codes	Description	
89335	Cryopreservation, reproductive tissue, testicular	
89344	Storage (per year); reproductive tissue, testicular/ovarian	
89354	Thawing of cryopreserved; reproductive tissue, testicular/ovarian	
0058T	Cryopreservation; reproductive tissue, ovarian	

## Cosmetic/Not Covered when performed as a component of gender reassignment, even when coverage for gender reassignment surgery exists:

CPT <sup>®</sup> * Codes	Description
11950	Subcutaneous injection of filling material (eg, collagen); 1 cc or less
11951	Subcutaneous injection of filling material (eg, collagen); 1.1 to 5.0 cc
11952	Subcutaneous injection of filling material (eg, collagen); 5.1 to 10.0 cc
11954	Subcutaneous injection of filling material (eg, collagen); over 10.0 cc
11960	Insertion of tissue expander(s) for other than breast, including subsequent expansion
11970	Replacement of tissue expander with permanent prosthesis
11971	Removal of tissue expander(s) without insertion of prosthesis
15775	Punch graft for hair transplant; 1 to 15 punch grafts
15776	Punch graft for hair transplant; more than 15 punch grafts
15780	Dermabrasion; total face (eg, for acne scarring, fine wrinkling, rhytids, general keratosis)

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15781	Dermabrasion; segmental, face
15782	Dermabrasion; regional, other than face
15783	Dermabrasion; regional, ourier trial race  Dermabrasion; superficial, any site (eg, tattoo removal)
15786	Abrasion; single lesion (eg, keratosis, scar)
15787	Abrasion; each additional 4 lesions or less (List separately in addition to code for
13701	primary procedure)
15788	Chemical peel, facial; epidermal
15789	
	Chemical peel, facial; dermal
15792	Chemical peel, nonfacial; epidermal
15793	Chemical peel, nonfacial; dermal
15820	Blepharoplasty, lower eyelid;
15821	Blepharoplasty, lower eyelid with extensive herniated fat pad
15822	Blepharoplasty, upper eyelid
15823	Blepharoplasty, upper eyelid; with extensive skin weighting down lid
15824	Rhytidectomy, forehead
15825	Rhytidectomy; neck with platysmal tightening (platysmal flap, P-flap)
15826	Rhytidectomy; glabellar frown lines
15828	Rhytidectomy; cheek, chin, and neck
15829	Rhytidectomy; superficial musculoaponeurotic system (SMAS) flap
15830	Excision, excessive skin and subcutaneous tissue (includes lipectomy);
	abdomen, infraumbilical panniculectomy
15832	Excision, excessive skin and subcutaneous tissue (includes lipectomy); thigh
15833	Excision, excessive skin and subcutaneous tissue (includes lipectomy); leg
15834	Excision, excessive skin and subcutaneous tissue (includes lipectomy); hip
15835	Excision, excessive skin and subcutaneous tissue (includes lipectomy); buttock
15836	Excision, excessive skin and subcutaneous tissue (includes lipectomy); arm
15837	Excision, excessive skin and subcutaneous tissue (includes lipectomy); forearm
10001	or hand
15838	Excision, excessive skin and subcutaneous tissue (includes lipectomy);
	submental fat pad
15839	Excision, excessive skin and subcutaneous tissue (includes lipectomy); other
	area
15847	Excision, excessive skin and subcutaneous tissue (includes lipectomy);
	abdomen (eg, abdominoplasty) (includes umbilical transposition and fascial
	plication) (List separately in addition to code for primary procedure)
15876	Suction assisted lipectomy; head and neck
15877	Suction assisted lipectomy; trunk
15878	Suction assisted lipectomy; upper extremity
15879	Suction assisted lipectomy; lower extremity
17380	Electrolysis epilation, each 30 minutes
17999 <sup>†</sup>	Unlisted procedure, skin, mucous membrane and subcutaneous tissue
19316	
19324	Mastopexy  Mammaplaghy guamantation; without proofhatic implant
	Mammaplasty, augmentation; without prosthetic implant
19325	Mammaplasty, augmentation; with prosthetic implant
19340	Immediate insertion of breast prosthesis following mastopexy, mastectomy or in
10010	reconstruction
1 <b>9342</b>	Delayed insertion of breast prosthesis following mastopexy, mastectomy or in
10050	reconstruction
19350	Nipple/areola reconstruction
21120	Genioplasty; augmentation (autograft, allograft, prosthetic material)
21121	Genioplasty; sliding osteotomy, single piece
21122	Genioplasty; sliding osteotomies, 2 or more osteotomies (eg, wedge excision or
	bone wedge reversal for asymmetrical chin)
21123	Genioplasty; sliding, augmentation with interpositional bone grafts (includes
	obtaining autografts)
21125	Augmentation, mandibular body or angle; prosthetic material

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21127	Augmentation, mandibular body or angle; with bone graft, onlay or interpositional	
	(includes obtaining autograft)	
21137	Reduction forehead; contouring only	
21210	Graft, bone; nasal, maxillary or malar areas (includes obtaining graft)	
21270	Malar augmentation, prosthetic material	
30400	Rhinoplasty, primary; lateral and alar cartilages and/or elevation of nasal tip	
30410	Rhinoplasty, primary; complete, external parts including bony pyramid, lateral and alar cartilages, and/or elevation of nasal tip	
30420	Rhinoplasty, primary; including major septal repair	
30430	Rhinoplasty, secondary; minor revision (small amount of nasal tip work)	
30435	Rhinoplasty, secondary; intermediate revision (bony work with osteotomies)	
30450	Rhinoplasty, secondary; major revision (nasal tip work and osteotomies)	
31599 <sup>11</sup>	Unlisted procedure, larynx	
40799 <sup>111</sup>	Unlisted procedure, loips	
54400	Insertion of penile prosthesis; noninflatable (semi-rigid)	
54401	Insertion of penile prosthesis; inflatable (self-contained)	
54405	Insertion of multi-component inflatable penile prosthesis, including placement of pump, cylinders and reservoir	
54660	Insertion of testicular prosthesis (separate procedure)	
<b>55</b> 175	Scrotoplasty, simple	
55180	Scrotoplasty; complicated	
92507	Treatment of speech, language, voice, communication, and/or auditory processing disorder; individual	

HCPCS Codes	Description	
C1789	Prosthesis, breast (implantable)	
C1813	Prosthesis, penile, inflatable	
C2622	Prosthesis, penile, noninflatable	
L8600	Implantable breast prosthesis, silicone or equal	

<sup>†</sup>N<u>OTE</u>: Cosmetic/Not covered when used to report calf, cheek, malar or pectoral implants or fat transfers performed in conjunction with gender reassignment surgery, even when coverage for gender reassignment surgery exists.

TINOTE: Cosmetic/Not covered when used to report laryngoplasty performed in conjunction with gender reassignment surgery, even when coverage for gender reassignment surgery exists.

MOTE: Cosmetic/Not covered when used to report lip reduction/enhancement performed in conjunction with gender reassignment surgery, even when coverage for gender reassignment surgery exists.

\*Current Procedural Terminology (CPT®) ©2014 American Medical Association: Chicago, IL.

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Such operating subsidiaries include Connecticut General Life Insurance Company, Cigna Health and Life Insurance Company, Cigna Behavioral Health, Inc., Cigna Health Management, Inc., and HMO or service company subsidiaries of Cigna Health Corporation.

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## **Gender Transition-Related Services Coverage Rider**

## I. Adult coverage

In addition to the standard coverage for gender reassignment surgery, Yahoo! will provide coverage for the following services for individuals 18 years of age or older who have been diagnosed with gender dysphoria/gender identity disorder (ICD-9 302.85) by a licensed mental health professional and who have at least one letter of support from a licensed mental health professional according to WPATH Standards of Care version 7 guidelines:

CPI	Description
Codes	
11950	Subcutaneous injection of filling material (eg, collagen); 1 cc or less (face only)
11951	Subcutaneous injection of filling material (eg, collagen); 1.1 to 5.0 cc (face only)
11952	Subcutaneous injection of filling material (eg, collagen); 5.1 to 10.0 cc (face only)
11954	Subcutaneous injection of filling material (eg, collagen); over 10.0 cc (face only)
11960	Insertion of tissue expander(s) for other than breast, including subsequent expansion
11970	Replacement of tissue expander with permanent prosthesis
11971	Removal of tissue expander(s) without insertion of prosthesis
15775	Punch graft for hair transplant; 1 to 15 punch grafts
15776	Punch graft for hair transplant; more than 15 punch grafts
15780	Dermabrasion; total face (eg, for acne scarring, fine wrinkling, rhytids, general keratosis)
15781	Dermabrasion; segmental, face
15788	Chemical peel, facial; epidermal
15789	Chemical peel, facial; dermal
15820	Blepharoplasty, lower eyelid;
L5821	Blepharoplasty, lower eyelid with extensive herniated fat pad
15822	Blepharoplasty, upper eyelid
L5823	Blepharoplasty, upper eyelid; with extensive skin weighting down lid
L5824	Rhytidectomy, forehead
L5825	Rhytidectomy; neck with platysmal tightening (platysmal flap, P-flap)
L5826	Rhytidectomy; glabellar frown lines
L5828	Rhytidectomy; cheek, chin, and neck
L5829	Rhytidectomy; superficial musculoaponeurotic system (SMAS) flap
L5838	Excision, excessive skin and subcutaneous tissue (includes lipectomy); submental fat pad
L5876	Suction assisted lipectomy; head and neck
L <b>7380</b>	Electrolysis epilation, each 30 minutes
L7999	Unlisted procedure, skin, mucous membrane and subcutaneous tissue
9316	Mastopexy
.9324	Mammaplasty, augmentation; without prosthetic implant
.9325	Mammaplasty, augmentation; with prosthetic implant

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19340	Immediate insertion of breast prosthesis following mastopexy, mastectomy or in reconstruction
19342	Delayed insertion of breast prosthesis following mastopexy, mastectomy or in reconstruction
19350	Nipple/areola reconstruction
21120	
21121	·
21122	, , , , , , , , , , , , , , , , , , , ,
	wedge reversal for asymmetrical chin)
21123	Genioplasty; sliding, augmentation with interpositional bone grafts (includes obtaining autografts)
21125	Augmentation, mandibular body or angle; prosthetic material
21127	Augmentation, mandibular body or angle; with bone graft, onlay or interpositional
	(includes obtaining autograft)
21137	Reduction forehead; contouring only
21210	Graft, bone; nasal, maxillary or malar areas (includes obtaining graft)
21270	Malar augmentation, prosthetic material
30400	Rhinoplasty, primary; lateral and alar cartilages and/or elevation of nasal tip
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	and/or elevation of nasal-tip
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30430	Rhinoplasty, secondary; minor revision (small amount of nasal tip work)
30435	Rhinoplasty, secondary; intermediate revision (bony work with osteotomies)
30450	Rhinoplasty, secondary; major revision (nasal tip work and osteotomies)
31599	Unlisted procedure, larynx
10799	Unlisted procedure, lips
54400	Insertion of penile prosthesis; noninflatable (semi-rigid)
54401	Insertion of penile prosthesis; inflatable (self-contained)
54405	Insertion of multi-component inflatable penile prosthesis, including placement of pump, cylinders and reservoir
54660	Insertion of testicular prosthesis (separate procedure)
55175	Scrotoplasty; simple
55180	Scrotoplasty; complicated
92507	Treatment of speech, language, voice, communication, and/or auditory processing disorder; individual

## II. Children and adolescents

Yahoo! will provide coverage of puberty-suppressing hormones under the direction of a pediatric endocrinologist experienced in pediatric transgender care for adolescents who have reached at least Tanner stage 2 of sexual development and meet the following criteria,

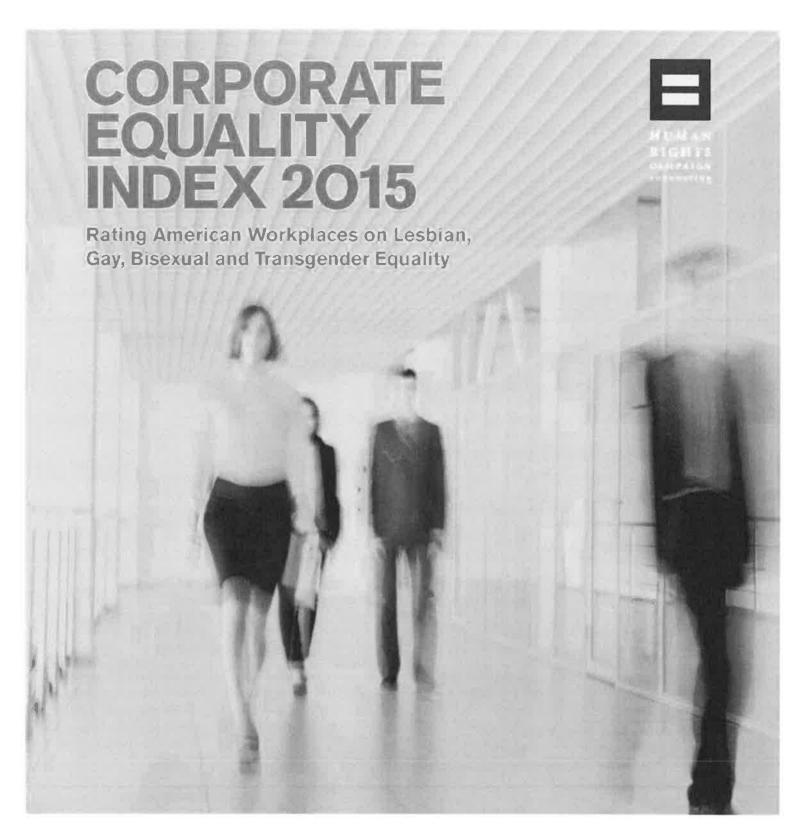
Version 1.0 6/17/2015

as confirmed in a letter of support from a licensed mental health professional who is trained in childhood and adolescent developmental psychology and competent in diagnosing and treating the ordinary problems of:

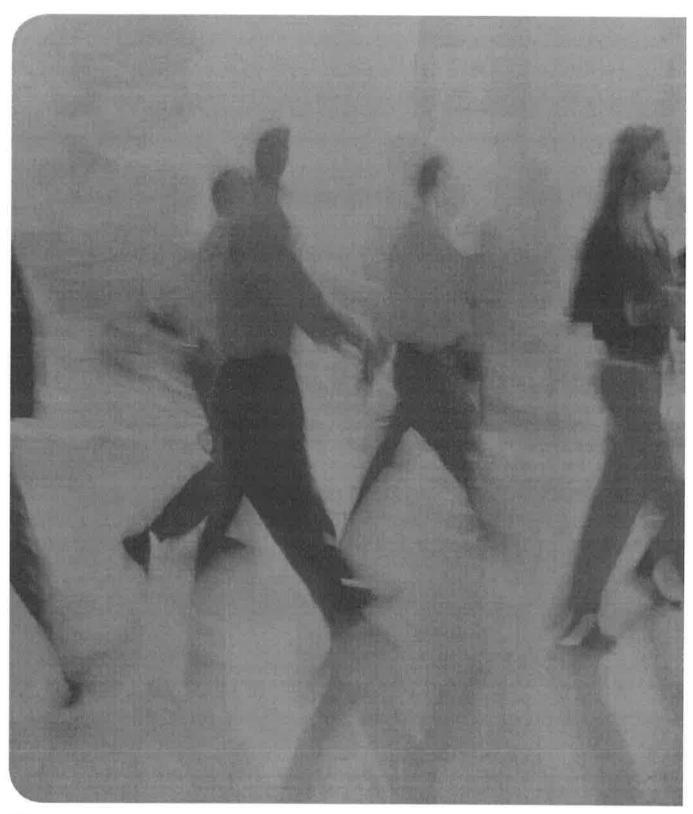
- 1. The adolescent has demonstrated a long-lasting and intense pattern of gender nonconformity or gender dysphoria (whether suppressed or expressed);
- 2. Gender dysphoria emerged or worsened with the onset of puberty;
- 3. Any coexisting psychological, medical, or social problems that could interfere with treatment (e.g., that may compromise treatment adherence) have been addressed, such that the adolescent's situation and functioning are stable enough to start treatment;
- 4. The adolescent has given informed consent and, particularly when the adolescent has not reached the age of medical consent, the parents or other caretakers or guardians have consented to the treatment and are involved in supporting the adolescent throughout the treatment process.

## III. All

- A. Coverage for all gender transition-related services (all services for which a diagnosis of gender dysphoria or gender identity disorder is required) will be subject to a lifetime limit of \$100,000.
- B. Yahoo! will only provide coverage for gender reassignment surgery when performed by a designated provider (see addendum)
- C. Yahoo! will provide up to \$5000 in reimbursement for travel related expenses in support of provision IIIB above, when supported by appropriate documentation.



781 Of the Nation's Largest Businesses Demonstrated Their Commitment to LGBT Equality and Inclusion



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CEI 2015 Letter from HRC Foundation President Chad Griffin

While many

Americans are

getting to know

the transgender

community for

the first time,

America has long been

Corporate

a leader in

the fight for

transgender

inclusion.

This year marks the 13th edition of the Human Rights Campaign Foundation's Corporate Equality Index. After a historic year of progress for the equal rights of lesbian, gay, bisexual and transgender (LGBT) Americans, we are experiencing a culture shift as well. Now more than ever, we are in the midst of greater visibility and understanding of the transgender community than ever before.

From hit TV shows, to documentaries, authors, and advocates in the news, transgender individuals are being given the opportunity to share their stories. This is not only a great step forward for the LGBT movement, but for the entire nation. The more we can do to lift up the stories of transgender people, the more progress we will all see.

While many Americans are getting to know the transgender community for the first time, Corporate America has long been a leader in the fight for transgender inclusion.

Since the CEI's inception in 2002, America's largest employers embrace LGBT-inclusion as a best business practice, and protections for employees on the basis of gender identity as a non-negotiable. In this year's national benchmarking report, an all-time record of 366 major businesses — spanning nearly every industry and geography — earned a top score of 100 percent and the coveted distinction of "Best Places to Work for LGBT Equality." This designation reflects true inclusion of the transgender workforce, from non-discrimination protections, to inclusive benefits and diversity practices, to respectful gender transition guidelines, allowing employees to self-identity based on gender identity, and engaging the broader transgender community. Wherever these 366 companies are doing business, transgender-inclusion is a priority.

An impressive group of 418 CEI participants now have transgender-inclusive health care coverage. Over Two hundred and ninety have adopted supportive gender transition guidelines, to ensure that employees experience a safe, respectful, successful transition in the workplace. Eight in ten employers in the CEI provide LGBT-inclusive diversity training. The most successful businesses have fully embraced transgender-inclusion as a top priority to support their workforce, their families, and the bottom line.

Even with overall increased visibility and the universal progress we have seen among fair-minded employers, we must remember that our work is not done.

Despite 66% of all Fortune 500 companies now including gender identity in the employment protections, we know that this does not always translate into everyday inclusion of the transgender community. While many companies are leading the way, our nation's federal non-discrimination protections are lagging behind. Critical cultural shifts need to take place to foster greater inclusion. In this case, our elected leaders should be looking to corporate America for a sterling example of how progress is achieved.

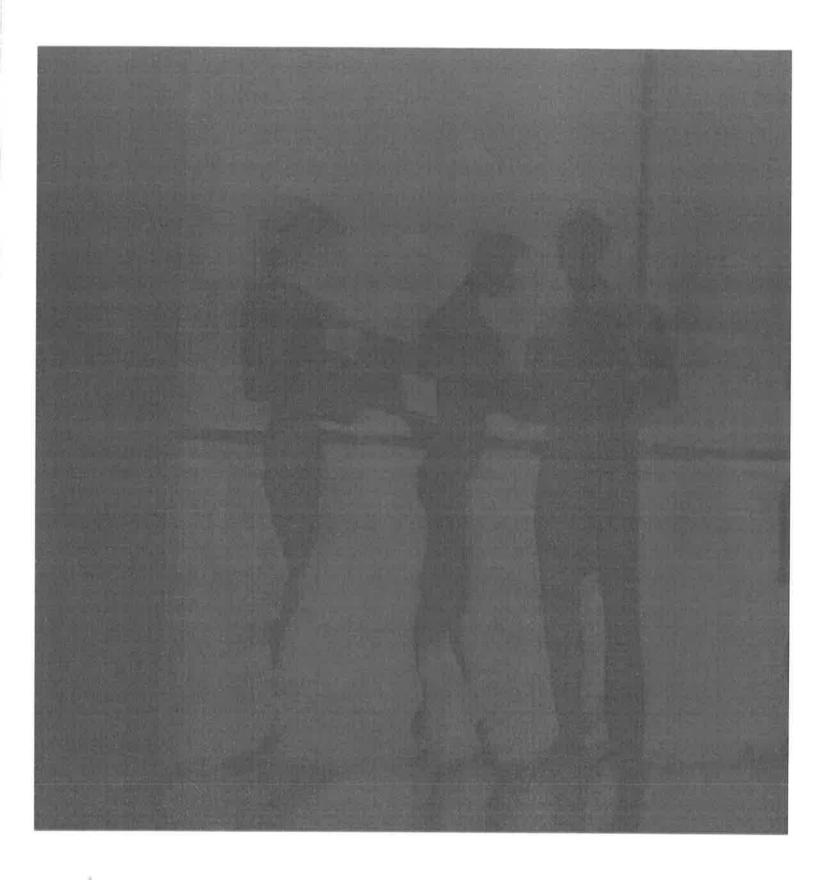
We have so much more work left to do. But thanks to the private sector successes documented in the Corporate Equality Index, we have a roadmap to achieve even greater progress. Together, the LGBT community and our 781 CEI corporate partners will keep moving forward every day.

Sincerely,

Chad Griffin, President

Human Rights Campaign Foundation

■ www.picosukosi



# **Executive** Summary

CEI 2015

Even after two

significant revi-

sions resulting

number of 100

percent-rated

businesses in

of the CEI.

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**Executive Summary** 

# Corporate Equality Index 2015 A New Standard of Equality Emerges from Corporate America

In this 13th edition of the Human Rights Campaign Foundation's Corporate Equality Index, a record 366 businesses achieved a top rating of 100 percent. Even after two significant revisions resulting in more stringent criteria, this is the highest number of 100 percent-rated businesses in the entire history of the CEI.

In the first year of the CEI a decade ago, 13 businesses achieved a top score of 100 percent and in the 2012 CEI, the year of the most recent scorecard updates, just 189 businesses earned top marks.

Highly rated businesses span hearly every industry and major geography of the United States. In addition, more and more businesses are going global with their LGBT initiatives.

This year marks another set of records with regard to comprehensive transgender inclusion initiatives:

- Two-thirds of the Fortune 500 and 89 percent of the entire CEI universe of businesses offer explicit gender identity non-discrimination protections;
- One-third of the Fortune 500 and over half of the CEI universe of businesses offer transgender-inclusive health care coverage, up from 0 in 2002 and nearly ten times as many businesses as five years ago;
- A majority of CEI-rated businesses (eight in ten) offer education and training programs

that specifically include definitions and/ or scenarios on gender identity in the workplace; and.

 Hundreds of major businesses have adopted gender transition guidelines for employees and their teams to establish best practices in transgender inclusion.

The policies, benefits and practices businesses must implement to earn a perfect score are best-in-class demonstrations of corporate commitments to LGBT workers and the broader community at-large.

In addition to the depth of investment the toprated businesses have made in the name of equality, the 2015 CEI shows an unprecedented breadth of brand new businesses. This year's CEI contains an impressive 48 new businesses that opted into the survey.

A grand total of 4,446 major brands fall under rated CEI businesses.

The following report is reflective of primarily verified data submitted to the HRC Foundation as well as independent research on non-responding businesses. Wherever credit can be verified, all ranked businesses will receive it, irrespective of their participation in the CEI survey.

The HRC Foundation has worked with hundreds of businesses to promote workpiace equality for LGBT workers.

Fortune 500	2002	2008	2013	2014	2015	
Sexual Orientation in Non-Discrimination Policy	61%	88%	88%	91%	89%	
Gender Identity in Non-Discrimination Policy	3%	25%	57%	6196	<b>66</b> %	

CEI 2015

This year, a record 366 businesses achieved a top rating of 100 percent.

In the first year of the CEI a decade ago, 13 businesses achieved a top score of 100 percent.

2002	2008	2013	2014	2015	100% by Industry
	30	71	81	89	Law Firms
- 1	32	33	36	49	Banking and Financial Services
1	13	19	20	26	Retall and Consumer Products
1100	14	12	16	21	Food, Beverages and Groceries
	10	14	16	20	insurance
11178	6	14	17	19	Consulting and Business Services
	9	8	10	12	Healthcare
	7	8	11	12.	Hotels, Resorts and Casinos
	3	7	9	73	Manufacturing
-1	3	7	9	10	Advertising and Marketing
	- 5	6	9	10	Pharmaceuticals
	1.0	5	8	9	Computer Software
13.5	3	4	6	9	Entertainment and Electronic Media
- 4	7	5	6	7.	Automotive
1000	6	8	8	7	Telecommunications
-	6	5	6	8	Chemicals and Biotechnology
2	6	4	4	8	Computer Hardware and Office Equipment
1000	2	4	5	8	Energy and Utilities
-1	5	4	4	8	High-Tech/Photo/Science Equip.
		3	4	6	Internet Services and Retailing
1	2	2	2	5	Airlines
1.70	3	4	5	5	Computer and Data Services
1000	4	2	3	4	Aerospace and Defense
1	8	2	2	2	Apparel, Fashion, Textiles, Dept, Stores
	2		11	2	Real Estate, Commercial
100		-1	1=	i gii	Home Furnishing
100	1		1	10	Mining and Metals
		1.	1	1.0	Oil and Gas
100	2	1	1	4	Publishing and Printing
			1	3.	Transportation and Travel
17.74	4	1	1	1	Miscellaneous
	-		-		

■ www.hic.org/cel

CEI 2015 | Executive Summary

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

A record 306 of the Fortune 500-ranked businesses have official CEI ratings based on submitted surveys (as compared to 301 last year), with an average rating of 86. The Fortune 500 list has been invited each year since 2002.

150 of the Fortune 500-ranked businesses achieved a 100 percent rating, with 14 of the top 20 Fortune-ranked businesses at this top score. Eighty-nine percent of the Fortune 500 include "sexual orientation" in their nondiscrimination policies and 66 percent include "gender dentity." The majority of the total Fortune 500 - 66 percent - offer equivalent medical benefits between spouses and partners and 34 percent offer transgender-inclusive health care benefits, including surgical procedures.

Fortune 1000 list of the largest publicly traded companies was invited to take part in the Corporate Equality Index survey for the seventh year in a row.



CEI 2015 Equality at the Fortune-Ranked Companies

14 of the
Top 20
Fortune-Ranked
Companies
Received
100% Ratings

	Fortune1000	2015 CEI Score
Wal-Mart Stores Inc.	1	90
Exxon Mobil Corp.	2	-25
Chevron Corp.	3	100
Phillips 66	4	15
Berkshire Hathaway Inc.	5	0
Apple Inc.	6	100
General Motors Co.	7	100
General Electric Co.	8	100
Valero Energy Corp.	9	15
Ford Motor Co.	10	100
AT&T Inc.	11	100
Federal National Mortgage Association (Fannie Mae)	12	100
CVS Caremark Corp.	13	100
McKesson Corp.	34	100
Hewlett-Packard Co.	15	100
Verizon Communications Inc.	16	90
UnitedHealth Group Inc.	17	100
IPMorgan Chase & Co.	18	100
Cardinal Health Inc.	19	100
International Business Machines Corp. (IBM)	20	100

Businesses' Commitment to LGBT Employees

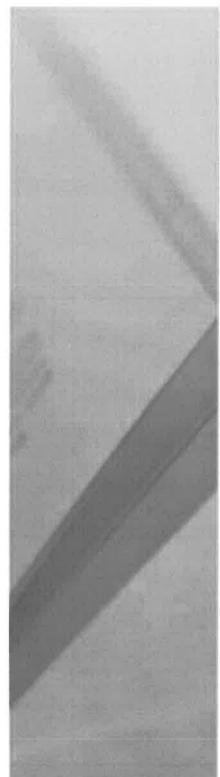
	All Fortune 500	Fortune 500 Participants	Fortune 500 Non-Responders
Sexual Orientation in Non-Discrimination Policy	89%	98%	<b>75</b> %
Gender Identity in Non-Discrimination Policy	66%	90%	<b>26</b> %
Domestic Partner Health Benefits	66%	95%	18%
Transgender Inclusive Benefits	34%	<b>55</b> %	0%
Organizational Competency Practices	48%	<b>78</b> %	0%
Public Commitment to the LGBT Community	<b>51</b> %	83%	0%
Average Score	45	86	12

<sup>■</sup> www.hrc.org/cel

CEI 2Q15 Executive Summary



CEI 2015 Executive Summary



# Equality at the American Lawyer-Ranked Firms

The country's most prominent law firms as ranked by American Lawyer continue to occupy the top spot in terms of industry representation amongst 100 percent-rated employers in the CEI.

The following law firms make up 89 of the 366 employers with top ratings.

Akerman LLP

Akin, Gump, Strauss, Hauer & Feld LLP

Alston & Bird LLP Arent Fox LLP Arnold & Porter LLP Baker & McKerzio LLP Bingham McCutchen LLP Brown Rudnick LLP

Bryan Cave LLP Cadwalader, Wickersham & Talt LLP

Carlton Fields Jorden Burt Chapman and Cutler LLP Choate, Hall & Stewart LLP

Cleary Gottlieb Steen & Hamilton LLP

Clittord Chance US LLP Covington & Burling LLP Crowell & Moring LLP Davis Wright Tremaine LLP Debevoise & Plimpton LLP

Dechert LLP Dentons US LLP

DLA Piper

Dorsey & Whitney LLP Dykema Gossett PLLC Edwards Wildman Paimer LLP

Faegre Baker Daniels Fenwick & West LLP

Finnegan, Henderson, Farabow, Garrett & Dunner LLP

Fish & Richardson PC Foley & Lardner LLP Foley Hoag LLP Fried, Frank, Harris, Shriver & Jacobson LLP Frost Brown fodd LLC

Gibson, Dunn & Crutcher LLP Goodwin Proctor LLP Hinshaw & Culbertson LLP Hogan Lovells US LLP Holland & Knight LLP Hunton & Williams LLP Jenner & Block LLP K&L Gates LLP

Katten Muchin Rosenman LLP

King & Spalding LLP Kirkland & Ellis LLP

Kramer Levin Naftalis & Frankel LLP

Latham & Watkins LLP Lindquist & Vennum LLP Littler Mendelson PC

Mayer Brown LLP

McDermott Will & Emery LLP Milbank, Tweed, Hadley & McCloy LLP

Mintz, Levin, Conn. Ferris, Glovsky & Popeo PC

Morgan Lewis & Bockius LLP Morrison & Foorster LLP Nixon Peabody LLP O'Melveny & Myers LLP

Orrick, Herrington & Sutcliffe LLP Patterson Bolknap Webb & Tyler LLP

Paul Hastings LLP

Paul, Weiss, Rilkind, Wharton & Garrison LLP

Pepper Hamilton LLP Perkins Cole LLP

Pillsbury Winthrop Shaw Pittman LLP

Quaries & Brady LLP Reed Smith LLP

Robins, Kaplan, Miller & Ciresi LLP

Ropes & Gray LLP Schiff Hardin LLP Sødgwick LLP Seyfarth Shaw LLP Shearman & Sterling LLP

Sheppard, Mullin, Richter & Hampton LLP

Shook, Hardy & Bacon LLP Sidley Austin LLP Simpson, Thacher & Bartlett LLP

Skadden, Arps, Slate, Meagher & Flom LLP

Squire Patton Boggs Stoel Rives LLP

Sutherland Asbill & Brennan LLP

Thompson Coburn LLP Thompson Hine LLP Troutman Sanders LLP Vinson & Elkins LLP Wachtell, Lipton, Rosen & Katz Weil, Gotshal & Manges LLP White & Case LLP

Wilmer Cutler Pickering Hale & Dorr LLP

Winston & Strawn LLP

Womble Carlyle Sandridge & Rice, LLP

www.hxc.org/cet

CEI 2015

Rating System and Methodology

# 2015 Corporate Equality Index Rating System and Methodology

The HRC Foundation Corporate Equality Index criteria serve as a road map for major U.S. businesses' adoption of inclusive policies, practices and benefits for LGBT employees. Launched in 2002, the CEI is the nationally recognized benchmarking report for businesses to gauge their level of LGBT workplace inclusion against competitors.

In addition to growing the number of highly-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 781**, encompassing ail major industry sectors and geographic regions of the U.S.

## What Businesses Are Rated

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

- Fortune magazine's 1,000 largest publicly traded businesses (2012 Fortune 1000) and
- American Lawyer magazine's top 200 revenue-grossing law firms (2012 AmLaw 200).

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

# How Ratings Are Used

The CEI is the primary source of data for two key I-IRC Foundation resources aimed at LGBT and allied consumers, employees, shareholders and prospective employees. They are:



- HRC Foundation Employer Search, a free online database of thousands of private and public sector U.S. employers available at www.hrc.org/employersearch.
- Buying for Workplace Equality 2015, a consumer-oriented guide based on CEI ratings, available at www.hrc.org/buyersguide. Coinciding with the start of the winter holiday and shopping season, the guide is distributed via print, online and smartphone applications to thousands of LGBT consumers estimated to have a cumulative spending power of \$830 billion, according to Witeck Communications market research. This accessible reference has given over 1 million consumers easy access to the CEI ratings corresponding to recognizable consumer brands.

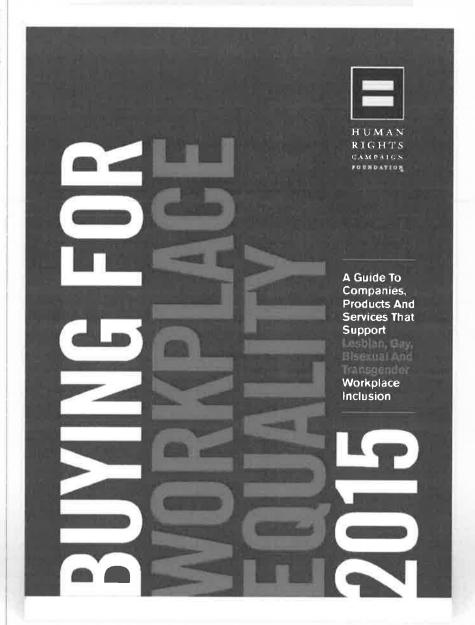
# 'BEST PLACES TO WORK'

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.



The total buying power of the LGBT adult population for 2013 is projected to be \$830 billion

Witeck Communications



www.hrc.arg/cei

CEI 2015

Criteria Timeline

# The Evolution of the Criteria

**The HRC Foundation is committed to maintaining a rigorous, fair, attainable and transparent CEI rating system.** Apart from the survey process itself, HRC Foundation staff work year-round to develop 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**,

The HRC Foundation continually examines the criteria and gathers input to guide the future of the criteria. Changes to the CEI criteria are necessary to account for:

- 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.

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

# Criteria Evolution Timeline

### 2002

The first CEI rated employers strictly on seven criteria that remain the basis for today's scoring system. The original criteria were guided n 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,

## 2004

The HRC Foundation released the second version of the criteria, with greater weight given to comprehensive domestic partner benefits and to transgender-inclusive health care coverage options. These criteria went into effect in 2006 and remained in effect through 2010 (for the CEI 2011 report).

