



CORPORATE SOCIAL RESPONSIBILITY FOR ALL

EVALUATION REPORT

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I. INTRODUCTION

Within the EU-funded Project “CSR for All” (Ref: EuropeAid/132438/C/ACT/Multi – Corporate Social Responsibility for All - CSR for ALL Project), five studies on the national CSR environments and activities of companies were conducted in Croatia, Macedonia, Montenegro, Romania and Turkey.

The aim of the national studies was to acquire a better understanding of the framework conditions, challenges, obstacles and drivers for CSR in Southeast Europe, as well as levels of companies’ CSR awareness and their concrete activities. The national studies therefore entailed two main parts: one, a general country profile focussing on the economic and social situation in the country, as well as CSR-related information on regulatory framework conditions, policy approaches and existing initiatives and networks; and two, a survey of around 100 companies (small, medium and large) on the uptake of CSR in each of the five countries. The results of the studies are intended to feed into further project planning on CSR awareness raising and capacity building in Southeast Europe to make sure that further project activities meet the needs of companies and employers’ organisations.

This evaluation report brings together the results of the five national studies. It is not for benchmarking - or for ranking or judging countries - but to give an overview of similarities and differences in CSR framework conditions and company activities, as well as to identify common areas for further project activities in the countries. This is all the more important because the structure of the national economies, as well as the sample of companies which responded to the survey, are very different in the five countries. In Romania for instance, 90% of companies who completed the questionnaire are SMEs (under 250 employees). In Montenegro, the percentage of SMEs was even higher, at 93.4%. In Turkey, by contrast, SMEs accounted for only 43.13% of the sample companies and 56.87% were large companies. Moreover, economic sectors differed in the company samples. In Turkey, 43% of sample companies belonged to the manufacturing sector, in Montenegro only 4% did. In Macedonia, 45% of sample companies belonged to the wholesale and retail trade, but in Romania only 9% belonged to this sector. Thus, differences in results might be due to a range of factors; the varying challenges and framework conditions, differences in the national economic structures and the distinctive characters of the sample companies.

The national reports are therefore the main source for the development of the individual national training packages. The evaluation report aims to distil some major messages from the five country reports, but does not replace or take precedence over them.

II. MAIN FINDINGS

- The vast majority of sample companies in all five countries are aware of their responsibility towards the environment, the local community, their employees and other stakeholders, and are engaged in social and environmental initiatives and activities. Their social and environmental commitments are part of a century-old entrepreneurial culture and tradition.
- The majority of sample companies are familiar with the CSR concept, although there are differences between countries with regard to familiarity with the term CSR, as well as regional differences within countries. Most of the companies have been familiar with the term for more than one year.
- The high awareness of the term is also linked to the fact that in all five countries several CSR initiatives have developed from the beginning of the new millennium and governments have become increasingly active in promoting CSR (though the majority of sample companies, with the exception of Montenegro, were not aware of government activities).
- Responsibility towards employees is a high priority for the companies in all five countries. This is in line with findings from similar studies in other countries and reflects the value of employees for business. However, beyond this focus on employees, the picture becomes more fragmented and confirms the complexity of CSR. The overall priorities of the sample companies are not only different from country to country, but also between the different sectors of the economy within a country. The ownership of a company and whether it is a domestic company or an MNE also affect the CSR priorities of the sample companies.
- The main driver for CSR in all five countries is the company culture. It is also of high importance in attracting and motivating employees. Interestingly, pressure from NGOs only plays a marginal role in company engagement in CSR in all five countries. Governments have likewise not played a significant role in this regard.
- Although there are significant differences between the five countries in awareness of the main international instruments, tools and frameworks, the use and implementation of these elements by the sample companies are low in the countries (with the exception of Croatia), which indicates a need to raise awareness as well as to provide training on these instruments and frameworks.

