



## **Why you need a Brussels Liaison Office?©**

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## **Introduction**

While companies in the European Union increasingly recognize the importance of lobbying at the European and national level only a few have their own representation office in Brussels. Yet companies need to be compliant in many sectors e.g. consumer protection and producer liability, work safety, product certification, technical regulations, standards, food quality and safety, environmental protection, rules of competition, labels, trademarks, patents without talking about what's in the pipeline in terms of new legislation that is bound to affect their business.

More than 70% of national commercial law is based on decisions taken in Brussels. Companies are finding more and more that their markets are shaped by regulations established in Brussels. Today's business strategy must therefore be based on the legal instruments that the EU is likely to introduce. The existing resources of the EU law givers are exhausted by the continuous process of market change and increasingly complex economic structures. There is no guarantee that there will be any consideration of the impact their measures may have on business. Although EU legislators appeal directly to market players to become involved in the decision making procedures they remain insufficiently informed about the varying interests of the different sectors of trade and industry.

Companies that understand and work to impact the EU legislative and regulatory arenas deliver great rewards to their shareholders. On the other hand those that ignore Brussels miss opportunities and are often left behind by policy-makers and more active stakeholders.

For internationally oriented firms the EU legal and political framework is crucial for the development of their international operations and having a permanent representation in Brussels allows them to stay in direct contact with politicians and officials at the EU level.

## **1. Corporate Public Policy Activities at EU level**

Corporate public policy activities include a broad set of actions with the overall purpose of ensuring that a company's views are listened to within the EU institutions and other areas of policy debate and development. The aim is to ensure that the legislative, regulatory framework protects and promotes the company or at least does not damage it.

Companies typically strive to identify potentially problematic issues as they begin to emerge, intervene with decision-makers at an early stage, set the agenda and shape policy as it is formulated.

Most companies aim to present an issue arising rather than seek to defeat a proposal once it has been formulated. This calls for the development of relationships with the EU decision-makers. The company viewpoint is expressed at formal and informal meetings. Formal submissions include briefing documents and position papers, responses to official proposals and direct contact with EU officials.

Monitoring political issues is a critical element of corporate public policy activities. This covers current legislation proceedings as well as an informal policy activity in order to provide early warning of emerging issues. Companies need to understand the macro-policy framework as well as the specific areas to the company on a day-to-day basis. Policy analysis on specific issues such as CO2 emissions require a detailed understanding of the political evolution, political pressures and opportunities for changing proposals.

A huge variety of initiatives and consultations are often in play at anyone time across a range of EU institutions. Intelligence gathering acts as an early warning service on relevant consultations, inquiries and policy initiatives. Good radar systems also help to identify suitable opportunities for companies to comment publicly and privately on policy developments.

In summary, public policy activities may fall in several areas:

- Influencing the outcome or direction of a proposed or existing legislation
- Influencing how regulators apply or enforce existing laws
- Influencing the broad direction of public policy at EU level
- Supporting either directly or indirectly external organizations, including industry associations, chambers of commerce, think tanks and NGOs that seek to influence public policy.
- Develop or improve the company's relationships with EU officials, civil servants, MEPs. etc.

## **2. Purpose of Brussels Office**

The prime purpose of the Brussels office is to promote and ensure the influence of the company in European policy and decision-making on both European and international issues that affect the company's business. The Brussels office allows a better coordination of the lobbying strategy, monitoring policy developments, building contacts with relevant MEPs and Commission officials and taking care of the company's senior officials when they come to Brussels for meetings.

In view of the increasing number of European legislation as well as regulations this task is of increasing importance. For a company's long term strategy it is essential to be well informed about developments in the EU. The Brussels office facilitates swift and efficient cooperation with the institutions.

In short, the Brussels office serves as the ears and the eyes of the company by monitoring and forwarding information to headquarter as well as the voice and the feet of the company on the Brussels playing field by fine-tuning the efforts to lobby the EU process.

Of course the opening of a Brussels office does not mean that companies will stop using the services of law firms, consultancies and leave the industry associations that represent them. On the contrary companies want to be represented through all channels at the same time to maximize contact and coverage of the EU institutions and their regulations.

## **2.1. Typical Tasks and Responsibilities of Brussels Office**

- To co-ordinate and promote the representation of the company to the institutions of the European Union
- To represent the company in day-to-day contact with European institutions and networks in order to influence their policies and decisions
- To develop and advise on specific policy influencing materials and activities to influence European policy development and decision-making through press releases, publications, speeches, briefing papers, legislative amendments, seminars etc.
- To build strategic relationships with people in positions of influence e.g. Commissioners, civil servants in key Directorates General, journalists, parliamentarians, professionals and other journalists.
- To represent the company on relevant industry associations committees
- To ensure the alignment of public affairs objectives to planning processes
- To identify and prioritize key objectives and develop and support public affairs strategies to seize opportunities and minimize threats that have a major impact on the company's bottom line.
- To monitor policy development advising on significant trends and development as part of an overall information strategy.

## **2.2. Sample job description of a Vice-President Public Affairs (Dream Person)**

### **Purpose**

- Provide strategic counsel on government and policy matters at EU level and establish relationships with policy makers, opinion leaders

## **Professional competencies**

**Innovating:** Exercise a fundamental willingness to learn; identify imaginative and resourceful solutions to problems; identify and pursue better ways of doing things and seeking opportunities to explore different solutions. Finding creative, inventive, and resourceful ways of solving problems, overcoming barriers and building confidence within a team.

**Influencing:** Persuasive approach which identifies ways to motivate others to take action toward a desired result; articulates and gains support for the team's vision and goals and seeks win/win outcomes. Takes the initiative to make things happen, with and through other people. Builds commitment in top management and colleagues. Possesses a high degree of organisational and analytical aptitude. Good negotiation skills.

**Results:** Exceeds objectives and expectations - consistently a top performer; steadfastly pushes himself/herself and others for results; maintains a high-quality threshold to their work under the pressure of deadlines and competing priorities; plans for, generates and measures PR results. Proactive rather than reactive.

**Change Management:** Manages and embraces change effectively; open to new ideas and ways of doing things; patient in ambiguous situations.

**Stakeholder-focused:** Dedicated to surpassing the expectations and requirements of internal and external stakeholders in the business; Able to cultivate a wide range of interpersonal styles. Is flexible in their approach to varying situations; accommodates cultural/style differences. Handles obstacles with diplomacy and tact.

**Judgment:** Makes well-informed decisions that meet corporate objectives. Takes a broad corporate perspective in making effective decisions based upon analysis, experience and wisdom.

**Teamwork:** Works effectively and efficiently as a member of a team and has clear understanding of the value of a team; collaborates with others and recognises the value of teammate's contributions. Inclusive by nature. Learns and grows from professional interaction with others. Able to recognise individual contributions to team successes and motivate them accordingly.

**Business Acumen:** Focused on the bottom line whilst producing high-quality work; understands the mechanics of how businesses work; knowledgeable about policies, practices, and trends and their implications to the workplace; knows and understands business processes and uses insight to drive change internally. Understands the company's business model, strategic objectives, and competitive environment; is knowledgeable across the wider company's product and service offering; continual awareness to market changes that present opportunities and threats to the company's competitive position in the market.

## **Qualifications**

### **Education and Experience Requirements:**

- Degree educated in a politics/policy or business related field. Evidence of international study or post-graduate academic development an advantage.

### **Preferred Experience**

- At least 10 years experience in Public Affairs
- A thorough understanding of European policy issues in the area of the company's activities. Good contacts network in Brussels
- Professional experience in a public affairs role, lobbying the European Parliament and Commission and EU member states

### **Broad professional experience, encompassing:**

- Insight into business imperatives / impact of politics and regulatory environment on business
- A self-starter - needs to be motivated to build and grow a public affairs practice
- Experience in working in a fast paced environment
- Strong leadership experience
- Fluent in English and French, both written and spoken. Other languages a bonus
- Self confident, diplomatic and must have a high level of integrity

### **Culture**

- Relationship-driven requiring a high degree of collaboration and communication
- Open and honest with a need for individuals to work well in a collaborative environment
- Open to ongoing change

### **Summary**

In order to do an effective job in Brussels, your corporate representative needs to develop a great deal of interest and attention to the issues that are critical for the company's business units he/she represents before the EU institutions. The job is mostly being a sort of ambassador for the company in the political arena. This entails a great deal of patience and perseverance. It requires a lot of diplomatic skills internally making sure that the Brussels office communicates effectively within the company. Sometimes the messages to be delivered to policymakers are clear. It's just a question of tailoring them to the circumstances. In other instances, getting a company's position is not that clear cut. It is important that the people your Brussels office deals with feel confident and trust their working methods. Most of the time the Brussels office will be confronted with situations that need a quick reaction and answers must be communicated in an assertive manner. Clarity and thoroughness of the company's messages is crucial as is creativity, imagination and the ability to prioritize tasks.