#### 2009

The HRC Foundation announced the third version of the criteria, with comprehensive requirements for partner benefits, transgenderinclusive benefits, organizational competency on LGBT issues and employers public commitment to equality for the broader LGBT community. These criteria went into effect in 2011 (for the CEI 2012 report), 2009

#### 2014

The HRC Foundation announces new criteria requirements in place for the 2016 CEI. All of the changes stem from one guiding principle: that discrimination has no place in a top-rated CEI business. For a 100% in the 2016 Corporate Equality Index report, businesses must:

- Have sexual orientation and gender identity nondiscrimination protections explicitly included in all of its operations, both within the US and global operations.
- Require U.S. contractors to abide by companies' existing inclusive nondiscrimination policy.
- Implement internal requirements prohibiting company/ law firm philanthropic giving to non-religious organizations that have a written policy of discrimination on the basis of sexual orientation and/ or gender identity.

(See www.hrc.org/2016cel for more detail)

CORPORATE EQUALITY INDEX 2015

# Criteria There were four main objectives of the criteria changes that first went into effect in the 2012 CEI: Provide equal benefits for same-sex partners and spouses End benefits discrimination for transgender employees and dependents Demonstrate firm-wide organizational competency on LGBT issues Demonstrate firm-wide public commitment to the LGBT community Criteria 1 Equal employment opportunity policy includes: a Sexual orientation 15 points b. Gender identity or expression 15 points Criteria 2 Employment benefits a. Equivalent spousai and partner benefits Equivalent medical benefits 15 points includes parily between employees with different-sex appropriate same-sex partners or spouses in the provision of the following benefits: COBRA dental; vision; legal dependent coverage b. Other soft benefits - includes parity between employees with of the following benefits: bereavement leave; employer-provided suppliemental life insurance for a distinct, relocation/travel assistance, adoption assistance; qualified joint and survivor annuity for partners; qualified pre-retirement survivor annuity for partners; cash balance; rollows and hardship options, retiree health care benefits; and employee discounts 10 points Transgender inclusive health insurance coverage. 10 points Fount health coverage for transgender intlividuals without exclusion for Insurance contract explicitly affirms coverage and contains no blanket occlusions for coverage Insurance contract and/or policy documentation is based on the World Professional Association for Transgender Health (WPATH) Standards of Care Criteria continues on next two pages

■ www.htc.org/cal

CEI 2015 Rating

Rating System and Methodology

- Plan documentation must be readily available to employees and must clearly communicate inclusive insurance options to employees and their eligible dependents.
- Benefits available to other employees must extend to transgender individuals. The following benefits should extend to transgender individuals, including for services related to gender transition (e.g., medically necessary services related to sex affirmation/ reassignment):
  - Short term medical leave
  - Menta health herields
  - Pharmacoutical coverage (e.g., for normeno replacement therapics)
  - Coverage for medical visits or laboratory services
  - Coverage for reconstructive surgicel procedures related to sex reassignment
  - Coverage of routine, chronic or urgent non-transition services
  - Plan intiguage ensuring facequacy of networks or access to specialists should extend to transition related care (including provisions for travel or other expenses analysis are extended to the expenses analysis are extended.)
- Dollar maximums on this area of coverage must meet or exceed \$75,000.

To secure full credit for benefits criteria, each benefit must be available to all benefits eligible U.S. employees, in areas where more than one health insurance plan is available, at least one inclusive plan must be available.

#### Criteria 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 sexual orientation and gender identity and provides definitions or scenarios illustrating the policy for each
  - Supervisors undergo training that includes sexual onentation and gender identity as discrete topics (may be part of a broader training), and provides definitions or scenarios illustrating the policy (or each
  - Integration of sexual orientation and gender identity in professional development, skills-based or other laudership training that includes elements of diversity and/or cultural competency
  - Senior management/executive performance measures include LGBT diversity metrics
  - Gender transition guidelines with supportive restroom/facilities, dress code and documentation guidance
  - Anonymous employee engagement or climate surveys conducted on an annual or binninal basis allow employees the option to identify as LGBT
  - 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 eigentation and gender identity.
- b. Employee group or Diversity council

10 points

10 points

E CORPORATE EQUALITY INDEX 2015

#### Criteria 4

#### Public commitment

15 points

GBT-specific efforts, including at least three of the following: recruiting. supplier diversity, marketing or advertising, phrianthropy or public support for LGBT equality under the law. Bunnesses must demonstrate ongoing LGBT-specific engagement that extends across the firm, including at least three of the following:

- LGBT employee recruitment offerts
- Supplier diversity program with demonstrated effort to include. contried 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

#### Criteria 5 Responsible citizenship

No known activity that would undernine LGBT equality.

25 points

 Employers will have 25 points deducted from their score for a largescale official or public anti-LGBT blemish on their recent records. Scores on this criterion are based on information that has come to the HRC Foundation's attention related to topics including but not limited to: unduo influence by a significant shareholder calculated to undermine a business, 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

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

CEI 2015 Perfect Score

100 points

www.hrc.org/cell





# How We Obtain the Information The Corporate Equality Index Survey

The primary source of information for the Corporate Equality Index rating each business receives is the CEI survey sent every year to previous and prospective respondents.

Invitations for the CEI 2015 survey were mailed in late March 2014 and due back August 2014. 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 prior submissions.

The web-based survey included links to sample policies and other guidance on the HRC Foundation website. While many questions on the survey are required for participation in the CEI, others are informational questions that gauge trends and best practices among all businesses or particular industries. HRC Foundation 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 Foundation staff with any additional information or updates before this report went to print.

The information required to generate CEI ratings for businesses is largely considered proprietary and is difficult to ascertain from public records alone. In addition to the self-reporting provided through the CEI survey, the HRC Foundation 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, including any connections with organizations that engage in anti-LGBT activities. Employers are not rated until all appropriate information has been gathered and verified to the extent possible.

In total, the sources used include:

- The HRC Foundation's CEI survey;
- Securities and Exchange Commission filings to track connections between public companies' significant shareholders and any organizations or activities that engage in anti-LGBT activities (such connections are footnoted in this report, but do not necessarily change a business's rating);
- internal Revenue Service 990 tax filings for business foundations' gifts to anti-LGBT groups;
- 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 the HRC Foundation; and
- The HRC Foundation 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.

CEI 2015

How We Obtain the Information

If a business was found to have a connection with an anti-LGBT organization or activity, the HRC Foundation contacted the business and provided an opportunity 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 25 points from their overall rating through Criterion 5.

# Non-Responders: Official and Unofficial Ratings

The HRC Foundation may 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 the HRC Foundation has obtained sufficient information to provide an individual rating. In both cases, the HRC Foundation notifies the business of the rating and asks for any updates or clarification.

A lotal of 1,889 received invitations to take part in the survey.

- Of that number, 606 submitted surveys, and 781 were officially rated. Last year, a total of 1,923 businesses were sent invitations, 574 submitted surveys and 734 were rated.
- Forty-eight businesses participated for the first time this year, increasing the total number of rated businesses.

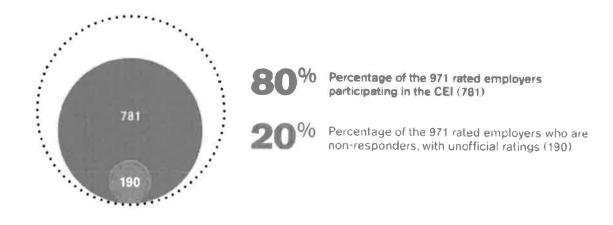
The HRC Foundation has spotlighted those Fortune 500 companies that, after repeated invitations, have never responded to the annual CEI survey. **These 190 Fortune 500 companies are noted in gray in Appendix B and C along with unofficial CEI ratings.** 

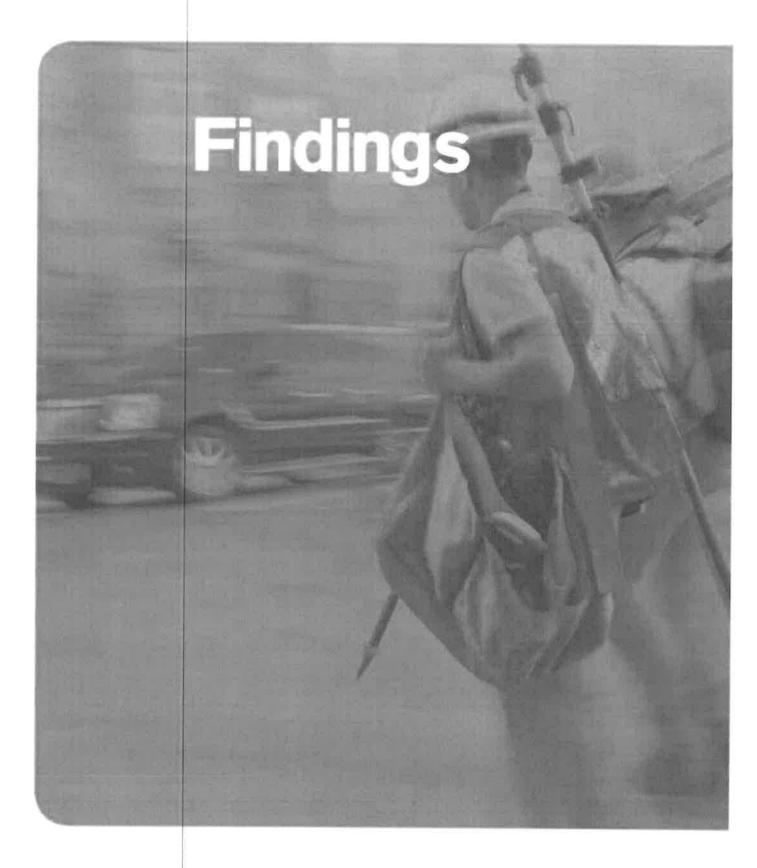
HRC Foundation commends those employers that have committed to work toward equality through the public and transparent process of the CEI survey and we invite these 190 companies to do the same.

In total, the CEI 2015 officially rates **306** Fortune 500 businesses, **86** Fortune 1000 businesses, **149** law firms and **240** additional major businesses.

An additional **190** Fortune 500 businesses have unofficial ratings, bringing the total to **971** rated businesses.

Findings in the following sections are based on the 781 officially rated businesses.





CE1 2015

Findings

# Non-Discrimination Policies

The most foundational element of equality in the workplace is the implementation of an affirmative equal opportunity/ non-discrimination policy that specifically covers sexual orientation and gender identity as protected characteristics with regard to employment decisions, namely hiring, firing and promotional practices. Federal laws clearly and consistently afford protections from workplace discrimination on the basis of race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability and genetic information but do not afford these same protections on the basis of sexual orientation or gender identity.

Currently, the Federal Equal Employment Opportunity Commission is accepting complaints of gender dentity discrimination in employment based on Title VII's prohibition against sex discrimination. In addition, 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 32 states because of their gender identity.

Despite this patchwork of state laws and federal guidance, private sector employers have far outpaced fawmakers in the implementation of fully inclusive non-discrimination polices. Even as the legal landscape is tending towards greater progress, the CEI continues to prioritize the implementation of inclusive non-discrimination policies for both the material protections they offer workers and the signal of LGBT inclusion, the specific protections offer. In other words, the CEI is not just a measure of what is legally required, but a benchmark of a private sector employer's own adoption of LGBT-inclusive policies, benefits and practices.

# **Sexual Orientation Protections**

Criterion 1a

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

98% of CEI-rated employers provide employment protections on the basis of sexual orientation.

# **Gender Identity Protections**

Criterion 1b

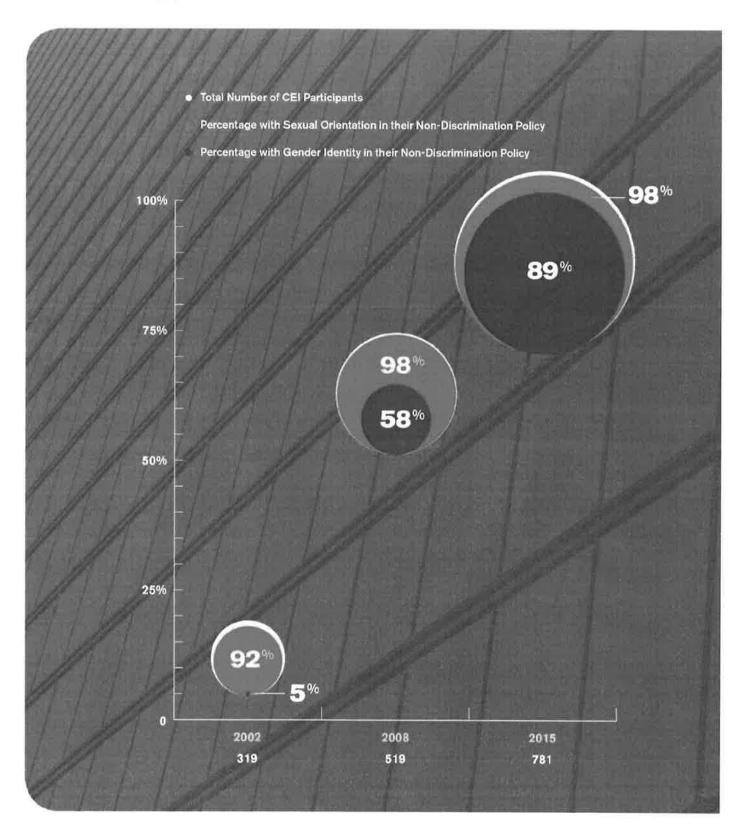
**Businesses That Prohibit Discrimination Based on Gender Identity** 

of CEI-rated employers provide employment protections on the basis of gender identity, the highest figure to date and an increase of 2 percentage points from last year.

This criterion has seen the most rapid growth of any other element of the CEI. In 2002, just 5 percent of the rated businesses included gender identity in their non-discrimination policies and every year that figure has climbed to today's strong majority with these protections in place. Also of note is the record low in the gap—less than ten percent—between sexual orientation protections and gender identity protections.

E COMPORATE EQUALITY INDEX 2019

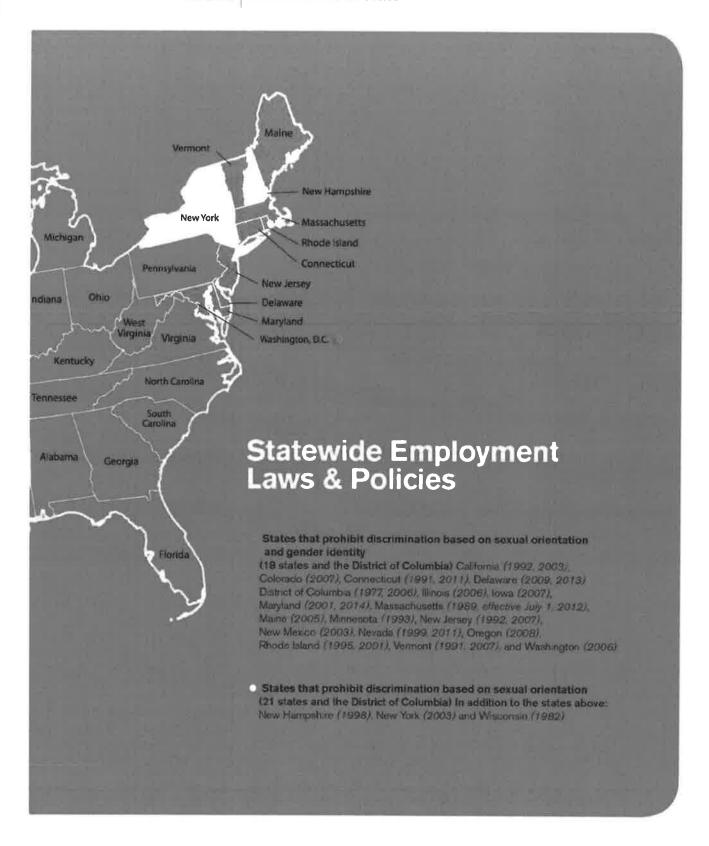
Findings Non-Discrimination Policies



www.hrc.org/cei



CEI 2015 Non-Discrimination Policies



CEI 2015

Findings

# **Equal Benefits**

From health care coverage to retirement investments to leave policies and more, employer-provided benefits' packages are significant incentives for attracting and retaining talent. Ensuring LGBT-inclusive benefits to employees and their families is an overall low-cost, high-return proposition for businesses to remain competitive for talent and broader corporate reputations within their industries. Most employers report an overall increase of less than 1 percent of total benefits costs when they implement partner benefits and marginal increases related to transgender-inclusive health care coverage (i.e. a fraction of a decimal point of cost calculations). Fundamentally offering equal benefits is part of a core principle of equal pay for equal work across a diverse workforce. Apart from actual wages paid, **benefits account on average for roughly 20 percent of employees' overall compensation.** Therefore, employers have amended many benefits structures to ensure that this valuable bundle of benefits is equitably extended to their workforce, rrespective of sexual orientation and gender identity.

Partner Benefits:
Aimed at LGBT
Employees, but
Expanding to
Entire Workforce

When denied equal benefits coverage, the cost to LGBT workers and their families is profound. The HRC Foundation 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
- Transgender-inclusive health insurance coverage of medically necessary treatment and care.

In addition, employers are rated on having full parity across their entire suite of benefits - including non-healthcare benefits such as leave, retirement and others - between different-sex spouses and same sex partners/spouses.

Businesses meeting the partner benefits and transgender-inclusive health care coverage criteria have done so in the spirit of parity. In its CEI scoring, the HRC Foundation does not penalize an employer if a particular benefit is not offered to

any employees, but holds employers accountable to provide equitable benefits to LGBT employees and their families across the complete package of benefits offered, not just basic health care coverage.

In other words, all of the benefits extended to employees with a partner or spouse of a different sex are equally extended to same-sex partners and spouses. Similarly where routine care, hormone therapies and medically necessary surgenes and procedures are available to dis-gender (people who are not transgender), these same health care benefits are equally extended to transgender plan enrollees. Many employers have begun to comprehensively address health insurance coverage for transgender individuals, and most have experienced little to no premium increases as a result.

The HRC Foundation provides extensive resources relating to LGBT-inclusive benefits on its website at www.hrc.org/benefits.

Criterion 2a

# **Businesses That Offer Domestic Partner Health Insurance**

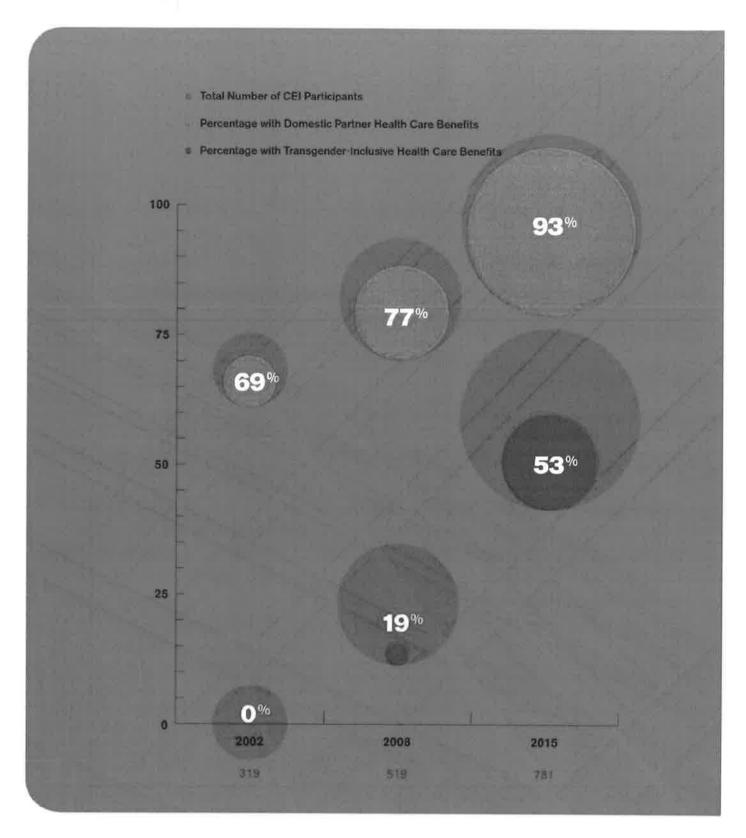


CEI-rated employers provide medical and comprehensive health benefits such as dental, vision, dependent medical and Consolidated Omnibus Budget Reconciliation Act (COBRA)-equivalent continuation coverage.

While not a mandate of the CEI criteria, of the employers providing partner health insurance, **71 percent** provide them to both same- and different sex partners of employees. What began as a comprehensive effort within Corporate America to address legal and financial inequities faced by the LGBT community soon is growing to reflect changing expectations and needs of an evolving workforce wanting health care coverage for diverse families.

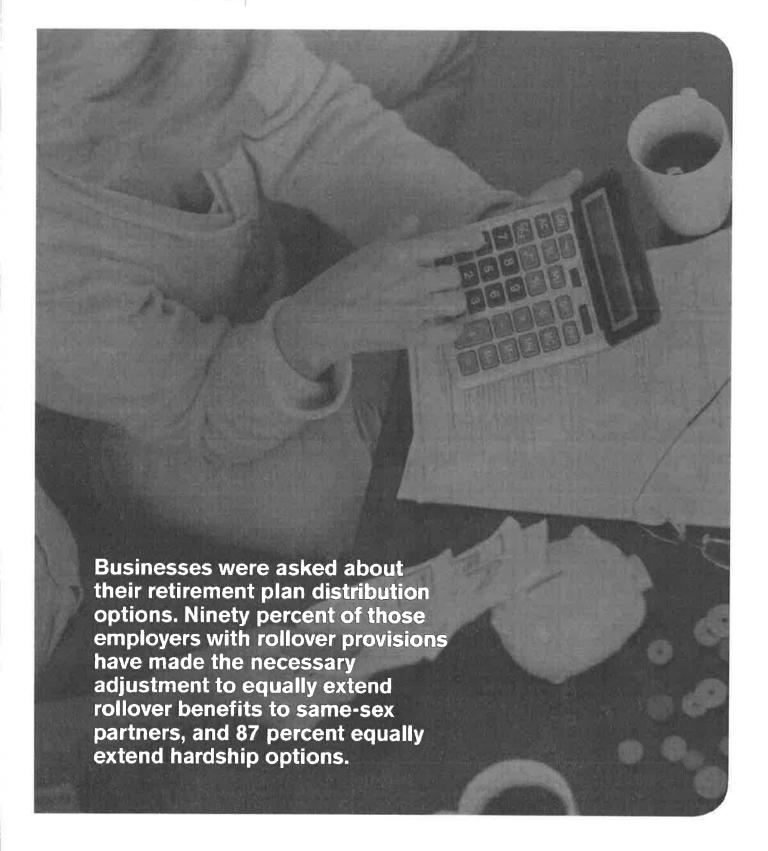
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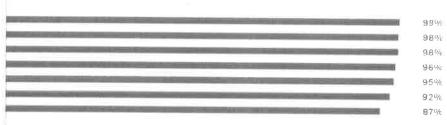
Equal Benefits

# Criterion 2b Parity Across All "Soft" Benefits for Domestic Partners

of CEI-rated employers have complete parity in spousal and partner access to "soft" benefits (when such benefits are offered at all) such as bereavement leave, employee assistance programs, employee discounts and relocation assistance.

Those individual benefits with the highest rates of parity include:

Adoption Assistance
Employee Discounts
Bereavement Leave
Relocation Assistance
Supplemental Life
FMI\_A-type Leave



# Retirement Benefits: In Focus for Employers and Employees Alike

In the year following the landmark Supreme Court decisions of United States v. Windsor and Hollingsworth v. Perry, businesses have in some circumstances been legally compelled to extend retirement benefits to same-sex spouses of employees. Prior to these rulings, the HRC Foundation worked with hundreds of businesses to make LGBT employees retirement benefits available to their surviving family members as they would be to other workers.

In 2011, the first Baby Boomers turned 65. According to the Pew Research Center, since January 1, 2011 and every day for the next 19 years, 10,000 Baby Boomers will reach age 65, the traditional retirement age.

The retiring population of LGBT workers is no different from their peers in wanting to ensure continued access to health care coverage as well as accrued financial benefits to their families.

# Retirement Financial Benefits

Since the passage of the 2006 Pension Protection Act, the HRC Foundation worked to ensure CElrated employers both understood and followed the changes that went into effect under this law. As a pre-cursor to the last year's legal changes post-Supreme Court rulings on same-sex marriage, the PPA opened up a significant opportunity for employers to extend retirement benefits to non-spouse (according to then federal definitions that excluded same-sex spouses) beneficiaries.

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 contained technical corrections to the PPA — as a result, all qualifying retirement plans were required to implement the non-spouse rollover provision as of Jan. 1, 2010. The PPA also allows for hardship withdrawals from a retirement plan for any designated beneficiary of the participant's plan, such as a domestic partner, parent or sibling.

Businesses were asked about their retirement plan distribution options. Ninety percent of those employers with rollover provisions have made the necessary adjustment to equally extend rollover benefits to same-sex partners, and 87 percent equally extend hardship options.

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Equal Benefits

# Classic Pensions: Making Defined Benefit Plans More Equal

Even though employers have been steadily cutting defined benefit plans (pensions), the HRC Foundation continued to survey employers with such plans still active on whether they provided survivor options for domestic partners of employees, either in the form of Qualified Joint and Survivor Annuities or Qualified Pre-retirement Survivor Annuities.

A total of 59 percent of participating employers indicated that they offer defined benefits to their employees; 80 percent of those with pensions offer QJSAs to their employees' domestic partners, while 79 percent offer QPSAs.

Of those employers offering cash balance pension plans, 87 percent extend the benefit equally to spouses and partners.

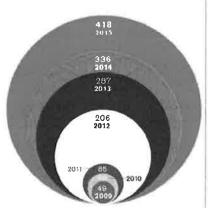
# Transgender-Inclusive Health Care Benefits

The HRC Foundation has, in partnership with hundreds of major businesses taking part in the CEI, led great change in employer provided health insurance coverage for transgender people. Today, for the first time in history, a majority of CEI-rated businesses offer this coverage.

Since 2004, the CEI has identified transgender-inclusive health care coverage as an area of educational outreach and criteria inclusion.

From 2006 through the 2011 CEI, to earn top rating businesses needed to mitigate at least one exclusion for transgender health care found in the vast majority of insurance plans restricting medically necessary health care coverage for transition-related care as well as routine and chronic care for transgender individuals. Two years prior to the 2012 CEI, the HRC Foundation announced a major change to what would be the 2012 CEI criteria: to earn a top rating of 100 percent, a business needed to not just mitigate one or more exclusions, but address the root problem of transgender exclusion in coverage and fully affirm health care coverage for medically necessary transition-related care and other routine and chronic conditions.

Through the intensive educational and consultative efforts to address health care and insurance disparities for the transgender population and their families, including: cutreach to leading health insurance companies direct consultation with both fully and self-insured employers to modify their health care plans and collection and dissemination of cost and utilization data from leading businesses, the HRC Foundation led an increase in the number of major U.S. employers affording transgender-inclusive health care coverage, from 0 in 2002 to 49 in the 2009 CEI to 278 in the 2013 CEI to 336 in 2014 and a record 418 in this year's 2015 CEI.



The number of major employers offering transgender-inclusive health care coverage

#### Criterion 2c

# Businesses That Offer at Least One Transgender-Inclusive Health Care Coverage Plan ▶

53% of this year's rated businesses afford transgender-inclusive health care coverage options through at least one firm-wide plan. This coverage includes:

- short-term leave,
- counseling by a mental health professional,
- hormone therapy,
- medical visits to monitor hormone therapy and
- surgical procedures

These benefits are critical for the health and well-being of individual transgender people. According to businesses reporting to the HRC Foundation, making these benefits accessible comes at an overall negligible cost to the employers' overall health insurance plans. This holds true across industries,

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# 418 Businesses That Offer at Least One Transgender-Inclusive Health Care Coverage Plan

A.T. Kenmey Inc. AbbVie Inc. Abertrombis & Filch Co. Accenture Astna Inc AlG. Air Products & Chemicals Inc. Akarmar LLP Akin, Gump, Strauss, Houer & Feld LLP Alaska Ali Group Inc. Alcedel Lucent Alcon Inc Alakan & Baid LI,P Aline Group Inc. AMC Entertainment Inc. Arnericus At Ilnes Amo scan Espicas Co. American Femily Insurance Group Ame uprise Financiel Inc. An Huseh Companies Inc. ADL Average Co. Acoust & Photo: LLD Astralias Pharms US inc. Astral/errors PLC ALAT INC. Automatic Data Pharasonighic Aurust Inc. Avanthoractic loc AXA AX Amon Exchange Africaniale Isc.
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Cadwalader, Wickensham & Tell ILLP Coopers Entertainment Corp. Cambbe | Stup Co Capital Mailetts Company NV, The Cepital One Financial Corp. Cardinal Health Inc.

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CBSCorp. Chapmas and Culter LLP

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Comington & Beiling LLP Crodit Sunsa USA Inc Crowell & Moring LLP
CSAA Insurance Group Currentine lec-CV5 Health Corp. Usraher Corp Darden Restrumenta Inc. Date Wright Tromano LLP
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InterContinental Holete Group Americas International Business Machines Corp. (BM) Interpublic Group of Comparison Inc. Intuit Inc. Investo Ltd. J.C. Penney Go. Inc. Janden Corp. Jenner & Block LLP Jeffiles Airerays Corp. Jahn Hansock Fireness Services inc. Jahnson & Jahnson JPMorgan Chain & Co. K&L Gales LLP Kaiger Pérmanante Hotte: Machin Re Hotto: Machin Rosesson Holley Drys & Warren LU Helioos Co. KayCorp Kimpha Helmi & Rostmanni Group Inc. King & Speiding LLP Kirkland & Elbs L.P KPMG LLP Kranti Foods Group Inc.
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McDermold Will & Emery LLP McKeeson Corp. McKinsey & Co. Inc. Meditanic Inc. Merjer Inc. Merch & Co. Imp MatLibe Inc MGM Records International Microsoft Corp Milbank, Tweed, Hadley & McCloy LLP AMerCoors LLC Mints, Leven, Cohn, Farris, Blowsky & Poper PC Mitchell Gold + Boh Williams Monganto Co Moody's Corp Morgan Lewis & Bockius LLP

Morgan Stanley Morrison & Fourster LLP Mosaic Co MSLGROUP Americas Natanvida Navigent Consulting Inc. NCR Corp Nestlé Piura PelCare Co NotAppine. Netto: inc. New York Life Insurance Co. Newsii Rubbermaid Inc. Neisen Co., The Nike Inc Nixtan Peabody LLP Northern Trust Corp. Northrop Growman Corp. Northwestern Michael Life Insurance Nevertis Philippinesticals Core NVIDIA Corp. O'Matery & Myors LLP Office Dooot Inc. Ogihy Group Inc., The Oracle Corp. Charle Walfewide In-Orticle, Harrington & Substiffe LLP Outerwelf Inc. Cours Corning
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Shook, Harry & Barr LLP Stdley Austin LLP

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Sony Electronics Inc.

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Support, Thicker & Bartlett LLF SIRUS XM Radio Inc.

Sony Pictures Enterlainment Inc.

Sheppard, Mullin, Richter & Hampton LLP

Skadden, Alps, State, Meagher & Flore LLP

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Southern California Edwar Co. Sprint Nextel Carp. Squire Parton Boggs St. Juda Machcal Inc Starbucks Corp. Starcom Martin Vivet Group Star wood Hotels & Resorts Worldwide State Farm Group State Street Corp Stroicese no. Stepton & Johnson LLP Sice River LLP Sun Life Financial Inc (U.S.) SunPower Corp. SunTrust Banks Inc. Supervaluino. Sufher and Assiz & Brannen LLP T-Metalle USA Inc. TD Brank, N.A. College Reinsment Equities Fund uh Deta Gorp. mis Notors ind The Consequential of Las Veges Thermo Fisher Scanlific Inc.
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# **Organizational Competency in LGBT Inclusion**

Criterion 3a

Competency Training, Metrics, Resources or Accountability Measures

of CEI-rated employers offer a robust set of practices
(at least three efforts) to support organizational LGBT diversity competency.

The rates at which major businesses have laid a foundation of equal policies and benefits for LGBT workers have necessitated further expansion of internal diversity and inclusion efforts to better ensure that LGBT inclusion is weven into the daily culture and employee engagement programming within the business.

Even with critical changes to policies, employers have recognized that additional programming and educational efforts are necessary to make these policies part of the business's competency portfolio across all employee tiers. No business wants to inadvertently lose its momentum towards greater inclusion, retention and productivity of talent because of a lack of comprehensive educational efforts.

Some of the most common forms of LGBT inclusion efforts are: diversity training programs, LGBT metrics and evaluation mechanisms and gender transition guidelines. Many employers integrate these educational programs into already existing diversity and inclusion programs. To obtain full credit in this criterion, employers must show at least three types of organizational competency programming. This comprehensive metric is provided as accountability for employers to devote resources to creating and maintaining a climate of inclusion.

In light of policy and benefits expansion, the HRC Foundation has rolled out a number of studies and resources aimed at making the policies and benefits part of an everyday workplace practice of LGBT inclusion. These can be found at www.hrc.org/workplaceclimate

Diversity Training and Educational Programs Diversity training and educational programs are often essential to employee onboarding processes as well as managerial and leadership trainings. Simply put, "sexual orientation" and "gender identity" workplace protections are not self-evident in concept and do not enjoy a history of federal guidance as other categories do. Most employees need some direction as to what these policies mean in their workplaces with regard to employee expectations. In addition, diversity training and educational programs are key platforms for the employer to show alignment in their business values around inclusion with broader business objectives such as solidifying diverse market shares, attracting talent and more.

Trainings may be in-person or web-based modules; credit is given to employers that include definitions or scenarios of how "sexual orientation" and "gender identity or expression" are included in the employer's non-discrimination policy as discrete subjects within broader trainings or as standalone trainings.

While some employers meet this requirement with basic new-hire training (74 percent of all employers), others have developed fully integrated diversity and inclusion programs that combine lessons on diversity with other trainings that are skills or policy-based. For example, a training focused on the professional development of new managers may cover a range of topics including job-related software skills, ethics training, and organizational values with respect to promoting diversity and inclusion. Sixty percent of this year's rated businesses indicated that they offer such integrated training programs.

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Organizational Competency in LGBT Inclusion

of CEI-rated employers offer employees question options to voluntarily disclose their sexual orientation and gender identity on anonymous suveys or confidential HR records.

Counting
LGBT Employees:
Optional
Self-Identification
Questions

Unlike other diversity categories such as race and gender, employers are not required by law to collect data on the LGBT people they employ. However, many employers have implemented optional self-identification questions for LGBT employees to answer alongside other standard demographic questions.

These data collection efforts are aimed at quantifying the extent to which businesses' LGBT inclusion efforts have yielded positive results in terms of the recruitment and retention of LGBT talent. In addition, many employers have anonymous workplace climate surveys and the LGBT data provides valuable information on broader engagement measures of this workforce segment. As the business maxim states: "It you can't measure it, you can't manage it" and so hundreds of businesses have started to count their LGBT employees.

Currently, forty six percent of CEI participants allow employees to voluntarily disclose their sexual orientation and gender identity on anonymous surveys or confidential Human Resource records.

# Senior Leadership Metrics of Inclusion

Now an emerging trend, some employers define a set of annual diversity and inclusion goals and hold their senior leaders accountable for the accomplishment of these goals through senior leadership performance evaluations. Thirty-eight percent of CEI-rated employers allow senior leaders to submit LGBT-focused diversity efforts as part of their annual review of overall leadership on diversity and inclusion goals.