- Codes of conduct are widespread in the region. A large number of companies have a code of conduct which they also pass on to their suppliers. Additionally, a large portion of the sample companies have to follow the code of conduct of their customer companies. This finding illustrates a growing challenge with regard to a wave of partly competing codes of conduct, which creates a bureaucratic and administrative burden for supply chain companies, which has also been observed in other regions in Europe.
- A major challenge to companies engaging in CSR activities is lack of time and resources. Further challenges include: uncertainty over what a comprehensive CSR policy looks like, or what it should contain; an unfavourable business environment in which legislation is not enforced; and lack of clarity over the respective limits of the responsibilities of government and companies.
- Sample companies are convinced that the significance of CSR will grow in the future and are interested in participating in training sessions.

III. NATIONAL CONTEXT FOR CSR

Although situated in one region, the five countries of the project partners display very different characteristics with regard to size, population, economic and social profile as well as political framework conditions. Indeed, the population of the countries ranges from 620,029 in Montenegro, to 75,627,324 in Turkey. Where in Turkey the population is young, with half under the age of 30, in Croatia the growth rate is negative and only one-third of the population is under the age of 30.

Small and medium-sized enterprises are the backbone of the economies and the labour markets in all of the five countries. In Turkey, up to 90% of the total number of enterprises consists of SMEs, which employ 77.8% of the workforce and realise 59.6 % of exports. This indicates that Turkish SMEs are part of global supply chains. Also in Montenegro, three-quarters of the current economy is generated by SMEs – medium-sized enterprises account for 25.4%, while large companies account for 25.6%. Similarly in Romania, 87% of all enterprises are micro, 10.5% are small, 2% are medium and only 0.5% are large. The data is similar for Croatia and Macedonia. In Croatia 90% of companies are micro-companies with less than 10 employees, and only 0.4% of all companies have more than 250 employees. In Macedonia small and medium-sized enterprises constitute 99.5% of the total number of enterprises.

Wholesale/retail and manufacturing are the most important sectors of the economy in terms of GDP in all the partner countries, with the exception of Macedonia. Agriculture also plays a relatively important role in all countries, although there are big differences ranging from 32% of the population in Romania employed in agriculture and primary production, to around 15% in Croatia.

These countries have been affected differently by the global economic crisis. Whereas all countries went into a recession in 2009, Macedonia, Montenegro, and Turkey were already able to achieve positive GDP growth the following year and Romania followed in 2011. Unemployment, although a challenge in all countries, ranges from 30.1% in Macedonia to 9.4% in Turkey. Similarly, the percentage of the population living in poverty ranges from 4.4% in Romania to 30.4% in Macedonia. All countries are faced with the problem of a large informal sector.

IV. CSR CONTEXT

In all participating countries, CSR gained importance around the turn of the new millennium. Many CSR initiatives were developed, for instance, the establishment of the Croatian Business Council for Sustainable Development in 1997, and the Business World and Sustainable Development Association in 2004 and the Corporate Social Responsibility Association in 2005 in Turkey. In Macedonia, a National Coordinating Body on CSR was set up in 2007, which serves as a multi-stakeholder forum for policy dialogue and consultation between various CSR stakeholders, drafts national CSR policy and coordinates activities on promoting CSR. In Romania several initiatives for networks, forums, blogs and websites on CSR/SR and sustainable development have emerged, as for instance CSR Romania, or the Center for Corporate Citizenship, Romania. In Montenegro, a network for social responsibility has only recently been established. Moreover, in all countries, with the exception of Romania, there is a local UN Global Compact network.

Governments have become increasingly active and undertaken awareness-raising and promotion campaigns for CSR in the last decade: for instance, in 2007 the Montenegrin Department for Development of Small and Medium-sized Enterprises and in 2010 the Macedonian Ministry of the Economy. Croatia and Romania, both EU member states, have developed CSR strategies such as the Croatian Sustainable Development Strategy in 2009 and the Romanian National Strategy for the Promotion of Social Responsibility for the 2011 - 2016 period.