### **3. Cost of Brussels Office**

The cost factor of establishing a permanent representation office in Brussels is important within the multi-level structure of the European Union. At the same time it should be noted

that Brussels is among the less expensive cities worldwide. The average premium rate for offices is about €295 per square meter, i.e. 40% of the rent for similar facilities in London.

When figuring out the cost of a Brussels office the following other items beside rent should be accounted for:

- salaries and bonuses
- employee benefits and prerequisites
- travel and entertainment
- consultants and independent lobbyists
- publications, subscriptions, specialized computer software and on-line tracking services
- dues and professional training
- coalition expenses
- publicity, advertising and PR expenses
- events and receptions

The rule of thumb is that your budget should be twice the amount of personnel costs including salaries, bonus and benefits.

#### **4. Key Value Drivers of Public Affairs and Brussels Office**

Compelling evidence shows that a company that understands the public affairs function and invests in a Brussels office will see real benefits from that commitment.

The following are the key value drivers of public affairs and a Brussels office:

1. Freedom to operate: Preventing restrictions on the company's ability to act. These restrictions could come from EU regulators, legislators, unions and public opinion.
2. Cost avoidance: Preventing future taxes, rate increases, permits or other business costs.
3. Market opportunity or advantage: Establishing a competitive advantage such as favorably shaping the business climate to the benefit of the company.
4. Brand image or reputation: Increasing the company's brand equity or the brand equity of its products and services among its stakeholders.
5. Speed: Moving quickly to capture opportunities, respond to threats or alter the business in an advantageous way.
6. Productivity: Increasing the quantity and quality of products and services produced.

In summary, companies must realize that market success depends not just on their products and services, the efficiency of their operations, their internal organization and the organization of their supply chains, distribution channels and alliance networks. Success also depends on how effectively they deal with governmental authorities at both the EU and national level, interest groups, activists and the public. The forces these parties generate can foreclose entry into new markets, limit price increases and raise the costs of competing. They can also unlock

markets, reduce regulation, handicap rivals and generate competitive advantage. These forces are manifested outside of markets but often work in conjunction with them.

## **5. Possible Public Affairs Strategies**

Companies having a Brussels office have a wide range of tools and approaches they can use in their public affairs efforts. Companies are most likely to adapt an adaptive, proactive or protective approach. These approaches can be used individually or in combination with other approaches that best suit the company's strategy in regard to a specific policy area or situation.

### **Adaptive Approach**

The effectiveness of adaptive strategies will depend on the ability of the Brussels office to correctly understand and interpret legislative and regulatory changes so the company can realign or reconfigure its structural and technical processes i.e. compliance with new standards, production of compliance information for regulators, improving processes that directly reduce the costs of compliance. Under this strategy the Brussels office serves as an information antenna and gather legislative and technical information relevant to the company's different sectors of activity.

### **Proactive Approach**

While adaptive strategies rely on actions related to policy implementation, the proactive approach pertains to activities undertaken in the regulatory formulation stage, namely:

- Environmental scanning i.e. legislative review, stakeholder and key decision-maker mapping, market research etc.
- Intelligence gathering and research
- Positioning of the company vis-à-vis the public forum and key decision-makers as a credible and trusted expert and representative of the industry.

The objectives of most proactive strategies range from initiation of self-regulation standards (pre-empting costly and time-consuming governmental interventions and regulations for the industry) to active participation in the shaping of a policy proposal through the various stakeholder and expert groups within the European institutional bodies at the earliest stage.

Even though the proactive strategies require dedicated expert resources to regularly monitor, interpret and research issues, this approach provides the company with early knowledge and an ability to appropriately respond before these changes are implemented. The investment in a proactive company stance provides the best opportunity to anticipate, mitigate and prepare for potential negative legislative or regulatory developments while building legitimacy through policy engagement.

### **Protective Approach**

This approach is taken when a company intends to thwart changes in the policy environment and to protect what it views as a favourable 'status quo'. Therefore when a potential regulatory change is perceived as a threat or a constraint to the company's ability to sustain its current competitive advantage, the company may want to exhibit vigorous influence efforts to

protect the value of its strategic assets and competencies. Examples of protective public affairs strategies include advocacy of entry restrictions, influencing policy makers to retain rules favourable to the company, advocating a reduction in the threat of the modification of the definition of a certain products with a view to increase or reduce the scope of a piece of legislation etc.. The role of the protective public affairs approach is to exert influence on policy makers or those who might persuade officials to sustain current regulations. An effective protective approach is based on a company's ability to cultivate and utilize relations with decision-makers and/or develop indirect ties or networks to those who influence decision-makers for purposes of protecting corporate interests.

## **Conclusions**

The open structure of the supranational institutions and the complexity of the decision-making processes have created a multitude of opportunities, and challenges, to influence the decision-making process. The typically elitist nature of the system of interest representation at the EU level, having the timely access to the right information and being able to influence in the decision-making process, requires a strong presence in Brussels and insider knowledge of how to play the 'Brussels game'.

Having a permanent office in Brussels with knowledgeable and skilled staff allows a company to further its interests and ensures a better profile of their organization vis-à-vis the EU bodies. It also facilitates access to crucial information regarding opportunities and threats to a sector's interests.

Although companies can choose from a number of public affairs approaches, according to their specific industry and needs, the majority of companies in Brussels attempt to influence the EU policy- and decision-making processes through monitoring, intelligence gathering and by providing information to EU institutions that could influence policy outcomes. Secondly, the company will use its own statistics, research and information to design strategies, create position papers, and develop programmes that correspond to the policy being discussed, submitting these to supranational institutions. This is a proactive function.

To summarise, the main functions of the Brussels office can be generalized as:

- Local network building and management
- Monitoring of policy developments and legislative initiatives
- Influencing EU policy and legislation as a recognized stakeholder

In a complex and influential policy environment such as that of the European Union, a company can strengthen its competitive advantage by actively engaging in public affairs rather than taking a passive or politically inactive stance.

Successful Brussels organizations tend to view the European policy environment as a set of opportunities, within which they face a multitude of choices about what objectives to pursue and how to pursue them in a way that best serves their members.

Developing a public affairs capability is a process by which a company attempts to influence the policy environment affecting it for the purpose of generating future value or protecting the current value from any changes in the legal or competitive environment. The costs of developing and maintaining an organization's public affairs efforts need to be



appraised against any potential opportunities for value creation or protection. Favourable subsidies, grants or European funding, the reduced threat of market forces, greater legitimacy, the reduced threat of foreign product subsidies are all examples of potential outcomes of effectively managing the policy environment in Brussels.

Participation in the EU legislative and regulatory process is difficult to achieve from afar. It is important to be present in order to facilitate the vital face to face contacts, networking and attendance to meetings, presentations and events that allow the effective exchange of information.

The opportunity cost of not having proper corporate representation in Brussels is too high to be ignored. An investment in a Brussels office will pay itself back in the form of greater influence and legitimacy. Whatever the current structure or financial capacity may be, it is vital that the Brussels office is managed as professionally as possible. It is important for the company to make use of current management best practices and activities. These include the strategic use of outsource service partners and experts that fully understand and appreciate the special needs of the company, especially as relates to activities in the complicated legislative and regulatory environment of the European Union.