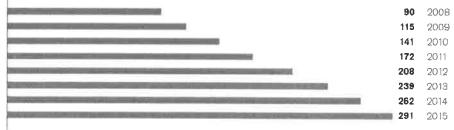
# Gender Transition Guidelines

The proliferation of comprehensive transgender-inclusive health care benefits and gender identity workplace protections has catalyzed more and more businesses to work with the HRC Foundation to implement guidelines on the transition process. The guidelines are aimed at establishing common reference points and expectations for all involved, including the transitioning employee, HR, management and work groups, to further everyone's goal of a respectful fransition process that retains the employee and individual engagement.

A record 291major employers submitted gender transition guidelines — the vast majority of which were adopted from the HRC Foundation's template guidelines (available at www.hrc.org/workplace).

From suggestions on how to have respectful and informative conversations about the topic of transgender inclusion in the workplace to the administrative changes to one's personnel and workplace documents, these guidelines clearly delineate responsibilities and expectations of transitioning employees, their supervisors, colleagues and other staff.

The number of major employers with gender transition guidelines



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# Criterion 3b LGBT/Ailles Employee Groups and Diversity Councils

of CEI-rated employers have an employee resource group or diversity council that includes LGBT issues. Sixty-seven percent of rated employers have employee groups, 77 percent have diversity councils and 61 percent of rated employers have both.

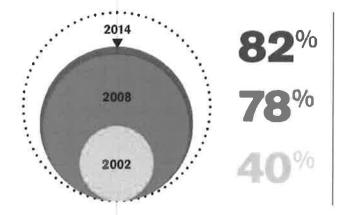
Many large employers have formally recognized employee resource groups (also known as an employee network groups or affinity groups) for diverse populations of their workforce, including women, people of color, people of varied abilities and LGBT/allied people. These groups' purpose is two-fold:

- To foster a sense of community within a business and
- To leverage each unique populations' networks and skills to help accomplish business goals such as market innovation, recruitment and retention of talent.

ERGs are great platforms for leadership opportunities for LGBT and allied employees to better their own work environments. In addition, the reach of many ERGs 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.

Employers 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. LGBT/A ERGs empower employees as change agents, and also help to provide a sense of safety and acceptance for LGBT employees within the workplace.

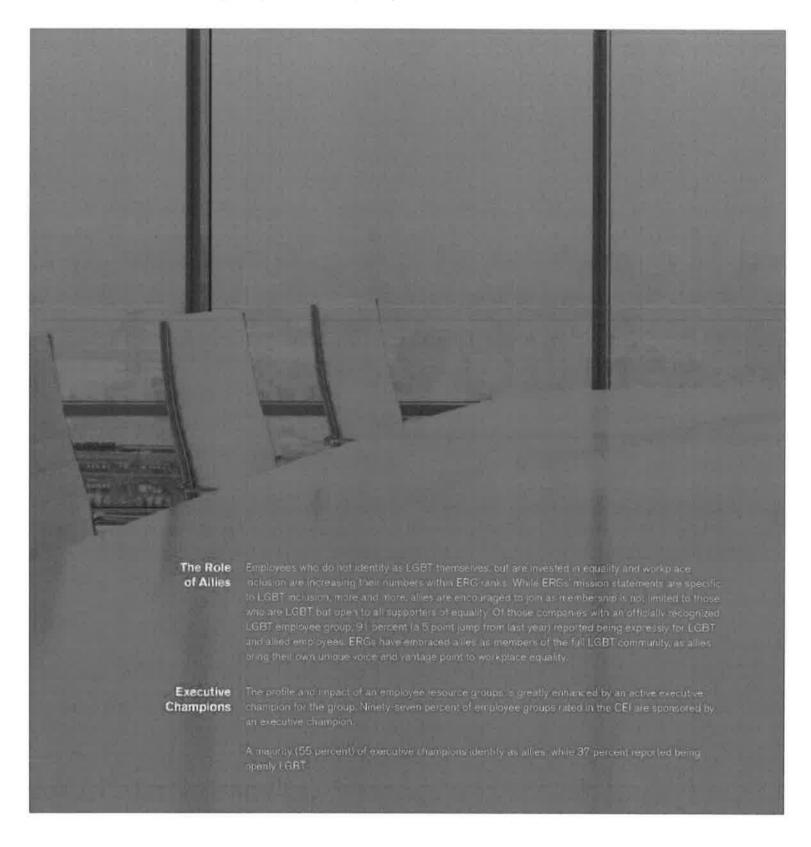
Recognizing the differences in businesses rated in the CEI, Criterion 3b can also be met with an organization-wide diversity council or working group with a mission that specifically includes LGBT diversity and inclusion.



CEI-Rated Employers with an LGBT Employee Resource Group or Diversity Council

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# **Public Commitment**

#### Criterion 4

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

of CEI-rated businesses report implementing at least three efforts of public engagement with the LGBT community, namely through marketing, advertising and recruitment efforts, philanthropic contributions to LGBT organizations, LGBT diverse supplier initiatives and public policy weigh-in.

# Promoting Business Growth Through Visibility Respectful Advertising & Talent Recruiting

Businesses are touting their credentials as LGBT inclusive employers by investing in talent recruitment efforts at LGBT-focused job fairs as well as communicating inclusion to the community at large through advertising and sponsorship.

Professional events such as the annual Out & Equal Workplace Summit, Lavender Law conference and Reaching Out MBA career expo are filled with highly rated CEI employers looking to attract diverse employees. Employers' presence at these and other events sends a clear message to potential employees that LGBT diversity is part of company culture, and that LGBT candidates are valued as the best and the brightest across industries, geographies and trades.

Ad campaigns and sponsorships further this message of company values to the public. Increasingly, ads with authentic images of LGBT people are featured in both LGBT media outlets and general press alike.

# Supporting the Community - Philanthropy

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.

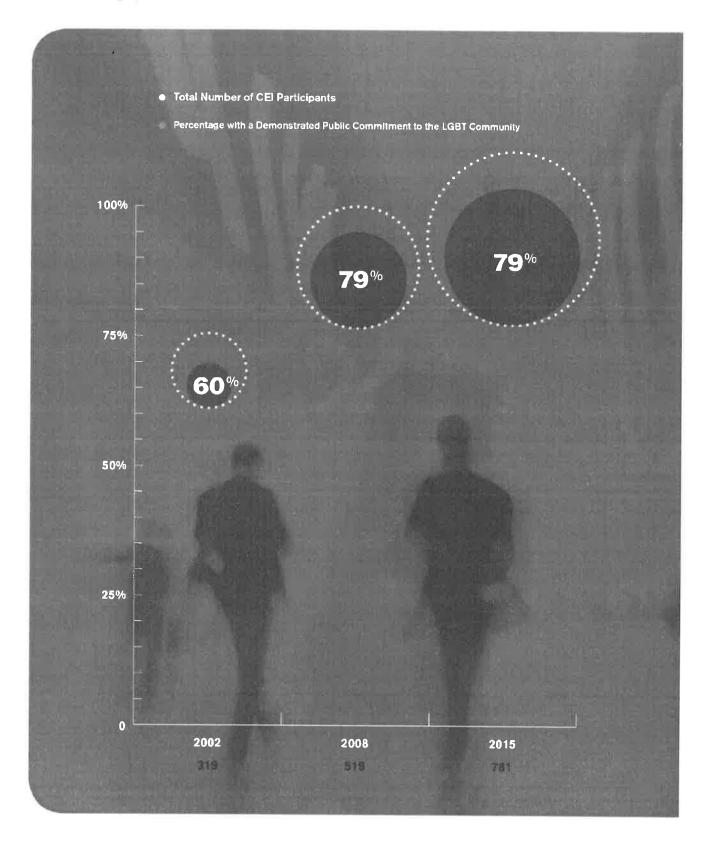
# Supplier Chain Management -Promoting Effective Business and Inclusion

Supplier diversity programs ensure that the procurement process includes specific opportunities for minority-owned 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 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 under-utilized entrepreneurial groups. Furthermore, there are federal initiatives such as the Center for Veterans Enterprise that is designed to assist U.S. veterans in launching and thriving in private business. These initiatives intend to give more equitable opportunities to those would-be small business owners who are more likely to face social and practical barriers to success.

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' good standing in the community. Supplier

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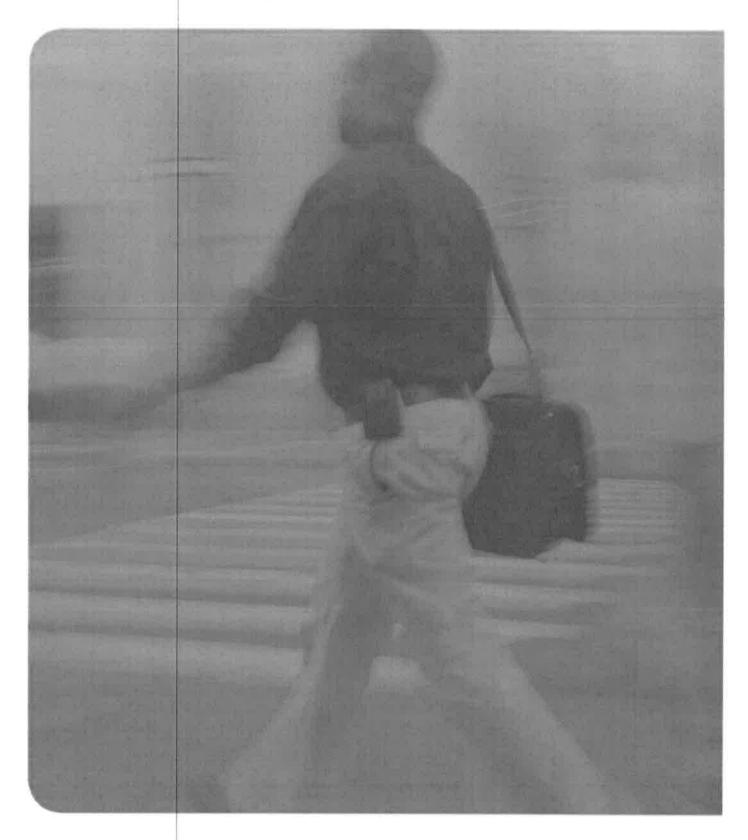
**Public Commitment** 

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, one-fifth 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

A majority of businesses are responsibly engaging suppliers and vendors to ensure that their own standards for diversity and inclusion are upheld in all business-to-business operations. Sixty-one percent of CEI participants noted that they require suppliers to prohibit discrimination based on the protections in their own inclusive non-discrimination policy. Requiring suppliers' adherence to established nondiscrimination policies provides an engagement opportunity for businesses that typically rely on other businesses for goods or services, rather than consumers, to demonstrate their overarching commitment to the LGBT community.

Business for Equality in Public Policy – Efforts to Support LGBT Legal Equality Over the last five years, the rates of corporate engagement on matters of LGBT-relevant public policy and legal matters have skyrocketed. Since 2008's Prop 8 campaign for marriage equality, hundreds of businesses signed on to amicus briefs challenging the Defense of Marriage Act and dozens more lent their corporate names and resources to the fights for marriage equality in the states. HRC's Business Coalition for Workplace Fairness is a group of leading U.S. employers that support federal workplace protections on the basis of sexual orientation and gender identity, going on record that equality is good for business.

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### 360 Degrees of Equality: CEI 2016 Standards

The cornerstone of the Corporate Equality Index has always been a principle of non-discrimination with respect to sexual orientation and gender identity. This ethos underpins all of the criteria to-date, from equal benefits to equal visibility and engagement with LGBT employees and the community at-large,

In the 2013 CEI, the HRC Foundation noted an important trend emerging from both top rated and other businesses across the CEI spectrum: the principles of non-discrimination were being extended and codified into policies for global operations, supplier standards and corporate philanthropy.

Announced spring 2013 and set for scoring in the 2016 CEI, the following standards must be met by each employer for a 100 percent rating:

- Have sexual orientation and gender identity non-discrimination protections explicitly included in all of
  its operations, both within the US and global operations.
- Require U.S. contractors to abide by companies' existing inclusive non-discrimination policy.
- Implement internal requirements prohibiting company/ law firm philanthropic giving to non-religious
  organizations that have a written policy of discrimination on the basis of sexual orientation and/ or
  gender identity.

A strong majority of businesses are on a path to meeting these standards in time for next year's CEI.

Global Non-Discrimination Policies and Codes of Conduct

The majority of businesses surveyed in the CEI = 64 percent = has operations outside of the U.S. and in some cases are headquartered abroad. For the ninth year in a row, the CEI included questions on global employers' levels of LGBT inclusive policies and practices both within the U.S. and outside the country.

Eighty-five percent of employers report that their non-discrimination policies apply across all of their global operations, and 54 percent have distinct global codes of conduct that specify expectations on workplace inclusion and non-discrimination standards along the lines of sexual orientation and gender identity.

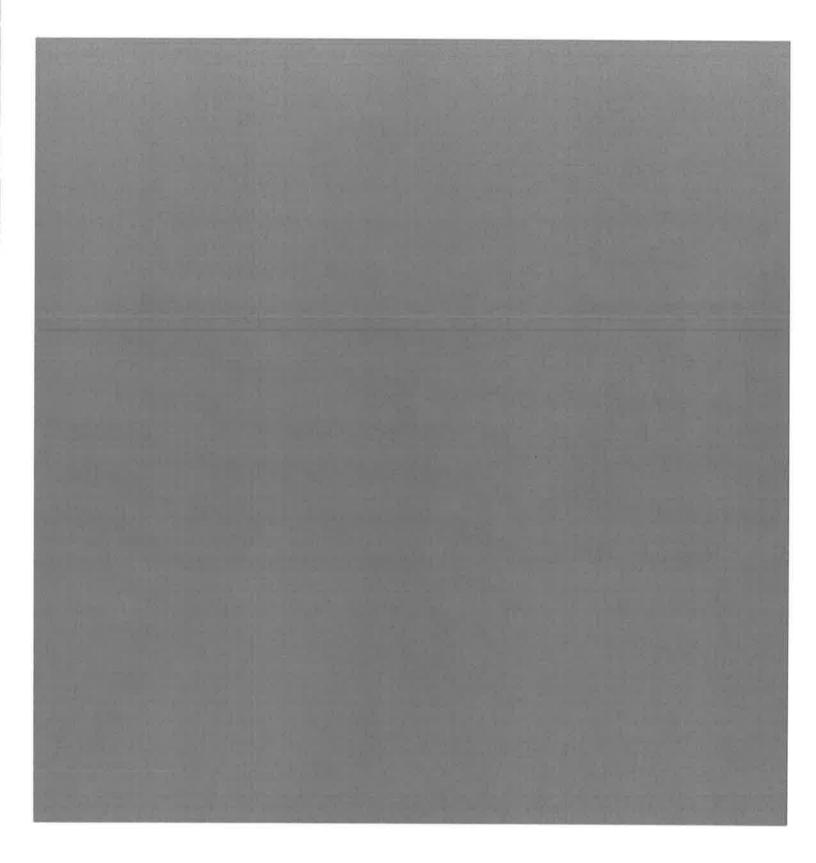
Contractor and Vendor Standards Most businesses rely on other businesses for goods and services. In order to align suppliers' business practices with the contracting employer, a majority of businesses = 61 percent = has established supplier non-discrimination standards that include provisions on sexual orientation and gender identity.

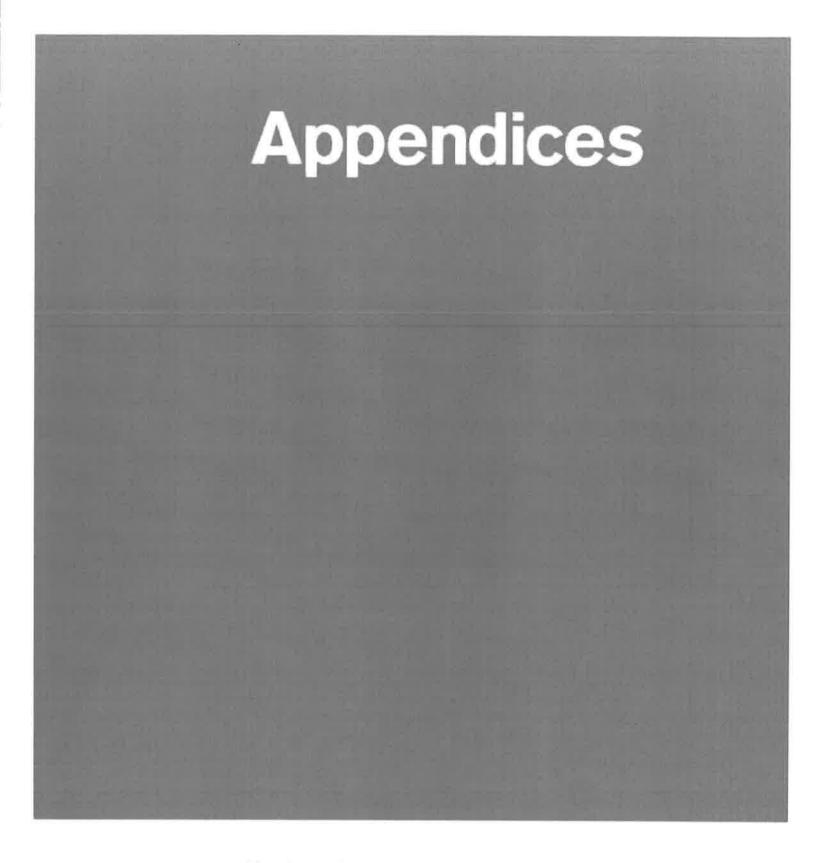
Corporate Giving Guidelines The CEI has long incorporated employers philanthropic giving through the systematic review of tax forms to evaluate the flow of money from businesses' coffers to organizations with a specific aim of undermining LGBT equality (e.g. organizations set up to implement state level bans on same-sex marriage, adoption prohibitions, etc.). From 2002 to present, a company would be contacted, and potentially receive a 25 point deduction, if HRC found instances of foundational corporate giving to any organization whose explicit mission included efforts to undermine LGBT equality. This framework is being widened to hold companies accountable for any giving to a non-religious organization with an explicit policy of discrimination against LGBT people (e.g. The Boy Scouts of America).

In order to align corporate values and corporate philanthropy, dozens of businesses have long maintained responsible giving guidelines to ensure that organizations they fund do not discriminate on the basis of sexual orientation and gender identity. Fifteen percent of this year's CEI employers reported having these guidelines in place.

For case study example and more information on all of the above standards, please see www.hrc.org/2016cei

www.hic.org/cei





CEI 2015 Appendices

## Appendix A Employers With Ratings of 100 Percent

#### Corporate Equality index Rating Criteria.

- 1a Prohibits Discrimination Based on Sexual Orientation (15 points).
- 15 Prohibits Discrimination Based on Gender Identity or Expression (15 points)
- 2a Offers Partner Health/Medical Insurance (15 points)
- 2b Has Fanty Across Other "Soft" Benefits for Partners (10 points) (half cradit for parity across some, but not all benefits)
- 2c Offers Transgender Inclusive Health Insurance Coverage (10 points)
- 3a Firm wide Organizational Competency Programs (10 points)
- 3b Has Employer-Supported Employee Resource Group OR Firm-Wide Diversity Council (10 points) Would Support ERG if Employees Express Interest (half-credit)
- 4 Postively Engages the External LGST Community (15 points) (partial credit of 5 points gives for less than 5 efforts)
- 5 Responsible Offizenship Employers will have 25 points deducted from their score for a large scale official or public anti LGBT blemish on their recent records (-25 points)

Appendix A Employers with Ratings of 100 Percent

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		points	To and d	50105	Doorse	6	0 parts	O purds	2 101.15	15		CED Rating	Fortune 1000
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W .											2	2014	1
Employer	Headquarters Location	1a	Ib	2#	аь	2c	3a	3.6	· d	5	A	a	100
3MCa.	St. Faul MN										100	100	101
A.T. Knarroy Inc.	Chicago, IL								.0		100	100	
AJX Armani Exchange	New York, NY										100	100	
Abercramo e & Fron Co.	New Albany, OH				0		.0	•			100	100	529
Ancenture	New York, NY	•	0		9				•		10.0	100	100
Adobe Systems Inc.	Sam Jossu, CA								•		100	90	540
Aetha Inc.	Hartford, CT	•				0			•		100	100	84
AIG	New York, NY		•	•	0			•			100	100	36
Akerman LLP	Mami, FL		•	.0	9				•		100		
Akin, Gurrp, Strause, Heuer & Fold LLP	Washington, UC										100	100	
Alaska Air Group Inc.	Seattle, WA			.0			.0	0	0		100	90	515
AleptoHucont	Murray Hill, NJ	•									1843	100	1
Alcos Inc.	New York, NY		4		. 0			.0	.0		100	100	128
Aleton & Bird LLP	Atlanta, GA							•			1400	100	
AMC Entertainment Inc.	Leswood, KS	•									100	100	787
American Aglinea	Fort Worth, TX										100	100	121
Amençan Eagle Outlitters Inc.	Priteburgh, PA						9	•			100	100	642
American Express Co.	New Yark, NY	•				0					100	100	90
Amerprise Financial Inc.	Minnoapois, MN				•						100	100	393
Anheuser-Buach Compan ea Inc.	St Laue, MO		•		. 0			0	4		100	90	
Aon Corp.	Chicago, IL		•			•					100	100	
Apple Inc.	Cupertino, CA				. 10						F00	100	6
Ansmerk Corp.	Philadelphia, PA										109	90	205
Arera Fox LLP	Weetington, DC				. 0				6		100	100	
Arrold & Porter LLP	Washington, DC			0				•			100	100	1000
Astellas Pharma US Inc.	Northbrook, IL			*	.0				٠		100	55	100
AT&T Inc.	Daties, TX								•		100	100	5337
Automatic Data Processing Inc.	Roseland, NJ		•					4	•		190	100	255
Avon Pracuota Inc.	New York, NY										100	100	252
AXA	New York, NY										100	100	100
Ban & Co. Inc. / Bridgespan Group	Boston, MA							•			100	100	
Baker & McKenzer III.P	Chicago, II							10			100	100	
Bank of America Corp.	Crewfotte, NC	•		*					•		300	100	21
Bank of New York Melleri Corp., The	New York, NY	9									100	100	180
Barclays	New York, NY	•			•						100	100	
Banks America Ing.	Bancaakbum, L	•									100		Var.
Barnes & Nobie Inc.	New York, NY		٠		•				•		100	100	360
BASF Corp.	Forham Park, NJ		0		•						106	100	FULL
Boot Suy Co. Inc.	Richfield, MN	0			•						100	100	61
Birgham McCotchen LLP	Bouton, MA				•				•		100	100	
Biegen Idea Inc.	Cambridge, MA	•			•		۰		•		190	100	454
BlackRock	New York, NY	•		0.	•				۰		100	100	288
Blue Cross & Blue Shield of Rhode Island	Providence, RI										100		
Blue Cross Blue Shield of Florida Inc.	Jacksonville, FL							•			100	100	
Blue Cross Blue Shald of Minnosota	Eagan, MN										100	100	
Blue Croup Blue Studie of North Carolina	Chape! Hill, NC					•		•			100	86	
BMO Bankocip ho.	Chicago, IL						9				100	100	12.75
BNP Par bae	New York, NY										100	100	24 U
BoshingerIngelhorn USA Corp.	Ridgefield, CT				- 0						100	100	1
Borny Co.	Chicago, IL	•				•			•		100	100	30
Book Alon Hamiton Inc.	McLear, VA								•		100	100	436
Bastan Canaultrig Group	Baston, MA							0	۰		100	100	JH 4

Appendix A Employers with Ratings of 100 Percent

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Employer	Headquarters Location	Ta	1b	2a	2b	2c	3a	3ь	- 4	5	9108	2014	2
Boston Scientific Corp.	AM, Mariborough, MA										100	65	357
Bustol-Myers Squibb Co	New York, NY										100	100	District of
Broadridge Financial Schittons Inc.	Lake Succeas, NY										100	100	
Brown Rubinsk LLP	Boston, MA										100	100	SACCOLD .
Brown Store Company, Inc.	St. Louis, MO										160	100	
Brown Forman Corp.	Louisvila, KY										100	100	767
Bryen Cave LLP	Sairt Louis MO						6	0	0		100	100	
CA Technologies Inc.	Islandia NY										100	100	499
Cadwalador, Wickersham & Tatt LLP	New York, NY										100	100	
Cassala Entertairment Corp.	Las Yogas, NV										100	100	300
Campbel Soup Co.	Campen, NJ				. 0				0		100	100	338
Capital Markets Company NV, The	New York, NY										100		
Capital One Financial Corp.	McLear, VA				. 0			- 6			100	100	127
Cardinal Health Inc.	Oublin, OH		0				-0				100	100	19
CaroFuerch Corp.	San Diego, CA										100	100	622
Cargii Ino.	Wayzata, MN										100	100	
Carlon Fields Jordan Burt	fampa, FL							Œ			100	100	100
CBRE, Inc.	Los Angeles, CA							.0.			100	100	387
CBS Corp.	New York, NY				.0						100	90	186
Chapman and Cuter LLP	Chicago, IL				.0						100	100	
Chorles Scrwab Corp., The	San Francisco, CA										100	100	468
Chevron Corp.	San Ramon, CA								.0		100	100	3
Choole, Hall & Slowar LLP	Goston, MA										100	100	
Charge Hotels Infernational Inc.	Rockvilla, MD				.0						100	100	
Chysler Group LLC	Aubum Hi®s, MI								0		100	100	Charles .
Chubb Corp.	Warron, NJ					۰			۰		190	100	(Court book)
CIGNA Corp	Bloomfied, CT		0								100	100	103
Cisco Systems Inc.	San Jase, CA										100	100	60
Clares Catalon Pages & Mary San U. D.	New York, NY										100	100	26
Cleary Gottlieb Steen & Hamilton LLP Clifford Chance US LLP	New York, NY New York, NY										100	100	_
Cicrox Co.	Oakano, CA										100	100	100 0000
Coach Inc.	New York, NY										100	100 78	504
Coca Cola Co., The	Atarta, GA										100	100	57
Compast Corp.	Philadelphia, PA										100	100	46
Comer ca line	Dalias, TX										100	90	772
ConAgra Foods Inc.	Omahe, NE										100	95	200
Consol disted Educat Co.	New York, NY										100	90	226
Corning Inc.	Coming, NY										100	100	326
Covergion & Burling LLP	Washington, DC					•					100	100	2434142
Crodit Suese USA Inn.	New York, NY										100	100	
Crowell& Moring LLP	Washington, DC							0			100	100	
CSAA Insurance Group	Walnut Greek, CA										100	100	
Cummins inc.	Coiumbue, (N										100	100	160
CVS Health Corp.	Wooneocket, RI										190	88	13
Dangter Corp.	Wasnington, DC						•				100	100	152
Darden Restaurants Inc.	Orlando, FL					•					100	100	328
Davis Wright Tremaine LLP	Seattle, WA					•					100	100	
Debevoral & Pimpton LLP	New York, NY			•					0		100	100	17.7
DesheltsP	Philadelphia, PA					•					100	100	100
De haize America inc.	Salisbury, NC				.0						:100	100	211
Daline.	Round Rock, TX		•		a	•					100	100	51

E CORPORATE EQUALITY INDEX 2015

Appendix A Employers with Ratings of 100 Percent

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Empfayer	Headquarters Location	1a	1b	2.6	2h	24	3a	3h	4	5	3016	2014	Fortun
Dolonte LLP	New York, NY												1
Dectors US LLP	New York, NY										100	100	_
Dispository Trust & Cleaning Corp., The	New York, NY										150	100	100
Deutsche Bank	New York, NY										1000	100	
Diageo North America	Norwalk, CT										100	100	100
Digitas LB	Boston, MA										100	100	100
DIRECTY	E Segundo, CA										1500		10000
Discover Financial Sarvices	Riverwoods, IL										10000	95	102
DLA Ppor	Baltmoro, MD										100	100	294
Dorsey & Whitney LLP	Minneapolia, MN										100	100	
Dow Chemical Co., The	Midland, MI										200	100	
Dykema Gossett PLLC	Detroit, MI										100	100	52
E& Gallo Wrery	Modesto, CA											100	
E. Lidu Pont de Nemours and Co. (DuPont)	Wilmington, DE					*					100	100	
Eastern Bank Corp.	Boston, MA							. 6			100	100	72
Eastman Kodak Co.	Rochester, NY										100	100	
eBay Inc.	San Jose, CA										100	100	502
Ecolab Mc.	St. Paul, MN				-	1 200	35				100	100	196
Edwards Wildman Polmer LLP	Soston, MA										100	100	229
Electronic Arts Inc.	Redwood City, CA							•	•		160	100	2000
El Lily & Co.	Indianapolis, IN							•			100	100	505
EMC Corp.	Hopkinton MA		0				0		•		100	100	130
Einst & Young LLP	· ·			•				•			100	100	133
Excellent Health Plan Inc.	New York, NY Rechaster, NY						•	•			100	100	118
Exelor Corp.								•			100	80	000
Facebook (no.	Chicago, IL							•			100	100	129
Faegre Elsker Daniels	Meric Park, CA						•				100		482
-	Chicago, IL						•				100	100	Com
Federal Home Loan Mortgage Corp. (Fredera Mac)	McLear, VA	۰			•	0					106	100	31
Fodoral National Mortgage Association (Fannio Mae) Fodoral Reservo Bank of Atlanta	Washington, DC						•				100	90	12
Federal Reserve Bank of Boston	Atlenta, GA		.0								100		
Federal Reserve Bank of Bioston Federal Reserve Bank of Richmond	Boston, MA							۰			100	80	
	Richmond, VA								0		100	80	
Fernanck & West LLP	Mountain View, CA								•		100	100	
Finnegan, Henderson, Farabow, Garrett & Durner LLP	Washington, DC		0		0		•				100	90	
First Data Corp. Frah & Richardson PC	Atlanta, GA	. *									130	45	254
	Boston, MA		۰						•		100	100	
Foley & Lardiner LLP	Miwaukee, WI								•		190	100	
Foliay Hong LLP	Boston, MA	•	۰		•		•	0			100	100	
Ford Sorts Many Comments and S	Dearborn, MI				•			•			100	100	10
Fried, Frank, Harris, Shriver & Jacobson U.P	New York, NY	•			•		•				190	100	
Frost Brown Todd LLC	Cindimati, OH					•					100	90	
GameStop Corp.	Grupevare, TX				.0	0					100	100	298
Gao Inc.	San Francisco, CA				•	•					160	100	1719
Generatory Inc.	South San Francisco, CA			æ					۰		160	100	
General Beatino Co.	Fairfield, CT										100	100	
Ganaral Mills Inc	Minneapoiet, MN				•	0					190	100	169
General Motore Co.	Detro4, MI						0				100	100	7
Gibson, Dunn & Crutcher LLP	Los Angeles, CA	0			•						102	100	
GlassSmithKinuLLC	Rosearch Trangle Park, NC			•	0		0				700	100	CLI
Goldman Sechs Group Inc., The	New York, NY						•				100	100	68
Goodwin Propter LLP	Boston, MA	0			•						100	100	-
Google Inc.	Mountain View, CA										106	100	55