There is no specific legislation which explicitly promotes CSR in any of the five countries, although in Macedonia the Investment Funds Law and the Law on Compulsory Capitally Funded Pension

Insurance are currently being amended to include a provision demanding that pension/investment funds disclose their ethical, social and environmental considerations when deciding on investments, and that they report on this annually. Croatia and Romania are faced with a European Commission proposal for a directive on disclosure of non-financial information and on diversity, which is currently being discussed in the European Parliament.

Interestingly, in most cases, sample companies in the five countries are not aware of government CSR policies. In Croatia (73%), Montenegro (82.9%) and Romania (70.05%), most respondents have not heard of any government CSR policies, with the exception of Macedonia, where almost three-quarters of respondents were aware of government initiatives, policies or measures to support or promote CSR. The vast majority of sample companies, however, see a role for governments in promoting CSR through, for instance, providing information, awards or tax benefits, and raising awareness.

V. AWARENESS OF CSR IN COMPANIES

In all five countries, the majority of companies are aware of the term CSR. The numbers range from 52.9% in Turkey, around 70% in Montenegro and Romania, and up to 84% in Croatia and Macedonia. Not surprisingly, within the majority of the countries (Croatia, Montenegro and Romania) there are clear differences between large companies and SMEs. In Montenegro, all of the large companies were familiar with the term CSR, whereas only 64.3% of the micro-enterprises confirmed their awareness.

There are also other factors that influence awareness. The analysis shows that in Croatia, Romania and Turkey awareness of the concept of CSR is higher in companies that address multiple markets than in companies that only address the domestic market (in Romania for instance 84% of companies that address multiple markets versus 64% that address only the domestic market). In Montenegro, although there was no difference in the results with regard to companies which address the domestic market versus companies addressing multiple markets, more companies that have foreign capital are aware of the term than those which are wholly domestically owned. There are also regional differences, for instance in Turkey the awareness level of the companies which operate in the Istanbul and Western Anatolia regions is considerably higher than in other regions.

Moreover, it is important to note that while companies may not be aware of the term CSR, they may still take their environmental and social responsibilities very seriously. The Turkish national report

rightly points out that the commitment of Turkish business to the environment, society and the world of work did not only start with the concept of CSR, but has a long tradition going back many centuries. Indeed, when looking at the survey results with regard to environmental and social activities and the engagement of companies, it can be observed that the figures are much higher than those collected for the awareness of CSR.

The majority of companies in the five countries have become aware of the term CSR within the last six years. However, it is striking that in Croatia and Turkey there is also a large proportion of companies which have been aware of the term for more than 10 years. However, despite the large number of companies in this category in Turkey, only 7.27% have a special department which takes the lead in addressing the company's social responsibilities and impact. At 6%, the number in Macedonia is similarly low. In Croatia and Romania by contrast, the percentage of companies with a department responsible for CSR is significantly higher at 55% and 48.62% respectively. Montenegro was in the middle with 28.6%. If a company has a department in charge of CSR it is mostly that of Corporate Communications and/or Public Relations, Human Resources or the Office of the CEO.

VI. COMPANIES' CSR PRIORITIES AND ACTIVITIES

When it comes to the CSR priorities of companies, the “responsibility towards employees” is high for the companies in all five countries. However, beyond this focus on employees, the picture becomes more fragmented. “Responsibility towards the local community / region” is of special importance in Croatia and Turkey; “fair business practices” is the focus for companies in Croatia and Montenegro; “respecting human rights” is one of the top three priorities in Montenegro and Romania; “securing jobs” and “support for culture, science and sports” are the special focus for companies in Macedonia; and “responsibility with regard to the environment” is of special importance for companies in Turkey.