## **APPENDICES**

### **1. Non-Exhaustive List of Companies having a Brussels Representation**

Source: European Agenda

ABB EUROPE ASEA BROWN BOVERI  
ABN-AMRO BANK  
ABX LOGISTICS WORLDWIDE SA/NV  
AGILENT TECHNOLOGIES  
AMERICAN INTERNATIONAL GROUP-AIG EUROPE  
AIR FRANCE  
ALCAN  
ALCOA EUROPE  
ALITALIA  
ALLIANZ EUROPEAN AFFAIRS OFFICE  
AMAZON.COM  
AMERICAN AIRLINES  
AMWAY EUROPE  
APPLE  
ARD-VERBINDUNGSBÜRO  
AREVA  
ASTRAZENECA  
AT&T  
ATOS WORLDWIDE  
AUSTRIAN AIRLINES  
AUTOSTRADE PER L'ITALIA  
AXA BELGIUM  
BAE SYSTEMS  
BANCA DI ROMA  
BANCA MONTE PASCHI BELGIO  
BANCO BILBAO VIZCAYA  
BASE  
BASF AG  
BAXTER WORLD TRADE  
BAYER AG  
BBC  
BELGACOM  
BERTELSMANN AG  
BMW GROUP  
BOEING  
BOMBARDIER TRANSPORT  
ROBERT BOSCH GMBH  
BP PLC  
BRISTOL-MYERS SQUIBB PHARMA BELGIUM  
BRITISH AIRWAYS  
BRITISH AMERICAN TOBACCO  
BRITISH ENERGY  
BRITISH TELECOM  
BRUSSELS AIRLINES

CATERPILLAR  
CISCO  
CITI  
COCA-COLA  
COMMERZBANK EU LIAISON OFFICE  
CZECH POWER (CEZ)  
CZECH RAILWAYS  
DAIMLER AG  
DATEV EG  
RAG BETEILIGUNGS-AG/DEGUSSA  
DEKRA  
DELHAIZE GROUP  
DEUTSCHE BAHN  
DEUTSCHE BANK  
DEUTSCHE LUFTHANSA  
DEUTSCHE POST WORLD NET  
DEUTSCHE TELEKOM  
DHL  
THE DOW CHEMICAL  
DU PONT  
E-ON AG  
EADS/EUROPEAN AERONAUTIC DEFENCE AND SPACE COMPANY  
EBAY  
EDEKA  
EDISON  
EDF  
ELECTRABEL  
EDS/ ELECTRONIC DATA SYSTEMS  
ELECTROLUX  
ELI-LILLY & CO  
ENEL SPA  
ENERGIE BADEN-WÜRTTEMBERG  
ENI  
ERICSSON EUROPEAN AFFAIRS OFFICE  
EXXONMOBIL  
FEDEX  
FERROVIE DELLO STATO  
FIAT  
FINMECCANICA  
FORD MOTOR COMPANY  
FORTIS  
FORTUM OY  
FRANCE TELECOM  
GAZ DE FRANCE (GDF)  
GENERAL ELECTRIC (GE)  
GENERALI GROUP  
GLAXOSMITHKLINE  
GENERAL MOTORS AG  
HP  
HITACHI

HOLCIM  
HONEYWELL  
HUNGARIAN DEVELOPMENT BANK  
HYDRO ASA  
IBERDROLA  
IBM EMEA  
INBEV  
ING BELGIUM  
INTEL CORPORATION GOVERNMENT AFFAIRS EMEA  
INTESA SANPAOLO SPA  
JOHNSON & JOHNSON  
JTI INTERNATIONAL  
KBC GROUP  
KELLOG'S  
KFW BANKENGRUPPE  
KLM ROYAL DUTCH AIRLINES  
KRAFT FOODS  
LAGARDERE  
L'OREAL  
LOT POLISH AIRLINES  
MAN AKTIENGESELLSCHAFT AG  
MASTERCARD WORLDWIDE  
MCDONALD'S EUROPE  
MERCK SHARP & DOHME  
METRO AG  
MICHELIN  
MICROSOFT  
MONSANTO EUROPE  
MOTOROLA  
NESTLE  
NIKE  
NOKIA  
NORTEL NETWORKS  
NOVARTIS INTERNATIONAL AG  
PANASONIC EUROPE  
PSA PEUGEOT CITROEN  
PFIZER  
PHILIPS ROYAL PHILIPS ELECTRONICS OF THE NETHERLANDS  
PIONEER OVERSEAS CORPORATION  
PIRELLI  
PROCTER AND GAMBLE PHARMACEUTICALS  
RENAULT  
REPSOL YPF  
REWE  
ROLLS ROYCE  
RWE AG  
SANOFI-AVENTIS  
SAP AG  
SCHLUMBERGER  
SHELL

SIEMENS  
SOCIETE NATIONALE DES CHEMINS DE FER FRANCAIS  
SOLVAY  
SONY  
SONY PICTURES ENTERTAINMENT  
STATOIL  
SUN MICROSYSTEMS INC  
SYNGENTA  
TELECOM ITALIA  
TELEFONICA S.A.  
TELECOM AUSTRIA  
TELENOR  
TELIASONERA  
TEOLLISUUDEN VOIMA OY  
TETRA PAK  
THALES  
THYSSENKRUPP AG  
TIME WARNER  
TOTAL  
TOYOTA MOTORS CORPORATION  
TÜV RHEINLAND GROUP  
UCB  
UNICREDITGROUP  
UNILEVER  
UNISYS  
UNITED TECHNOLOGIES  
UPS-UNITED PARCEL SERVICE  
VATTENFALL  
VEOLIA  
VERBUNDNETZ GAS AG  
VODAFONE  
VOLKSWAGEN AG  
VOLVO GROUP REPRESENTATION EU  
WINGAS  
WÜRTH  
ZDF EUROPABÜRO

## 2. List of EU Global Companies

Source: Forbes Global 2000 in 2005

Out of Forbes Global 2000 Companies (2005) EU Companies account for only 24% of the total (479 companies).

|                |     |
|----------------|-----|
| Austria        | 9   |
| Belgium        | 12  |
| Czech Republic | 2   |
| Denmark        | 10  |
| Finland        | 15  |
| France         | 62  |
| Germany        | 63  |
| Greece         | 12  |
| Hungary        | 2   |
| Ireland        | 8   |
| Italy          | 45  |
| Luxembourg     | 4   |
| Netherlands    | 33  |
| Poland         | 2   |
| Portugal       | 2   |
| Spain          | 30  |
| Sweden         | 28  |
| United Kingdom | 140 |
| Total          | 479 |

Legend

**Red** indicates presence of Brussels Office

**Blue** indicates that Public Affairs activities are handled from headquarters

**Austria (8)**

|                           |                            |
|---------------------------|----------------------------|
| ERSTE BANK                | Banking                    |
| INVESTKEDIT BANK          | Banking                    |
| OMV                       | Oil & Gas Operations       |
| <b>TELEKOM AUSTRIA</b>    | Telecommunication Services |
| UNIQA                     | Insurance                  |
| VERBUND AUSTRIAN ELECTRIC | Utilities                  |
| <b>VOESTALPINE</b>        | Materials                  |
| WIENER STADTISCHE         | Insurance                  |

**Belgium (13)**

|                                     |                               |
|-------------------------------------|-------------------------------|
| <b>AGFA GEVAERT</b>                 | Household & Personal Products |
| <b>ALMANIJ</b>                      | Diversified Financials        |
| <b>BANQUE NATIONALE DE BELGIQUE</b> | Banking                       |
| <b>BELGACOM</b>                     | Telecommunication Services    |
| <b>DELHAIZE GROUP</b>               | Food Markets                  |
| <b>DEXIA</b>                        | Banking                       |
| <b>FRANZ COLRUYT</b>                | Food Markets                  |
| <b>INBEV</b>                        | Food, Drink & Tobacco         |
| <b>ING</b>                          | Diversified Financials        |
| <b>SOLVAY GROUP</b>                 | Chemicals                     |
| <b>TYCO INTERNATIONAL</b>           | Conglomerates                 |
| <b>UCB</b>                          | Drugs & Biotechnology         |
| <b>UMICORE</b>                      | Materials                     |

**Czech Republic (2)**

|                          |                            |
|--------------------------|----------------------------|
| CESKY TELECOM            | Telecommunication Services |
| <b>CZECH POWER (CEZ)</b> | Utilities                  |

**Denmark (10)**

|                     |                                |
|---------------------|--------------------------------|
| CARLSBERG           | Food, Drink & Tobacco          |
| DANISCO             | Food, Drink & Tobacco          |
| DANSKE BANK GROUP   | Banking                        |
| H LUNDBECK          | Drugs & Biotechnology          |
| ISS                 | Business Services and Supplies |
| JYSKE BANK          | Banking                        |
| MOLLER-MAERSK       | Transportation                 |
| <b>NOVO-NORDISK</b> | Drugs & Biotechnology          |
| SYDBANK             | Banking                        |
| TDC GROUP           | Telecommunications Services    |

**Finland (15)**

|                    |                                 |
|--------------------|---------------------------------|
| <b>FORTUM</b>      | Oil & Gas Operations            |
| KESKO GROUP        | Food Markets                    |
| KONE               | Construction                    |
| METSO              | Capital Goods                   |
| M-REAL             | Materials                       |
| <b>NOKIA</b>       | Technology Hardware & Equipment |
| OKO BANK           | Banking                         |
| OUTOKUMPU          | Materials                       |
| RAUTARUUKKI        | Materials                       |
| SAMPO              | Insurance                       |
| SANOMA WSOY        | Media                           |
| <b>STORA ENSO</b>  | Materials                       |
| TIETOENATOR        | Business Services & Supplies    |
| <b>UPM-KYMMENE</b> | Materials                       |
| WDRTSILD           | Capital Goods                   |