Appendix A | Employers with Ratings of 100 Percent

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11	JetBlue Airwaya Corp.						501	2.1	5			- 2236		i -
John Hamcook Financial Services Inc.  Boston, MA  John Hamcook Financial Services Inc.  New Burunswick, NJ  John Hamcook Financial Co.  New York, NY  Kat Gares LLP  Pathsburgh, PA  Now York, NY  Katlan Muchin Resumment LLP  Katlan Muchin Resumment LLP  Katlan Muchin Resumment LLP  Kerp Cop  Clavifierd, OH  Kimpon Hotal & Restruant Group Inc.  Kerp & Spatieng LLP  Now York, NY  Now York, NY  Now York, NY  Left and Attack & Frankel LLP  Left and a Machina LLP  Left and Attack & Frankel LLP  New York, NY  Left and Attack & Frankel LLP  Left and a Machina LLP  Left and Attack NN  Left and Attack LLP  New York, NY  Left and Attack LLP  New York, NY  Left and Attack LLP  Left and a Machina LLP  Left and Attack LLP  New York, NY  Left and Attack LLP  Left and Attack LLP  New York, NY  Left and Attack LLP  Left and Attack LLP  Left and a Machina LLP  Left and Attack LLP  New York, NY  Left and Attack LLP  L		- ,	200											10000
Johnson   New Brunswick, NJ   100	John Harcock Financial Services Inc.			100		(G. 1)	-6.	- 30	100			10000		596
JPMorgan Chase & Co.   New York, NY   100 100 100 100 100 100 100 100 100 1	Johnson & Johnson			0.0										- 100
K&L Gazon LLP  Roser Permanente  Oak and, CA  Satur Muchan Resuman LLP  Chocago, IL  Karun Muchan Resuman LLP  Chocago, IL  Key Corp  Clowland, OH  San Francisco, CA  San Francisco, CA  San Francisco, CA  San Francisco, CA  Krister & Elist LLP  Chocago, IL  Remote Jane Lucin Natrais & Frankel LLP  New York, NY  Land O'Lakes Inc.  Land O'Lakes Inc.  Land O'Lakes Inc.  Land Wakhas LLP  New York, NY  Lead o'Lakes Inc.  Land O'Lakes Inc.  Longian LL  Lew Straus & Co.  Lew Straus & Co.  Lew Manual LLP  Mercet Jane Co.  San Francesco, CA  Longian LL  Lew Manual LLP  Mercet Jane Co.  San Francesco, CA  Longian LLP  Lew Manual LLP  Mercet Jane Co.  San Francesco, CA  Longian LL  Lew Manual LLP  Mercet Jane Co.  San Francesco, CA  Longian LL  Longian LL  Longian LL  Longian LLP  Mercet Jane Co.  San Francesco, CA  Longian LL  Longian LLP  Mercet Jane Co.  San Francesco, CA  Longian LLP  Litter Mandeliscor PC  San Francesco, CA  Longian LLP  Residence MD  San Mary's Inc.  Mercet Jane Co.  Longian LLP  Litter Mandeliscor PC  San Francesco, CA  Longian LLP  Litter Mandeliscor PC  San Francescor  Longian LLP  Litter Mandeliscor PC  San Francescor  Longian LLP  Litter Mandeliscor  Longian LLP  L	JPMorgan Chase & Co.					0.5		2.1	46			200		SD
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KeyCorp         Clavelard, OH         100         510           Kimpton Hotel & Restaurant Group Inc.         San Francisco, CA         100         100           King & Spaliding LLP         Atlanta, GA         100         100           Kinkland & Ellis LLP         Chicago, IL         100         100           KPMG LLP         Now York, NY         100         100           Kraffer Levin Natratis & Frankei LLP         New York, NY         100         100           Land O'Lafou Inc.         Octombus, OH         100         100           Land O'Lafou Inc.         Arden Hko, MN         100         100           Land Wakins LLP         New York, NY         100         100           Loo Burnett Company Inc.         Chicago, IL         100         100           Lew Strause & Co.         San Francisco, CA         100         100           Lew Strause & Vennum LLP         Minnespolis, MN         100         500           Lidter Mendelisor PC         San Francisco, CA         100         100           Lockheid Martin Crup         Batheads, MD         100         100           Mercent Idencetroup Inc.         Crickheid Mercent Idencetroup Inc.         100         100           Linkheid Mercent Idencetroup Inc.	Kelogg Co.											MINERS.		***
Kimpton Hotel & Rostaurant Group Ino.         San Francisco, CA         100           King & Spaiding LLP         Atlanta, GA         100           Kirkland & Elis LLP         Chicago, IL         100           KPMG LLP         Now York, NY         100           Kraff Foods Group Inc.         Northford, IL         100           Kramer Levin Nattaks & Frankel LLP         New York, NY         100           L Brands Inc.         Columbus, OH         100         256           Land O'Lakes Inc.         Arden Hea, MN         100         100         256           Lethans & Warkins LLP         New York, NY         100 </td <td>KeyCorp</td> <td>Clevelard, OH</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>- 2 1</td> <td></td> <td></td> <td></td> <td>300000</td> <td></td> <td>-</td>	KeyCorp	Clevelard, OH						- 2 1				300000		-
King & Spatiding LLP       Attenta, GA         Kirkland & Elias LLP       Chicago, IL         KPMG LLP       Now York, NY         Kraft Foods Group fire.       Nor Make's IL         Kramer Levin Natratis & Frankel LLP       New York, NY         Lerands Inc.       Columbus, OH         Land O'Lakes Inc.       Ander Hea, MN         Lethan & Warkins LLP       New York, NY         Lee Strougles.       Chicago, IL         Leving Company Inc.       Chicago, IL         Litter Mandelisor PC       San Francisco, CA         Litter Mandelisor PC       Ser Francisco, CA         Litter Mandelisor PC       Ser Francisco, CA         Lockhaurt Martin Crup       Batheada, MD         Macrost Inforcetoring Inc.       Cincernal, OH         Macrost Inforcetoring Inc.       Cincernal, OH         Macrost Inforcetoring Inc.       Cincernal, OH         Litter Mandelisor PC       Ser Francisco, CA         Litter Mandelisor PC       Ser Francisco, CA         Litter Mandelisor PC       Ser Francisco, CA	Kimpton Hotel & Rostaurant Group Inc.											Account 1		510
Kirkland & Elis LLP  KPMG LLP  Now York, NY  Northfield, IL  Kramer Levin Natratis & Frankel LLP  New York, NY  Dendrous Inc.  Lord O'Lakes Inc.	King & Spalding LLP		200		100	100	200	2.0	1.53			1000000		400
KPMG LLP         Now York, NY         100         100           Kraft Foods Group Inc.         Northfield LL         100         161           Kramer Levin Natratis & Frankel LLP         New York, NY         100         165           Lend O'Lakes Inc.         Columbus, OH         100         100         258           Lend O'Lakes Inc.         Arden Hills, MN         100	Kirkland & Elia LLP	Chicago, K.										4		
Kreft Foods Group line	KPMG LLP							77				5000		
New York, NY   100   1	Kraft Foods Group Inc	Northfield, IL				0								161
L Brand's Inc. Land O'Lakes Inc. Land O'Lakes Inc. Land O'Lakes Inc. Lathern & Watkins LLP New York, NY Loe Burneth Company Inc. Les Strause & Co. Les Strause & Co. Les Strause & Co. Les Transcoo, CA Les Transcoo, CA Les Transcoo, CA Littler Mandalister PC Sen Francisco, CA Littler Mandalister PC Sen Francisco, CA Lordest & Vennum LLP Littler Mandalister PC Batheada, MD Macy's Inc. Cincernati, OTI Mercent Inforcetons Inc. Batheada, MD Batheada, M	Krænge Levin Nahalis & Franke ILLP	New York, NY										1000		
Land O'Lakes Inc.  Lathern & Watkins LLP  New York, NY  Loe Burnett Company Inc.  Lew Strause & Co.  San Francisco, CA  Lownelk International Inc.  Lowngron, KY  Litter Mendeliser PC  San Francisco, CA  Lownels Research, MD  Macy's Inc.  Cincernatio, OII  Mercent Informational Inc.  Loregonia, MD  Macy's Inc.  Cincernatio, OII  Mercent Informational Inc.  Lowners A. Vennum LLP  Batheaute, MD  Macy's Inc.  Cincernatio, OII  Mercent Informational Inc.  Description, CII	L Brands Inc.	Columbus, OH		0										258
Lethern & Watkins LLP Let Burnett Company Inc. Let Strause & Co. Lew Strause & Co. San Francisco, CA Lew Indiquest & Vennum LLP Littler Mendelities PC Littler Mendelities PC Ser Francisco, CA Lower Martin Crup Macy's Inc. Cincernati, OTI Mercent Informational Inc. Services A	Land O'Lakes Inc.	Arden Hille, MN							10.1			1000		11.236
Los Burnett Company Inc.  Lev Strouse & Co.  Lev Strouge & Co.  Lev Strouge & Co.  Lev Strouge & Co.  Lev Strouge & Co.  Lev St	Letham & Watkins LLP	New York, NY												1000
Lev Strause & Co.  Lovmerk International Inc.  Los Ington, KY  100 100 600  Londquet & Vennum LLP  Minnespalin, WN  Litter Mandaliser PC  Ser Francisco, CA  100 100  Lockheid Martin Grup  Macy's Inc.  Cincinati, OTI  Mercert Informations	Loc Burnett Company Inc.	Chicago, IL												
Lampit International Inc.  Los mgton, KY  100 600  Lindquist & Vennum LLP  Minnespolis, MN  103 95  Littler Mandalisch PC  San Francisco, CA  100 100  Lockheid Martin Grup  Macy's Inc.  Cincinnati, OTI  Marcost Informational Inc.  Referent 400  100 90 100	Levi Strauge & Co.						255		100	7.5				620
Littler Mandalister PC         Sen Francisco, CA         100           Lockheid Martin Crap         Betheads, MD         100           Macy's Inc.         Cinctinuit, OH         100	Learnetk International Inc.	Lexington, KY												1000
Littler Mendelsics PC         Sen Francisco, CA         100           Lockhaird Martin Crop         Betheads, MD         100           Macy's Inc.         Cincrinati, OH         100           Mercrot Inforcetorial Inc.         Perfectled MD	Lindquet & Vennum LLP				53.1				4.7					1000
Lockhand Martin Crip         Betheads, MD         100         89           Macy's Inc.         Cincinnati, OH         100         90         109           Mercrot Informational Inc.         Perfectly MR         100 <t< td=""><td>Litter Mendelsor, PC</td><td>Sen Francisco, CA</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>58</td></t<>	Litter Mendelsor, PC	Sen Francisco, CA												58
Macy's Inc.  Cincinnate, OII  Macy of the Control Inc.  Perfect of the Control Inc.	Lockheed Martin Crip		1000		-50		2.7	38.1	1.00	13		0.00		59
Marriott Internetional Inc	Macy's Indi		1							- 1				
COST-COLDE, VICE	Marriott International Inc.	Betheeds, MD										100	100	230
March & Mal using Company Inc	Marsh & McLennan Companies (sc.	New York, NY	100			0		170						228

Appendix A Employers with Ratings of 100 Percent

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Employer (	leadquarters Location	1 21	Jb.	2a	26	2c	3a	3h	4	5	81.88	2014	Fortune
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	Springhold, MA	۰		•			•		•		100	100	94
	Pui chaee, NY	۰				•					190	100	348
	Chicago, IL		.0		0						100	100	
	Chicago, IL			0							100	100	100
	San Francisco, CA				•				•		160	100	14
	New York, NY										100	100	100
	Memeapola, MN			.0			.0		0		100	100	172
	Whitehouse Station, NJ			•		0			6		100	100	58
	New York, NY										100	100	40
	Las Vegas, NV					0		0.			100	100	292
	Redmond, WA							0	•		100	100	35
	New York, NY	•							•		100	100	
	Chicago, IL								.6		100	100	
Mintz, Levin, Cohn, Ferra, Glovsky & Poped PC	Boston, MA		.0.								100	100	
	Taylorovite, NC										100	100	
	East Hanover, rj						0	۰			100		88
Monsanto Co.	St Lovie, MO										100	100	206
Moody's Corp.	New York, NY				.0		•				100	100	765
Morgan Levie & Bookus LLP	Philadelphia, PA				-10						100	100	
Morgan Stanley	New York, NY		0								100	100	96
Marrison & Foerster LLP	San Francisco, CA	. 0		0				.0			100	100	
MSI.GROUP Americas	New York, NY								6		100	100	
Nationwide	Calcimbus, OH										160	100	100
Navigant Consulting Inc.	Chidago , IL							6			190	100	
NCR Corp.	Duluth, GA				- 0						100	90	441
NetApo Inu.	Surreyvale, CA										109	90	408
New York Life Insurance Co.	New York, NY						0				100	80	89
Nover Rubbermard litte.	Ationta, GA										100	85	433
Niciaen Co., The	Now York City, NY				•						100	100	
N ke fro.	Beaverton, OR										100	100	126
Nisean North Amonda Inc.	Franklin, TN										100	100	100
Nixon Peapody LLP	Boston, MA	0									180	100	50.00
Nordetrain Inc.	Seattle, WA										100	100	227
Northern Trust Corp.	Chicago, IL				•						100	100	561
Nontrop Grumman Corp.	alle Church, VA										100	95	120
Northwestern Mutual Life Insurance	Vitwaukoa, Wt										100	90	114
Novarte Pharmaceuricale Corp.	East Hanover, NJ										100	100	
Office Depat Inc.	Boca Rator, FL										100	100	253
	Now York, NY				•						100	90	
O'Mervery & Myers LLP	as Angeles, CA										100	100	100
	Redwood City, CA										100	100	80
	Chicago, IL										100	100	
	Bar Francisco, CA		0								100	100	5-8
	elede, OH										700	100	476
	New York, NY				0						100	100	
	ou Angelen, CA			-							100	100	(2)
	Yew York, NY		è								100	100	TH
	Jopar Saddio River, NJ										100	100	
	Philadelphia, PA												
	Purchase, NY										100	90	
	Seattle, WA										100	100	43
	New York, NY										100	100	4.0
1.1891.139	10-7F (-U15-19-F			-	-	7	*	-			1100	100	48

Appendix A Employers with Ratings of 100 Percent

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Intployer	Headquarters Location	1a	1b	24	2h	2c	3a	3h	4	5	뮸	2014	ē
PG&E Corp.	San Francisco, CA										160	100	183
Pelsbury Winthrop Shaw Pittman LLP	New York, NY										100	100	
PNC Financial Services Group Inc., The	Prineburgh, PA										100	100	
Port and General Electric Co.	Portand, OR	.00									100	100	
ProcwaterhouseCoopers LLP	New York, NY										100	100	
Proctor & Gamble Co.	Cinclinate OFF										100	100	28
Progressive Corp., Tha	Mayheld Vilage, OH										100	100	166
Prudontal Francial inc.	Newark, AU										100	100	29
Publicia Hapitheara Communicationa	New York, NY							•			100	100	1000
Puhko s Inc.	New York, NY		.0								100	100	
QUALCOMM Inc.	San Diego, CA					0					100	100	149
Quarios & Brady LLP	Missaukoa, WI							•			100	90	
Raytheon Co.	Wallham, MA						9				100	100	124
Razorfieh	Suattle, WA	.0.	10.	.0	.0.				.6		1.00	100	130
RBC Cap tai Viadrote LLC	Now York, NY			.4							100	100	
RBC Wealth Management	Minneapolis, MN		•						0		1.00	100	100
Recreational Equipment Inc.	Kent, WA										100	90	
Reed Smith LLP	Priteburgh, PA										100	100	
Ruplacements, Ltd.	McLaurovita, NC		•		9		0	•			+043	100	
Robert W. Bard & Co. Incorporated	Mrwaukee, VVI										100	90	Sec.
Robins, Kaplan, Miller & Cirosi LLP	Maraepola, MN		0			•			•		100	100	100
Rockwell Automation Inc.	Milwaukee, WI										109	100	403
Ropus & Gray LLP	Boston, MA		.0				۰		•		100	100	
S.C. Johnson & Son Inc.	Racina, WI							0	•		100	90	
Salevay Inc.	Pieasarton, CA	P.									100	100	62
aaleaforee.com Inc.	Set Francisco, CA										100	100	702
SAP America Inc.	Newtown Square, PA				. 0						100	100	
Schill Hardin LLP	Chicago, IL										100	100	Sec. Sec.
Sears Holdings Corp.  Sedgwick LLP	Holfman Estates, (L							•			100	100	71
Sempla Energy	San Francisco, CA							•			100	100	
Seylarih Shaw LLP	San Diego, CA				. 0				•		100	100	281
Shearman & Stering LLP	Chrcago, IL										100	100	
Sheppard, Mulin, Righter & Hampton LLP	New York, NY Los Angeles, CA					•		•	•		100	100	Tree land
Shook Hardy & Bacon LLP	Karusa City, MO						•	•			100	100	
Sigley Austin LLP	Chicago, IL					:					100	100	
Simpson, Thacher & Bartlett LLP	New York, NY										100	100	2000
SIRIUS XM Ragina Inc.	New York, NY										100	100	652
Skeddon, Arpa, State, Meegher & Forn LIP	Now York, NY										100	100	652
Sia om Consulting	Scattle, WA										100	90	
Sodexo Inc.	Galthersburg, MD										100	100	
Sony Pictures Entertainment Inc.	Culver City, CA										100	100	
Southern California Edison Co.	Rosemoad, CA							4			100	100	4 0
Sprint Nextel Corp.	Overland Park, KS										100	100	87
Squire Petton Boggs	Cleveland, OH										100	100	
St. Jugo Medicarlino	St. Paul, MN										100	85	467
Steples Inc.	Framingham, MA	-									100	100	122
Starbucks Cerp.	Soattle, WA	0					•				100	90	208
Standon Madia Vest Group	Chicago, It										100	100	
Starwood Hotels & Resorts Worldwide	Stamford, CT										100	100	400
State Street Corp.	Boeton, MA										100	90	268
Stee-gaeo Inc.	Grand Rap de, MI	•						•			100	90	758
Stee Rives LLP	Portland, OR		•								100	100	11.0

Appendix A Employers with Ratings of 100 Percent

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Employer	Hendquarters Location	1a	1h	2a	2b	2c	Эзв	3h	-4	5	8	8	E.
Sur Life Financial Inc. (U.S.)	Wallesiay Hills, MA										100	100	
SunTruet Banks Inc.	Atlanta, GA										110-0	100	239
Suiherland Asbill & Brannan LUP	Atlanta, GA										110:0	100	
Symantec Corp.	Mountain View, CA		. 0	.0							160	100	379
T. Rowe Price Associates Inc.	Baltmole, MD										100	100	709
Target Corp.	Mini eapoin, MN										100	100	36
TD Bank, N.A.	Wilmington, DE										100	100	
Teachers Insurance and Annuity Association - College Retrement Equities Fund	New York, NY							.0			100	100	97
Toch Data Corp.	Cloorwater, FL										100	100	119
Тевів Motore inc.	Palo Alto, CA						.00				100		100
The Cosmopoliton of Las Vegas	Las Vegas, NV				0			•			100	100	51
Thompson Coborn LLP	Saint Lores MO										100	100	
Thempson Hire LLP	Cleve and, OH			9							100	100	
Thomaon Reuters	New York, NY		.0.					.0	.6		too	100	
Time Warrer Cabre Inc.	New York, NY				.0						100	100	134
Time Warner Inc.	New York, NY										100	100	105
TJX Companies Inc., The	Framingham, MA							9.			100	96	115
T-Mobile USA Inc.	Bellow, a, WA							0.			100	100	120
Yowers Watson & Co.	Arlington, VA										100		649
Toyota Financial Services	Tomance, CA					.0					100	100	100
Toyota Mcter Salas USA Inc.	Tomerco, CA		0								100	100	1000
Troutman Sanders LLP	Attanta, GA										100	100	1000
U.S. Bancorp	Manneapola, MN										100	100	132
UBS AG	New York, NY										100	100	1000
Unitoyer	Englewood Cliffs, NJ										100	100	
Union Sark	San Francisco, CA										100	100	
United Air thea	Chicago, IL										1100	100	79
United Technologies Corp.	Hartford, CT						0				100	100	50
Linded Health Group Inc.	Micnetanka, MN										100	100	17
Viscom Inc.	New York, NY										166	100	19-8
Virgor & Ek na LLP	Houston, TX										100	90	
Virgin America	Buringame, CA										100	90	1
V-8a	San Francisco, CA										100	90	250
Volkswagen Group of America Inc.	Herndon, VA										100	100	
Voya Financial	New York, NY										100	100	
W.W. Granger Inc.	Lake Forest, IL										100	30	295
Wachtell, Lipton, Rosen & Ketz	New York, NY										100	100	
Walgreen Co.	Deerliola, IL										100	100	37
Walt Disney Co., The	Buthank, CA				0			0			100	100	66
Weil, Gotehai & Mairges LLP	New York, NY										100	100	
WallPoint Inc.	Indianapolis, IN										100	90	47
Wulls Fargo & Co.	San Francisco, CA										100	100	25
Whirlpool Corp.	Benton Harbor, MI										106	100	164
White & Case LLP	New York, NY										100	100	
Witner Cutter Pickering Halo & Don LLP	Washington, DC										100	100	12
Whoton & Strawn LLP	Chicago, IL				T						100	100	-
Wombie Carlyle Sandage & Rice, LLP	Winston-Salem, NC										100	90	
Wyndham Worldwice Corp.	Para:ppany, NJ										100	100	528
Wym Resorta Ltd.	Las Vegas, NV										100	100	
XGtox Corp.	Norwalk, CT										100		478
Yahoo Inc.	Sunnyvale, CA						7				100	100	131
Yalp loc,	San Francisco, CA										100	,50	494
ZenithÖplimedia	New York, NY					-	7			- 1	100	100	
		-	-	-		_	9	-	-		Chine	100	-

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Appendices

### Appendix B Ratings and Criteria Breakdowns

#### Corporate Equality Index Rating Criteria

- 1a Prohibits Discrimination Based on Sexual Orientation (15 points)
- 1b Prohibits Discrimination Based on Gender Identity or Expression (15 points)
- 2a Offers Partner Health/Medical Insurance (15 points)
- 2b Has Fanty Across Other "Soft" Benefits for Partners (10 points) (half credit for parity across some, but not all benefits)
- 2c Otters Transgender Inclusive Health Insurance Coverage (10 points)
- 3a Firm wide Organizational Competency Programs (10 points)
- 3b Has Employer Supported Employee Resource Group OR Firm Wide Diversity Council (10 points) Would Support ERG if Employees Express Interest (half credit)
- 4 Positively Engages the External LGBT Community (15 points) (partial credit of 5 points given for less than 3 efforts)
- 5 Responsible Citizenship Eniployers will have 25 points deducted from their score for a large scale official or public anti-LGBT blemish on their recent records (-25 points)

#### Ratings in Gray

Unofficial ratings 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.

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M. Fouring Inc.  M. Fauring Exc*-ampu  Apply Ammuni Exc*-ampu  Apply Inc.  Burry wale, M. M.  Apply Inc.  Burry M. M.  Burra Disne.  Burray M. M.  Burra Disne.  Burray M. M.  Burra Disne.  Burray M. M.  Burray M.  Burr	<u> Պիվ ոգուրթիի</u>	J-I, intra Mr						•				DOL		ı
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M. Kearroy Inc  Chicago, IL  Mannani Exchangu  Abhorial Laboratoras  About Laboratoras  Acambra & Fritch Co.  Acambra & Bannea LLC  Acambra & Bannea LCA  Acambra & Bannea Inc.  Bannowywie, CA  Acambra & Bannea Inc.  Acambra & Bannow Inc		Aq ,mvosneilA				1	•					59	90	ı
M. Kearroy Inc  Chicago, IL  Mannani Exchangu  Abhorial Laboratoras  About Laboratoras  Acambra & Fritch Co.  Acambra & Bannea LLC  Acambra & Bannea LCA  Acambra & Bannea Inc.  Bannowywie, CA  Acambra & Bannea Inc.  Acambra & Bannow Inc	ବା	New York, NY								•		201	100	l
M.C. Keerings Inc.  A.L. Keerings Inc.  A.D. Keerings Inc.  A.D. Amain Exchanges  Abdive Inc.  Abdive Inc.  Action Devices Inc.  Action	an ASU 6'erl		0			4	- 8					19	99	ı
M. Keeringy Inc.  A. Keeringy Inc.  Abbyte Inc.  Abbyte Inc.  Abbyte Inc.  About Laboratedrana  About Laboratedrana  About Inc.  Accenture  Acc	ാനി ജബ്ലമാവൻറല് 1ന്തില്ലർ	AD , snelD strieB		0		•						66	06	l
M. Kentrey Inc.  A. Kentrey Inc.  Althorise angua  Althor													er.	ı
AL. Keurrey Inc.  A.I. Keurrey Inc.  About Device angu.  About Leboratorace.  About Mannar Exchange.  About Inc.  About Mannar Exchange.  Action Devices a Frieir Co.  Annar co.  Annar co.  Annar co.  Annar co.  Ban Jose, CA.  Action Devices Inc.  Ban Jose, CA.	AFLAC Inc.	AiD ,audmuloO				4				0		690	92	ı
M. Keurrey Inc.  A. Keurrey Inc.  About Device angu.  About J. Keurrey Inc.  About Berice angu.  Accepting the acception of t	onliante	Marthore, CT					•					10101	100	
M.C. Keurrey Inc.  A.L. Keurrey Inc.  About Device angu.  About Inc.  About Annaur Excerangu.  About Annaur Excerangu.  About Inc.  About Annaur Excerangu.  Ban Jose, CA  About Berices Inc.  Ban Jose, CA  About Oberices Inc.  Ban Jose, CA  Access Systems Inc.  Ban Jose, CA  Access Systems Inc.  Ban Jose, CA  Access Systems Inc.													es .	
A.T. Keurrey Inc.  A.T. Keurrey Inc.  A.T. Keurrey Inc.  About Laboratorase  About Laboratorase  Accepture A. Reserve Inc.  Ban to see, C.A.	Aeiopostale inc.	Mow York, NY		0								98	S 8	ŀ
A.T. Keurrey Inc.  C. r. cago, I.L.  A.T. Keurrey Inc.  About Laboratorase  About Laboratorase  About Inc.  Month C.  Acenthura  Ace	AECOM *achrology Galpa	Foa VisBelae' CA					i	•				98	06	ı
A.T. Keurrey Inc.  A.T. Keurrey Inc.  A.T. Keurrey Inc.  Abhaman Exc*-angu  Abhari Laboratorasa  Abhari Inc.  Abhari Inc.  Abhari Inc.  Acenture	Адаленска М сто Devices Inc.	Sunryvaio, CA								0		94	99	l
A.T. Keerings from St. Paul, MN St. Paul, MN St. Paul, MN St. Paul, MN St. Keerings from Chinago IL Mow York, MY Month Laborationaria Applyie Inc.  Abbrill Laborationaria Applyie Inc.  Abbrill Laborationaria Month St. Month St. Month Co.  About Inc.  Acentificate  Acent Inc.  Acent			5									5¢	30	ı
M.T. Keermay Inc.  Chicago, I.L.  A.T. Keermay Inc.  May York, M.Y.  Abboth Laboratonas Andrew Heart, I.L.  Abboth Laboratonas Andrew Heart, I.L.  Abboth Inc.  Month Ton.  Month Ton.  Month Ton.  Month Ton.  Month Ton.  Abour Inc.  It snot, CA  Andrew L.C.  Andrew	anl emateny Spatement	AD , each rad							.0	.0		001	06	ŀ
AD MC ABRITON INC.  Chicago, IL  Chicago, IL  When the Mind Mind Mind Mind Mind Mind Mind Mind	αο ποιπιλ καθιόλ	90 breitre										98	91	ı
SL Restriey Inc.  Chicago, IL  A.T. Kestriey Inc.  Althorit Laborations And York, IN.  Abboth Laborations And Annuari Excellential Annuari Excellential Annuari Excellential Annuari Excellential Annuari Excellential Annuari Co.  About Inc.	QLI sonemAirtho/ copebA	Jacksonvoie, FL				•						96	06	ŀ
9 M.D. O.D. Pau, M.M.  A.T. Kearrey Inc.  Ch. cago, I.L.  AlX Armann Exc*angu  Abont Laboratorsos  Abont Denk, I.L.  Abont Co.  Abon														ı
PM Co.  All Paur, MN  All Kearrey Inc.  Chicago, IL  All Amain Exchange  About Laboratorsos  About Laboratorsos  About Inc.  A	Aanr Inc.	AO Jenisal										96	32	ı
SM.Co., St. Paur, MN. A.T. Kearmy Inc. Ch.cago, I.L. AlX Amain: Exchange Mow York, N.Y Abbott Laboratorase Abbit Inc. Month Ch.cago, IL			•									994	100	ı
Sh. Pau, MN  Sh. Pau, MN  A.T. Kearing Inc  Ch cago, IL  All Amain Exchange  About Laboratorsus  About Laboratorsus	Abamoimbia & Fitori Ca.	HQ , yrusdi A wolf	•								1	501	400	ı
SIN Co.,  SI, Paur, MN  A.Y. Көвитеу Inc  Съсъво, IL  AIX Аптил Ехсъвори  Мом York, МУ	ani erVddA	JI ogsoviO ritroli				4						50		ı
3M Co. St. Рам, МИ С. Съсв9о, IL 6M МУ Ому. ИУ МИ МУ Ому. ИУ МИ МУ Ому. ИУ МУ ОМУ ОМУ. ИУ МУ ОМУ ОМУ. ИУ МУ ОМУ ОМУ ОМУ. ИУ МУ ОМУ ОМУ. ИУ ОМУ ОМУ ОМУ ОМУ ОМУ ОМУ ОМУ ОМУ ОМУ ОМ						4						64	09	ı
SI, Paur, MN  SI, Paur, MN  Gricogo, IL												204	100	ı
3M Co.											- 1	oos	100	ı
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15 Personal			26.5	00:0	000	10 pe nts	Ордин'я	10 ролиз	10 pents	5 pents	25 porse	2016 CE Rating	2014 CEI Rating	ı

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		thing \$	\$ DC:1113	15 30 114	10 pents	l'Upçını ş	10 acms	10 gonts	th perms	ZS BOTHE	2016 CEL Pestin	CEI Rating	Portune 1000
Employer	Headquarters Location	La	1h	2u	2 h	2c	3a	3ь	4	35	2018	2014	Portu
AMC Entertainment Inc.	Leawnod, KS										100	100	787
Ameren Corp.	St. Louis, MO										86	85	Part I
American Airinge	Fort Worth, TX										100	100	
American Eagle Outlitters Inc.	Hiteburgh, PA										100	100	
American Electric Power Co. Inc.	Columbue, OH										80	80	2000
American Express Co.	New York, NY										100	100	90
Amurican Family Incurance Group	Madison, WI								•		85	55	100
								-			0.	0	485
Ameripaet Financial Inc.	Minneapolia, MN		0								100	100	263
											40	55	32
Amgon inc.	Thousand Oaks, CA			*						1	90	60	162
			+								39	15	207
			1.0								36		472
Andrews Kurth LLP	Houston, TX										96	90	
Anhouse Busch Companies Inc.	St. Lucie, MO				D						100	90	
											30	30	405
AQL	New York, NY										60	90	860
Aon Corp.	Chicago IL										100	100	
											30	30	167
Apple inc.	Cupertino, CA										100	100	6
Approx Materials Inc.	Santa Clare, CA										75	85	302
Aremark Corp	Philadelpha, PA	a									100	90	205
				-	2						20	38	27
Arent Fox LLP	Wasnington, DC	10	•		•						100	100	
Arnold & Partor LLP	Washington, DC	•		•		•					100	100	
		-									316	15	141
		100	l I								18	15	321
Acourant	Naw York, KY		•	•			٠				.00	85	300
Astelias Pharma US Inc.	Northbrook, IL					•			•		100	56	20
AstraZeneca PLC	W minglan, DE							•			45	85	100
AT&T Inc.	Dailes, TX										100	100	11
Abatin Radiological Asso.	Augmi, TX	•									-40	40	
		14.	10								340	15	317
Automatic Data Processing Inc.	Roseland, NJ				•			•			100	100	255
	Plat (m. bereit), (4)	100									19	15	177
											0	0	443
AutoZone Inc.	Memphia, TN	.0									16	16	305
Avaya Inc	Santa Claru , CA					•		. 6	*		75	80	477
A-regionary	The same that	15						100			16	15	375
Avis Bi, aget (group Inc.	Parsippany, NJ		•		,		۰		b		75	75	360
Avnoting	Phoenix AZ		•			•	•				40	70	117
Aven Products Inc.	New York, NY	•		•	0	•	۰		•		149.0	100	282
AXA	New York, NY		•		•		•	•			100	100	17
Bifs Wholesoin Club	Westborough, MA	•			*			ļ			38	35	

Appendix B Ratings and Criteria Breakdowns

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		S pounts	5 DE 11 E	1 30 RIV	2 serints	3.500.05	70 acmiz	10 pomils	spend (i	-25 points	British :	2014 CEI Rating	1000
		±2	ig.	4:	52	2	8	9	5	ý	3015 CE Pet	2 4	Fortune 1000
Employer	Headquarters tocation	1 a	- Th	20	2ь	2с	За	36	4	:5:	Ř	8	Ē
BAE Systems Inc.	Arlington, VA										90	85	1
Bain & Co. tro. / Bridgespan Group	Boston, MA								0		160	100	
Baker & Hosfetler LLP	Cleveland, OH								•		90	80	
Baku & McKerzo LLP	Chicago, IL			.01		•					100	100	100
Baker Botte LLP	Houston TX				•						40	90	
											195	16	135
Baker, Donalton, Bearman, Caldwell & Berkowitz PC	Momphia, TN										85	85	
Baldor Elegtric Co.	Fort Smith, AR										25	25	
Ball Corp.	Broomfield, CO										118	85	301
Barard Spahr LLP	Philadolphia, PA		•								90	90	1 -
Bank of America Corp.	Charlotto, NC	. 0									100	100	21
Bank of New York Mollon Corp., The	New York, NY										100	100	180
Barclays	Now York, NY				•			*			100	100	100
Barda Amorea Inc.	Sannockburn, IL							•			100		60
Bures & Nobletio	Nuw York, NY	0			•						100	100	360
BASF Corp.	Fornam Park, NJ						101				100	100	
Bausch & Lomb Inc.	Rochester, NY						. 0		•		.75	75	
Baxter International Inc.	Deertreld, IL										90	90	193
Bayor Corp.	Pitteburgh, PA										89	80	
BBAT Corp.	Winstor-Salem, NC										80	80	251
		0	100								30	30	332
											30	30	285
Co.											16	18	479
											ii ii	o	- 6
Best Buy Co. Inc.	Richfield, MN	•				•					100	100	61
		-									30	15	406
Bingham McCutchen LLP	Boston, MA										190	100	
Biogen Idae inc.	Cambridge MA					•			•		100	100	454
Black & Veatch Corp.	Overland Park, KS										05	65	
BlackRock	New York, NY						•		•		100	100	286
Bicomin' Brands Inc.	Tempa, FL										70	70	590
Blue Cross & Blue Smald of Rhoda Island	Providence, RI					•		•			100		
Bice Cross Blue Shield of Florida Inc.	Jacksonville, FL			•					•		100	100	
Blue Critisa Blue Shield of Michigan	Derroit, VII		•					•	•		8.5	85	
Bive Cross Bive Shield of Minnesots	Eagen, MN					•					100	100	
Blue Cross Blue Shield of North Carolina	Chapet Hill, NC				•			•			100	85	
BMC HeelthNot Plan	Boston, MA		0								60	60	
BMC Softward Inc.	Houston, TX								0		70	80	890
BMO Bankcorp Inc	Chicagn, IL	- 6			48			.6-			100	100	
BNP Parbas	New York, NY			•			•				100	100	
Bob Eyans Farms Inc.	New Alberty, OH			•	. 6				0		45	75	
Boarrage Ingohem USA Corp.	Ridgulield, CT		•	•		•			0		100	100	
Baeing Co.	Chicago, IL										100	100	30
Bon-Ten Steige, Inc.	York, PA		0		•			•	0		90	90	719

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											20		100
		Ť	90048	200113	51 #	pounts	100 E	27	pents	25 porms	Ĭ	CEI Rating	9
		(S. perior)	ν, Ö	5.00	21 314-94 01	0.00	10 penns	Minoral Min	8.	8	CE) Pts	2	oogl e
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Employer	Headquarters Location	136	16	2a	2h	2c	3a	36	4	5	2016	2014	Ž
Booz Alien Hom Iton Inc.	McLean, VA										100	100	436
		100									15	30	356
Boaton Consulting Group	Scaton, MA		0			.0		•	•		100	100	100
Boston Scientific Corp.	War:borougn, MA		•			•	•				100	66	307
BP America Inc.	Houston, TX						•		•		90	90	
Bracewell & Gillian	Houston, TX						•				90	90	
Bridgestone American Holding Inc	Nachville, TN										76	70	
Bright Horizons Family Solutions Inc.	Watertown, MA		•				•				.90	90	10
Brightpoint, Inc	Indianapolia, IN								0		30	30	
Broker Interestional Inc.	Dalas, TX										70	70	744
Brintal-Myore Squibb Co.	Now York, NY	. 0					•				100	100	158
		17									29	20	327
Broadnidge Financial Solutions Inc.	Lake Succese, NY				•			•	•		100	100	857
Brown Brothers Hamman & Co.	New York, NY	0	٥	•							75	65	
Brown Rounds LLF	Boston, MA		0				•				100	100	
Brown Stoe Company, Inc.	St. Louis, MO					•			•		100	100	788
Brown-Forman Corp.	Louisvilla, KY					•	•	•	•		100	100	767
Bryan Cere LLP	Sant Louis, MO		.0			•	0		•		100	100	
Burger King Corp.	Miami, FL		•					•			80	55	952
Burlington Northern Senta Fe Ocip.	Fort Worth, TX			190							20	30	-8
Burington Store, Inc.	Burnington, NJ	.0									60	60	577
C&S Wholeseia Grozzia Inc	Keara, NH										36	30	
											18	15	237
CA Technologies Inc.	Island:a, NY		•	•	•	•			•		100	100	400
											16	15	382
Caciwaladigi, Wilkinsham & Talt LLP	New York, NY					•		•	•		100	100	400
Casaars Entertainment Ccip.	Las Vegas, NV						•	•	•		100	100	300
Calpino Corp.	Houston, TX				•						40	40	459
	Phone, 77		7								36	0	310
Campbell Soup Co.	Camden, NJ			•	•		•				100	100	336
Canacian Imperial Bank of Commerce	New York, NY	•	4	. 0							TO	70	
Capgarini U.S. LLC	New York, NY		۰				•	۰	•		96	90	720
Capital Marketa Company NV, The	New York, NY							•	•		100		21000
Capital One Financial Corp.	McLear, VA							•			100	100	127
Cardinal Health Inc.	Dublin, OH		*				•				160	100	19
CareFusion Corp. Cargiffice.	San Diego, CA		*	•	•						100	100	622
	Wayzata, MN	. 0	9.	•		•	•	•			100	100	
Carlson, Inc.	Minneapolis, MN			•							90	55	-
Cariton Helde Jordon Burt	Minnetonka, MN			•							95	85	
CarMax Inc.	lampa, FL Richmand, VA							۰			100	100	DYO
Camival Corp.				•				•			79	- 11	269
Camival Corp.	Mami, FL	•		•			•				#5	85	200
Careipilariles.	Peora, IL										90	0	302
and the second s	- som out on	n s j	î ş.	2.					- 1		68	80	42