Within the different sectors in each of the five economies, priorities are even more diverse. In Montenegro for instance, the responsibility towards the environment is a particular priority for the construction industry, whereas for financial and insurance companies it is fair business practices. Moreover, the results show that companies with domestic and foreign ownership differ significantly regarding their CSR priorities in the same way as export-oriented companies do from domestic-market oriented companies. Again, in Montenegro for example, foreign owned companies place more importance on human rights than domestically owned companies. On the other hand, philanthropic activities are more important for domestic market-oriented companies than for export-

oriented companies. The results therefore confirm the complexity of CSR: the ways in which companies engage in CSR depend on the sector, the size and the market place of the company, as well as on the needs of their stakeholders. The study shows that there is no “one-size-fits-all” approach when it comes to fulfilling the social and environmental responsibility of companies.

Exploring the topic more deeply, we see that company priorities are reflected in their CSR activities. In all five countries the vast majority of companies are active with regard to the *work-life balance of employees* (83% in Croatia, 81% in Macedonia, 88% in Montenegro, 72% in Romania, 66% in Turkey), *training of employees* (95% in Croatia, 88% in Macedonia, 87% in Montenegro, 74% in Romania, 89% in Turkey), *non-discriminatory behaviour* (94% in Croatia, 96% in Montenegro, 67% in Romania, 92% in Turkey), *promotion of healthy and safe work environments* (96% in Croatia, 95% in Macedonia, 96% in Montenegro, 75% in Romania, 93% in Turkey), *measures to abolish child labour* (81% in Croatia, 80% in Macedonia, 73% in Montenegro, 57% in Romania, 82% in Turkey) and *engagement in the rights of employees to establish and join organisations of their own choosing and engaging them in social dialogue processes* (79% in Croatia, 72% in Macedonia, 73% in Montenegro, 55% in Romania and 69% in Turkey). While the majority of companies also have feedback mechanisms such as employee hotlines that allow employees to submit concerns to management (66% in Croatia, 72% in Macedonia, 78% in Montenegro, 43% in Romania, 51% in Turkey), a relatively high proportion of company representatives who answered the survey were unsure about the existence of such feedback mechanisms (16% in Croatia, 15% in Macedonia, 17% in Montenegro, 27% in Romania and 27.5% in Turkey).

Most sample companies agree in the five countries that respecting human rights is a priority for them. However, when it comes to concrete activities, the responses become more nuanced. The majority of company representatives are not sure whether the company has started to implement the UN Guiding Principles on Business and Human Rights and/or have started to engage in due diligence and human rights impact assessments. There is a huge disparity in the results with regard to the question of whether the company has a public commitment to respect human rights, ranging from 44% of sample companies having such a commitment in Romania to 84% in Croatia.

Across the board, there is support for community initiatives in all five countries. Education and training institutions and initiatives play an especially important role in Croatia, Romania and Turkey, which are supported in Turkey by more than 84% of the companies, in Croatia by 70%, and Romania by 60%. In Macedonia and Montenegro, in contrast, social initiatives were the areas in which the most companies were active (75% in Macedonia, 70% in Montenegro). Moreover, not only with regard to SMEs versus MNEs, but also within a country, there might be huge regional

differences, as the Turkish country survey has shown, where the support for social initiatives and cultural projects in the Istanbul region was significantly higher than in other regions.

Although “responsibility with regard to the environment” is only one of the top three CSR priorities for companies in Turkey, in all five countries companies are extremely active with regard to measures to reduce energy consumption, and the use of natural resources and emissions, with between 70% and 89% of companies active in these fields. However, when it comes to the concrete use of standards and tools, the high percentage falls to 39% in Croatia, 33% in Macedonia, 32% in Montenegro, 50% in Romania and 61% in Turkey. Moreover, respondents are much more often unsure about the use of standards and tools (16% in Croatia, 41% in Macedonia, 52% in Montenegro, 22% in Romania and Turkey). There are however significant differences between large companies and SMEs with regard to the use of standards and instruments. In Croatia, for instance, more than 60% of the large sample companies reported using environmental standards and tools in contrast to less than 5% of micro-enterprises.