**France (62)**

|                                    |                                  |
|------------------------------------|----------------------------------|
| ACCOR                              | Hotels, Restaurants & Leisure    |
| <b>AIR FRANCE-KLM GROUP</b>        | Transportation                   |
| AIR LIQUIDE GROUP                  | Chemicals                        |
| ALCATEL                            | Technology Hardware & Equipment  |
| <b>ALSTOM</b>                      | Capital Goods                    |
| <b>AREVA GROUP</b>                 | Materials                        |
| ASF-AUTOROUTES DU SUD DE LA FRANCE | Transportation                   |
| ATOS ORIGIN                        | Business Services & Supplies     |
| AUTOROUTES PARIS-RHIN-RHÔNE        | Transportation                   |
| <b>AXA GROUP</b>                   | Insurance                        |
| BNP PARIBAS                        | Banking                          |
| <b>BOUYGUES GROUP</b>              | Construction                     |
| CAP GEMINI                         | Software & Services              |
| CARREFOUR GROUP                    | Food Markets                     |
| CHRISTIAN DIOR                     | Household & Personal Products    |
| CIC GROUP                          | Banking                          |
| CNP ASSURANCES                     | Insurance                        |
| CREDIT AGRICOLE                    | Banking                          |
| <b>DANONE</b>                      | Food, Drink & Tobacco            |
| DASSAULT SYSTEMES                  | Software & Services              |
| EIFFAGE                            | Construction                     |
| ESSILOR INTERNATIONAL              | Health Care Equipment & Services |
| EULER HERMES                       | Insurance                        |
| EUROTUNNEL                         | Transportation                   |
| FINANCIERE DE L'ODET               | Transportation                   |
| FINATIS                            | Trading Companies                |
| <b>FRANCE TELECOM</b>              | Telecommunications Services      |



|                                  |                                 |
|----------------------------------|---------------------------------|
| GALERIES LAFAYETTE               | Retailing                       |
| GECINA                           | Diversified Financials          |
| HERMES INTERNATIONAL             | Household & Personal Products   |
| IMERYS                           | Construction                    |
| <b>L'OREAL GROUP</b>             | Household & Personal Products   |
| LAFARGE                          | Construction                    |
| LAGARDERE SCA                    | Media                           |
| <b>MICHELIN GROUP</b>            | Consumer Durables               |
| NATEXIS BANQUES POPULAIRES       | Banking                         |
| <b>PERNOD RICARD</b>             | Food, Drink & Tobacco           |
| <b>PSA-PEUGEOT-CITROEN GROUP</b> | Consumer Durables               |
| PINAULT PRINTEMPS REDOUTE        | Retailing                       |
| PUBLICIS GROUPE                  | Media                           |
| <b>RENAULT GROUP</b>             | Consumer Durables               |
| RHODIA                           | Chemicals                       |
| SAGEM                            | Technology Hardware & Equipment |
| SAINT GOBAIN                     | Construction                    |
| <b>SANOFI AVENTIS</b>            | Drugs & Biotechnology           |
| SCHNEIDER ELECTRIC               | Capital Goods                   |
| SCOR                             | Insurance                       |
| <b>SNECMA</b>                    | Aerospace & Defense             |
| SOCIETE GENERALE GROUP           | Banking                         |
| SODEXHO ALLIANCE                 | Hotels, Restaurants & Leisure   |
| <b>SUEZ GROUP</b>                | Utilities                       |
| TECHNIP                          | Oil & Gas Operations            |
| <b>THALES</b>                    | Aerospace & Defense             |
| THOMSON                          | Consumer Durables               |
| <b>TOTAL</b>                     | Oil & Gas Operations            |
| UNIBAIL                          | Diversified Financials          |
| VALEO                            | Consumer Durables               |
| <b>VEOLIA ENVIRONNEMENT</b>      | Utilities                       |
| VINCI GROUP                      | Construction                    |
| VIVENDI UNIVERSAL                | Media                           |
| WENDEL INVESTISSEMENT            | Diversified Financials          |

### Germany (63)

|                          |                               |
|--------------------------|-------------------------------|
| AAREAL BANK              | Diversified Financials        |
| ADIDAS-SALOMON           | Household & Personal Products |
| <b>ALLIANZ WORLDWIDE</b> | Insurance                     |
| ALTANA                   | Drugs & Biotechnology         |
| AVA                      | Retailing                     |
| AXEL SPRINGER VERLAG     | Media                         |
| BANKGESELLSCHAFT BERLIN  | Banking                       |
| <b>BASF GROUP</b>        | Chemicals                     |
| <b>BAYER GROUP</b>       | Chemicals                     |
| BAYERISCHE IMMOBILIEN    | Diversified Financials        |

|                              |                                   |
|------------------------------|-----------------------------------|
| BAYWA                        | Food, Drink & Tobacco             |
| BEIERSDORF                   | Household & Personal Products     |
| BHW HOLDING                  | Diversified Financials            |
| BILFINGER & BERGER           | Construction                      |
| <b>BMW-BAYERISCHE MOTOR</b>  | Consumer Durables                 |
| CELESIO                      | Healthcare, Equipment & Services  |
| <b>COMMERZBANK</b>           | Banking                           |
| CONTINENTAL                  | Consumer Durables                 |
| <b>DAIMLERCHRYSLER</b>       | Consumer Durables                 |
| <b>DEGUSSA</b>               | Chemicals                         |
| <b>DEUTSCHE BANK GROUP</b>   | Diversified Financials            |
| DEUTSCHE BOERSE              | Diversified Financials            |
| <b>DEUTSCHE LUFTHANSA</b>    | Transportation                    |
| <b>DEUTSCHE POST</b>         | Transportation                    |
| <b>DEUTSCHE TELEKOM</b>      | Telecommunications Services       |
| DVB BANK                     | Banking                           |
| ENBW-ENERGIE BADEN           | Utilities                         |
| <b>E-ON</b>                  | Utilities                         |
| FRAPORT                      | Transportation                    |
| FRESENIUS                    | Health Care, Equipment & Services |
| HANNOVER RE                  | Insurance                         |
| HEIDELBERG CEMENT            | Construction                      |
| HEIDELBERGER DRUCKMASCHINEN  | Capital Goods                     |
| <b>HENKEL GROUP</b>          | Household & Personal Products     |
| HOCHTIEF                     | Construction                      |
| HVB-HYPOVEREINSBANK          | Banking                           |
| HYPOREAL ESTATE HOLDING      | Diversified financials            |
| IKB                          | Banking                           |
| <b>INFINEON TECHNOLOGIES</b> | Semi Conductors                   |
| KAARSTADTQUELLE              | Retailing                         |
| LINDE                        | Capital Goods                     |
| <b>MAN GROUP</b>             | Capital Goods                     |
| MERCK                        | Drugs & Biotechnology             |
| <b>METRO AG</b>              | Food Markets                      |
| MG TECHNOLOGIES              | Chemicals                         |
| MUNICH RE                    | Insurance                         |
| NÜRBERGER BETEILIGUNGS       | Insurance                         |
| PORSCHE                      | Consumer Durables                 |
| PUMA                         | Household & Personal Products     |
| <b>RHEINMETALL</b>           | Conglomerates                     |
| <b>RWE GROUP</b>             | Utilities                         |
| SALZGITTER                   | Materials                         |
| <b>SAP</b>                   | Software & Services               |
| SCHERING GROUP               | Drugs & Biotechnology             |
| <b>SIEMENS GROUP</b>         | Conglomerates                     |
| SPAR HANDELS                 | Food Markets                      |
| SÜDZUCKER                    | Food, Drink & Tobacco             |
| <b>THYSSENKRUPP GROUP</b>    | Materials                         |

|                          |                               |
|--------------------------|-------------------------------|
| TUI GROUP                | Hotels, Restaurants & Leisure |
| <b>VATTENFALL EUROPE</b> | Utilities                     |
| <b>VOLKSWAGEN GROUP</b>  | Consumer Durables             |
| W&W-WÜSTENROT            | Diversified Financials        |

### Greece (12)

|                          |                               |
|--------------------------|-------------------------------|
| AGRICULTURAL BANK GREECE | Banking                       |
| ALPHA BANK               | Banking                       |
| BANK OF GREECE           | Banking                       |
| COCA COLA HBC            | Food, Drink & Tobacco         |
| EFG EUROBANK ERGASIAS    | Banking                       |
| EMPORIKI BANK OF GREECE  | Banking                       |
| HELLENIC PETROLEUM       | Oil & Gas Operations          |
| HELLENIC TELECOM         | Telecommunications Services   |
| NATIONAL BANK OF GREECE  | Banking                       |
| OPAP                     | Hotels, Restaurants & Leisure |
| PIRAEUS BANK             | Banking                       |
| PUBLIC POWER             | Utilities                     |