Appendix B Ratings and Criteria Breakdowns

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		d/v		=	=	92	1,2	Ξ.	5	5	90	20	å i
Employer	Meadquarters Location	l a	1h	20	2b	2c	Эa	аь	4	5	100	ğ	Pag.
CBRE, Inc.	Los Angeles, CA	1 .									100	100	307
CBS Corp.	New York, NY										100	90	
CC Media Holdings (no. (Crear Channel)	San Antonio, TX										76	75	
CDW Corp.	Vernon Hits, IL										94)	80	51123
Celanene Corp.	Irving, TX						-				NO	15	396
											30	30	450
					1 1							o	303
		-									15	15	344
CenturyLink Inc.	Monros, LA							•			80	60	150
Corner Corp	North Kansas City, MD						•				90	80	774
PH I manufacture for										İ	. 0	٥	410
CH2M HILL Compenses Ltd.	Englewood, CO	•									9.0	90	415
Chadboume & Parke (LP	Now York, NY							*	140		94	90	
Chambenin Edmonds & Associates inc.	Arlanta, GA				в						40	40	
Chapman and Cutter LLP	Circago, IL		•								100	100	
Charles Schwab Corp., The	San Francisco, CA						•	0			100	100	488
Your Consumption	100	-									15	15	340
		16.									16	15	223
Chavron Coro.	San Ràmon, CA							•			100	100	3
CHG Healthoard Services, Inc.,	Sart Lake City, UT							6			90		
Chipotle Mexican Griffino.	Derwer, CO							1			79	75	763
Chaufe, Hall & Stewart LLP	Boston, MA										100	100	188
Choice Hotels International Inc.	Rockvere, MD		•		•						100	100	
Cryslet Group LLC	Aubum Hillin, Mt		•			•					100	100	
											:0	0	69
Chulab Carp.	Warren, NJ		•		•		•		•		100	100	202
CIGNA Corp.	Bloomfield, CT	•						•	•		100	100	103
Cicao Systema Inc.	San Jose, CA	•	•	•		•	•	•			100	100	60
Cff Group Inc.	New York, NY										16	15	589
Citigroup Inc.	New York, NY								•		160	100	26
Classified Ventures LLC	Ciscago, IL				0						90	90	
Cleary Gottlieb Steen & Hamilton LLP	New York, NY	•		•		•		•			100	100	
		100									3.6	30	424
Cinterd Chance US LLP	Ivew York, NY	•	•					•	•		100	100	
Clorox Co.	Oakland, CA				•		0				100	100	461
CMS Energy Services	Jackson, Mi	•					0		P		35	36	406
CNA Insurance	Chicago, IL			•				•			85	85	
Coapt Inc.	Now York, NY		•		•		•		•		100	75	504
Coca-Cola Co., The	Atlanta, GA					.0		•	•		180	100	67
											35	15	352
Colgan-Palmonus Co.	New York, NY		•	•	•				•		90	90	10.5
Comcast Corp.	Philadelphia, PA		0		•						100	100	46
Comerics Inc.	Dallas, TX		•	•	•				•		100	90	772
			-								30	30	135

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		Symbol 9)	S 200-65	Physical Programs	10 pents	10 peints	top do.	10 years	1 ag c	-25 point€ •	CEL Reving	CE Rating	ne 1000
Employer	Headquarters Location	la	1b	2a	2h	2c	3a	ЗЬ	94.5	5	20.05	2014	Forth
			1		ĺ		li .			İ	30	30	184
Compass Barochares Inc. (BBVA Compass)	8 nm rgham, AL			•							93	65	
Compass Group USA Inc.	Charlotte, NC				٠						95	65	
Computer Sciences Corp. (CSC)	Falls Church, VA		•		- 1			.00			86	85	176
Сопримеге Согр.	Ontrait, VII		*		-			1	0		no.	80	100
ConAgra Foods Inc.	Cmana, NE		•								100	96	209
ConocoPhilips	Houston, TX		•						1.0		-78	55	45
											15	15	463
Consolidated Edison Co.	Now York, NY				P			•			100	90	226
Constellation Brands Inc.	V ctor, NY										50	0	779
Conditional Energy Group Inc.	Bo 1 moro, MD			9							190	90	100
Convergys Corp.	Cingnitati, OH					*		-			33	36	906
		1.2	-								30	30	450
Gooley LLP	Palc Airo, CA			•	0						90	90	100
Cooper Trad Rubber Co.	Feolay, Olf										26	25	500
Corbia Corp.	Seatte_WA				1						80	50	( E
CoreLagic	Sante Aria, CA										90	90	
											ø	o	388
Corning inc.	Coming, NY				•	•					100	100	326
Costco Who seek Corp.	Issaquah, WA										90	90	22
		1										15	195
Covington & Suiting LLP	Weshington, DC								0		100	100	
Cox Enterprises Inc.	Aliama, GA										90	90	
Cracker Barrel Old Country Store inc.	Labaron, TN										46	45	79.3
Crate and Barre / CB2	Northbrook, IL			0					•		90	90	
Cravath, Swame & Monre LLP	New York, NY			•		1 1					90	90	
Credit Sursas USA Inc.	New York, NY		•				•				160	100	
Crowcii & Mering LLP	Washington, DC				•				•		100	100	
		1 :									15	15	312
OSAA Insurance Group	Walrur Creek, CA										100	100	100
CSX Corp.	Jacksonville, FL				- 1				0		70	85	231
Cummestre	Columbus, IN				•						160	100	100
CLINA Mutual Insurance Group	Mag-son, WI										50	30	693
CVS Hearin Corp.	Waansocker, RI										100	80	13
Dana Holding Corp.	Maumes, OH				0				0		30	45	356
Danaher Corp.	Washington, DC				•						100	100	152
Dardon Restaurante Inc.	Cilando, FL		0				0.				100	100	328
Dens Polk & Wardwell LLP	New York, NY		•								90	78	-
Davis Wright Tremains LLP	Soattle, WA										100	100	
		10									10	15	311
Day Pitney LLP	Hartfore, CT		•								90	80	
Dean Foods Co.	Dades, TX		q								55	40	217
Dobevoise & Plimpton LLP	New York, NY		•								100	100	
Deshert LLP	Philadolph a, PA								0		100	100	

Appendix B Ratings and Criteria Breakdowns

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Employer	Headquarters Location	1.a	1h	2a	26	2c	3a	3h	4	5	2016	2014	Fortu
Dвеге & Co.	Maine, IL										65	66	85
De haize America Inc.	Saliebusy, NC										100	100	100
Dot Inc.	Round Rock, TX		•		•				0		100	100	51
Decitu LLP	Now York, NY							•	•		100	100	200
Deta Air Lines Inc.	Atlanta, GA										90	90	a.s
Dentors US LLP	Now York, NY		9			•					106	100	
Depository Trust & Classing Corp., The	New York, NY							•			100	100	
Deutsche Bank	New York, NY	•		0		•		•	0		100	100	
			-								36	30	284
Diageo North America	Norwalk, CT			٠	•	•	0				100	100	7
											30	15	497
Dickate in Shap to LLP	Wash rigton, DC		0						0		95	100	
DigitalLBi	Boston, MA					•		•	•		100	100	100
											30	30	378
DIRECTV	E Segundo, CA		0		•						100	95	102
Discoval Financial Services	Riverwoods, IL		9	•					•		100	100	294
											۰	0	189
DLA Piper	Seltmore, MD		•			٠			0		100	100	
Dole Face Co. Inc.	Westlake Village, CA										.16	30	372
Dolar General Corp.	Goodettsville, TN	•	•		B			•	0		.70	70	176
Dolar Fronty Automotive Group Inc.	Tulsa, QK	.0	ø	•							70	70	
											30	30	346
Dominion Resources Inc.	Richmond, VA	•	0		- 8			•	•		85	85	210
Domino's Pizza Inc.	Ann Arbor, MI				b .			•	D:		36	35	
											116	15	458
Darray & Whitroy LLP	Minneapolie, MN			•			•		•		100	100	
											18	15	308
Dow Chamical Co., The	Midland, MI	•		•			•	•			+04	100	62
Dr Pepper Snappie Group Inc.	Plano, TX				•						70	70	427
Drinker Bridin & Reath LLP	Philadelph a, FA	•			•			•			me:	90	
DTE Energy Co.	Detroit, MI	•			0			•			26	35	299
Doure Mons LLP	Philadelphia, PA	•	•					•	•		90	85	
Duke Energy Corp.	Charlotte, NC		•			1		•	•		90	80	145
Dun & Bradetreet Corp., The	Short Hills, NJ	•		*							30	30	100
Dykema Gospeti PLLC	Detroit, VII	•			•			•			100	100	
E&J Gallo Winoty	Madeslo, CA		•		•	•	•				100	100	
E*TRADE Financial Corp.	Now York, NY			•							58	55	883
E. I. du Pent de Nemours and Co. (DuPont)	W-magton, DE				•	•			•		100	100	72
EarthLink Inc.	Atlanta, GA		.0.								95	55	
Eastern (Bank Corp.	Boston, MA	0			•		•				100	100	17.30
		7						١,, ١			16		324
Eastman Kocak Co.	Rochaeler, NY		•	•							100	100	562
«Вау Inc.	San Jose, CA	•			•	•					100	100	196
Reptabline,	St. Paul, MN		•	۰	•	•		•	•		100	100	229

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Employer Headquarters Location	ta	1h	2u	2h	2ε	За	Зb	4	5	8	8	. 2
		-								30	30	212
Edwards Witman Parmer LEP Boston, MA					•					100	100	
Electronic Arts Inc. Redwood City, CA								•		100	100	568
El Usy & Co. Indianapolie, IN					.0			•		100	100	130
EMC Corp. Hopkoms, MA		•	6	•			•			100	100	133
										16	15	396
Emerson Statute Co. St. Love, MO										80	60	123
Emmis Communications Corporation Industrapoles, IN						10				75	75	
										16	15	281
										15	15	447
										. 0	0	161
Entergy Corp. New Orleans, LA								•		90	60	251
Enterprise Holdings Inc. St. Louis, MO										**	85	
										a	15	64
										75	15	230
Epstein Backer & Green PC New York, NY										90	90	200
Erie Inauranoe Group Erie, PA										95	30	40.5
Einst & Young LLP New York, NY										100	100	
Estire Lauder Companies inc., The New York, NY				,						946	95	279
Eaurance Inc. San Francisco, CA					1					96	90	E
Excellus Hesith Plan Inc. Rochester, NY										160	80	
Exaina Mollann, VA					-					85		453
Exelon Corp. Clucago, IL										100	100	129
Experia Inc. Bellevue, WA										90	90	69-3
From tent printings to								-		15	16	428
Express Scripts Ico. St. Louis, MO						1				76	70	24
Exan Mooil Corp. Irving, TX		-					-			26	-25	
Facebook Inc. Man'o Park. CA									•	106	-20	
FactSet Research Systems Inc. Norwalk, CT					~					810		482
Faegre Baker Daniels Chosego, IL											80	
r augra wanter durinos				-	•					100	100	
Federal Home Loan Mintgage Corp. (Freddie Mac) McLean, VA						_	_			30	30	287
			•	•		•	۰	•		100	100	31
Fodoral National Mertgage Association (Fernie Mae)  Washergron, DC				•						1610	90	12
Federal Reserve Bank of Atlanta Arianta Arianta, GA										100		
Fuderal Reserve Bank of Boston Boston Boston, MA  Fuderal Reserve Bank of Cavaland Cigoriand Cigoriand, OH	•				۰					100	80	
				۰				0		90	80	
Federal Reserve Bank of Richmond Richmond Richmond Alexandry A			•		•		•		1 1	100	80	
FudEx Corp. Momphia, TN						•	۰			85	85	- 63
Ferwick & West LLP Mountain View, CA							•			100	100	
										30	30	353
tors researched become		الع								15	15	434
Filtri & Pacific Companies Inc.  New York, NY	•		•			۰	•	•	1 1	#6	85	
First Third Bancorp Cincinnate, OH Financial industry Regulatory Authority inc. Washington, DC								•		WG.	90	361

Appendix B Ratings and Criteria Breakdowns

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		F Section	'S peruts	15 points	10 bemits	10 penns	10 ocur:	18 son 8	15 pe ms	-25 points	CEI Pante	2014 Cli Rating	000E at
Employer	Meadquarters Location	1a	1b	24	2 b	2c	3a	3ь	4	5	2018 0	2014 C	Fortum
		1 -											
Findegan, Henderson, Farabow, Garrott & Dunner LLP First Data Corp.	Washington, DC Affanta, GA			•			۰				100	90	Alexa.
First Horizon National Corp.	Memphs, IN			۰							100	45	254
Frai Curzon Malional Corp.	метряв. П		۰					•	•		79	70	187
Fign & Richardson PC	Boston MA										100	100	1
Fig-annan-Hitard Inc.	SI, Lou a, MO										80		
Fluor Corp	Irzing, TX		•		1		1				75	45	110
		-									310	15	417
Foley & Lardner LUP	Milwaukee, WI			•							100	100	
Foley Hosg ILP	Boston MA										100	100	
											16	15	413
Ford Motor Ce.	Dearborn, MI										100	100	10
Franklin Rosovices Inc.	Sen Mateo, CA		0						0			40	302
											0	o	156
Freescale Semiconductor Inc.	Austei, TX										80	80	
Fried, Frank, Harris, Shriver & Jacobson LLP	New York, NY							•			160	100	
		-									-18	15	492
Frost Brown food LLC	Cinqinnati, OH		a								100	90	
Galloway, Johnson, Tompkins, Burr & Smith, PLC	New Orleans, LA							•			90	90	
GameStop Corp.	Grapevine, TX										100	100	298
Gennett Co. Inc.	McLean, VA										60	45	457
Gap Inc.	San Francisco, CA										100	100	179
Gestronomy no.	Salt Lake City, UT		6		1				0		60	70	
Generatech Inc.	South San Francisco, CA		0								100	100	
											28	15	425
Gorreral Dynamics Corp.	Falls Church, VA										386	85	98
Goneral Electric Co.	Fairfield, CT										100	100	
General Milla Inc.	Menapola, MN			•	•		•				100	100	160
General Motors Co.	Ootzait, MI				۰			0			100	100	7
											15	15	214
Gerworth Financial Inc.	Richmond, VA										90	65	271
Grant Eagle Inc.	Pritaburgit, PA	•	•				•				78		
Gibson, Duns & Crutcher LLP	Los Angeles, CA		•								100	100	
GiaxoSmithKhnu LLC	Research Toangle Perk, NC				a						160	100	280
	200000000000	-					1				FIG	0	167
Goldman Sacha Group Inc., The	New York, NY	. 0		0		•		0	•		100	100	68
Goodwin Proctal LLP	Boston, MA			•				•			100	100	200
	Am. Cit										.16	15	137
Google Inc.	Mountain View, CA			.0							100	100	515
Gordon & Rees ILP	Sen Francisco, CA		•	•	۰						96	90	811
Goulaton & Storra	Soston, MA				v			•			80	80	
Grant Thornton LLP	Chicago, IL			•	•			-01	•		100	90	30
		-									.15	15	465

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Employer	Headquarters Location	ta	1b	2a	2 h	2c	3a	36	4	5	2006	2014	ě
Grien Mountain Coffee Roasters Inc.	Waterbury, VT					1		1			65	85	605
Greenberg Traung LLP	New York, NY										90	90	The same
Group   Automotive	Houston, TX										40	15	343
Group Health Cooperative	Seattle, WA		•				-0.				100	100	
Group Health Permanante	Seatrle_WA				•						265	100	
Grouponine,	Cissoage, IL										100	100	851
Guardan Life Insurance Co. of America, The	Now York, NY				Ŧ.						36	35	238
H&M Hennes & Meuritz AB	North Arington, NJ										70	70	
H&R Block Inc.	Kansos City, MO			•							36	35	605
H.E. Butt Grocory Co.	San Antonio, TX										40	40	
H.J. Honz Co.	Pittoburgh, PA										96	95	234
Hashette Book Group	New York, NY										75	75	
Hain Celastral Group Inc.	Lake Success, NY		*						•		.90	90	
											16	15	106
Halmark Carda inc.	Kanses City, MO						10	•			80	90	
Hancebrands Inc.	Wirstor-Seiem, NC				•						80	60	518
Hanover Direct Inc.	Weehawken, NJ							2			55	70	
Harrover Insurance Group Inc.	Worcaster, MA			•	1				•		86	15	522
											18	15	449
Hame Corp.	Merbourne, FL			0	9				В		90	85	429
Harra Interactive Ind.	New York; NY			. •	1.0				9		60	70	
Harry & Davio Holdings Inc.	Mediorc, DR	-0			a			. 8			55	70	
Haitford Financia: Services Group Inc., The	Hartford, CT				.0			. 4	4		100	100	112
Harvard Pilgrim Health Care Inc.	Wellesley, MA			•					•		100	100	
Hashro Inc.	Pawtucket, RI							•	•		78	25	576
Наутан and Boons LLP	Dutae, 1X								•		96	98	
HCA - Hospital Corporation of America	Nashvilla, TN								•		78	30	82
											36		330
Health Care Service Corp.	Chicago, IL		•						•		85	85	
											36	30	376
Hearth Net Inc.	Woodland Hills, CA		*	.0	Υ.			3	•		86	80	236
											16	15	290
HERE North America LLC	Chicago, IL		•		•			•	•		100	100	
Herman Malerino,	Zeeland, Mil	•	•					•	•		100	100	
Herrick Feinstein LLP	New York, NY		•		•						80	80	
Herahay Co., Thu	Herdney, PA	•						•			100	90	384
Hertz Global Holdings Inc.	Park Ricge, NJ	•	0	•	0				*		95	65	293
Hesa Colp.	New York, NY										40	40	75
Hewlott-Packard Co.	Palo Atto, CA		•	•	•		•		•		100	100	15
Hillan Wer dwide Inc.	MoLean, VA		0		9.		•				100	100	
Hirshaw & Culhertann LLP	Chinago, IL				•	•			•		TOO	100	194
Hogar Lovella US LLP	Washington, OC		•					•			100	100	12
Holland & Hart LLP	Danver, CC		•	•							lance.	75	
Holland & Knight LLP	Tampa, Fl.						•	•			105	90	

Appendix B Ratings and Criteria Breakdowns

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										ì		2014 CED Rating	Partiame
Employer	Headquarters Location	la	1b	2a	2h	2c	Зa	36	4	5	2016	8	Ē
		1 4	-								30	0	143
Holmo Roberts & Owan LLP	Deriver, CC										46	45	100
Home Deput Inc., The	Arlania, GA				•						90	90	34
Honoywort International Inc.	Morral fowestrp, NJ								В		328	85	78
Harizon Healtheam Services Inc.	Nowmrk, NJ										80	80	
Horme! Foods Corp.	Austrs, MN				1						76	85	319
Hospita Inc	Lako Forual, IL		•						ь		66	75	575
Host Hotels & Resorts Inc.	Bethesca, MD										30	15	469
Houghton Mifflir Harcourt Publishing Co.	Boston, MA	0									88	75	100
Howard & Howard Attornoya PLLC	Kalamezoo, MI										25	26	900
Howery LLP	Weehington, DC										70	85	80
HSBC USA	New York, NY								•		100	100	600
HSN Inc.	St. Pateroburg, FL		•		•						86	86	656
Hughea Pubbard & Read LLP	New York, NY							•	•		85	90	
Humana luc.	Louisvilla, KY							•			100	100	70
Huntington Bandanares Inc.	Cotumbue, OH				•			•			100	100	707
													380
Hunton & Williams LLP	Washington, DC								0		100	100	800
Huntaman Corp.	Salt Lako City, UT		•								40	40	241
Huron Consulting Group Inc.	Chicago II.										100	100	
Husch Blackwoll LLP	Saint Louis, MO						0				96	90	
Hyatt Hotels Corp.	Chinago, IL										100	100	693
Hyunda: Motor America	Fountain Valley, CA							•	0		78		
												o	178
IKEA (U.S.)	Conshanocken, PA								•		190	30	
Ismae Taai Warke Inc.	Garry ow, IL				D.				b		660	60	155
Imation Corp.	Oukdale, MN		•								RQ.	70	
Infooya Limited Inc.	Plane, TX						ľ				70	70	
Ingram Micro	Santa Ana, CA										90	90	76
												15	386
Insight Enterprises inc.	Tempo, AZ		97					0			70	0	470
Intel Corp.	Santa Clara, CA					•					160	98	54
InterContinental Hotels Group Americas	Alfante, GA										100	90	
International Business Machines Corp. (IBM)	Armork, NY					9			•		HOE	100	20
International Paper Co.	Momphie, TN				1						30.	45	107
Interpublic Group of Companies Indi	New York, NY						•				100	100	300
											0	0	39
Intu-t Inc.	Mountain View, CA							•			100	100	558
Ілуенсь Ілд,	Atlanta, GA			•							70	15	1 1
ITT Corp.	White Hairs, NY				Þ			•			0>	75	861
											œ.		400
J. M. Smucker Co.	Crrvilla, OH										60	60	452
J.C. Pennsy Co. Inc.	Plane, TX			•					•		195	95	215
		-									19	15	163

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Employer	Headquarters tocation	1a	1h	2=	2h	Эc	3.0	36	4	5	2012	2014 CEI Rating	Fortune 1000
Jacoba Engineering Group Inc.	Pasadena, CA				1				İ	İ	50	50	249
Jarden Corp.	Boca Reton, FL										90	80	383
Jenner & Black LLP	Chicago, IL										1650	100	100
JotBius Arways Corp.	Long feland City, NY								0		100	90	495
ILL	Chicago, IL								•		160	90	596
John Handock Financial Services Inc.	Besten, MA										100	85	No.
Johnson & Johnson	Now Bromwick, NJ					•					900	100	41
Johnson Controls Inc.	Milwaukaa, WI										80	50	67
	Territoria (M				188						8		491
Jones Group The	New York, NY										80	70	608
											110		446
JPMorgan Chase & Co.	New York, NY										100	100	18
K&L Gates LLP	Pittoburgin, PA								•		100	100	
Ka:ser Permenense	Caklanc, CA										100	100	
Katter Mecha Rosempan LLP	Chicago, IL										106	100	
Keyo Scholor LLP	New York, NY										96	90	M. E.
KB Home	Los Angeles, CA						٠.				50		
Kontolle	EUS Aligores, CA	1.7									30	50	
Keane Inc.	Boston, MA										200	0	334
Kotoy Drye & Warren LLP	New York, NY										20 98	25	
Kenogg Co.	Baitle Creek, MI										- 1	90	
Newsys Co.	Daile Creat, MI			-				*			100	100	192
Kennelin Cale Productiona Inc.	New York, NY							-			30	30	462
Kanyon & Kenyon	New York, NY										96	90	
KeyCorp	Cloveland, OH										100	85	200
Kilpatrick Townsend & Stockton LLP	Alfarta, GA										1000	100	510
											90	90	C 1170
Kimberly-Clark Corp.	Irving, TX San Francisco, CA										98	90	136
Kimpton Hatel & Restaurant Group Inc.	San President, CA	•					•				100	100	000
											16	16	265
K	44 4 64				-		24	-2.	_		.15	15	410
King & Spalding LLP	Allenta, GA								•		100	100	
Kukiand & Elba LLP	Gircage, IL				۰		۰	۰	•		100	100	Party.
Helperia.	Amount A.										115	15	277
KLA-Tendor Corp.	Mitpitas, CA										35	35	601
Kohl's Corp.	Menomones Falls, WI										16	16	148
KPMG LLP	New York, NY		•				۰	•			120	100	
Kraft Foods Group Inc.	Northfield, IL							•			100	100	151
Kramer Levin Nattelle & Frankel LLP	New York, NY	•				۰	•	•	•		100	100	The L
Kroger Co., The	Cincinnati, OH			0					•		95	85	23
Kutak Rock LLP	Cmaha, NE		0				. 4				60	90	
L Branda Inc.	Criumbus OH		•					•	•		180		258
L.L. Boan Inc.	Fruoport, ME						•				95	65	
		1.0									30	30	107
		1 "						Ų.				15	200

Appendix B Ratings and Criteria Breakdowns

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Employer	Headquarters Location	10:	16	2a	2h	2c	За	36	4	5	8	8	2
Lactede Group Inc., The	St. Louis, MO				•			0			80	80	
Land O'Lakes inc.	Ardon Hills, MN										100	100	194
											15	15	244
Latnum & Walking LLP	New York, NY		•		9				9		100	100	
Lear Corp.	Southfield, MI		•		7						75	15	167
Lond Lease American Inc.	Now York, NY			•	•	1 .3					70		88
Lee Burnett Company Inc.	Cricago, IL						•	•			700	100	
		1									0		289
Level 3 Communications Inc.	Broomfield, CO	•	0								-76		398
Lovi Straues & Co.	San Francisco, CA	•							6		100	100	520
Lowa Nows Group	Mamakurg, OH	•	•	4					0		96	90	
Lexmark International Inc.	Lexington, KY										100	100	609
		1.7									16.	15	256
											à	0	270
Liberty Mutual Group	Boston, MA		•						0		85	60	61
Lincoln National Corp.	Raditor, PA										90	85	235
Lindquist & Vennum LLP	M:nneapolla, MN		•			•			•		108	95	
Litter Mendalson PC	San Francisco, CA	•		•	•						100	100	
Live Nation His.	Beverly Hills, CA	•			•						70.	70	439
Locke Lord LLP	Dalles, TX								0		80	45	
Lockheed Martin Corp.	Bethesca MD	.0						•			100	100	59
Loeb & Loeb LLP	Now York, NY	•									76.	78	
Loews Corp.	New York, NY	.0									36	35	188
L'Creal USA (no.	New York, NY	•		•	h		•		•		85	15	888
		1.0	2								343	30	56
Luce Foward Hamilton & Sor pps LLP	San Diego, CA	•			•		•	•			66	70	800
M&T Bank Corp	Buffalo, NY	•									70	70	521
Macy's Inc.	Cinomali, DH			۰	•		•		•		500:	90	100
Manatt, Preips & Philips LLP	Los Angeles, CA			۰	•			•	•		90:	90	430
MarpowerQuoup	Witwaukee WI		•					•	•		85	90	140
Merathan Oil Corp.	Hauston, TX							۰	•		76	15	174
	- /										19	0	33
Marnett International Inc.	Bethesca, MO		•		•		•	•			100	100	230
Mara Inc.	Mr. Oilve, NJ	•						,			90	60	
Marah & McLernan Companios Inc.	New York, NY							•	•		too	100	228
	Table 1										35	15	336
Massechusetta Mutual Life Insurance Co.	Springfield, MA						•	•		, 1	900	100	94
Master Card Inc.	Purc 1899, NY	•	0			•		0	•		100	100	348
Martel Inc.	E Segundo, CA					•	•				95	95	396
Mayer Brown LUP	Chicago, IL			-2		•		۰			100	100	10
Mayo Chric	Rochester, MN		•	۰			۰	۰			76	70	
McAlee Inc.	Santa Clare, CA								اليا		25	25	E
McCarter & English LLP	Newark, NJ		•	:	•		•	•	•		9.0	90	
McDermott Will & Emery LLP	Chicago, IL			۰				•			100	100	

Management   Man							Criterio	n					ĺ	
Rendergrays			1											231
Rendergrays			Parent of	Sunt5	218/0	2	10	# 5	2007	5 5		1	tat fire	000
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Millioner of Force; Carlo Broad, IL	Employa	Mandauariana Laantina	la.	115	2a	26	ne.	7.2	76	4	45		2014	ortui
McGrany Edit Prenence   Name York, NY			1				1	.31	30		,	100		Section.
McGrard Monde LEP														
Mortionna Long & Acid agraphib All and						1.55		0				1		280
Morth respond Corp.   Stain Framewood, CA   O   O   O   O   O   O   O   O   O			1									1000		600
More Province Corp.    More Work Province Corp.								-	1			200		Brown !
Manch Weathers Corp.   Richment, VA					100							1		14
Merender   France   Merender			1						E-	-		1000		200
Mary for Frozen   March   Ma	·					100						200		NO.
Marris Weatherson fron, Tris   Mouris AGC   Front   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Country   Minimary Minimary   Minimary Country   Minimary Minimary   Minimary Minimary   Minimary Mini										1,1				172
Merch & Co. Inn.   Whitencure States, NJ			1							.*		1000		
Modification:    New Yards, NY						_	122							2000
MGM Research Feteriational Law Vegas, NV Microbusin, Corp. Microbusin, Corp. Reviewor, WA Microbusin, Corp. Reviewor, WA Microbusin, Corp. Reviewor, WA Microbusin, Corp. Reviewor, WA Microbusin, Microbusin, Corp. Reviewor, WA Microbusin, Corp. Reviewor, NY Microbusin, LLP New York, NY Microbusin, NY Microbusin, LLP New York, NY Microbusin, NY Microbusin, LLP New York, NY Microbusin, NY Microbusin, NY Microbusin, NY Mic												71100		
MG Reservis International  Les Vagas, NV  Moreschero, WR  Mor											1	100		
Microsoft Corp.  Micros														200
Microsert Corp.  Recimore, WA Microsert, Liveword, Handry & McCory LLP New York, NY Microsert, LG Chappe, IL Microsert, Corp. Mistr, Lovin, Cotin, Fores, Giovely & Papero PC			1 2 1									The same of	100	292
Microsoft Corp.  Microsoft Corp.  Microsoft Corp.  Microsoft Corp.  Microsoft Corp.  Microsoft Corp.  Microsoft Corp.  Microsoft Corp.  Chaspo, IL  Ch						1						200		210
Micark, Trever, Hadry & McCoy LIP New York, NY New York,			1											200
Mirar Corns LLC         Chicago, IL         100         100           Mirar Corn, Cato, Farre, Glovely & Popes PC         Boeton, MA         100         100         100           Mirar Corn.         Alfanta, GA         100         100         100         100         100           Michael Gofe 4 Brib Williams         Taylor walls, NC         100         <				1.5										35
Mintry, Lovin, Cohn, Forne, Glovely & Popeo PC         Boeten, MA         100         100           Mintrel Corp.         Atlanta, GA         100         100         100           Monawik Industrian no.         Cafnour, GA         100         100         100         100           Monawik Industrian no.         East Hamover, rij         100         100         15         423         423           Mondoloz International Inc.         East Hamover, rij         100         100         100         98           Mondoloz International Inc.         East Hamover, rij         100         100         100         98           Mondoloz International Inc.         East Hamover, rij         100         100         100         90           Mondoloz International Inc.         St. Laus, WO         100         10														88
March Corp.         Afanta, GA         9         30         30           Michael Gold + Side Williams         Taylor wells, NC         9         9         100         100           Monawik Industrion Inc.         Calinour, GA         9         9         100         100         20           Monde International Inc.         Esat Harlower, rij         9         9         100         100         88           Monde Caller, NC         51, Laue, MO         9         100         100         100         206           Mospin Caller, NC         9         100         100         100         765         100         100         765           Morgan Lawa, & Bockun LLP         Philadisphia, RA         9         100         100         765           Morgan Lawa, & Bockun LLP         Philadisphia, RA         9         100         100         765           Morgan Lawa, & Bockun LLP         Philadisphia, RY         9         100         100         765           Morgan Lawa, & Bockun LLP         Philadisphia, RY         9         100         100         90           Morgan Lawa, & Bockun LLP         Sai Francisco, RY         9         100         100         90         90         90         304 <td></td> <td></td> <td>1</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>1000</td> <td></td> <td>800</td>			1									1000		800
Michael Gale + Sab Williams														200
Monawk Industrian no.   Calnour, GA			100											100
Mondo/az International Inc.   East Handwor, rij									· **			10000		440
Monde/az International Inc.         Esat Handwar, rij         0         0         88           Monestric Co.         St. Lovia, MO         0         100         200           Mood 2 Coro.         Naw York, NY         0         100         100         765           Moor & Van Allen PLLC         Charlotte, NC         0         76         76         76           Morgan Starricy         Now York, NY         0         100								l l				100		1000
Moreuscrito Ca.         St. Louis, MO           Mooory's Core.         Naw York, NY           Moor & Van Allen PLLC         Charlottu, NC           Morgan Lewes & Bocken LLP         Philadelphia, PA           Morgan Starrity         Now York, NY           Morningstur Inc.         Chicago, IL           Multisupu & Footister LLP         Star Francisco, CA           Most of D.         Pymauth, MN           Most of D.         Schaumburg, IL           Milliannian R.         Schaumburg, IL           Milliannian					-							- 4	15	Total I
Moory's Core.         Naw York, NY         100         765           Moory & Van Allen PLLC         Charlettu, NC         100         100           Morgan Lawre & Backiun LLP         Philadeiphia, PA         100         100           Morgan Starrley         New York, NY         100         100           Morningstur Inc.         Chicago, IL         100         100           Municipital & Foorsion LLP         Suit Francisco, CA         100         100           Mosa o Co.         Pymouth, MN         100         100         100           Mosa o Co.         Pymouth, MN         100         100         100           Missioner in Sciunceral Inc.         Scriptimburg, IL         100         100         100           Murger, Talleo & Olvan LLP         Los Angeres, CA         100         100         100           Muture of Omeha Insurance         Cmeha, NE         100         374           Muture of USA         Brooklyn, NY         100         100			1 X					100				1000	***	-
Moore & Van Allen PLLC         Charlette, NC         775           Morgan Lawis & Bocklus LLP         Philadelphia, PA         100         100         90           Morgan Startiny         New York, NY         90         100         90           Morningstar Inc.         Cisicago, IL         90         100         100           Mustace & Founder LLP         Surfiture Decorption, MN         90         100         100           Mose o Co.         Pymouth, MN         90         304         451           Million of a Solutional Inc.         Sensumburg, IL         90         304           Murger, Tallee & Olson LLP         Les Angeles, CA         90         304           Murger, Tallee & Olson LLP         Cmaha, NE         90         394           Muture of Omaha Insurance         Cmaha, NE         90         394           National Gric USA         Brooklyn, NY         90         116         444														956
Morgan Laws & Bockus LLP         Philaderphia, PA           Morgan Starrey         New York, NY           Morningsturine.         Chicage, IL           Morrandi & Footaler LLP         Start Francisco, CA           Morrandi & Footaler LLP         Start Francisco, CA           Moscio Co.         Plymouth, MN           Morror à Solutional Inc.         Schaumburg, IL           MSLGRGUP Americas         Now York, NY           Murger, Tolleo & Olson LLP         Los Angures, CA           Murger, Tolleo & Olson LLP         Cmaha, NE           Muture of Omaha Insurance         Cmaha, NE           Muture of USA         Brooklyn, NY			1.5						-			1		/55
Morgan Starley         New York, NY         96           Morningstar Inc.         Circago, IL         90           Municipal & Foorbillor LLP         Star Francisco, CA         90           Moscie Co.         Pymouth, MN         90         100           Morce of a Softward Inc.         Scripumburg, IL         90         304           MSLGROUP Americas         New York, NY         90         100           Murger, Talles & Olson LLP         Los Angures, CA         90         304           Muture of Omaha Insurance         Cmaha, NE         90         304           Muture of USA         Brooklyn, NY         90         30												and the		
Monningstar Inc.         Cinogo, IL           Munique & Fonsier LLP         Suir Francisco, CA           Moscio Co.         Pymouth, MN           Morrora Sciuticas Inc.         Scriptimburg, IL           MSLGROUP Americas         New York, NY           Murger, Talles & Olson LLP         Los Angures, CA           Muture of Omeha Insurance         Cmaha, NE           National Gric USA         Brooklyii, NY           Brooklyii, NY         15           144	•				7.3		100							0.0
Morration & Formation LLP  Mosque Co.  Mosque Co.  Mosque Co.  Morration & Scriptomburg, IL  MSLGRCUP Americas  Mew York, NY  Murger, Tallee & Olsan LLP  Los Angeres, CA  Muture of Omeha Insurance  Comaha, NE  New York, NY  Scriptomburg, IL  Scri														30
Mostino Co.         Plymautin, MN         70         246           Motoro la Sciutica line.         Sensumburg, IL         90         304           MSLGRGUP Americas         Naw York, NY         100         100           Murger, Tolleo & Olson LLP         Los Angeres, CA         101         104           Mutura of Omeha Insurance         Cmaha, NE         104         104           National Gric USA         Brooklyin, NY         100         300           National Gric USA         Brooklyin, NY         100         115			1			1.7						10000		
Motorola Sciuticas Inc.  Scrapmburg, IL  MSLGRGUP Americas  New York, NY  Los Angeres, CA  Mutura of Omeha Insurance  Cmaha, NE  National Gric USA  Scrapmburg, IL  Scrapmburg, IL  Scrapmburg, IL  451  Motorola Sciuticas Inc.  New York, NY  Los Angeres, CA  100  100  100  100  100  100  100  1			1.00					177				Look		246
MSLGRGUP Americas MSLGRGUP Americas Munger, Tolleo & Olson LLP Los Angeles, CA  Mutua of Omeha Insurance Cmaha, NE  O 374  National Gric USA  Scooklyn, NY  15  144			1 - 1	0			1							anion
MSLGRCUP Americas New York, NY			1	3		-			_			100		1000
Muriger, Talleo & Olsan LLP  Los Angeres, CA  104  Mutua of Omeha Insurance  Cmaha, NE  Cmaha, NE  30 394  30 500  National Gric USA  Scrooklyin, NY  18 144												7	100	
Midute of Omeha Insurance Cmaha, NE 60 394 0 374 30 500 National Gric USA 8rocklyin, NY 90 115 144												100		2.0
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E CORPORATE EQUALITY INDEX 2015