When it comes to supply chain management, the vast majority of sample companies answered that they integrate ethical, social and environmental criteria in their purchasing, distribution and contracting policies (75% in Croatia, 67% in Macedonia, 69% in Montenegro, 54% in Romania and 79% in Turkey). Between 50% and 60% of the sample companies in Croatia, Romania and Turkey claim to audit the social and ecological performance of their suppliers, whereas in Macedonia and Montenegro it was significantly less, with 32% (Macedonia) and 30% (Montenegro). Between 30% and 46% of the sample companies in Croatia, Romania and Turkey also stated that they provide training for their suppliers, but again Macedonia and Montenegro were an exception with around 18% and 19% of sample companies providing such training.

The numbers shown above on supply chain activities appear high, especially in view of the large proportion of SMEs in the company samples. Moreover, in Turkey, where the SME proportion of the company samples is the lowest, a significant difference on the issue of “Engaging with the Supply Chain” between SMEs and large companies cannot be observed. The high numbers are even more surprising when viewed in contrast to the responses to the question on companies’ participation in supply chain initiatives like the Business Social Compliance Initiative (BSCI). The positive number drops considerably, with 16% of sample companies in Macedonia, 11% of sample companies in Montenegro, 19% of sample companies in Romania and 29% of sample companies in Turkey participating in such supply chain initiatives. Thus, this data on supply chain management raises many questions and must be used with caution.

Combatting corruption was not stated as one of the top three CSR priorities of any of the countries. Nevertheless, when it comes to concrete CSR activities, between 66% (Romania) and 93% (Montenegro) of the companies implement and maintain policies and practices that counter corruption and extortion. Activities with regard to promoting responsible political involvement and discouraging anti-competitive behaviour are also high on the agenda of sample companies with between 60% and 85% stating they have clear rules on responsible political involvement and contributions, and how to deal with conflicts of interest.

The majority of sample companies in Croatia (52%), Macedonia (60%), Montenegro (79%), Romania (61%) and Turkey (77%) have remedial processes in place for cases where they cause or contribute to a human rights abuse, as well as stakeholder engagement processes for the employees of business partners (such as those in the supply chain) to raise concerns (66% of Macedonian sample companies, 69% of Montenegrin, 39% of Romanian and 55% of Turkish).

The culture of the company is the largest factor in CSR engagement in four of the five countries. In Croatia, Macedonia, Montenegro and Turkey, the second important reason is to attract and motivate employees. Interestingly, pressure by NGOs only plays a rather marginal role in the CSR engagement of companies in all five countries. Moreover, only in Macedonia and Romania are the interests of consumers amongst the top three reasons for the CSR commitment of companies and they play only a minor role in the other three countries. The interests of investors rank rather low in all five countries.

VII. USE OF CSR INSTRUMENTS, TOOLS AND INITIATIVES

Sample companies were asked whether they are aware of the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Tripartite Declaration of principles concerning multinational enterprises and social policy, the UN Global Compact, ISO 26000, or the Global Reporting Initiative (GRI). The UN Guiding Principles on Business and Human Rights were best known by company representatives in Croatia (21%), Montenegro (40%) and Turkey (63.8%). This is impressive given that the UN Guiding Principles on Business and Human Rights were only endorsed by the UN Human Rights Council in June 2011. Awareness of ISO 26000 also ranked high in all of the countries except Croatia (22% in Macedonia, 25% in Montenegro, 18% in Romania and 39% in Turkey).

Turkey as an OECD member country, and Romania which voluntarily adheres to the OECD Guidelines for Multinational Enterprises, are two of the five countries in which the OECD Guidelines are applicable. Although 30% of sample companies in Turkey know the OECD Guidelines, none use or implement them. In Romania, 4% of the whole company sample and 10% of the large sample companies are aware of the OECD Guidelines. However, again, none of the sample companies from Romania use or implement them. This also shows the need for additional awareness raising and training.