### Hungary (2)

|          |                      |
|----------|----------------------|
| MOL      | Oil & Gas Operations |
| OTP Bank | Banking              |

### Ireland (8)

|                        |                        |
|------------------------|------------------------|
| ALLIED IRISH BANKS     | Banking                |
| ANGLO IRISH BANK       | Banking                |
| <b>BANK OF IRELAND</b> | Banking                |
| CRH                    | Construction           |
| DEPFA BANK             | Diversified Financials |
| IRISH LIFE & PERMANENT | Insurance              |
| KERRY GROUP            | Food, Drinks & Tobacco |
| RYANAIR HOLDING        | Transportation         |

### Italy (45)

|                       |                               |
|-----------------------|-------------------------------|
| AEM                   | Utilities                     |
| <b>ALITALIA GROUP</b> | Transportation                |
| AUTOGRILL             | Hotels, Restaurants & Leisure |
| <b>AUTOSTRADA</b>     | Transportation                |
| BANCA ANTONVENETA     | Banking                       |
| BANCA CARIGE          | Banking                       |
| BANCA CR FIRENZE      | Banking                       |
| BANCA DI SARDEGNA     | Banking                       |
| <b>BANCA INTESA</b>   | Banking                       |

|                                   |                               |
|-----------------------------------|-------------------------------|
| BANCA LOMBARDA GROUP              | Banking                       |
| <b>BANCA NAZIONALE DEL LAVORO</b> | Banking                       |
| BANCA POPOLARE DI LODI            | Banking                       |
| BANCA POPOLARE DI MILANO          | Banking                       |
| BANCA POPOLARE DI SONDRIO         | Banking                       |
| BANCHE POPOLARI UNITE             | Banking                       |
| BPER-EMILIA ROMAGNA               | Banking                       |
| BUZZI UNICEM                      | Construction                  |
| BVPN GROUP                        | Banking                       |
| CAPITALIA                         | Banking                       |
| CATTOLICA ASSICURAZIONI           | Insurance                     |
| CREDITO EMILIANO                  | Banking                       |
| CREDITO VALTELLINESE              | Banking                       |
| <b>EDISON</b>                     | Utilities                     |
| <b>ENEL</b>                       | Utilities                     |
| <b>ENI</b>                        | Oil & Gas Operations          |
| ERG                               | Oil & Gas Operations          |
| <b>FIAT GROUP</b>                 | Consumer Durables             |
| <b>FINMECCANICA</b>               | Aerospace & Defense           |
| FONDIARIA-SAI                     | Insurance                     |
| <b>GENERALI GROUP</b>             | Insurance                     |
| IFIL                              | Diversified Financials        |
| IMPREGILO                         | Construction                  |
| INDESIT                           | Consumer Durables             |
| ITALMOBILIARE                     | Construction                  |
| LUXOTTICA GROUP                   | Household & Personal Products |
| MEDIALANNUM                       | Insurance                     |
| <b>MEDIASET</b>                   | Media                         |
| MEDIOBANCA                        | Diversified Financials        |
| <b>MONTE DEI PASCHI</b>           | Banking                       |
| <b>PIRELLI &amp; C</b>            | Consumer Durables             |
| <b>SANPAOLO IMI</b>               | Banking                       |
| SEAT-PAGINE GIALLE                | Business Services & Supplies  |
| <b>TELECOM ITALIA</b>             | Telecommunications Services   |
| <b>UNICREDITO ITALIANO</b>        | Banking                       |
| UNIPOL                            | Insurance                     |

#### Luxembourg (4)

|                          |                      |
|--------------------------|----------------------|
| ARCELOR                  | Materials            |
| ESPIRITO SANTO FINANCIAL | Banking              |
| SES GLOBAL               | Media                |
| TENARIS                  | Oil & Gas Operations |

**Netherlands (33)**

|                                |                              |
|--------------------------------|------------------------------|
| <b>ABN-AMRO HOLDING</b>        | Banking                      |
| AEGON                          | Insurance                    |
| AHOLD                          | Food Markets                 |
| AKZO NOBEL GROUP               | Chemicals                    |
| ASML HOLDING                   | Software & Services          |
| BUHRMANN                       | Business Services & Supplies |
| CSM                            | Food, Drinks & Tobacco       |
| DSM                            | Chemicals                    |
| <b>EADS</b>                    | Aerospace & Defense          |
| EURONEXT                       | Diversified Financials       |
| <b>FORTIS</b>                  | Diversified Financials       |
| GETRONICS                      | Software & Services          |
| HAGEMEYER                      | Trading Companies            |
| <b>HEINEKEN HOLDING</b>        | Food, Drinks & Tobacco       |
| <b>ING GROUP</b>               | Diversified Financials       |
| MITTAL STEEL                   | Materials                    |
| PETROPLUS INTERNATIONAL        | Trading Companies            |
| <b>PHILIPS GROUP</b>           | Conglomerates                |
| RANSTAD HOLDING                | Business Services & Supplies |
| ROYAL BAM GROUP                | Construction                 |
| <b>ROYAL DUTCH/SHELL GROUP</b> | Oil & Gas Operations         |
| <b>ROYAL KPN</b>               | Telecommunications Services  |
| ROYAL NUMICO                   | Food, Drinks & Tobacco       |
| ROYAL P&O NEDLLOYD             | Transportation               |
| <b>SCHLUMBERGER</b>            | Oil & Gas Operations         |
| TPG                            | Transportation               |
| <b>UNILEVER</b>                | Food, Drinks & Tobacco       |
| UNIVAR                         | Chemicals                    |
| VAN LANSCHOT                   | Diversified Financials       |
| VEDIOR                         | Business Services & Supplies |
| VNU                            | Media                        |
| WOLTERS KLUWER                 | Media                        |

**Poland (2)**

|                 |                      |
|-----------------|----------------------|
| PKN ORLEN       | Oil & Gas Operations |
| PKO BANK POLSKI | Banking              |

**Portugal (7)**

|                          |                        |
|--------------------------|------------------------|
| BANCO BPI                | Diversified Financials |
| BCP-BANCO COM PORTUGUESE | Banking                |
| BRISA                    | Transportation         |
| CIMPOR-CIMENTOS PORTUGAL | Construction           |
| EDP-ELEC DE PORTUGAL     | Utilities              |

|                         |                            |
|-------------------------|----------------------------|
| <b>PORTUGAL TELECOM</b> | Telecommunication Services |
| SONAE SGPS              | Conglomerates              |

### Spain (30)

|                                  |                               |
|----------------------------------|-------------------------------|
| ACCIONA                          | Construction                  |
| ACERINOX                         | Materials                     |
| ACS-GROUP                        | Construction                  |
| ALBERTIS                         | Transportation                |
| <b>ALTADIS</b>                   | Food, Drinks & Tobacco        |
| AMADEUS GLOBAL TRAVEL            | Business Services & Supplies  |
| BANCO DE SABADELL                | Banking                       |
| BANCO DE VAKLENCIA               | Banking                       |
| BANCO PASTOR                     | Banking                       |
| BANCO POPULAR ESPANOL            | Banking                       |
| BANCO SANTANDER                  | Banking                       |
| BANKINTER                        | Banking                       |
| <b>BBVA-BANCO BILBAO VIZCAYA</b> | Banking                       |
| CEPSA                            | Oil & Gas Operations          |
| CORPORATION MAPFRE               | Insurance                     |
| ENDESA GROUP                     | Utilities                     |
| ENOGAS                           | Oil & Gas Operations          |
| FCC GROUP                        | Construction                  |
| FERROVIAL                        | Construction                  |
| GAMESA                           | Capital Goods                 |
| GAS NATURAL SDG                  | Utilities                     |
| <b>IBERDROLA</b>                 | Utilities                     |
| IBERIA                           | Transportation                |
| INDITEX                          | Household & Personal Products |
| METROVACESA                      | Diversified Financials        |
| RED ELECTRICA DE ESPANA          | Utilities                     |
| <b>REPSOL-YPF</b>                | Oil & Gas Operations          |
| SACYR-VALLEHERMOSO               | Construction                  |
| <b>TELEFONICA</b>                | Telecommunications Services   |
| UNION FENOSA                     | Utilities                     |