Appendix B Ratings and Criteria Breakdowns

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		-		-	-		,-	1	-	, v	5	2014 CEI Rating	Î
Employer	Headquarters Location	1.0	th	20	2h	2c	3a	3 b	4	5	Ř	201	100
Navigant Consulting Inc.	Chicago , IL										100	100	
Naziator International Corp.	Lare_IL										40	40	210
NCR Corp.	Duluth, GA										100	90	441
Na son Muline Riley & Scarborough LLP	Columbia, SC	0									50	60	
Nextle Purns PetCare Co	St. I nu n, MO				7						95	65	(E.)
NetApp Inc.	Sunnyveie, CA				•						100	90	408
Northix Inc.	Los Galos, CA										ac.	80	620
New York Life Insurance Co.	New York, NY										100	90	89
New York Tirsed Co.	New York, NY										76	90	923
Newel Rubbermaid Inc.	Atlanta, GA										100	85	433
Nazimont Mitting Corporation	Groonwood Village, CO				,				,		€0	60	274
	Name and Add Add	1 .									18	15	91
NortEra Energy atc.	Juno Beach, FL										76	70	190
Nielsan Co., The	New York City, NY										100	100	10000
						2	-		. 5		:15	0	421
N.ker Inc.	Beaverton, OR										100	100	126
	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -			-	-			-	-		16	15	460
Nissan North Amorica in c.	Franklin, IN										100	100	
Nixon Peabody LUP	Boston, MA										100	100	733
Nardistrom Inc.	Seatrle, WA										100	100	227
Nortola Southern Corp.	Nortoik, VA					1.5	-				50	50	247
Norte: Networks Gospi	Richardson, TX				÷			-			50	50	***
Northeast Utilities	Springfialo, MA										30	30	402
Northern Trust Corp.	Chicago, IL										106	100	561
Northrop Grumman Corp.	Falls Church, VA										100	96	120
Northwestern Mutual Life Insurance	Milwaukee, WI										100	90	134
Norton Rose Fulbright	Houston, TX				•	-					96	90	***
Novartia Pharmagestrata Corp.	East Hanovar, NJ												500
NRG Energy Inc.	Princeton, NJ										100	100	1962
New Case Sylves	enticolor, 47	1							•			50	314
												0	146
NV Energy Inc.	Las Vegas, NV										15	15	389
NVIDIA Corp.	Santa Clara, CA							•	•		70	70	710
NYSE Euronaxt inc.								•			75		553
NISC ENCOUNT IN	New York, NY				•				•		45		010
Office Power fee		-		_		-			_		30	30	125
Office Depot Inc.  Og Ivy Group Inc., The	Bock Rator, FL						•	•	•		ODF	100	283
	Now York, NY				•	•	۰	•	•		HOS	90	7.0
Oglutree, Deakins, Nesh, Smoak & Stowart	Greaty e, 5C	•						۰	•		78	45	2000
CYONEL one of Michigan LT CA	Las Assess CA	_								1			496
O'Molyony & Myora LLP	Los Angeles, CA			•		•	•			H	100	100	
0	DI WALKER		I								16	15	416
Omnicom Group	New York, NY								•		65	80	191
ONEOK Inci	Tules, OK	.*	•	۰	•						70	30	219
Oradie Corp.	Raciwood City, CA			0							100	100	80

						Critorio	n					r	
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		ą	5(11)2	2016	22	F 5	g g	2"	ys 55	8	1	E S	
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		-		-	,-			-	-	1 17	5	5	Fortune 1000
Employer	Headquarters Location	1 a	1b	2 a	2h	2c	3 a	Эb	4	5	20018	2014 CEI Rating	Fort
Orbitz Worldwice Inc.	Chicago, IL										160	100	
						~~					16	0	412
Orack Hamington & Sutchilla LLP	San Francisco, CA										100	100	1000
				-							15	15	322
Outerwall Inc.	Bellovin, WA										96		
Overetock.com Inc.	Salt Lake City, UT										RO	70	500
Owans & Mearing	Mechanicaville, VA										-39	35	297
Owens Carring	Toledo, OH							0			100	100	476
											16	15	364
		16									166	15	108
Pacific Life Innuignee Co.	Nowport Boach, CA										- 01	8.5	359
Pacific Medical Centers	Seattle, WA							9	0		60		
Pao fi Corp	Pontland, OR										85	80	
Palm Management Corp.	Washington, DC										55	65	
											es	15	347
											30	15	211
Patterson Belknap Wobb & Tyler LLP	New York, NY			0					0		Fαα	100	
Pattorson Companies (Pattorson Dontal Supply)	St. Paus MN			•	-			1			.55	60	536
Patton Boggs LLP	Washington, DC						•		•		90	90	
Paul Haetings LLP	Los Angoles, CA		8								100	100	
Paul, Welss, Rilkind, Wharton & Gamison LLP	New York, NY		•	•			9				100	100	
											a		142
		-									18	15	315
Pearson Inc.	Upper Sadela River, NJ						•				100	100	
							1 (1				٥	0	203
Pop Boya-Marny, Moe & Jack	Philadelphia, PA								D		89	66	928
Pepco Holdings Inc.	Washington, DC	•									88	85	400
Popper Hamilton LLP	Philadolphia, PA					•	٠				100	90	
Papa Ca Inc.	Puronase, NY				•	•		•			180	100	43
Parkers + Will tray	Chinago, IL			•	- 1			•			48	45	
Paikins Cole LLP	Seattle, WA			•	•			0.			100	100	
Poir od R-card USA LLC	New York, NY		•		0	•		•			90	75	800
											18	15	243
PetSmart Inc.	Phoenix AZ	•	•		•		۰	۰	•		75	75	377
Pfizer inc.	New York, NY	.0		•	•			•			300	100	48
PG&E Corp.	Sun Francisco, CA							•	•		100	100	183
											16	0	99
											35		4
Prindery Winthrop Shaw Pittman LLP	New York, NY			•							100	100	1, 12.
Prinacle West Capital	Phaenix AZ		•						b		90	35	688
Pitney Bower Inc.	Stamford, CT		•		•		•				80	35	489
												0	77
PNC Financial Services Group Inc., The	Pitteburgh, PA	•	•	•	0	•	• ]	•			100	100	170
PNM Resources Inc.	Albuquarque, NM							•			35	35	1-11-

Appendix B Ratings and Criteria Breakdowns

Employee							Critorios	1						-
Property Company Com										1		530		
Personal Singular RC			Supplied St	, 5 og mit	h 20	10 penns	IÜ pein s	fund 0	10 pents	15 punts	Rorme	GE! Reting	CE Rating	ne 1000
Pent and General Extrice Co.	Employer	Meadquarters Location	l a	1h	24	2h	2c	Зи	3b	4	5	2016	2014	Fortu
Pent and General Extrice Co.	Polaroic Corp.	Waitham, MA										30	30	100
Pert sand Gircra of Electric Cis.												-		100
PRESENTED:   Administration   Presented	W 100 M. T.								500			10000		
Price of the Company   C				100					1					182
Present Files   Century   CT														200
Prices at Enriques Copper LLP New York, NY Prices at Garder Cas. Crain rat, CH Produce Garder Cas. Crain rat, CH Produce Garder Cas. Crain rat, CH Produce Garder Cas. Crain rat, CH Produce Reac LLP New York, NY Prices at Garder Cas. New York, NY Prices at Garder Cas. New York, NY Prices at Garder Cas. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY Prices at France allor. New York, NY	Prospering.													
10   15   475														2000
Price per France of Group   Des Mores (R)   0   0   0   0   0   0   0   0   0														
Precipal France of Groupe Co.   Character, Ch.	PrigewatsrhouseCcopers LLP	New York, NY												20.00
Pector & Gambo Co.   Cina rest, OH	Principal Financial Group	Qua Moinca, IA			-					7.55		2000		290
Projection France   May Find Visigns, OH		Circinnati, OH	11.00	0		1						F Con		District Co.
Procedure France LLP New York, NY Norwark, NJ Norwark, NJ Norwark	Progressive Corp., The	Wayfield Villago, CH							100					
Ph. Gent a France aline.  New York, NJ New York, NY New York, NY Publics Real Mathiciate Communications New York, NY Publics Communications New York, NY New York	Proskauor Rose LLP								-	200		1000		
Public Go voo Enterprise Group   Norwals, NJ   10   10   100   1	Prudental Financial Inc.	Nowark, NJ				0						100		29
Publics   HealthCaire Communications   New York, NY	Public Service Enterprise Group	Nework, NJ										80		
PVH Gorp.  New York, NY  Our manner Wasser Inc.  Groombers, NG  Guarlos & Brady LLP  Ahlwaukan, WI  Ouer ID agnesies inc.  Mad acr, NI  Our Research Urginard & Sulvan LLP  Cheet D agnesies & Sulvan LLP  Cheet D agnesi	Publics Healthcare Communications	New York, NY										100		
PVH Corp.   Nam York, NY	Publics Inc.	New York, NY										100	100	
Cuerriance Wasver Inc.   Greenabore, NC   San Dega CA   100 100 149 307												a	0	108
Claim Handon Waster Inc.   San Diago, CA   S	PVH Corp.	New York, NY							•			78	70	422
Cluarion & Brany LLP	Quartance Weaver Inc.	Greenaboro, NC												
Quaries & Brady LLP	QUALCOMM Ins.	San Diego CA		0								1000	100	149
Cluest Diagnostice line;   Madiason, NJ				-								16		307
Count Emanuni Unquinant & Sutilivan LLP	Quartes & Brady LLP	Milwaukas, Wt		•						0		100	90	
R.R. Dannelley & Sone Co.  Radio Shack Corp.  Radio Shack Corp.  Roy York, NY  Roy Larron Corp.  Now York, NY  Roy acenveris, Et  Roy Larron Corp.  Roy Wall xon, MA  Roy Captai Mulkois LLC  Roy Sourtes no.  Roy Sourtes no.  Roy Sources USA Inc.  Long Island City, NY  Read of Shath LLP  Regal Entertainment Group  Roy Captai Mulkois  Roy Source USA Inc.  Roy Source Box Mannes Corp.  Roy Sourc	Quest Disgnostics Inc.	Magaco, NJ		•	6							96	65	341
Radio Shack Corp.   Fort Worth, TX	Quinn Emanuel Urquhart & Sullivan LLP	Los Angeles, CA						•				80		
Raymand Jamen Financial Inc.   St. Parareburg, FL	R.R. Donnelley & Sone Co.	Chicago, IL						•				90	90	264
Raymend Jamen Financial Inc.   St. Putersburg, FL	RadioShack Corp.	Fort World, TX										45	30	556
Reprise on Co.  Rescribit  Rescri	Ralph Lauren Corp.	Now York, KY										90	90	370
Razertein	Raymond James Financial Inc.	St. Perroraburg, FL		•								90	90	601
RBC Capital Markets LLC  RBC Wealth Management  Minnespolis, MN  100  RBS Socurities no,  Ris Socurities no,  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Madison, NJ  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Reslogy Holongs Corp.  Madison, NJ  100  Reslogy Holongs Corp.  Reslogs Intertainment for the the the the the the the the the the	Raytimor. Co.	Wallam, MA								•		100	100	124
RBC Wealth Management Minneapolis, MN	Rezorteh	Seattle, WA					•					100	100	100
RBS Socurities no.  Residency USA Inc.  Long Island City, NY  100  Residency Holonings Corp.  Recrusional Equipment Inc.  Kent, WA  Residency Inc.  Regal Entertainment Group  Regal Entertainment Group  Regal Entertainment Group  Birmingham, AL  100  100  100  100  100  100  100  1	RBC Capital Markets LLC	New York, NY				٠			•			100	100	100
Residogy Holongs Corp.  Residogy Holongs Corp.  Recrustronal Equipment Inc.  Residogy Holongs Corp.  Recrustronal Equipment Inc.  Residogy Holongs Corp.  Residogy Holongs Corp.  Residogy Holongs Corp.  Pittoburgii, PA  Regul Entertainment Graup  Residona Financial Corp.  Birmingham, AL  100  151  176  187  188  189  180  180  180  180  180  180	RBC Wealth Management	Microapolis, MN		0						•		100	100	
Realogy Hninings Corp.         Madison, NJ         90         512           Recrustional Equipment fire.         Kent, WA         90         50           Read Smith LLP         Pitaburgit, PA         100         100           Regal Entertrainment Group         Knoxville, TN         90         401           Regions I'mandal Corp.         Birmingham, AL         90         401           15         313         742           Replacements, Ltd.         McLeaner/ e, NC         100	RBS Socurities no.	Stamford, CT				•				•		.75	75	
Recrustronal Equipment fire.   Kent, WA	Re:Sources USA Inc.	Long Island City, NY						۰				0.5	100	
Read Smith LLP         Pttaburgh, PA         100           Regal Entertainment Graup         Knoxville, TN         35         742           Regions Financial Corp.         Brimingham, AL         60         401           15         313         276           Replacements, Ltd.         McLeaner/ o, NC         100	Realogy Holoings Corp.	Madeon, NJ		•					•	•		910	90	512
Regal Enterteinment Graup         Knoxville, TN         35         742           Regions I: narioal Corp.         Brimingham, AL         60         401           15         276         15         313           Replacements, Ltd.         McLeaner/ o, NC         100         100	Recreational Equipment Inc.	Kent, WA								•		100	90	
Regione Financial Corp. Birmingham, AL	Read Smith LLP	Pittaburgh, PA										100	100	100
Replacements, Ltd. McLeaners o, NC	Regal Entertainment Graup	Kooxville, TN				В				*		38	35	742
15 313   Replacements, Ltd.   McLeanarillo, NC   100 100	Regione I harrolal Colp.	Hirmingham, AL						•	•	•		2014	60	401
Replacements, Ltd. McLeaneyillo, NC								- 1				30	15	275
												16	15	313
15 323	Replacements, Ltd.	McLeanavije, NC		•					•	•		100	100	
				1								30	15	323

								-4					
		S mad 41	5 p.v. (2	12 sp. n/s	10 points	10 pcm a	30 goung	10 acm's	(5 goars	-25 partie •	25 CEI Ruting	2014 CE Rating	Fortune 1050
Employer	Headquarters Location	1 a	1b	2a	2b	2c	Зa	ЭЬ	4	5	2018	8	E.
Remoids Amorican Inc.	Winston-Salem, NC						0	3	•		185	75	316
Rite Aid Corp.	Comp Hot, PA										:30	80	113
Robert Half International Inc.	Menlo Park, CA			•	. 6				•		65	85	571
Robont W. Baird & Co. Incorporated	M. waukee, VVI					0					100	80	
Robins Kaplan, Miller & Cresi LLP	Minneapoira, MN				•			•			100	100	0.
												0	291
Rockwell Automation Inc	M. Iwaskon, WI						•				108	100	403
Rockwell Celine Inc.	Codar Repids, IA		a			•					9.9	90	511
Ropes & Gray LLP	Boston, MA							•			100	100	
Ress Stores Inc.	Oubtini, CA						•		В		70	0	278
Rayal Caribbnan Crusson Ltd.	Miami, FL		0		•				•		#10	80	1000
RRI Energy line.	Houston, TX			. 6							:50	50	
Ryder System Inc.	M:am₁, FL							•			-85	85	404
Ryland Group Inc., The	Calabases, CA				1						20	20	
S.C. Jenneon & Son Inc.	Racine, WI				•	.0					TOC	90	
Sabre Holdings Inc	Southisto, TX		9	0							95	75	
Sateway Inc.	Pleasarton, CA				•		•	•			100	100	62
											15	15	240
seipetorce.com Inc.	San Francisco, CA		•								100	100	702
		1 .									30	30	487
											.0	0	420
Sannif-Avanta II S. LLC	Brogewates, NJ								В		46	45	
SAP America Inc.	Nowtown Square, PA		6	۰	.0		•		•		100	100	
Sapert Corp.	Boston, MA								•		RO	60	
Saul Ewing LLP	Philadelphia, PA			•	•		•		•		90	90	
Sb-₄	I.A. CA			•				В			211		
Senill Hardin LLP	Chicago, IL		•	•	•			•			100	100	
Scholastia Corp.	Now York, NY			•							7.5	66	900
Schule, Roth & Zabei LLP	New York, NY				٠						40	45	
		1										0	451
Seagate Technology LLC	Scotte Valley, CA		•								60	45	ķ = 1
		-									0	0	333
Sears Hordings Corp.	Hoffman Estatus, IL			•				•	•		100	100	71
Sedgwick LLP	San Francisco, CA			•							too	100	
Selective Insurance Group	Brunchville, NJ			•	-			•			.06	65	WA TO
Sumpra Energy	Sun Diego, CA					•	•				100	100	281
Severa Triant Services Inc.	Fort Washington, PA										50	60	60
Seyfarth Shaw LLP	Gleoago, IL Now York, NY					•					100	100	150
Shearman & Sterling LLP		F =							۰		100	100	
Sheri Qil Ca.	Hauston, I X Los Angrées, CA		•	0							100	95	100
Sheppard, Mulin, Richie & Hampton LLP	Los Angress, CA		-						•		900 30	100	282
Shook, Hardy & Bacon LLP	Kanssas City, MCI						0				100	100	
Sicroy Austin LLP	Chicago, IL							*			100	100	1
											18		497

Appendix B Ratings and Criteria Breakdowns

						Gritorio	1						
									1				
			*5 DGH15	IS points	10 pe mts	10 ac nus	10 ocinic	10 26 11 2	Ps pearls	-25 parms	CEI Patting	2014 CEJ Rating	Fortune 1000
Employer	Headquarters Location	ta	1h	2a	2h	2c	3a	3ь	4	5	2016.0	2100	ortun
Simpson, Thacher & Barrett LLP	New York, NY	1	1										
SIRIUS XM Page of Inc.	New York, NY		•			۰			•		100	100	16.5
Skadden, Arps, State, Meagher & Flom LLP	New York, NY										100	100	652
Slalom Consulting	Seettle, WA							•			100	100	
SLM Corp. (Snii & Man)	Newark, DE				. 0		•		•		100	90	-
and the state of t	William, Di.	1.									15	45	418
Snell & Wilmay	Phones AZ										95	15 90	213
Sodexa Inc.	Gaithersburg, MD										100	100	4 T
Software AG USA Inc.	Reeton, VA										100000		
Software House International	Somerest, NJ										76	70	100
SOUTH DO TO CO. IT TO THE REAL PROPERTY OF THE	Could on the										15	15 18	307
Sony Computer Entertairment America LLC	Footer City, CA										85		
Sony Electronics Inc.	San Diego, CA	0									98	100	
Sony Pictures Entertainment Inc.	Culver City, GA	0						•	•	ľ	100	100	
Southern Carlotha Edison Ca.	Rosemoud, CA										100	100	
Southern Co.	Atlanta, GA				1						70	45	171
Southwest Arines Co.	Oalas, 1X		•							,	90	90	164
Spectra Energy Corp	Houston, TX										90	85	475
												o	331
Spant Nextol Corp.	Overland Park, KS										100	100	87
							- 8			į.	0	0	431
Squire Patron Bogga	Cinvaland, OH										100	100	
SRA International Inc.	Fairlax, VA							•	•		80	80	20
St. Jude Medica Inc.	St. Paul, MN			•							100	65	457
Standard Insurance Company	Portiane, OR	•			9			•	a		75	75	100
		1 : (							1		26	25	245
Stap'eu Irc.	Framingham, MA			•							100	100	122
Starbucka Corp.	Soutric, WA							•	•		100	90	208
Starcom MediaVost Group	Cricago, IL						•				160	100	
Statwood Hotsis & Resorts Worldwide	Stamford, CT				- 6	•					100	100	400
State Farm Group	Bioomington, IL					•		•			95	95	44
State Stront Corp.	Boston, MA					•			•		100	90	268
		X :	7								30	30	354
Steolonse Inc.	Grand Rapide, MI		•		•	•		•	•		390	90	758
Steptce & Johnson LLP	Washington, DC					0			.0.		90	80	3 2
Stinson Leonard Street LLP	Kanses City, MO								•		100	90	
Sicel Rives LLP	Portland, QR	•	•			•					100	100	
Stryker Corp.	Kalamatoo, MI		•						0		65	18	306
Subaru of America Inc.	Cherry Holl, NJ	•	0	•	•		•				9.0	90	152
Sulivan & Cromwel CLP	New York, NY										190:	90	1/2 1
Sur Life Enancetine, (U.S.)	Wuiteday Hills, MA		•	•							100:	100	-
SurPower Curp.	San Jose, CA		9"						b		76	75	833
SunTrust Banks Inc	Atlanta, GA		•	•			•	•			106	100	239
Supervaluinc.	Eder Praise, MN							•	0		96	90	86
												0	460

Teachers insurance and Annuity Association. College Retrement Equities Fund

			e:			Gritorio	n,								
	* L.										9		100		
		15 prints	00,000	21. T.	201175	10 pouns	30 peints	10 pen y	(5 points	255 points	GE History	Į,	8		
		20	Ų,	=	0.0	10,	9	ğ	1	13	- H	- E	8		
Employer	Headquarters Location	1 a	th	2a	2b	7c	3 a	dE	4	5	50.02	2014 CEI Rating	Fortune 1000		
Sutherland Asbil & Broncen LLP	Atlanta, GA					4		1							
Symantec Corp.	Mountain View, CA										150	100	10000		
	71031 (a) Y ON, 627										30	0	5935		
		ľ									18	15	1000		
T. Rowe Price Associates inc.	Baitmore, MD			*							1490	100	WALLS		
			-	-	Ť	1.0	-	-			744	0			
Target Corp	Michapole, MN										\$810	100	10000		
TD Bank, N.A.	Winnington, DE										160	100	100000		
TIAA-CREF	New York, NY										190	100			
Tech Data Corp.	Croarwater, FL										100	100	1000		
hand the same of the same						-	7.	-	-		15	15	1000		
Terret Healthcare Corp.	Dales, TX		0					3			60	45	Name of		
											16	15	Sec.		
5-8-											50	45	70.00		
Testa Motore Inc.	Pais Alto, CA										100				
		1							100		15	15	96		
Texas instrumente Inc.	Dalas, TX										90	90	10000		
Textron Inc.	Providence, Rt								ь		50	50			
The Cosmopolitan of Las Vogas	Las Vegas, NV										100	100	2000		
					-						16	16	426		
The Wendy's Co	Dubin, OH	. 0									20	55	809		
Therma Esher Schedilic Inc.	Weitnern, MA							•			8	БО	220		
Thompson Coburn LUP	Saint Louis, MO										100	100	9.00		
Thompson Hire LLP	Cleveland, OH	•									100	100			
Thomson Reuters	New York, NY								•		100	100	-		
Thirvest Financial	Minneapolie, MN								p		46	15	325		
Tiltany & Co.	New York, NY							.0			95	95	611		
Timo Warror Cable Inc.	Now York, NY	•						•			160	100	134		
Time Warner Inc.	New York, NY		0.					0			100	100	105		
		-									30	30	493		
TJX Companies Inc., The	Framingham, MA							•			100	95	118		
T-Mobile USA Inc.	Bollevue, WA	•		•				•			100	100			
Towers Watson & Co.	Azington, VA			•	•			•			100		649		
Tayota Financial Services	Tonlance, CA	•					•				100	100			
Toyota Motor Sales USA Inc.	Толенса, СА	.0			8				0		1/30	100	8.28		
Toya R' Us Inc.	Wayne, NJ							1.			78	75	204		
Transamenca Corp., The	Cecar Rapida, IA	1		•	1						20	20	(1 × 2)		
Travel Impressions Ltd.	Farmingdale, NY	•					10	*			65	80			
		10									15	16	329		
Iravelors Companies Inc., The	Nnw York, NY										90	90	116		
Trave/port Ltd.	Parappany NJ		•					•	0		:65	65	100		
Tropicane Lau Vogea, The	Lae Vogau, NV			•				•	•		90	90	12		
Troutman Sandera LLP	Atlanta, GA		•	•	•		•	•			150	100	30		
Tive Value Co.	Chicago, IL	•					•	•	D		75	80			
						l l		10	Į Į		10	10	173		

Appendix B Ratings and Criteria Breakdowns

		Critorion											
												_	
		2016.9	571130	AN OR	211.52	IU pers la	241100	10 oc nits	f6 points	-25 points	1	2014 CEI Rating	8
		un.	0,0	-E	10 %	10.5	0.00	10.5	5	88	1	# F	2
											2015 GEI R	4	Fortune 1000
Emplayer	Meadquarters Location	ta	1b	20	2h	2c	3a	3 b	4	5	ä	×	5
Turner Construction Ce,	New York, NY	•					•				90	90	1
											36	15	83
U.S. Barcorp	Minneapolis, MN								•		160	100	132
UBM ptc	Marhassel, NY			•							40	60	
UBS AG	New York, NY				•			•	•		160	100	
WALLEY CO.											36	30	388
Ultimate Software Group Inc., The	Wastan FL				•				•		68		83
Unitover	Englewood Chife, NJ		•	- 0							100	100	
Union Bank	San Francisco, CA								•		-500	100	
Union Pacific Corp.	Cmaha, NE				.0		0	. 0			70	70	138
Unioyo Corp.	Sivo Boli, PA	. 0									40	40	621
United Anlinea	Chicago, IL								•		100	100	79
N-may have been been been been been been been be													474
United Parcel Service	Atlanta, GA	0	•				•	0			95	90	53
											8	0	139
											16	0	147
											115	15	484
United Technologies Corp.	Hartford, CT		•		.0						100	100	50
Unitablea th Group Inc.	Minnetonka, MN			•		•			•		100	100	17
		-									38	15	337
Unum Group	Chattencoga, IN							0	*.		60	60	257
		8									15	15	248
US Arrwaya Group Inc.	Tempe, AZ		0	•			•		•		90	90	199
US Fopos Inc.	Rosemont, IL	.0			•						76	75	
Valasas Communications Inc.	Evor:a, MI										85	65	890
		- 0									18	15	0
Venguard Group Inc.	Malvon PA	.0	•								9-6	95	
											16	0	391
Varizon Communications Inc.	New Jorsey, NJ							0			90	100	16
Viscom Inc.	New York, NY		•			•			•		100	100	198
Vinson & Elkine LLP	Houston, TX				•		•		•		160	90	
Virgin America	Duringanio, CA	•	•		•	•		•			100	90	9
Viaa	San Francisco, CA		•		•	D			•		100	90	260
Vistean Carp.	Van Buren Township, MI			•				•	Ð		90	80	359
Volkawagen Group of Amorica Inc.	Herndon, VA					0					100	100	200
Vorys, Saler, Seymour and Pease LLP	Columbus, OH	•						•			80	80	11.5
Voya Financial	New York, NY	. 6			8						100	100	- 50
		15.									15	0	438
W.W. Granger Inc.	Lake Forest, IL				•		٠	•	•		100	30	295
Wachiell, Lipton, Resen & Katz	New York, NY						•			N	100	100	
Waddof & Road Financial Inc.	Overland Park, KS	•	•						•		ns	40	112
Welgreen Cc.	Deerfield, fL			•			•			1 1	100	100	37
Wal-Wart Stores Inc.	Bentanville, AR				•			•			96	60	-1
Wall Discoy Co., The	Burlbank, CA	0	•	•		•	٠				100	100	66
Weshington Post Co.	Washington, OC			•	10				- 1		20	20	580

			Chitorion									ı	
		Spensy.	'S ocurs	th aners	10 pents	U petitis	0.00	10 ad n ts	להיישם עלו	25 points	Pating	2014 CES Reting	1000
Total Control											2015 GID	014 CE	Fortune 1000
Employer	Headquarters Location	la	1b	39	2h	2¢	3a	Зb	4	5	8	N N	*
Waste Management Inc.	Houston, TX			•			•	0	•		96	90	200
Wawa hrc,	Wawa, PA	a									96	30	100
Worl, Gotshai & Manges LuP	Now York, NY	•		4			•		•		100	100	100
W 48 - 1				1740							30	15	1
Well-Point Inc.	Indianapolia, IN		•		•		•	•	۰		100	90	-47
Welle Fargo & Co.	Son Francisco, CA		•								100	100	10000
											5.65	0	1000
												0	Section 1
		-	DC.								20	30	222
					-						1316	0	283
	F		-								30	30	445
Weyerhacusai Ca, Whirlpool Carp.	Federal Way, WA					122	.0.		.0		65	8.5	363
White & Case LLP	Senton Harbor, MI			*					.0		100	100	154
Whole Foods Market Ing.	New York, NY			۰	0	•	•		0		100	100	1
Wildman, Harrold, Alten & Dixon LLP	Austri, TX						•	۰			75	75	232
Williams Companies Inc.	Chicago, IL							•			35	45	-
Williams Mulen PC	Tules, OK				1		•	•			0.5	60	342
Williams-Soroma Inc.	Richmond, VA	•	•		0		•	•	0		U.O	90	13.4
Wilke Fort & Galagner LLP	Sen Francisco, CA		•				•		•		90	80	582
Wilmer Cutter Pickoning Hate & Dorr LLP	New York, NY							•			70	85	100
Wison Sons ri Gnodroh & Rosel PC	Westington, DC Pain Alin, CA							•			106	100	
AN WILL COLLEGE AND COLUMN OF LANGES SAFA	ran Aus, CA			•	a		•	•	•		AS	85	1450
Winn Dixe Stores Inc.	Jacksonville, FL						4				16		414
Wineton & Strawn (LP	Chicago, IL										46	45	圝
Wildonian Energy Corp.	Wilwardon, WI				-						100	100	and the
Womble Carlyle Sanor dgo & Rice, LLP	Winstor-Salem, NC										100	45	557
	7773107 02 011,110	2			-						30	90	200
WPP Group USA	New York, NY										80	80	74
Wyerh	Madison, NJ										45	45	8.51
Wyndham Worldwide Corp.	Parsippany, NJ										100	100	508
Wynn Rosens Ltd.	Lau Veges, NV										100	100	528 478
Xeol Energy Inc.	Monapolis, MN										90	75	266
Xerox Corp.	Norwalk, CT					. 1					100	100	131
Xylent Inc	White Plains, NY							1			85	65	612
Yahadi Inc.	Surryvsie, CA				•					1	100	100	494
Yela Inc.	San Francisco, CA									1	100		1500
Yasing's Market Co.	Tustin, CA					~					65	60	- 17
YRC Waridwade Inc.	Overland Park, KS						1				30	20	498
Yum: Brance Inc.	Louisville, KY	•									80	80	201
ZenithOptimicla	New York, NY										TOC	100	110
Zurion North America	Scheumburg, IL									1	65	65	
	-	~~ (	n = -	-					- ()	1	No. of Lot		100

CEI 2015 Appendices

# Appendix C Ratings by Industry, Descending Score

#### Corporate Equality Index Rating Criteria

- 1a Prohibits Discrimination Based on Sexual Orientation (15 points)
- 1b Prohibits Discrimination Based on Gender Identity or Expression (15 points)
- 2a Offers Partner Health/Medical Insurance (15 points)
- 2b Has Parity Across Other "Soft" Benefits for Partners (10 points) (half credit for parity across some, but not all benefits)
- 2c Otters Transgender Inclusive Health Insurance Coverage (10 points)
- 3a Firm wide Organizational Competency Programs (10 points)
- 3b Has Employer Supported Employee Resource Group OR Firm-Wide Diversity Council (10 points) Would Support ERG # Employees Express Interest (half credit)
- 4 Positively Engages the External LGBT Community (15 points) (partial credit of 5 points given for less than 3 efforts)
- Responsible Citizenship Employers will have 23 points deducted from their score for a large scale official or public anti-LGBT blemish on their recent records (-25 points)

#### Ratings in Gray

Unofficial ratings of the Fertune 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.