Less surprising is the low number of sample companies which are aware of the ILO Tripartite MNE Declaration (3.8% in Montenegro for instance). This is consistent with the finding of an EU study from March 2013 on Policy References made by EU Companies to Internationally Recognised CSR Guidelines and Principles, according to which only 2% of the sample companies refer to the ILO Tripartite MNE Declaration in their public commitments. On the other hand it has to be recognised that the provisions of the ILO Tripartite MNE Declaration are (partly) included in the OECD Guidelines and ISO 26000. Thus, the impact of the Declaration might be higher than the low number indicates at first sight.

Whereas in Macedonia 6%, in Romania 11.93%, in Montenegro 17% and in Turkey 24.5% of the companies which are aware of at least one of the above mentioned instruments make use of at least one of them; in Croatia the number is markedly higher at 57.4%. The reason for the gap between awareness and use of the instruments might indicate training needs by companies.

27.5 % of the Turkish sample companies have made a public commitment to CSR. This stands in contrast to 54% of the Turkish sample companies which claim to have a public commitment to respect human rights. It could be expected that more companies have a more general CSR commitment than a special human rights commitment or that the human rights commitment is part of the CSR commitment. Similar questions also arise for the other countries. In Romania for instance, the public CSR commitment of 11% of sample companies stands in contrast to 44% of sample companies claiming to have a public commitment to human rights. In Montenegro, moreover, half of the interviewed company representatives said that their company has a public commitment to CSR, but only six could provide an internet link where information on this commitment could be accessed.

The majority of the sample companies have a code of conduct: in Croatia (55%) Macedonia (50%) and in Montenegro (74%), whereas the results in Romania (34%) and Turkey (34%) are lower. There are also obviously large differences between large companies and SMEs. In Croatia for instance, 86% of the companies which have a code of conduct are large companies. Similarly, in Turkey, 77% of the sample companies which have a code of conduct are large-scale companies.

The high number of companies with a code of conduct in Montenegro is noteworthy, especially in view of the high number of SMEs in the company sample. When just looking at SMEs in Montenegro, 73% state that they have a code of conduct. 53% of all of the sample companies in Montenegro which have a code of conduct inform their suppliers, and 97.7% of them expect suppliers to follow it. Again, in view of the large number of SMEs in the company sample in Montenegro, this is very high since SMEs normally have much less leverage to impose such demands on suppliers.

In Turkey, 31.4 % of the sample companies with a code of conduct informed their suppliers, and 78.1 % of those demand that their suppliers apply it. In Croatia, the numbers are more than double, with 72% of the sample companies which have a code of conduct informing the supplier and all of them expecting the supplier to fulfil it.

Companies are themselves part of supply chains and therefore not only ask their suppliers to follow their code of conduct, but also have to follow the code of conduct of their customers, which is the case in 88% of Croatian sample companies, in 66% of sample companies in Montenegro, and in 39% of sample companies in Macedonia, but only the case in around 18% of Romanian and Turkish sample companies. The high percentage of sample companies which have to follow a code of conduct of another company in Montenegro and Croatia supports the finding that codes of conduct are widely used in these countries.

Around one-quarter of the sample companies (in Macedonia 28%, in Montenegro 23%, in Romania 25%, in Turkey 28%) report on their CSR engagement. In Croatia, the number is significantly higher at 46%. Moreover, ways of reporting vary between countries. Whereas in Croatia, Macedonia and Romania the most common means of reporting is online, in Turkey reporting is integrated, and in Montenegro it is usually achieved through meetings with stakeholders. This finding proves that there is no “one-size-fits-all” approach to reporting, but that companies choose the most appropriate way according to their size, the local environment they operate in, the needs of their stakeholders and the challenges and opportunities of their sector.