### Sweden (30)

|                         |                                  |
|-------------------------|----------------------------------|
| ASSA ABLOY              | Capital Goods                    |
| ATLAS COPCO             | Capital Goods                    |
| <b>ELECTROLUX GROUP</b> | Consumer Durables                |
| FÖRENINGSSPARBANKEN     | Banking                          |
| GAMBRO                  | Health Care Equipment & Services |
| H&M HENNES & MAURITZ    | Retailing                        |
| INDUSTRIVARDEN          | Construction                     |
| INVESTOR                | Diversified Financials           |
| <b>LM ERICSSON</b>      | Technology, Hardware & Equipment |
| LUNDBERGS               | Diversified Financials           |

|                          |                              |
|--------------------------|------------------------------|
| NCC GROUP                | Construction                 |
| NORDEA BANK              | Banking                      |
| SANDVIK                  | Capital Goods                |
| SAS GROUP                | Transportation               |
| SCANIA                   | Capital Goods                |
| SCA-SVENSKA CELLULOSA    | Materials                    |
| SEB-SKAND ENSKILDA BANK  | Banking                      |
| SECURITAS                | Business Services & Supplies |
| SKANDIA INSURANCE        | Insurance                    |
| SKANSKA                  | Construction                 |
| <b>SKF GROUP</b>         | Capital Goods                |
| SSAB-SVENSKT STAL        | Materials                    |
| SVENSKA HANDELSBANKEN    | Banking                      |
| SWEDISH MATCH            | Food, Drinks & Tobacco       |
| TELE2                    | Telecommunications Services  |
| <b>TELIASONERA GROUP</b> | Telecommunications Services  |
| <b>VOLVO GROUP</b>       | Capital Goods                |
| WIHLBORGS FASTIGHETER    | Diversified Financials       |

#### United Kingdom (140)

|                          |                                   |
|--------------------------|-----------------------------------|
| 02                       | Telecommunications Services       |
| AGGREGATE INDUSTRIES     | Construction                      |
| ALLIANCE & LEICESTER     | Banking                           |
| ALLIANCE UNICHEM         | Health Care, Equipment & Services |
| <b>ALLIED DOMECQ</b>     | Food, Drinks & Tobacco            |
| AMDOCS                   | Business Services & Supplies      |
| AMEC                     | Construction                      |
| AMVESCAP                 | Diversified Financials            |
| ANGLO AMERICAN           | Materials                         |
| ANTOFAGASTA              | Materials                         |
| ASSOCIATED BRITISH FOODS | Food, Drinks & Tobacco            |
| <b>ASTRAZENECA</b>       | Drugs & Biotechnology             |
| AVIVA                    | Insurance                         |
| AWG                      | Utilities                         |
| <b>BAA</b>               | Transportation                    |
| <b>BAE SYSTEMS</b>       | Aerospace & Defense               |
| BALFOUR BEATTY           | Construction                      |
| <b>BARCLAYS</b>          | Banking                           |
| BARRATT DEVELOPMENTS     | Construction                      |
| BERKELEY GROUP           | Construction                      |
| <b>BG GROUP</b>          | Oil & Gas Operations              |
| BOC GROUP                | Chemicals                         |
| BOOTS                    | Food Markets                      |
| <b>BP</b>                | Oil & Gas Operations              |
| BPB                      | Construction                      |
| BRADFORD & BINGLEY       | Diversified Financials            |
| BRITANNIC GROUP          | Insurance                         |

|                                 |                               |
|---------------------------------|-------------------------------|
| <b>BRITISH AIRWAYS</b>          | Transportation                |
| <b>BRITISH AMERICAN TOBACCO</b> | Food, Drinks & Tobacco        |
| BRITISH LAND                    | Diversified Financials        |
| BRITISH SKY BROADCASTING        | Media                         |
| <b>BT GROUP</b>                 | Telecommunications Services   |
| BUNZL                           | Materials                     |
| CABLE & WIRELESS                | Telecommunications Services   |
| CADBURY SCHWEPPE                | Food, Drinks & Tobacco        |
| CAPITA GROUP                    | Business Services & Supplies  |
| <b>CENTRICA</b>                 | Utilities                     |
| COMPASS GROUP                   | Hotels, Restaurants & Leisure |
| CORUS GROUP                     | Materials                     |
| DAILY MAIL & GENERAL            | Media                         |
| <b>DIAGEO</b>                   | Food, Drinks & Tobacco        |
| DIXONS GROUP                    | Retailing                     |
| EMAP                            | Media                         |
| EMI GROUP                       | Media                         |
| ENTERPRISE INNS                 | Hotels, Restaurants & Leisure |
| EXEL                            | Transportation                |
| FIRSTGROUP                      | Transportation                |
| FRIENDS PROVIDENT               | Insurance                     |
| <b>GALLAGHER GROUP</b>          | Food, Drinks & Tobacco        |
| GEORGE WIMPEY                   | Construction                  |
| GKN                             | Consumer Durables             |
| <b>GLAXOSMITHKLINE</b>          | Drugs & Biotechnology         |
| GROUP4 SECURICOR                | Business Services & Supplies  |
| GUS                             | Retailing                     |
| HAMMERSON                       | Diversified Financials        |
| HANSON                          | Construction                  |
| HAYS                            | Business Services & Supplies  |
| HBOS                            | Banking                       |
| HHG                             | Insurance                     |
| <b>HILTON GROUP</b>             | Hotels, Restaurants & Leisure |
| <b>HSBC</b>                     | Banking                       |
| IMPERIAL CHEMICAL INDUSTRIES    | Chemicals                     |
| IMPERIAL TOBACCO GROUP          | Food, Drinks & Tobacco        |
| <b>INCHCAPE</b>                 | Trading Companies             |
| INTERCONTINENTAL HOTELS         | Hotels, Restaurants & Leisure |
| INTERNATIONAL POWER             | Utilities                     |
| INVENSYS                        | Capital Goods                 |
| INVESTEC                        | Diversified Financials        |
| ITV                             | Media                         |
| J. SAINSBURY                    | Food Markets                  |
| JOHNSON MATTHEY                 | Materials                     |
| KELDA GROUP                     | Utilities                     |
| KESA ELECTRICALS                | Retailing                     |
| KINGFISHER                      | Retailing                     |
| LAND SECURITIES GROUP           | Diversified Financials        |



|                          |                                   |
|--------------------------|-----------------------------------|
| LEGAL & GENERAL GROUP    | Insurance                         |
| LIBERTY INTERNATIONAL    | Diversified Financials            |
| LLOYDS TSB GROUP         | Banking                           |
| MAN GROUP PLC            | Diversified Financials            |
| MARKS & SPENCER          | Retailing                         |
| MITCHELLS & BUTLERS      | Hotels, Restaurants & Leisure     |
| MY TRAVEL GROUP          | Hotels, Restaurants & Leisure     |
| NATIONAL GRID TRANSCO    | Utilities                         |
| NEXT                     | Retailing                         |
| NORTHERN ROCK            | Banking                           |
| OLD MUTUAL               | Diversified Financials            |
| PEARSON                  | Media                             |
| PENDRAGON                | Retailing                         |
| PENINSULAR & ORIENTAL    | Transportation                    |
| PERSIMMON                | Construction                      |
| PILKINGTON               | Construction                      |
| PROVIDENT FINANCIAL      | Diversified Financials            |
| PRUDENTIAL               | Insurance                         |
| PUNCH TAVERNS            | Hotels, Restaurants & Leisure     |
| RANK GROUP               | Hotels, Restaurants & Leisure     |
| RECKITT BERNCKISER       | Household & Personal Products     |
| REED ELSEVIER            | Media                             |
| RENTOKIL INITIAL         | Business Services & Supplies      |
| <b>REUTERS GROUP</b>     | Media                             |
| REXAM                    | Materials                         |
| RIO TINTO                | Materials                         |
| RMC GROUP                | Construction                      |
| ROLLS ROYCE              | Aerospace & Defense               |
| ROYAL & SUN ALLIANCE     | Insurance                         |
| ROYAL BANK OF SCOTLAND   | Banking                           |
| SABMILLER                | Food, Drinks & Tobacco            |
| SAGE GROUP               | Software & Services               |
| SCOTTISH & NEWCASTLE     | Food, Drinks & Tobacco            |
| SCOTTISH & SOUTHERN      | Utilities                         |
| SCOTTISH POWER           | Utilities                         |
| SEVERN TRENT             | Utilities                         |
| SHIRE PHARMACEUTICALS    | Drugs & Biotechnology             |
| SIGNET GROUP             | Retailing                         |
| SLOUGH ESTATES           | Diversified Financials            |
| SMITH & NEPHEW           | Health care, Equipment & Services |
| SMITHS GROUP             | Conglomerates                     |
| SOMERFIELD               | Food Markets                      |
| STANDARD CHARTERED GROUP | Banking                           |
| TATE & LYLE GROUP        | Food, Drinks & Tobacco            |
| TAYLOR WOODROW           | Construction                      |
| TELEWEST GLOBAL          | Telecommunications Services       |
| TESCO                    | Food Markets                      |
| TOMKINS                  | Conglomerates                     |

|                          |                               |
|--------------------------|-------------------------------|
| TRAVIS PERKINS           | Retailing                     |
| UNITED UTILITIES         | Utilities                     |
| VODAFONE                 | Telecommunications Services   |
| WHITBREAD HOLDINGS       | Hotels, Restaurants & Leisure |
| WILLIAM HILL ORG         | Hotels, Restaurants & Leisure |
| WILLIS GROUP HOLDINGS    | Insurance                     |
| WM MORRISON SUPERMARKETS | Food Markets                  |
| WOLSELEY                 | Trading Companies             |
| WPP                      | Media                         |
| XSTRATA                  | Materials                     |
| YELL GROUP               | Media                         |