■ www.hrc.org/cei

Appendix C Ratings by Industry, Descending Score

	10		Criterion											
	€	1	F.	5	8	4	3	-24		a a	2014 CEI Rating			
	p. 50 g	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Spenier de	000	10 points	10 post 1	(Gphrth	5000	-25 pents	2015 CELFE	2	Fortune 1000		
	-						-	000	η,	3	4	ığ.		
Empfoyer Headquar	less Location ta	1b	2a	2b	20	3a	3ъ	4	5	Ř	8	P.		
Advertising and Marketing		1												
Digites LB: Boston, MA										300	100			
Interpublic Group of Compenies Inc. New York, I	NY							•		141111	100	386		
Lee Burnett Company Inc. Chicago, IL		•								1640	100			
MSLGROUF America: New York, 8						•		•		ao	100			
Ogslvy Group Inc., The New York, I	NY	•								200	90			
Publica Healthcare Communications New York, I	NY •					•				5001	100	50		
Publics Inc. New York, I	NY .							•		tetis	100			
Razorfeh Seattle, W	4						•			100	100	5		
Starcom Media Vest Group Chicago, IL										596	100			
ZenthOptmode New York, 1	ii a					•	•			10c	100			
Ro:Sources USA Inc. Long Island									- 4	85	100			
Freisnman-Hillard Inc. St. Louis, W	1									60				
WPP Group USA New Yark, N							•	D		80	80	l°:		
Emmis Communications Corporation Indianapolis										75	75	1		
Omnicom Group New York, 8										55	80	191		
Valassis Communications Inc. Livonia, MI										nh.	66	893		
Aerospace and Defense										_		_		
Boxing Co. Chicago, IL										100	100	30		
Lockheed Martin Corp.   Bolisada )						•				100	100	59		
Northrop Grumman Corp. Fails Chuic	h, VA					•				100	95	120		
Raytheen Co. Weitham, M	1A		•	•		•				100	100	124		
Rockwell Controllice. Gedar Rapi	dn, IA									95	90	511		
BAE Systems Inc. Adogram, V	Α			•						90	85			
Exelia McLean, VA										96		453		
Gorreral Dynamics Corp. False Churc	h, VA			0				•		86	85	98		
Honeywell International Inc. Mores Town	riship, NJ	100								75	85	78		
Attent Techsystems Inc. Arington, V	Α									50	50	519		
Textron Inc. Providence	, RI		0					*		50.	50	225		
										30	30	197		
Security Sec		24								30	30	355		
Airlines														
Alaska Air Group Inc. Seattle, WA						•				100	90	515		
American Artings Foil Worth,	.TX						0.			100	100	121		
JetBlue Arwaya Co:p. Long Island	City, NY									100	90	495		
United Airlines Chicago, IL					9					700	100	79		
Virgin America Burningama.	, CA		•			•				1248	90			
Deta Air Lines Inc. Alfanta, GA										90	90	83		
Soulnwest Artnes Co. Dellas, TX				•		•	•	0:		90	90	164		
US Aliwaya Group Inc. Tampe, AZ	0		•	•			•			90.	90	199		
Apparel, Fashion, Textiles, Dept. Stores														
Levi Straues & Co. Sun Franco	ico, CA		•					•		100	100	520		
Nike inc. Bewurter .	OR •	•			•	•	•			100	100	126		
			0		- 3			a		90	90	107		

Appendix C Ratings by Industry, Descending Score

						Criterio	ח						
		1	1	1		1	1	1	1				105
		th porte	A 1450 P.	Property.	Capitals	10 op 10	10 sos 1	10 por 5	15 aoritt.	-2% pv its	CE! Rating	2014 CEI Rating	Fortune 1000
Employer	Headquarters Location	la	lh	2a	2h	2c	3a	36	4	5	2015	2014	Fortu
Macy's Inc.	Cinc enati, OH										100	90	109
Raiph Lauren Corp.	New York, NY										90	90	370
Aéropostale inc.	New York, NY										86	85	839
Ad das America	Portland, OR					-					80	15	0.00
Hanesbrands Inc.	Winston-Salom, NC							-			786	60	518
PVH Corp.	New York, NY			-	1						20	70	422
L.L. Bean Inc	Frosport, ME							1			79.55	65	
Jorga Group The	New York NY										40	70	608
Automotive	7707 7017,777	1									-		
Chrysler Group LLC	Auburn Hills, MI										100	100	
Fora Matar Co.	Dearthon, Mi										700	100	10
Gurera: Metals Co	Detroit, MI										100	100	7
Nissan North America inc.	Frankin, TN										106	100	
Testa Motors (ng	Paio Ato, CA										100		
Toyota Motor Seres USA Inc.	Torrance, CA										106	100	
Vokswagen Group of America Inc.	Hainden, VA										100	100	200
Subaru of America Inc.	Cherry Hill, NJ					100					940	90	
Vistean Corp.	Van Buran Township, MI										90	80	350
Hyundai Motor Amenca	Fountain Valley, CA										75	- 00	
Lear Corp.	Southlield, MI										75	15	107
Bridgestone Americas Floxding Inc.	Nasny Fe, TN				,						70	70	
Hertz Global Holdings Inc.	Park Ricgo, NJ						-				Als	65	293
Group ) Automotive	Houston, TX						1				8.0	15	343
Newstar International Corp	Late, It			100							440	40	216
ATTE	E (16, 15										30	15	317
Dana Holding Corp	Masmee, DH										30	45	358
Cooper Tre & Rubber Co.	Findley, OH							В			25	25	500
	(()	1 .									16	15	177
	Appendix of	1 .									15	30	358
											16	15	197
		1					. 3				16	15	168
		1									15	15	349
											10	10	173
											18	0	20.3
		1									0		307
Sanking and Financial Services													and the second
American Express Co.	New York, NY			0.			•		• 1		100	100	90
Ameripreo Financial Inc.	Minneapola, MN										100	100	263
Bank of America Corp.	Charlotte, NC						•				100	100	21
Bank at New York Majian Corp., The	New York, NY						•				166	100	180
Bardays	New York, NY										106	100	
BlackRock	Now York, NY										100	100	286
BMCI Bankcorp Inc	Chicago, IL										100	100	100
BNP Paribas	New York, NY		0				•				100	100	100
			100			1.00		- 3	- 10		Victoria		

						Criterio	n						100
					1		l)						
		1000	4343	25	Shirts	s)mbg.	黄	V*	<u>4</u> 7	and.	1	2014 CEI Rating	8
		5 5	62	Spekki M	00.01	27	10 proofs	10 points	Shauc 2	trond ex-		2	9
		0		1							2015 CEI RO	14 C	Fortune 1000
Employer	Heatiquarters Location	Tan-	1Ь	2n	2b	2¢	3la	3 P	4	ō	2	8	2
Capital Markete Company NV, The	New York, NY										100		417
Capitál One Financial Corp.	McLaan, VA										100	100	127
Charleo Schwab Corp., Tho	Sun Francisco, CA										100	100	488
Cagroup Inc.	New York, NY				. 0				a		100	100	26
Comerca Inc.	Daffas, TX	•									100	90	772
Crada Suessa USA Inc.	New York, NY				.0		0		•		500	100	
Depusitory Trust & Cleaning Corp., The	New York, NY				•						100	100	110
Deutsche Bank	New York, NY						•		•		100	100	1000
Discover Financial Services	Riverwoods, iL										100	100	204
Easton: Bank Corp.	Boston, MA			•							100	100	1
Federal Home Loan Mortgage Corp. (Fieddie Mac)	McLuari, VA					b	0		0.		100	100	31
Faderal National Mortgage Association (Fannia Man)	Washington DC						•				100	90	12
Federal Reserve Bank of Atlanta	Atiants, GA										100		
Federal Roserve Bank of Boston	Boston, MA						•				100	80	P 1
Federal Reserve Bank of Richmond	Richmond, VA					•		10			100	80	\$
First Data Corp.	Atlama, GA				•						100	45	254
Goldman Secha Group Inc., The	New York, NY		•			•			•		100	100	68
HSBC USA	New York, NY		•		•	•					100	100	100
Huntington Bancahares Inc.	Columbus, OH					•					100	100	707
JPMorgan Chase & Co.	New York, NY					•			•		100	100	18
KeyCcrp	Clevaland, OH										106	100	510
Meater Card Inc.	Punshase, NY				•						100	100	348
Maady's Caro.	New York, NY							•			106	100	765
Moligan Stanley	New York, NY					•	•				100	100	96
Northern Trust Corp.	Chipago, L	. 0	•		•						.100	100	561
PNC Firencial Staylors Group Inc., The	Pritaburgh, PA							- 0			.100	100	170
Prudential Financial Inc.	Nowark, NJ				.0				•		100	100	29
RBC Capital Marketa LLC	New York, NY					•		10	•		700	100	
RBC Wealth Management	Mirmapolia, MN			•				16			106	100	
Robert W. Baird & Co. Incorporated	Milwaukoe, WI			•	•		•	•	•		100	90	100
State Street Corp.	Boeton, MA						•	•			100	90	268
SunTrust Banks Inc.	Attante, GA						•	•			100	100	239
T. Rown Price Associates inc.	Baitmore, MD		•					•			100	100	700
TD Bank, N.A.	Wilmington , DE			•		.0		•	•		100	100	
TIAA-CREF	Now York, NY	.0.							0.1		100	100	97.
Toyota Financial Serviceu	Torrance, CA				10				. 0		100	100	
U.S. Bancorp	M:nneapole, MN					•			9		100	100	133
UBS AG	New York, NY								•		100	100	821
Union Bank	Sun Fragierson, CA		•					•	•		100	100	
Vien	San Francisco, CA							•	•		1400	90	260
Walls Fargo & Co.	San Francisco, CA	•									166	100	25
Vanguard Group Inc.	Maivom, PA			•	1			•	۰		185	95	11 7
Corologio	Santa Ana, CA			•			۰				90	90	8
Federal Reserve Bank of Cleveland	Cleveland, OH		0						. 0		90	60	

Appendix C Ratings by Industry, Descending Score

						Criterio	n						
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		4.5	1.4	1	100	20		<u> </u>	d		3	2014 CEI Rating	9
		the power	Page 15	"S point	Opor.	Count	1000	Coart	"S powds	-25 punts	087 Ra	2	Fortune 1000
						,,,		1		7,	8	7	Ě
Employer	Headquarters Location	1 a	1h	2a	2h	2c	380	3 h	4	5.	2018	8	Ē.
Fifth Third Bandom	Cinc chat, OH		6								90	90	361
Financia) industry Regulatory Authority Inc.	Washington, DC										940	90	
McGraw Hill Financial	Now York, NY										90	90	390
Moiningstay Inc.	Chicago, IL		0								90	BO	
Raymond James Financial Inc	St. Potersburg, FL		•						•		940	90	601
Regions Financial Corp.	Brimingnem, Al.		0	•	- 18	į.					85	60	401
Alianco Bernstoin	New York, NY				-0						200		
BB&T Corp.	Winston-Salem, NC			•	1.0				•		60	80	251
Brown Brothere Hamman & Co.	New York, NY								•		.76	65	
First Honzon National Corp.	Memphia, TN	6	•				0	0			76	70	
RBS Securitor re.	Standord, CT						0		•		75	76	
Caracian Imperial Bank of Commerce	New York, NY				18						70	70	
hyesco Lo.	Allanta, GA										70	16	570
M&T Bank Corp.	Buttate, NY				18				•		70	70	521
Compass Darroshpres Inc. (BBVA Compass)	Birmingham, AL								•		65	05	
Franklin Resources the	Sun Matee, CA	0						*	P		66	40	362
Waggott & Reed Financial Inc.	Overland Perk, KS				*						85	40	
ETRADE Financial Corp.	New York NY		-								.95	55	883
NYSE Europext (to.)	New York, NY				18						45	45	616
SLM Corp. (Sa. a Mao)	Newark, OF										46	45	418
Chambertin Edinords & Associates inc.	Atlanta, GA			9				- 5			40	40	
H&R Block Inc.	Karsas City, MO										35	36	665
		1.0	-								30	30	353
		1.0									30	30	445
Dun & Bradameet Corp., The	Short Hiller, NJ										30	30	
		1 .									16	15	221
				1							.10	15	434
											16	15	277
CIT Group Inc.	New York, NY										76	15	589
		1										0	39
		1											491
		Ţ.		)									289
Chemicals and Biotechnology										r	-		-
BASECO: p.	Fornam Fark, Nu			•	•	•					24161	100	
Dow Chemical Co., The  E. I. du Pont do Nemours and Co. (DuPont)	Micland, MI				•		•	•			tohij	100	52
Egolab Inc.	Winnington, DE							•			300	100	72
Generatech Inc.	St. Paril, MN							•			1230	100	229
Morsanto Co.	South San Franciaco, CA										100	100	000
Air Products & Chemicals Inc	St. Louis, MO	17									n in	100	206
Bayer Corp.	Attentown, PA Pateburgh, PA					-		•			an an	65 60	273
Celanuan Corp.	-										90	15	396
PPG Industries Inc.	fiving, TX Pittoburgh, PA						1				76	75	182
Praxe r Inc.											ari	50	1000
E Reproprie 1920 ME	Dachary, CT	1	100			1		-				50	1111

						Critario	n.					- 1	
							-	1		•	7	, l	
		**************************************	di di	THE PROPERTY.	1C pairrs	It sollts	10 points	(F, an	12 point.	23 pb 18	2015 CEF Reting	2014 CEI Rating	Fortune 1000
Employer	Headquarters Location	1a	1b	2a	2b	2c	За	36	4	5	2015	2014	Fortu
Hunteman Corp.	Sait Lake City, UT										4.0	40	24
											30	15	28:
											1.5	15	32
		] -				i l					7.5	15	37
											3.55	15	32
											9	0	41
Computer and Data Services											III.		
Automatic Data Processing Inc.	Roseland, NJ				•						106	100	25
Benariodge Energial Solutions Inc.	Lake Success, KY	0									100	100	85
EMC Corp.	Hapkinton, MA				•						100	100	130
Hewlett-Packard Co.	Palo Ato, CA										160	100	11
Tech Date Corp.	Clearwater, FL		.8.	0						-	100	100	111
Lanahowa Group	Mamisburg, OH										90	90	
Computer Sciences Corp. (CSC)	Fais Chuich, VA				- 1						95	85	170
FactSet Research Systems Inc.	Narwerk, CT									. 1	Hit	80	
SRA International Inc.	Faytax, VA										40	60	
Uniaye Corp.	Blue Bell, PA										46	40	621
Keane Inc.	Boston, MA							a.			25	25	
											96	15	362
											15	15	240
Computer Hardware and Office Equipment													
Apple Inc	Supertino, CA										TOG	100	
De! Inc.	Round Rock, TX										100	100	61
Leymark International Inc.	Lexington, KY								•		100	100	608
NCR Corp.	Duiuth, GA										100	90	441
NotApp Inc.	Surnyvale, CA				D						100	90	408
Xerox Corp.	Norwalk, CT										100	100	13
CDW Carpy	Versor Hile, IL								•		90	90	26
Ingrant Micro	Santa Ana, CA										90	90	76
Avnet no.	Phoen s, AZ							*			80	70	111
lua ght Enterprises Inc.	Tompo, AZ		4								70	0	470
Scagato Tochnology LLC	Scotta Valley, CA										60	46	
Princy Bower Inc.	Stamfore, CT										80	35	486
Ager Iec.	fring, CA									. 1	35	35	
	4113137										30	0	262
			-				1				36		222
X		1 -									15	15	141
											16	15	484
Spitware House International	Somaraot NJ										16	15	
Computer Software	gradient ald [11]												
Adobe Systems Inc.	San Jose, CA										100	90	540
CA Teshnologies Iro,	felandia, NY											100	496
	researcher 19.1			-							Aire	,	Children

Appendix C Ratings by Industry, Descending Score

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		5 por (*	Number 1911	Brown.	1Coart	Though.	"Opport,	(Cpart):	15 powts.	-24 powts	20 5 SE Rating	2014 CEI Pating	Fortune 1000
Employer	Huadquarters Location	f,a:	3h	2a	2h	24:	За	Зb	4	5	Ř	କ୍ଷ	5
Intuit Inc.	Mountain View CA										100	100	<del>\$</del> 58
Microsoft Corp.	Roomand, WA						•				100	100	36
Oracle Corp.	Roswood City, CA						•	4			100	100	80
ualestorce.com brc.	San Francisco, CA			.0							1210	100	702
SAP Amenda Inc.	Nowtown Square, PA			•	•						100	100	
Symantec Carp.	Mountain View, CA		.0			•			•		100	100	379
Avuya Inic	Santa Ciaro , CA			•				b	- k		-28	80	477
BMC Softwaru Inc.	Hauston, TX										70	80	890
Sortware AG USA Inc.	Reston, VA							•	16		10	70	
Ultimate Software Group Inc., The	Weston, FL										6.5		
Сатрэмис Согр.	Delrait, MI								D		60	60	
Alisonota-Mays Healthcard Solutions Inc.	Chicago, L					-					30	30	
McAtaa Inc.	Santa Clara, CA							*			29	25	
Consulting and Business Services													
AJ: Kearney his	Gircago, L.		•		•	•	•				106	100	100
Accepture	New York, NY		•			•	•				100	100	
Aor Corp.	Chicago, IL		6			•		•	•		100	100	
Arsmark Corp.	Philadelphia, PA			•				. •			100	90	205
Bald & Co. Inc./ Bridgespan Group	Boston, MA		•			•			•		100	100	
Booz Affen Ham fron Inc.	Mcteen, VA				•			•			100	100	436
Boaton Consulting Group	Boston, MA		•	•		•					100	100	
De o:tte LLP	New York, NY	-0.	•								100	100	
Huran Consulting Group Inc.	Chicago, IL						•				100	100	
International Suamesa Machinea Corp. (IBM)	Armonis, NY				•			Hell			100	100	20
KPMG LLP	New York, NY		•	•			•		•		100	100	
Marsh & McLennan Companiès Inc.	New York, NY						•				100	100	228
McKraey & Co. Inc.	New York, NY		•		•	D		•	•		100	100	
Navigant Consuling Int.	Chicago , IL			•		•			•		100	100	
Nielsen Co., The	New York City, AY		•	•	•	•		•	•		106	100	
PricewsterhouseCcopera LLP	Nuw York, NY						•	•			toe	100	
Slatom Consulting	Seattie, WA		•	•	•			•	•		100	90	
Thomson Reviets	New York, NY				•		•	•			100	100	
Towers Watson & Co.	Arington, VA			•			•		•		100		649
Adocco North America LLC	Jucksonville, FL		•		•		•	•			96	90	
Capgemini V.S. LLC	New York, NY		.0				•	•			90	90	
Grant Themton LLF	Chroago, IL		•		•		•	•	•		90	90	
MarpowerGroup	Miwaiken, WI		•	•	. 0			•			95	90	140
Rebort Haif International Inc.	Menlo Paik, CA	•			•	ļ,		- D			1995	85	571
Sap ert Corp.	Boston, MA		•						9		80	80	100
Intoeys Limited Inc.	Plano, TX				•	i					70	70	75.
Hairs Interactive Inc.	Now York, NY	•	•	•	D			B			66	70	
Сопундуз Согр.	Circimati, OH				0			8			56	35	906
			-			1					30	30	402

Appendix C	Ratings	by Inc	lustry,	Descendir	ig Scare

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		l poor q	Tool	19 BOOKT	Coort	10.000.01	0.00	Cpart.	5 2071	Sh pump	20 5 offi Raling	2014 CEI Rating	0001 9
		Ŧ.	3	送	5	5	C	10	5	Ş.	-	- C	nue.
Employer	Headquarters Location	La	1b	2a	2h	2c	За	36	- (4)	:5:	201	2014	Forts
Education and Child Care			1.		-	A.					_		-
Bright Honzone Family Solutions Inc.	Waterlown, MA									ĺ	90	90	100
Energy and Utilities				1									
Conuci dated Edison Co.	New York, NY										100	90	226
Exelor Corp.	Chicago, IL			*							14163	100	129
PG&E Corp.	San Francisco, CA			0	•						199	100	183
Portiana Garassi Electric Co.	Portlatti, OR								•		16161	100	
Sempla Emergy	San Dago, CA										100	100	281
Southern Caltoma Edson Co.	Rosemeac, CA								•		100	100	
Constellation Energy Group Inc.	Battmore, MD					£.,			•		44(2	90	
Duko Energy Corp.	Charlotte, NC										4011	90	145
Entergy Corp.	New Orleans, LA										-00	80	261
National Grio USA	Brooklyn, NY										96	90	E31
Public Service Enterprise Group	Newark, NJ				0						96	90	276
Xoel Energy No.	Minneapolis, MN										910	75	266
Alicant Energy Corp.	Madison, WI										26	85	656
Ameren Corp.											65	85	373
Dominion Resources Inc.	St. Louis, MO										1000	65	4 250
	Richmone, VA										975		210
Pepco Holdings Inc.	Washington, DC	•									86	65	483
Amarican Electric Power Co. Inc	Сейнтона ОН			0	۰						80	80	185
Lacioce Group (nc., The	St. Louis, MO	1				1		•	•		d)	80	
SunPower Corp	San Jose, CA		•	•	•						75	76	833
NertEra Energy Inc.	Juno Beach, FL		•				•		•		3.0	70	190
NRG Energy Inc.	Princetor, NJ		•	•					. 0		761	50	314
NV Energy Inc.	Lae Vogas, NV						•		0		70	70	718
ONEOK Inc.	Tulsa, ĐK			•	•						76	30	219
Southern Co.	Atlanta, GA				-				•		70	45	171
Pacifi Corp	Portland, OR							P			66	80	
PPL Corp.	Allentown, PA		•		•						65	65	224
Prinacle Wood Capitel	Ptsoen s, AZ		•	•							**	36	688
RRI Energy Inc.	Houston, TX										- 46	50	FILE
Severit Treat Services Inc.	Fort Washington, PA			•	b.						50	50	
Wisconsin Energy Corp.	Milwaukon, WI	•							•		45	45	557
Саір-ля Согр.	Houston, TX	•		•	1.			В			40	40	459
CMS Enrargy Services	Jacksen, MI						•		-8		:35	35	408
DTE Energy Co.	Datror, MI				1.0				30.7		35	35	299
PNM Resources Inc.	Albuquarqua, NM						3				15	35	
		1	1								-311	30	212
											80	30	388
Mirant Corp.	Atlanta, GA	•									340	30	
Northeast Uthhas	Springhero, MA				×						36	30	402
		4									16	15	344
		100				1					18	15	447
		-									15	0	157
											16		480

Appendix C Ratings by Industry, Descending Score

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		सम्भववं द.	S specific	Theory	10 Bornts	Straight	0.50	Opposit	Sagnific	로마하다 취소.	CE! Rating	2014 CEI Rating	Fortune 1000
Employer	Headquarters Location	ta	16	2a	2h	2c	= Oa	3h	4	5	5 05	2014	Fortu
Allegnany Energy Inc.													
Muddinguis Es an Maria	Greenshuig PA										15	15	100
											•	15	lines.
												0	101
													181
Engineering and Construction			-			1			1			0	4-310
AECOM Technology Corp.	Las Angeles, CA					1					gn	90	320
CH2M HILL Companies Ltd.											ēn.	90	1000
Tumor Construction Co.	Englewood, CO New York, NY										zat)		
Fluor Corp.											75	90	
Black & Vootah Corp.	Irving, TX Overland <sup>th</sup> auk, KS										ne.	45 65	110
Jacobe Engineering Group Inc.											54		249
KB Homo	Pasaduna, CA										50	50 50	249
Perkons + W∜ Inc.	Los Angeles, CA Chresgo, IL		,								45	45	
Talinos Tatalian	Un'cago, iL		100	, T	1						310	0	334
Ryland Group Inc., The	Calabagas, CA										20	20	33.4
	Carabacae, CA										15	15	399
											35	15	243
	7										15	1.0	397
											18	15	426
											19	15	248
Estartalment and Electronic Media							-				- Charles	-	
AMC Entertainment Inc.	Leswood KS										160	100	787
CB\$ Corp.i.	New York, NY										300	90	186
Comcast Corp.	Philadelphia, PA										- 500	100	46
DIRECTV	E Segunoo, CA										150	95	102
SIRIUS XM Radio Inc.	New York, NY										106	100	652
Sony Pictures Entertainment Inc.	Culver City, CA										160	100	
Timo Warner Inc.	New York, NY					0					7 993	100	105
Viscom Iro.	New York, NY										100	100	198
Walt Dianey Co., The	Burbank, CA										1000	100	86
Cox Enterprises for:	Atlante, GA				10			*			510	90	
Sony Computer Enterteinment America LLC	Foeter City, CA										तह		
Northalina	Los Gatos, CA										40	80	629
CC Media Holoings Inc. (Clear Channel)	San Antonio, TX										75	75	407
Live Nation (inc.)	Boverty Hills, CA										70	70	438
Corb's Corp.	Soame, WA										50	50	
Regal Entertainment Group	Knarville, TN								¥.		30	35	742
							9				15	15	91
Food, Severages and Grocertes		£.											
Астисант-Везей Companies Inc	St, Louis, MO					•		•	•		100	90	
Bauta America fro	Bannockbum, IL		0				•		•		100	1	1
Brown-Forman Corp.	Lou avea, KY			•	•			le l			100	100	767
Campbell Soup Co.		110	1					_					338

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						Czitorio	0				100		
		Report 9	15 pages 2.	15 points	10 points	Cpos is	10 post ts	Opoint	· 5 pearle.	• string 32-	Rating	2014 CEI Rating	Fostune 1000
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Imployer	Headquerters Location	1 m	1Ь	2a	2b	2c	3a	3h	4	6	30.18	2017	Fort
Cargilling.	Wayrata, MN										160	100	900
Coca-Cola Co., The	Atlanta, GA					10					100	100	67
ConAgra Foods Inc.	Omena, NE		•			•			•		100	95	200
Darden Restaurante Inc.	Orlando, FL		0								100	100	328
Dehaze America Inc.	Salebury, NC										100	100	
Diagon North America	Norwalk, CT								•		100	100	
E&J Gallo W nory	Modesta, CA										100	100	500
General Mille Inc.	Minneapolis, MN								•		1440	100	169
Kalegg Co.	Battle Creek, MI										100	100	192
Krist Foods Group Inc.	Northfield, IL				0.						106	100	151
Land O'Lakoo Inc.	Arden Hols, MIN										100	100	104
MillerCoore LLC	Chicago, IL										100	100	
Mondelez International Inc.	East Hanover, nj	.0									100		00
Pepa Co Inc.	Purchase, NY										100	100	43
Sideway Inc.	Pleasanton, CA			•							100	100	62
Societa Inc.	Gatheraburg, MD		•								100	100	900
H.J. Homa Co.	Pataburgh, PA	•						×	•		95	85	234
Hain Coleatial Group Inc.	Lake Success, KY	. 0	•		0			•			90	90	
Herehey Go., The	Hershey, PA				0						100	90	384
McDonard's Corp.	Oak Brook, R.				9						90	90	333
Perrod Ricard USA LLC	New York, NY	•						•			96	75	
Superviole Inc.	Edon Praine, MN				ø			•			96	90	88
Green Mountain Oction Roasters Inc.	Waterbury, VT		•								85	85	605
Kroger Co., The	Cinaintali, OH	- 4			a.		-				85	85	23
Burger King Corp.	Miami, FL		•		۵		9				86	55	952
Yumi Brands Inc.	Locisvile, KY										96	80	201
Chipotle Mission Gritting,	Denvor, CO										75	75	763
Gart Eagle ho.	Pittsburgh, PA						•		•		76		
US Foods Inc.	Rasemant, IL		0		•				B		78	76	
Whole Foods Market Inc.	Austin, TX	•					•				76	76	232
Bloomn' Brands Inc.	Tampa, FL							18			20	70	590
Braker International Inc.	Dallas, TX										79.	70	744
Dr Pepper Strappie Group Inc.	Plano, TX	•		.0.							70	70	427
Hormul Foods Corp.	Aust n, MN	•			0			- 4			70	85	310
Compose Group USA inc.	Charlotte, NC							•			05	65	
Wawa Inc.	Wawa, PA	•	•					•			98	30	
Young's Merket Co.	Tuern, CA										65	60	-84
Caribou Coffee Company Inc.	Micheepolia, MN							0			-0	55	1
Gastronomy inc.	Salt Lake City, UT								*		60	70	
J. M. Smucker Co.	Orrvito, CH	•						18			60	60	452
The Wendy's Co.	Oublin, OH	•			B						60	85	809
Ahold USA Inc.	Quincy, MA		0								95	85	
Doan Foods Co.	Dallag, TX		•					0			55	40	217
Palm Management Corp.	Washington, DC				P		٠	0	*		99	65	45 3

Appendix C Ratings by Industry, Descending Score

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		inody,	S chart	, 16 probes	.Coo-1		Topoot.	10,000	11, od 5,	51 ad 95-	26 S CEl Rating	2014 CEI Rating	Fortune 1000
Employer	Headquarters Location	la	Ila	28	26	2¢	3.4	36	4	5	50	20,	For
Bausen & Lomb Inc	Rochester, NY										76	75	
Mayo Cinic	Rochoster, MN					1					Tis.	70	
Ехргеза Scripts Inc.	St Louis, MO			0			-				20	70	24
Patterion Companies (Patterson Dentel Supply)	St. Peul, MN										25	60	636
		1			-					1	40	55	32
Austin Radiological Ason,	Auetin, TX							- 3			4-2	40	
Owans & Mir or inc	Moonan-onville, VA							1			3-5	35	297
A STATE OF THE STA		1.2									465	15	345
		8 -								1	16	15	296
		-									15	15	444
		-		[							16	15	416
Cetarion											a	0	303
1		1									0	15	105
											0	15	423
Healthcare Medical Facilities											Œ		
HCA - Hospital Corporation of America	Nashvillo, TN										75	30	82
Pacific Medical Contors	Seattle, WA							2			60		
Tenet Healthcare Corp.	Daline, TX							*			60	45	269
		1 -									>0	30	184
4-5-14-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1											310	30	378
		-									10	16	311
		-	1								16	16	410
		-									15	15	337
											16	0	391
High-Fech/Photo/Science Equip.											-		
Eastman Kocak Co.	Rochester, NY										tops	100	562
Errat & Young LLP	New York, NY										257(1)	100	
HERE North America LLC	Chicago, L						•				100	100	
Intal Corp.	Santa Clara, CA						•				100	95	54
Madtropic Inc.	Minneapons, MN						•				166	100	172
St. Jude Mndica Inc.	St. Paul, MN						•				25302	85	457
Agrient Technologiea Inc.	Santa Clara, CA						•				90	90	371
Texas instruments Inc.	Dalas, TX						•				90	90	218
Thorms Figher Scientific lice,	Waihem, MA				.*	•					115	50	220
Advancer Micro Devices Inc.	Sunnyvale, CA										26	65	464
Applied Materials Inc.	Santa Ulara, UA		•		*		•	•			76	85	302
NVIDIA Corp.	Santa Clara, DA							•			75		553
ITT Corp.	White Plains, NY			*	*			•	*		0.5	75	861
		1 .	4	100	~						50	45	351
KLA-Innoor Coro.	Mirpites, CA										325	35	681
											76	30	332
		-					j				30	15	211
			-								365	30	487
											100	30	493

Appendix C Ratings by Industry, Descending Score

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		1					1	1					1
		15.00	1,000,0	*Paradel	Coorts	TOPPER	10,004.1	Cpont	5,00015	5 ll od 97-	S OEI Rating	2014 CEI Rating	Fortune 1000
Employer	Headquarters Location	to:	1b	2a	2h	2с	3a	3 b	4	5	2015	2014	Fort
Polaroid Corp.	Walthern MA					1					30	30	8 -
									4		20	20	32
											15	15	27:
		-									16	16	30
											15:	15	42
											15	15	46
											15		444
		100									15	15	31
		1 = 1									16	o	381
				1							0	0	420
												0	43
Howe Pareloling													
Mitchell Gold + Bob Williams	Taylorovelo, NC				•						100	100	
IKEA (U.S.)	Conshehocken, PA		•		•						96	30	п
		-									15	15	336
Hotels, Resorts and Casinos													
Cassars Entertainment Corp.	Las Vogas, NV			0							toe	100	300
Challee Hate's listemational Inc.	Rockville, MD							0			4.952	100	
Hisan Worldwide Inc.	Мсцева, VA							0			200	100	
Hyatt Hatels Corp.	Chaago, IL					. 10		0			100	100	593
InterContinental Holeis Group Amonicas	Atlanta, GA		0								150	90	
Kimpton Hotel & Restaurant Group Inc.	San Francisco, CA			à							100	100	23
Marnott International Inc.	Bothesoa MD										100	100	236
MGM Resorts International	Lac Vogan, NV	. 0						10			160	100	201
Starwood Hotels & Resorts Worldwide	Stamford, CT	. 0				D					150	100	400
The Cosmopolitan of Las Veges	Las Vogas, NV							*			150	100	
Wyndham Worriwjde Corp.	Para ppany, NJ					b					100	100	520
Wynn Records Ltd.	Lac Vegus, NV							. 0			160	100	471
Tropicana Lad Vegas, The	Las Vogas, NV							6			90	90	
Caraco, Inc.	Minnetonia, MN				. 1				*		et i	65	
She	LA, CA							*			95		0.1
Quantanco Weaver Inc.	Greensborn, NC										75		
Host Hotela & Resorts Inc	Buliunas MD					İ					56	15	469
		-									15	18	24
tosurence		107											
AIG	New York, NY							4			Oil	100	36
AXA	New York, NY										1211	100	
Bitle Cross & Bitle Shield of Rhode Island	Providence, RI			*							100		20
B'ue Cross Blue Shield of Florida Inc.	Jacksonvie, FL	0							•		150)	100	
Blue Cross Slue Shield at North Carolina	Chapet Hill, NC								۰		Title 1	85	
On life Grop	Warren, KJ			0							100	100	20:
CIGNA Corp.	Bloomfield, CT				0						300	100	100
OSAA Insurance Group	Wainu: Crank, CA								•		(1GH):	100	
Hartford Financial Services Group Inc., The	Hartford, CT	. 0						10			4,61	100	112

						Criterio	n					1	100
									i		1 13		
		n,	4	4	19 66	l g	Sav da	É	21		1	2014 CEI Reting	2
		5 post 15	4 4 2	Spent	200	children to	- á	20 95 855	3114.4 C	-25 points	CEL No.	2	100
			**					5	-	','		7	Fortune 1000
Employer	Headquarters Location	1a	16	2a	2b	2c	За	36	4	5	2016	201	For
Harvard Pilgrim Hoeth Care Inc.	Wedasley, MA										1490	100	
John Hancock Financial Services Inc.	Boston, MA						•				100	85	
Massachusetts Mutual Life Insurance Co.	Springfield, MA		0	9	•						100	100	94
Mot Life Inc	New York, NY		•		•						100	100	40
Nationwide	Columbus, OH		•	0			•				100	100	100
New York Life Insurance Co.	New York, NY								•		108	90	89
Northwestern Mutual Life inscrance	M∃wasken, WI				•	D					100	90	114
Progressive Corp., The	Mayfield Village, OH								•		100	100	166
Sun Life Financia: Inc. (U.S.)	Worldstoy Hills, MA		0	•	•						100	100	
Voya Financial	New York, NY										100	100	
WellPoint Inc.	Indianapolis, IN										1490	90	47
Ero Insurance Group	Erio, PA										95	30	455
State Farm Group	Bioomington, IL										95	95	44
Allianz Life Insurance Co. of North America	Winneapolis, MN		•								96	60	
Assurant	New York, NY										96	85	309
Esurance Inc.	San Francisco, CA										190	80	
Lincoln National Corp.	Rusroi, PA										100	85	235
Principal Financial Group	Das Morrey, A				•				ø		90	90	290
Travelors Companies IndigThe	New York, NY										96	90	116
AFLAC Inc.	Columbua, GA	0		•			D.				116	75	118
Albiate Corp., The	Northbrook, IL										76E	85	92
American Family Insurance Group	Madison, WI		•								86	55	393
Bite Cross Blue Sheld of Michigan	Detroit, MI										85	85	
CNA Insurance	Chicago, IL			•	-0						185	86	
Hoa th Coro Service Corp	Choago, IL										AS	85	
Liberty Mutual Group	Boston, MA										86	60	61
Paorfic Life Insurance Co	Nowport Boach, CA							p.			ns	85	369
Granworth Financial Inc.	Richmans, VA				•						90	65	271
Hanover haurande Group Inc.	Wordeater, MA										mo	15	522
Standard Insurance Company	Portland, OR										75	75	
Selective Insurance Group	Branchylla, NJ										00	65	101
Zurich North America	Schaumburg, IL				4						- 00	65	
BMC HealthNot Pien	Bostor, MA										60	60	20
Unum Group	Chattanooga, TN								D		50	60	257
Mutual of Omaha Insurance	Omana, NE										310	60	394
CUNA Mutual Insurance Group	Madison, WI										50	30	693
Thirvort hisarcial	Micreapolle, MN							D			46	16	326
Guardian Life Insurances Co. of America, Tho	New York, NY										386	35	238
Loswa Corp.	New York, NY										36	35	188
	1907 1976 141	1									90	15	275
Transamorica Corp., The	Gedar Rapida, IA										26	20	
WI I-I-I	George Rupices, IN	1 -		-	150						48	0	438
		1									0	0	485
		1									0	0	443
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Appendix C Ratings by Industry, Descending Score