VIII. CHALLENGES WITH REGARD TO CSR

A major challenge for companies engaging in CSR activities is lack of time and resources (37.8% of companies in Turkey, 31% in Macedonia, 26.5% in Montenegro and 39.45% in Romania, but only

11% companies in Croatia). Further major challenges are that companies are not sure what a comprehensive CSR policy looks like, or what it should contain (35.37% of sample companies in Turkey, 23.85% in Romania), an unfavourable business environment in which legislation is not enforced (35% in Macedonia, 29.2% in Montenegro and 17.07% in Turkey), and uncertainty about where the limits of the respective responsibilities of the company and the government lie (29.36% in Romania).

IX. FUTURE DEVELOPMENT OF CSR AND TRAINING NEEDS OF COMPANIES

In all five countries, the vast majority of companies believe that the significance of CSR will grow (73% in Croatia, 65.5% in Macedonia, 83.9% in Montenegro, 68% in Romania and 87.23 % in Turkey). Key topics in the CSR agenda are expected to be responsibility towards the environment, towards employees and with regard to human rights, as well as fair business behaviour.

This is also reflected in the future demand for training on CSR. Approximately half of the respondents would be interested in participating in training sessions later in the project (57% in Croatia, 47% in Macedonia, 45.3% in Montenegro, 72.48% in Romania and 57% in Turkey).

The topics of interests were rather wide and relate to general information about CSR, human rights, the business case for CSR, information about responsibility towards employees, the environment and the local community, information on international instruments and tools, risk management, and reporting.

X. CONCLUSIONS

The vast majority of the sample companies are engaged in CSR activities. There seems, however, to be a need for awareness raising and training when it comes to applying the concrete international CSR instruments, tools and frameworks. The knowledge and uptake of these elements were found to be significantly lower than the CSR activities of sample companies.

- The training courses should have a particular focus on international CSR instruments, tools and frameworks. Moreover, the vast amount of existing guides and literature on these international instruments and tools should be listed in an electronic reference directory (with

links) and thus made accessible to companies and employers' organisations in a "one-stop" shop.

There are already CSR networks and initiatives which have been very active at national level for quite some time in all five countries. In Croatia, there is even a highly popular national CSR tool called the "CSR Index".

- For the implementation of the training modules at national level, partnerships with some of these existing initiatives might be considered in order to avoid duplication of work. The project in its implementation phase should take an inclusive approach when it comes to the involvement of these initiatives and networks, and should take into account national characteristics as identified in the national reports.

Lack of time and resources was identified as a major challenge to companies in engaging in CSR activities. Unfortunately, there is little the project can do about this. However, sample companies also stated as a major obstacle that they are not sure what a comprehensive CSR policy should look like or what it should contain..

- The dissemination of concrete best practice on comprehensive CSR policies should be part of the implementation phase of the project. This could be done through a compilation of best practices, as well as through direct exchange between companies in the training seminars.

SMEs are not only the backbone of the economies in all five countries; they also face the biggest challenges when it comes to the implementation of certain instruments and initiatives. Thus, in the implementation phase, the needs and limits of SMEs should be particularly considered.

- In awareness-raising campaigns, the content of the training modules as well as the accessibility of the training, needs and capabilities of SMEs should be the focus. The "KISS" approach (Keep it Simple, Stupid) is central. If the training is too burdensome, SMEs will not participate. If the proposed CSR approaches too complex, they will not consider implementing them. To be able quickly to read short fact sheets on the different issues should give companies an initial introduction to the topics.

There are wide regional variations in the awareness and implementation of CSR. As the Turkish example has especially shown, training in the periphery is needed.

- The project should be mindful of this and ensure that training seminars are offered especially in regions where levels of CSR awareness and knowledge are low.

Discussions during the CSR Roundtable revealed the need to demonstrate the business case for CSR. This would not only encourage companies to engage, but also facilitate discussions within companies.

- When it comes to the compilation and sharing of best practices, special attention should be paid to highlighting the business case for CSR.



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