**ASSOCIATION OF ACCREDITED LOBBYISTS TO THE EUROPEAN PARLIAMENT**

**3. CORPORATIONS HAVING ACCREDITED LOBBYISTS TO THE EUROPEAN PARLIAMENT (AS OF 26.08.07)**

**Source: European Parliament**

|   |
|---|
| 1. ABB-ASEA BROWN BOVERI                  |
| 2. ABN AMRO BANK                          |
| 3. ACCOR                                  |
| 4. AER LINGUS                             |
| 5. AMERICAN INTERNATIONAL GROUP           |
| 6. AIR FRANCE                             |
| 7. AIR LIQUIDE                            |
| 8. AIRBUS INDUSTRIES                      |
| 9. ALCATEL                                |
| 10. ALCOA EUROPE                          |
| 11. ALLIANZ GROUP                         |
| 12. ALTADIS                               |
| 13. AMAZON.COM                            |
| 14. AMERICAN AIRLINES                     |
| 15. AMWAY EUROPE                          |
| 16. AREVA                                 |
| 17. ASTRA ZENECA                          |
| 18. AUTOSTRADA PER L'ITALIA SpA           |
| 19. AVON                                  |
| 20. AXA                                   |
| 21. BAE SYSTEMS INTERNATIONAL             |
| 22. BANCA DI ROMA                         |
| 23. BANCA INTESA                          |
| 24. BASF AG                               |
| 25. BAT- BRITISH-AMERICAN TOBACCO         |
| 26. BAXTER WORLD TRADE SA                 |
| 27. BAYER-EU LIAISON OFFICE               |
| 28. BBC                                   |
| 29. BBVA- BANCO BILBAO VIZCAYA ARGENTARIA |
| 30. BELGACOM                              |
| 31. BERLIN PARTNER GmbH                   |
| 32. BERTELSMANN AG                        |

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| 33.BMS- BRISTOL-MYERS SQUIBB           |
| 34.BMW GROUP                           |
| 35.BNP PARIBAS                         |
| 36.BOEING INTERNATIONAL CORPORATION    |
| 37.BOUYGUES SA                         |
| 38.BP EUROPE                           |
| 39.BRITISH AIRWAYS                     |
| 40.BRITISH ENERGY Plc                  |
| 41.BT-BRITISH TELECOM                  |
| 42.CA COMPUTER ASSOCIATES              |
| 43.CABLE EUROPE                        |
| 44.CATERPILLAR                         |
| 45.CEZ-CZECH POWER COMPANY             |
| 46.CHANEL                              |
| 47.CHEVRON TEXACO BELGIUM NV           |
| 48.COCA COLA SERVICES NV               |
| 49.COMMERZBANK                         |
| 50.CREDIT AGRICOLE DU NORD EST         |
| 51.CZECH RAILWAYS                      |
| 52.CULLEN INTERNATINAL SA              |
| 53.DAIMLERCHRYSLER                     |
| 54.DANSK ENERGI                        |
| 55.DATEV eg.                           |
| 56.DB-DEUTSCHE BAHN                    |
| 57.DE POST-LA POSTE                    |
| 58.DEGUSSA                             |
| 59.DEKRA                               |
| 60.DEUTSCHE BANK AG                    |
| 61.DEUTSCHE LUFTHANSA                  |
| 62.DEUTSCHE TELEKOM                    |
| 63.DOW EUROPE                          |
| 64.DPWN- DEUTSCHE POST WORLD NET       |
| 65.DU PONT DE NEMOURS INTERNATIONAL SA |
| 66.EADS                                |
| 67.EBAY INTERNATIONAL                  |
| 68.EDF (ELECTRICITE DE FRANCE)         |
| 69.EDISON SpA                          |
| 70.ELECTRABEL                          |
| 71.ELECTROLUX                          |
| 72.ELI LILLY & CO                      |
| 73.ENEL SpA                            |
| 74.ENI SpA                             |
| 75.E-ON AG                             |
| 76.E-ON NORDIC                         |
| 77.E-ON SVERIGE AB                     |
| 78.EXXONMOBIL                          |
| 79.FIAT                                |
| 80.FINMECCANICA                        |

|   |
|---|
| 81.FORD MOTOR COMPANY                             |
| 82.FORD OF EUROPE GmbH                            |
| 83.FRANCE TELECOM                                 |
| 84.FRANCE TELEVISIONS                             |
| 85.GDF-GAZ DE FRANCE                              |
| 86.GE-GENERAL ELECTRIC EUROPE                     |
| 87.GENZYME BELGIUM NV/SA                          |
| 88.GM-GENERAL MOTORS EUROPE                       |
| 89.GOLDMAN SACHS INTERNATIONAL                    |
| 90.GOOGLE   |
| 91.GROUPE CARREFOUR                               |
| 92.GSK-GLAXOSMITHKLINE                            |
| 93.HOLCIM   |
| 94.HONEYWELL EUROPE SA                            |
| 95.HP-HEWLETT PACKARD                             |
| 96.HUTCHISON EUROPE                               |
| 97.IBERDROLA                                      |
| 98.IBM  |
| 99.IKEA GROUP                                     |
| 100.IMPERIAL TOBACCO                              |
| 101.INTEL CORPORATION                             |
| 102.INTESA SANPAOLO                               |
| 103.IVECO   |
| 104.JOHNSON & JOHNSON                             |
| 105.JP MORGAN                                     |
| 106.KLM   |
| 107.KELLOGG'S EUROPE                              |
| 108.KfW-BANKENGRUPPE                              |
| 109.KPN   |
| 110.KRAFT FOODS INTERNATIONAL                     |
| 111.LA POSTE, BUREAU DE REPRESENTATION PERMANENTE |
| 112.LAGARDERE SA                                  |
| 113.LLOYD'S                                       |
| 114.LLOYDS TSB BANK PLC                           |
| 115.L'OREAL                                       |
| 116.LYONDELL CHEMICAL                             |
| 117.MAN AKTIENGESELLSCHAFT                        |
| 118.MC DONALD'S EUROPE                            |
| 119.MEDIASET sPA                                  |
| 120.MICHELIN                                      |
| 121.MICROSOFT                                     |
| 122.MOET HENNESSY                                 |
| 123.MONSANTO                                      |
| 124.MOTOROLA SA                                   |
| 125.MSD-MERCK SHARP & DOHME                       |
| 126.NCR   |
| 127.NEC EUROPE LTD                                |
| 128.NESTLE  |