						Criterio	n						
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		S port	Cappenia	S port	Chart	3 web.	10,16	dood)	Thou ?	-2% pents	2015 OEL Path	2014 CEI Rating	Fortune 1000
Επρίογοι	Headquarters Location	1a	Rb.	20	2h	2c	За	ЗЬ	4	ő	2015	2014	Fortu
		1									0		49
		1										0	13
Antin I Make Form of December				1							0	0	47
Internet Services and Retailing													
nBay Inc.	San Jose, CA										m	100	19
Facebook Inc.	Merio Paik, CA							0			100		48
Google inc	Mountain View, CA										1416	100	65
Groupanine.	Chicago, iL			0		0.					100	100	85
Yakoo! Inc.	Sunnyvale, CA								•		4917	100	49
Yelp Inc.	San Francisco, CA										Un		88
Amazen,com lite	Seattle, WA										90	90	41
ACL	New York, NY										90	90	88
Ciasa:fice Ventures LLC	Chicago, IL										98	90	
aped a Irc.	Betlevue, WA										<b>4</b> (1)	90	58
Hangver Direct Inc.	Weehawken, NJ										55	70	
	A Partitional Automatical (170)											0	27
are Firms		.1.				1	-			1			-
Akerman LLP	Minerii, FL									1	-100		
ukin, Gump, Straues, Hauer & Feld LLP	Wasnington, DC										106	100	
Nation & Bird LUP	Atlante, GA				0						5498	100	
Aroni Fox LEP	Waarington, DC			9							108	100	
Imod & Parer U.P	Washington, DC										140	100	
laker & McKenze LLP	Chicago, iL										150	100	B
Bingham McCodeisen U.F	Broston, MA										3490	100	ш
Brown Ruenick LLP	Boston, MA										350	100	
Bryan Cave LLP	Sami Louis, MO										1490	100	
Cadwaracer, Wickeranom & Tafr LLP	Now York, NY										1530	100	
Cariton Fraida Jordon Burt				-							104	100	н
Chapman and Outler LLP	Tumpa, FL										100	100	
Choste, Hall & Stowert LLP	Chicago, IL Boston, MA										150	100	
Ceary Gottleob Steen & Hamilton ELP	New York, NY										100	100	
Called Change US LLP	New York, NY										1200	100	
Covington & Builing LLP											3/3/0	100	
Crowell & Moring ELP	Washington, DC											100	
	Washington, DC										1210		80
Davis Wight Tremaine LLP Depeyoran & Primpton LLF	Seattle, WA											100	
Depleyoran & Pumpton Lue	Now York, NY								-		100	100	и
	Phradelphia, PA			•					•			100	
Dentone US LLP	Nuw York, NY			•			:				1000	100	
DLA Pipe	Bertimoro, MD						•				1.30	100	
Joraey & Winney LLP	Minneapolia, MN										309	100	
Dykoma Grasati PLLC	Detroit, MI				•	•					300	100	
Edwards Wildman Palmur LLP	Boston, MA							•			100	100	
Faegre Baker Daniels	Chicago, IL				•	•	•	•	•		105	100	1
Fenwick & West LLP	Mountain Viewi CA										7000	100	

								400				
						Criterio	1					_
		35 pom n.	. Bess. 2.	<sup>1</sup> 15 pront?	Coorse	10 poiles	Doores	10 paints	15 aoetts	-25 portes	Offi Stating	2014 CEI Rating
Employer	Headquarters Location	la	1h	2a	2b	2¢	За	dE	4	ä	2018 081	2014 <
Fincegan, Henderson, Farabow, Garrett & Outnot LLP	Washington, DC										100	90
Fan & Richardson PC	Boston, MA										100	100
Foloy & Lardner LLP	Milwackee, WI										100	100
Foley Houg LLP	Boston, MA		.0				0				500	100
ned, Frank, Harris, Shriver & Jacobson LLP	Now York, NY										100	100
iven Brown Tood LLC	Cincinnati, OH										100	90
Sibson, Durn & Civicher LLP	Los Angeiro, CA										190	100
Goodwin Prooter LLP	Baston, WA										100	100
Irrahaw & Culberteon LUP	Chicago, L										100	100
logar Lovelis US LLP	Washington, DC										100	100
Ioliand & Kinghi LLP	Tampa, FL										300	90
lunton & Williams LLP	Washington, DC										100	100
Biock LLP	Chicago, IL										108	100
&L Gates LuP	Pritriburgh, PA										500	100
artor: Much of Rosenty an LLP											100	100
ng & Spaiding LLP	Chicago, IL										100	100
rkiard & Eira LLP	Atlanta, GA										100	100
amer Levin Natte is & Franks: LLP	Chicago, IL										100	100
and Levinvalles a range LLP	New York, NY New York, NY										100	100
ndosiat & Vernum LLP											100	95
tter Mendelson PC	Michospeils, MN San Francisco, CA										100	100
ayer Brown LLP					•						100	100
CDennatt Will & Emery LLP	Cheage, L			-							100	100
Shark, Tweeri, Hadley & McCley LLP	Chicago, iL New York, NY										100	100
intz, Levin, Colin, Ferrie, Głovsky & Popeo PC											100	100
organ Lewis & Bockros LLP	Boston, MA										100	100
organ & Foerster LLP	Privadelphia, PA										100	100
INON Peabody LLP	San Francisco, CA										306	100
"Morany & Myera LLP	Boston, MA										100	100
Irrick, Herrington & Sutcitte LLP	Los Angelos, CA San Francisco, CA										100	100
attorson Belknap Wobb & Tyler LLP											100	100
au Hastings LLP	New York, NY										108	100
eul, Weiss, Ritking, Wharton & Garlson LLP	Los Angeias, CA Now York, NY										100	100
opper Hamilton LLP									7		100	90
erkins Cole LLP	Privadelphia, PA	1									100	100
eikina Core CEP	Seattle, WA Now York, NY										100	100
verius & Brady LLP	Milwarkan, WI	9									100	90
eed Smith LLP											100	100
ob ns, Kaplan, Miller & Ciresi LLP	Pittaburgh, PA										100	100
op ne, Kapian, Willer & Greek CLP op ne & Gray LLP	Minneapolis, MN										100	100
ones a Gray CCP	Boston, MA										100	
	Chicago, IL										100	100
edgwick LLP eyforth Shew LLP	San Franciaco, CA						100					100
eyronn anew LLP	Chicago, IL								-		300	100

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Appendix C Ratings by Industry, Descending Score

						Criterio	n						
		B points	E sond	15 posts a	Coants	Cpounts	1000013	Coont	'S porte	• string 42-	Restang	2014 CE Rating	000
		2	20	1 2	Ö	Ş	ĝ	ļ. ģ	.5	Ť	s off fee	C	Fortune 1000
Employer	Headquarters Location	1n	1b	28	2h	2c	3.a	3 b	4	э	20.15	201	Fort
Shopparo, Mullin, Richter & Hampton LEP	Los Angeles, CA										100	100	
Shook, Hordy & Bacon LLP	Kansas City, MO								e		100	100	
Sicley Austin LLP	Chicago, IL										100	100	
Simpuori, Thacher & Bartielt LLP	New York, NY										100	100	
Skadden Arpa, Slate Meagher & From LLP	New York, NY		6					-			100	100	
Stoel Rives LLP	Portland, OR										190	100	
Sutherland Asbirl & Brampan LLP	Atlanta, GA										100	100	H
Thompson Cabern ILP	Saint Louis, MO										100	100	
Thompson Hina LLP	Cleveland, OH										100	100	K.
Troutman Sanders LLP	Atlanta, GA										100	100	
Vincer & Ekite LLF	Floyston, TX										166	90	3
Wachtell, Lipton, Rosen & Katz	New York, NY										100	100	
Weil, Gotshal & Mangos LLP	New York, NY										100	100	
Whito & Case LLP	New York, NY										100	100	
Winner Cutter Pickering Hate & Don LLP	Weshington, DC										100	100	
Winaton & Shawn LLP	Chicago, IL										100	100	
Womble Cartyle Sandridge & Rice, LLP	Windon-Salem, NC										100	90	
Dickstein Shapiro LLP	Washington, DC										95	100	
Kelley Drye & Warren LLP	New York, NY				l w						95	90	
Andrews Kurth LLP	Houston, TX										96	90	
Baker & Housetter LLP	Cleveland, OH										90	90	
Baker Botts LLP	Houston, TX		1		-						80	90	
Ballard Spaltr LLP											90	90	
Bracowall & Guanni	Phiagelphia, PA										90	90	
Chadbourne & Parks LLP	Hauston, TX										90	90	
Cooley LLP	New York, NY						-				90	90	
Cravath, Swaine & Moore U.P	Paio Ato, CA					-					96	90	
Davis Polk & Wardwell LLP	Naw York, NY										96	75	
Day Panay LLP	New York, NY										90		
Droke Bidde & Reath LLP	Hartford, CT		2								96	90	
Duane Morris LLP	Phiadelphia, PA										90	85	
	Philadelphia, PA										80		
Epaten Becker & Green PC	New York, NY			-53			-	F			90	90	
Galloway, Johnson, Tompkins, Burr & Smith, PLC	New Crieens, LA							•			222	90	
Gordon & Rees LLP	San Francisco, CA				- 2						90	90	
Greenberg Traung LLP	New York, NY					5					90	90	
Haynes and Bloom LLP	Da≋aa, IX							•			***	85	
Huach Blackwell LLP	Saint Louis, MO										90	90	
Kayo Scholer LLP	New York, NY										Did.	80	
Kenyon & Kenyon	New York, NY		0								90	85	
Kilpatrick Townsend & Stockton LLP	Atlanta, GA						•				90	80	
Kutak Rock LLP	Omeha, NE						•				90	80	
Menett, Phelpe & Philipe LLP	Los Angeira, CA										.90	90	
McCarter & English LLP	Newark, NJ		•		-						90	90	
McGureWoods LLP	Richmone, VA										90	90	

						Criferio	in.						
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		15 ppmts	Plane 1	figures.	Caoint	PDSB488	10 oos 2	Opent	15 april	Shind 45-	GEL Recision	2014 CEI Rating	Fortune 1000
Employer	Neadquartees Location	la	1b	2a	2b	26	За	3h	4	s	2018	2014 0	Fortun
		1.5		-									
McKunna Long & Aldridge LLP	Atlants, GA								•		96	80	
Mungar, Tolies & Olaon U.P.	Los Angeles, CA				. 0				0		90	60	
Norton Rase Fulbright Patton Boggs LLP	Houston, TX										90	90	
Proskauer Rose LLP	Wasnington, OC										90	90	
Saul Ewing I.LP	Now York, NY							-			90	90	
	Philadelphia PA					-	•					90	
Snell & Wilmer	Phoen x, AZ			•			•	•	•		96	90	
Steptop & Johnson LLP	Washington, DC	•	•					•			96	80	
Stinson Loonard Street LLP	Kansas City, MO						•	•			90	90	
Suffician & Cromwel LLP	New York, NY						•		•		90	90	
Williams Mullion PC	Righmone, VA		•	•			•	•	•		90	90	
Baker, Donotson, Bearman, Caldwell & Berkovitz PC	Memphis, TN						•		•		- 815	85	
Hughes Hubbard & Read LLP	New York, NY						•				ns.	90	
Michael Best & Fredrich LLP	Milwackon, WI							•			95		
Source Patron Boggs	Cievinand, OH			•				•			100	100	
Wisel Sanain Goodrich & Rosal PC	Pala Ato, CA	. 0					•		. 0		715	85	
Goulston & Storts	Boston MA								•		80	80	
Remick Feinstein LLP	New York, NY			•				•			80	80	
Locke Lord LLP	Dallas, TX					1	1	•			80	46	
Vorys, Sater, Seymour and Pease LLP	Colombia, OH								•		86	80	
Loab & Loeb LLP	New York, NY							•			775	76	
Moore & Van Ailes PULC	Charlotte, NC			•					•		To	75	
Ogietree, Deakins, Nash, Smook & Stewart	Greenville, SC							•			.75	46	
Howrey LuP	Wainington, DC			•			•	•			76	85	
Pois-nail Shughart PC	Kanasa City, VIC		0,	•			•				70	85	
Wilkie Fort & Gallagher LLP	New York, NY			•			•				76	85	
Holiand & Hart LLP	Denver, CO		0		3				- 0		45	75	
Quirin Emanual Urquhart & Sullyan LLP	Los Angeles, CA			.0			•		•		60		
Luce Forward Hamilton & Scripps LLP	San Diego, CA										95	70	
Na son Mains Ricy & Scarborough LLP	Coumb a SC										60	60	
Home Roberts & Ower LLP	Darver CO										46	45	
Schulte, Reth & Zabel LLP	New York, NY										49	45	
Wroman, Harrold, Allen & Dixon LLP	Chicago, IL							0	*		36	45	
Howard & Howard Alterneys PLLC	Kalamazop, MI										20	25	
Mail and Freight Delivery													
United Parcel Service	Atlanta, GA								٠		90	80	53
Fud Ex Corp.	Mamphia, TN				9						85	95	63
Union Paulic Corp.	Omaha, NE										70	70	138
Burlington Northerr Sente Fe Corp.	Fort Worts, TX								9		20	20	
YRC Worldwide Inc.	Overland Park, KS								i		20	20	498
		1									ä		406
Manufacturing													
3MCo.	St. Peul, MN										100	100	101
Corning Inc.	Carring, NY										100	100	326

Appendix C Ratings by Industry, Descending Score

						Criterio	n					i	
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		ansé 4,	a, mont ()	F 5469173	(Coard	2, 100 G	10001	10 postit	Theod (),	-25 points	CE! Rating	2014 CEI Rating	Fortune 1000
Employer	Readquarters Location	1a	1b	2a	2h	2c	3.a	3Б	4	5	50.5	2014	Fortu
		1 -				-		-			TOU	100	160
Cummina Inc.	Catamison, IN		•									100	800
Danaher Corp.	Washington, OC							•			100	- 1	152
General Electric Co.	Farifiold, CT										1781	100	A
Homan Misler Inc.	Zeward, MI										100	100	478
Owens Corning	Tologo, OH										190	100	403
Rockwell Automation Inc.	Mawaskoe, WI										100	90	758
Stoolcaus Inc.	Grand Rapids, MI										1410	100	50
United Testimologies Corp.	Hartlord, CT		-						17.1		1000	100	
Whirlipool Corp.	Berton Harbor, MI			*						-	900		154
Neetle Purins PetCare Co	St. Louis, MO										95	85	40
Catorpilla inc.	Peorla, IL										910	90	42
Jarden Corp.	Boca Raton, ≗L				-							80	383
R.R. Connolley & Sons Co.	Chicago, IL		*				•				202	90	264
Ball Corp	Broomfield, CO			•							H5	85	301
Emareon Electric Co.	St. Louin, MO						•				80	60	123
Freescale Semiconductor Inc.	Austin, TX	0	۰	•				•	•		80	80	
Deare & Co.	Moine, IL								•		65	65	85
Stryker Corp	Kalamazoo, MI							•			65	15	306
Xylem Inc	White Plams, NY										68	65	612
Priora Toot Works Inc.	Glerrenw, II							•			60	60	155
Mara Inc.	M1, O: ve, NJ				1						6.0	60	
Johnson Cordrola Inc.	Milwackee, WI										50	50	67
MeaclWestvaco Corp.	Richmons, VA	•							D		4.5	45	448
Baltier Electric Co.	Fort Smith, AR	•							P		2=	25	
Monawk Industrias no.	Cathour, GA										201	20	442
											* 4		380
												15	312
											35	15	163
											10	15	322
		-	_	_							-10	15	364
Mining and Metals		7 -									NAME OF		
Alicea Inc.	New York, NY				-		•		•		(00)	100	128
Moseic Co.	Plymouth, MN										Вħ	70	246
Nawmont Miring Corporation	Groenwood Valage, CO										est.		274
								,			31)	30	430
											-16	30	490
											.40)	15	207
											30	30	167
											30	30	335
	Married W. Co.	200									30		284
		-41	1.7								10	30	128
		10									36		354
		100									35	15	223
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Employer	Headquarters Location	1 20	1b	2a	2b	2c	3a	3 b	4	ŝ	20018	ğ
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Miscellansous												
N.W. Greinger Inc.	Lake Forest, IL						•		•	1	100	30 2
Harris Corp.	Me bourne, FL										90	65
mation Carp.	Oakdare, MN										80	70
			- 10							1	100	30
											15	15 4
		×									166	15 2
		1									10	0 2
											0	0 3
										1	8	0 3
Oil and Que											The same	0
Creavron Carp.	San Ramon, CA	- 0						•		- 1	100 1	00
Shall O Co.	Houston, TX				b				•		96	95
3Р Ашенса Іпс.	Hauston, TX	.0	•					•			96	90
Spectra Energy Corp	Haunter, TX						•				96	85 A
Villama Companies Inc.	Tulsa, OK		•		D.		•	•	•		86	60 3
ConscoPhilips	Houston, TX			•				•			76	56
Marathon Oll Ccrp.	Houaton, TX		•	0	491					- 1	76	15
Hose Corp.	Now York, NY								8		40	40
			-41								30	0 3
			20								30	0 1
Marie San	Record	0	16.								30	30
		-									76	15 1
	Manager VI	1.0									F6	15 3
											146	18 4
											16	15 1
		8								1	58	15 2
	Transport for	-									16	0
		-									10	4
		1									16	16 1
											16	15
						1	119				100	100
						1 1					19	16 3
											16	16 3
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Appendix C Ratings by Industry, Descending Score

Employer Headquarters Location	Nuod Q:	1b	(Separt)	'Coarte	Criterion	0 ps tr	*Cpainf	"G portts	2005	Bulling	tling	
	1.0		(frequely	Coorts.	Chieffi	the sta	141100	20172		4	tling	
		1b			100	8	101	2,00	-25 points	OWN Red	2014 CIEI Rating	Fortune 1000
	0		2a	2h	2c	3.6	3h	4	6	2015 010	2014	Forts
										16	0	283
										o		142
										. 0	15	64
											0	77
Expan Mobil Corp. Irving, TX										-35	-25	
Pharmacauticals										-		
Assolicy Pharma U.S. Inc. Northbrook, IL										100	55	
Bicgur Idea no, Cambridge, MA										100	100	454
Bookinger Ingelholm USA Corp Rogarie'c, CT							•	•		100	100	
Bristol-Myers Squildo Co. New York, NY										106	100	158
ELL I y & Co. In criamapolis, IN						•				100	100	130
GlaxoSmithKline LLC Research Triang a Park, NC										100	100	
Johnson & Johnson New Brunswick, NJ							•			ton	100	41
Merck & Co. ino Whitehouse Station, NJ		0					•			100	100	58
Novatis Pharmaceuticals Corp. East Hacoviti, NJ		e								106	100	
Plizer no. New York, NY										100	100	48
AbbV:u Inc. North Chicago, IL										95		
Bakter International Inc.  Discription, IL.										90	80	193
AstraZeneca PUC Wilmington, DE				9			•			85	86	
Amgen fric. Inousanri Oake, CA										80	60	162
Hospita Inc. Lake Forest, IL		0								- 05	76	576
Sprofi-Aventa U.S. LLC Buildgewater, NJ								1		46	45	
Wyeth Madison, NJ										48	45	
the same of the sa										36		432
		100								30	30	456
						- 7				1946	15	440
	1									0	ø	280
											0	374
Publishing and Printing												_
Pearson Inc. Upper Sadd'e River, NJ						•				190	100	
Houghton Mithir Harcourt Publishing Co. Boston, MA							0			AE.	76	
Harbette Book Group New York, NY							D			75	75	
New York Times Co. New York, NY		w		b						76	90	923
Scholestic Corp. New York, NY				•						76	66	900
Ganneti Co, Inc. McLean, VA										60	45	467
UBM pic Manhaseot, NY										50	60	
Washington Post Co. Washington, DC										20		580
Ree) Estato, Commercial												
CERE, Inc. Los Angeles, CA								0		100	100	387
JLL Chicago, It.				•		•				100	90	
Lend Leaso Americas Inc Now York, NY			•							79		
Real Estate, Recidential	(I)					51						
Roslogy Molaings Corp. Madison, NJ										90	90	512
										15		487

						Criterio	n						
		T.	1				1 /		1				100
		ili oci di	1 100	Ť.	Coort	8	10001	Dportit	Through.	Chypumbs	2015 CEL Rating	2014 CEI Rating	9
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												014	Fortune 1990
Employer	Headquarters Location	1a	16	20	26	2ε:	30	3h	4	õ		ā	4
Retail and Consumer Products		11									-		-
A}X Armani Exchange	New York, NY		a		•		•	•	•		100	100	-0.00
Abergrembra & Fitch Co.	Now Albury, OH			•			•				190	100	1000
American Eagle Outlitters Inc.	Pitteburgh, PA		•	•	•						1436	100	17700
Avan Produms Inc.	Now York, NY		•					•			100	100	1000
Barnes & Nobie Inc.	New York, NY	•		•			•	•	•		100	100	360
Best Buy Co. Inc.	Richfield, MN				•				•		100	100	0.1
Brown Shoe Company, Inc.	Sr. Louis, MO				.0		•		0		100	100	1000
Clorox Co.	Osklano, CA						•				100	100	461
Coach he,	New York, NY		•	0					•		100	75	504
GamoStop Corp.	Grapezine, TX								•		100	100	208
Gap Inc.	Sen Francisco, CA		•				•	9			106	100	770
L Brands Inc.	Columbus, OH						*				100	100	240
News: Rubbermaid Inc.	Atlanta, GA		•	•		•	•				100	85	433
Nordettan Inc.	Seattle, WA								.0		100	100	227
Office Dopot Inc.	Boca Raton, Ft.		•	•					•		100	100	283
Procter & Gamble Co.	Gine innah, OH		•				•		•		160	100	28
Replacements, Ltd.	Moteanaylile NC			0					•		100	100	100
Seare Hodings Corp.	Hottman Estates, IL.		•		•	•			•		100	100	7.1
Staples Iro.	Framingham, MA			•							100	100	122
Starbucka Corp.	Seattle, WA		•			•		•	•		190	90	208
Target Corp.	Micheapelis, MM										106	100	36
13X Companies Inc., The	Framingham, MA						•				160	95	115
He lever	Englowacki Cittle, NJ										100	100	m
Walgreen Cc.	Deertio's, IL		•			•					100	100	37
Estés Lauder Companies Ind., Tho	New York, NY				b		•	•	•		98	96	270
I.C. Penney Co. inc.	Plane, TX		•	•				•	•		96	95	215
Mattel Inc.	El Seguado, CA			•		•	10		•		96	05	396
Sony Electronics Inc.	Sau Dugo, CA		•								95	100	
Tiffany & Co.	New York, NY		•	•	•			D			98	96	811
Banton Staine, Inc.	York, PA										943	90	719
Colyate-Paimpileo Co.	New York, NY								•		96	90	165
Coatco Who quale Corp.	Iseaquah, WA		0	•				0			9.0	90	22
Crate and Barre 7 CB2	Northbrook, IL		•		•		•				90	90	
Halmark Carols Inc.	Kansas City, MO										9.0	90	
Home Depot/no., The	Atranta, GA				•						-0	90	34
Kimberly-Clark Corp.	from 0, TX	6									96	90	136
Outorwall Inc.	Believoe, WA						3	10			190		
Recreational Enuipment Inc.	Kens, WA	•	0			0					100	90	
S.C. Johnson & Sor Inc.	Racine, WI										100	90	1 1
Wel-Wert Storen Inc.	Santonvilla, AR			•			•		•		90	80	- 10
Williams-Sociona tre.	Sun Francisco, CA								0		96	80	582
Fifth & Pacific Companies Inc.	New York, NY				- 10		•	•	•		85	85	1.2
HSN Inc.	St. Potersburg, Ft.								•		86	85	666

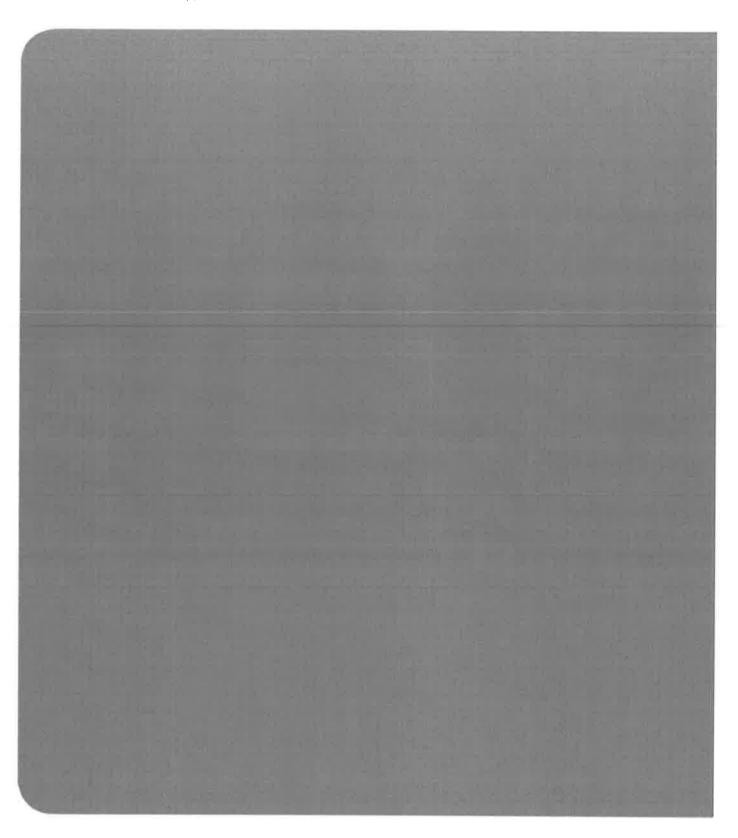
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Appendix C Ratings by Industry, Descending Score

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			100	8	1	w:	181	3	8		The state of	2014 CIEI Rating	
		5 pour	(Supplies	's prent	Cports	Cpars	10points	tueed.	15 approfit	25,96,13	CE Rating	2	me 1000
				10	-	· -	- 8	100	12	-/3	∂ 00	2	ŝ
Employer	Headquarters Location	t a	th	2a	26	2c	Эа	3 b	-4	5	50.5	201	For
L'Oreal USA Inc.	New York, NY										45	15	
Overstock.com Inc.	Sait Lake City, UT		- 10								Hu	70	
Hasbio Inc.	Pawtickel, Rt		0		0						75	25	576
PetSmart Inc.	Phoon x, AZ										25	75	377
Tays R' Laine	Waynu, NJ										75	75	204
True Value Co.	Chiengo, L	•					•				26	60	
CarMax Inc	Richmone, VA		٠								76	85	250
Dollar General Corp.	Goodlettevilla, TN		9		-						70	70	176
H&M Harras & Maurtz AB	North Arington, NJ				•						20	70	
Mayerino,	Grand Rapids, MI										76	25	
Rasa Starca Inc.	Dublin, CA								*		70	o	278
Pop Boys-Manny, Moe & Jack	Phradelphia, PA										64	65	926
Burlington Store, Inc.	Bullington, NJ										60	60	577
Herry & David Floidings (no.	Moditiza, OR		.0					- 0.1			55	70	
RauloShock Corp.	Fort Worth, TX							*:			45	30	556
Bufs Whotesale Club	Weatherough, MA										35	35	1.0
		16									305		330
		1									460	30	409
		100					j				50		472
											31)	30	285
		-	-0.								30	15	466
		100	101								317	15	437
	1 otto 10 octo 40	-	76								30	30	378
			7								36	30	346
		1.76	*			1					30	30	287
			-								30	30	58
Men'a Wearhouse Inc., Tha	Hoseton, TX										300	30	813
									2		20	26	245
		7							i		78	15	413
											HE	0	412
		-									16	15	347
											15	15	329
AutoZone Inc.	Memphy, TN										15	15	506
Kohi'a Curp,	Monumores Fats, WI										.10	15	146
		,									. 4	0	392
											0.	0	450
Telecommunications											_		
Alcalol-Lucunt	Murray H⊪, NI										100	100	
ATAT top.	Dalas, TX	6						0			106	100	11
Cisco Systems Inc.	San Jose, CA										100	100	60
QUAL COMM Inc.	San Diago, CA			•			•				100	100	149
Sprint Noviel Corp.	Overland Park, KS						٠				100	100	87
Time Wanter Cable Inc.	Naw York, NY								0		100	100	134
T-Mobile USA Inc.	Bollevue, WA							0	0		ino	100	

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		1	3	16	Į.	2	4	į.	퍝		main	2014 CEI Rating Fortune 1000
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Employer	Headquarters Location	Tax:	1b	2a	2b	2c	3.4	3h	4	ö	2	201. For
Motorola Solutions inc.	Schnumburg, It						•				453	90 30
Verizon Communications Inc.	New Jersey, NJ										30	100
CenturyUnk Inc.	Monrov, LA										(80	60 15
Lovel 3 Communications Inc.	Broomheld, CO		.0								25	39
EarthLink Inc.	Atlanta, GA				. 0			3			195	55
Nortei Networke Corp.	Richardson, TX				P				1		50	50
Buightpoint, Inc	Indianapolio, IN								¥:		36	30
		-4									18	15 38
											198	15 24
											18	15 49
											16	15 25
											16	0 42
											16	15 46
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											0	0 48
Tobacco												
Aitria Group inc.	Richmond, VA		•								90	80 15
Reynolds American Inc.	Winston-Salem, NC		•		•	1					85	75 31
											16	0 2
Transportation and Travel												
Orbitz Worldwice Inc.	Cheage, L		•								100	100
Camival Corp.	Miami, FL				.0.				a		865	85
Ryder System Inc.	Mum, FL			à							AS	85 40
Royal Caribbean Cities Lto.	Memi, FL								•		80	60
Avis Budget Group Inc.	Para:ppany, NJ			•					0		7.6	75 15
CSX Corp.	Jacksonville, FL										70	85 25
Dollar Thrifty Automotive Group Inc.	Tulsa, OK										79	70
Enterprise Holdings Inc.	St. Louis, MO										65	65
Sabra Holdinga Inc.	Southlake, TX		•		- 16						66	76
Travel Impressions Ltd.	Famingolaie, NY										65	80
Travelport Ltd.	Pars ppany, NJ		0.						*		68	65
Norfolk Southern Corp.	Nortolk, VA										50	50 247
			.00								30	30 450
		7									16	15 237
		7									18	15 42
		1									16	15 449
											19	15 476
Waste Management												
Waste Management Inc.	Houston, TX		•		•						96	90 200
		i	1	į .					1		100	16 323

CEI 2015 Appendices



CEI 2015

Rating American Workplaces on LGBT Equality

#### Deena Fidas and Liz Cooper, Authors

#### HRC Foundation's Workplace Equality Program

HRC Foundation's Workplace Equality Program 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 course, online resources, best practices information and on-site training and education. Program 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 Workplace Equality Program also makes available the expertise of the HRC Business Council for invaluable peer to open advice.

#### Project Staff

## Deena Fidas Director, HRC Foundation Workplace Equality Program

Deena Fidas is the director of the Workplace Equality Program and leads the Corporate Equality Index survey and annual report to over 1,200 major employers corporate public policy outreach and research on emerging workplace inclusion topics. Fidas has consulted directly with hundreds of Fortune 500 and other major businesses on the implementation of equitable policies and benefits for diverse employee populations. She works closely with company representatives to help them identify areas of potential improvement and works with their key stakeholders to effect change within their organizations, from domestic partner benefits to innovative trainings. Most recently Fidas expanded the work of the Corporate Equality programs to include global LGBT workforce best practices. In this capacity, she has conducted trainings in the US and abload on workforce diversity and best practices for inclusion before corporate and public sector audiences.

She also leads the Human Rights Campaign Foundation's published research on the experiences of LGBT workers nationwide, including the seminal 2009 Degrees of Equality study that found over half of LGBT workers remain closeted on the job. The follow-up 2013 study. The Gost of the Closet and the Rewards of Inclusion showed that most LGBT employees (53 percent) nationwide are closeted on the job and that the reduction in employee engagement can be measured (averaging 3C percent) and improved through investments in training and eadership development.

Fidas has been featured in The Washington Post, Mexico's Reforms, The Hulfington Post and Pacifica Radio. She is a regularly quoted expert for the Associated Press. The Wall Street Journal, Forbes, Fortune and other news outlets. Prior to joining the Human Rights Campaign in 2007, she worked in fundraising for the American Civil Liberties Union and Hillary Clinton for President, among other clients. Fidas holds a master's degree in sociology from American University in Washington, D.C., where she also worked as a researcher for the university's Women & Politics Institute.

GORPORATE EQUALITY INDEX 2015

# Beck Bailey Deputy Director of Employee Engagement, HRC Foundation Workplace Equality Program

Beck is Deouty Director of Employee Engagement in the Workplace Equality Program at the Human Rights Campaign Foundation, where he focuses on helping workplaces become more LGBT inclusive through employee engagement, training and education. He also conducts outreach to engage corporations in supporting legislative action to create workplace protections for LGBT people.

As a lifelong business professional prior to joining HRC, Beck brings his knowledge and experience as a manager and a leader to this work.

A lifetong EGBT advocate and out transgender man, Beck often speaks about his journey as a way to increase awareness and understanding. He prougly serves on the Board of Directors for Gay & Lesbian Advocates and Defenders (GLAD), Beck holds a BS in Management from Virginia Tech and an MBA from the Isenberg School of Management at UMass Amherst.

## Liz Cooper Associate Director, HRC Foundation Workplace Equality Program

Liz joined HRC in August 2010. As Associate Director, Liz engages orectly with employers to identify and improve EGBT-inclusive policies and practices. Cooper brings her background in sales marketing research to develop the Program's resources on LGBT diversity and inclusion best practices aimed at employers, employers, and consumers. She has a special focus on engaging new businesses to participate in the CEI survey, and also oversees the annual Buying for Workplace Equality Guida. In addition, Cooper has enlisted the support of ozens of major businesses for pro-equality legislation across the country. She also uses her articipate part of the workforce, Cooper hopes to make a fully inclusive culture the new standard for employers, allowing employees to be authentic and open in their workplace environment. Cooper holds a bachelor's degree in political science from Davidson College in North Carolina.

#### Rena Peng Coordinator, HRC Foundation Workplace Equality Program

Rena joined the Workplace team in September 2014. As Coordinator she engages directly with employers nationwide to identify and improve LGBT-inclusive policies and practices. Peng brings her skills in sales and research to help oversee corporate communications and provide key support to the annual Corporate Equality Index and Buying for Workplace Equality Guide. She works to provide new and continuing participants of the CEI with the resources they need to improve and promote non-discrimination policies, benefits and other practices that are essential for fairness in the workplace. Peng also brings her international background to support on going research on best practices and policies relating to LGBT workplace equality in the global arena. Peng holds a bachelor's degree in government with a minor in computer science from Smith College in Massachusetts.

CEI 2015

Rating American Workplaces on LGBT Equality

#### Meg Tsuda Assistant, HRC Foundation Workplace Equality Program

Meg joined the Workplace Equality Program in January 2014 as an intern. She stayed at HRC through the summer working in the Membership Outreach department, and re-joined the Workplace team as full-time staff in September 2014. Utilizing her experience in customer service, Isuda fields questions and feedback regarding the Corporate Equality Index and other workplace-related issues. She assets in the CEI validation process and manages data pulls of relevant CEI information, and provides administrative and logistical support in planning for CEI events and trainings for the Program staff. Tauda also performs research to help develop the Program's resources on best policies and practices as they relate to LGBT equality in the workplace, and beings her background in writing to publish blog posts for the Program Tauda holds a pachetor's degree in justice studies from James Madison University in Harrisonburg, VA.

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CEI 2016 HRC Business Advisory Council

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

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