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| 129.NOKIA GROUP                                  |
| 130.NOVARTIS                                     |
| 131.NRW BANK                                     |
| 132.OLYMPIC AIRWAYS                              |
| 133.ORANGE                                       |
| 134.PANASONIC EUROPE LTD                         |
| 135.PERNOD RICARD SA                             |
| 136.PFIZER                                       |
| 137.PHILIP MORRIS INTERNATIONAL                  |
| 138.PHILIPS                                      |
| 139.PIERRE FABRE SA                              |
| 140.PIONEER OVERSEAS CORPORATION                 |
| 141.PIRELLI SpA                                  |
| 142.PKP-POLISH STATE RAILWAYS                    |
| 143.PROCTER & GAMBLE EUROPE                      |
| 144.PSA PEUGEOT CITROEN                          |
| 145.RAG AG                                       |
| 146.RATP   |
| 147.RENAULT                                      |
| 148.REPSOL                                       |
| 149.REWE   |
| 150.RHODIA                                       |
| 151.ROBERT BOSCH GmbH                            |
| 152.ROCHE  |
| 153.RTL GROUP                                    |
| 154.RTVE-RADIO TELEVISION ESPANOLA               |
| 155.RWE AG                                       |
| 156.RZB-RAIFFEISEN ZENTRALBANK ÖSTERREICH AG     |
| 157.SAAB   |
| 158.SANDOZ GmbH                                  |
| 159.SANOFI AVENTIS                               |
| 160.SAS GROUP                                    |
| 161.SBB-CFF-FFS- CHEMINS DE FER FEDERAUX SUISSES |
| 162.SCANIA                                       |
| 163.SCHLUMBERGER                                 |
| 164.SECUREX                                      |
| 165.SEITA ALTADIS                                |
| 166.SEKO   |
| 167.SHELL INTERNATIONAL LTD.                     |
| 168.SIEMENS AG                                   |
| 169.SJ BERWIN & CO                               |
| 170.SKALDA                                       |
| 171.SNCB-NMBS                                    |
| 172.SNCF   |
| 173.SOCIETE GENERALE                             |
| 174.SOLVAY SA                                    |
| 175.SONY PICTURES                                |
| 176.STATOIL                                      |

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| 177.SUEZ LYONNAISE DES EAUX SA                    |
| 178.SUN MICROSYSTEMS                              |
| 179.SYNGENTA INTERNATIONAL                        |
| 180.TELECOM ITALIA                                |
| 181.TELEFONICA                                    |
| 182.TELEKOM AUSTRIA AG                            |
| 183.TELENOR                                       |
| 184.TELIA SONERA                                  |
| 185.TETRA PAK                                     |
| 186.THALES  |
| 187.THYSSENKRUPP AG                               |
| 188.TIME WARNER                                   |
| 189.TNT POST                                      |
| 190.TOTAL   |
| 191.TOYOTA MOTOR EUROPE                           |
| 192.T-SYSTEMS                                     |
| 193.UBS AG  |
| 194.UNICREDIT                                     |
| 195.UNILEVER                                      |
| 196.UPS-UNITED PARCEL SERVICE                     |
| 197.UTC-UNITED TECHNOLOGIES                       |
| 198.VEOLIA ENVIRONNEMENT                          |
| 199.VISA INTERNATIONAL                            |
| 200.VODAFONE                                      |
| 201.VOLKSWAGEN AG                                 |
| 202.VOLVO GROUP REPRESENTATION                    |
| 203.VORWERK & CO KG                               |
| 204.WALT DISNEY COMPANY                           |
| 205.WATER UK                                      |
| 206.WESTERN UNION                                 |
| 207.WESTINGHOUSE ELECTRIC COMPANY                 |
| 208.WINGAS  |
| 209.YAHOO EUROPE                                  |
| 210.ZDF-ZWEITES DEUTSCHES FERNSEHEN               |
| 211.ZSR- CHEMINS DE FER DE LA REPUBLIQUE SLOVAQUE |

#### 4. Companies either owned or controlled by U.S. individuals- Members of AmCham EU Committee.

Source: AmCham EU Committee

Note: The list here below does not include companies that advise on U.S. interests e.g. law firms, consultancies etc.

U.S. Global Companies find it necessary to monitor developments and sway regulatory decisions as they are happening at the EU level.

|                                   |
|-----------------------------------|
| 3M EUROPE                         |
| AGILENT TECHNOLOGIES              |
| ALCOA EUROPE                      |
| AMERICAN INTERNATIONAL GROUP INC. |
| AMGEN                             |
| AMWAY (EUROPE) LTD.               |
| APPLE                             |
| ASDA (PART OF WAL-MART STORES)    |
| AT& T INC.                        |
| AVON PRODUCTS                     |
| BAXTER WORLD TRADE CORPORATION    |
| THE BLACK & DECKER CORPORATION    |
| THE BOEING COMPANY                |
| BRINK'S EMEA                      |
| BRISTOL-MYERS SQUIBB COMPANY      |
| BRITISH-AMERICAN TOBACCO          |
| CARGILL EUROPE                    |
| CATERPILLAR                       |
| CHEVRON CORPORATION               |
| CHIQUITA                          |
| CHUBB INSURANCE COMPANY OF EUROPE |
| CISCO                             |
| CITIGROUP                         |
| THE COCA COLA COMPANY             |
| CONOCOPHILLIPS                    |
| CORNING INTERNATIONAL CORPORATION |
| DEERE & COMPANY                   |
| DOW                               |
| DOW CORNING EUROPE                |
| DU PONT DE NEMOURS INT'L SA       |
| EASTMAN KODAK COMPANY             |
| EDS                               |
| ELI LILLY & COMPANY               |
| THE ESTEE LAUDER COMPANIES        |
| EXXON MOBIL PETROLEUM & CHEMICAL  |
| FEDERAL EXPRESS EUROPE            |
| FIRST SOLAR                       |
| GENERAL ELECTRIC                  |



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|---|
| GENERAL MOTORS EUROPE                     |
| GOLDMAN SACHS INTERNATIONAL               |
| GOOGLE                                    |
| HERBALIFE INTERNATIONAL                   |
| HEWLETT-PACKARD                           |
| HONEYWELL EUROPE                          |
| IBM                                       |
| INTEL                                     |
| INTERNATIONAL PAPER                       |
| JOHNSON & JOHNSON                         |
| JP MORGAN                                 |
| KRAFT FOODS INTERNATIONAL                 |
| LINKLATERS                                |
| LOCKHEED MARTIN GLOBAL INC.               |
| LOVELLS                                   |
| LYONDELL CHEMICAL COMPANY                 |
| MAREX FINANCIAL LTD.                      |
| MASTERFOODS                               |
| MATTEL EUROPE                             |
| MC DONALD'S EUROPE                        |
| MERCK SHARP & DOHME                       |
| MERIAL                                    |
| MERRILL LYNCH                             |
| MICROSOFT EUROPE                          |
| MONSANTO                                  |
| MORGAN STANLEY INTERNATIONAL              |
| MOTOROLA                                  |
| NCR                                       |
| NETJETS                                   |
| NIKE EUROPE                               |
| NORTEL                                    |
| ORACLE                                    |
| PARTYLITE                                 |
| PEPSI COLA                                |
| PFIZER                                    |
| PHILIP MORRIS INTERNATIONAL MANAGEMENT SA |
| PITNEY BOWES LTD                          |
| PROCTER & GAMBLE                          |
| QUALCOMM                                  |
| RAYTHEON INTERNATIONAL INC.               |
| ROHM & HAAS                               |
| STANDARD & POOR'S                         |
| STATE STREET                              |
| SUN MICROSYSTEMS INC.                     |
| SYNGENTA INTERNATIONAL AG                 |
| TIME WARNER                               |
| UNITED TECHNOLOGIES CORPORATION           |
| UPS                                       |

|                                 |
|---------------------------------|
| VERISIGN                        |
| VERIZON BUSINESS COMMUNICATIONS |
| WESTINGHOUSE ELECTRIC COMPANY   |
| WHIRLPOOL EUROPE                |

## 5. EU LEGISLATION PRODUCED ANNUALLY FROM 1958 TO 2003

| YEAR | REGULATIONS | DIRECTIVES | DECISIONS |
|------|-------------|------------|-----------|
| 2003 | 2,461       | 153        | 804       |
| 2002 | 2,537       | 120        | 896       |
| 2001 | 2,769       | 136        | 820       |
| 1998 | 3,008       | 158        | 735       |
| 1993 | 1,566       | 166        | 707       |
| 1988 | 1,801       | 133        | 546       |
| 1983 | 1,454       | 84         | 514       |
| 1978 | 1,329       | 116        | 615       |
| 1973 | 1,110       | 57         | 254       |
| 1968 | 443         | 37         | 182       |
| 1963 | 96          | 8          | 266       |
| 1958 | 20          | 0          | 23        |

Source: Extracted from CELEX

The Table above presents the number of legislative instruments produced over the last 45 years. The trend in production of EU legislation over the period from 1958 to 2003 was sampled for the last three years and at five years intervals before that.

For reminder:

Regulations are directly applicable and binding in all Member States without the need for any national implementing legislation

Directives set legislative objectives (with a time limit) for Member States, but leaves them to decide how these objectives are translated into national laws

Decisions are binding on those to whom they are addressed and do not require national implementing legislation. An example would be where an Economic Regulator in a specific country fails to comply with EU requirements (e.g. on water quality), a decision will be issued instructing the Regulator to bring its practices into line.

Recommendations and Opinions are not binding.