

ACCOUNTABILITY AND SUSTAINABILITY

While IBM employs many people whose jobs are overtly associated with issues of accountability, environmental protection, diversity, employee well-being, and community engagement, they do not perform their jobs in isolation from the work of other IBMers.

Each one of us, from the newest hire to the Chairman of the Board, is responsible for IBM's actions on these issues. Corporate responsibility is literally that: corporate. It collectively represents the personal responsibility each IBMer accepts in doing his or her job.

This has been true at IBM since its beginning. From the earliest days, our company staked out a territory few corporations were willing to approach in that time, the idea of the corporation as partner, citizen, neighbor and participant in the world's affairs. To be, in other words, a leader among institutions and enterprises.

It's this commitment to leadership that has driven our groundbreaking achievements in hiring and promoting women, minorities and the disabled; in progressive policies in benefits and compensation; in world-class community partnerships that are making a real difference; and in innovations in employee health and environmental protection. And it's this same commitment that has made IBM a trusted partner for our customers, a reliable long-term investment, and the 20th century's fulcrum for conjoining business and information technology.

Nearly a century later, these goals are as urgent for us as ever. We recognize that corporate responsibility is an evolving area of focus for many corporations, and discussions will and should continue about the best ways to obtain the most benefit for people and the planet. We have our own ideas — among them, that our responsibilities

do not exist in a vacuum, but must be part of a broad ecosystem of companies, individuals, governments and other enterprises — and we have been deeply involved in many of those discussions for years. We welcome the chance to widen the circle and engage with a growing community of varying interests.

And our commitment to improving our company in these and other areas will continue. As IBMers, we each simply consider that part of our job.

Corporate Citizenship

A purely economic view of a corporation generally describes an organization competing to win monetarily in a zero-sum game. But while we certainly relish the chance to win in the marketplace — and exult when we do — IBMers' view of their work has never been limited to this one perspective.

In our view, for an organization citizenship implies a relationship with a wider group of equal participants. This relationship can be described in financial, social — even ecological — terms. It is, in other words, a full relationship. Maturity in a corporation requires that this holistic relationship with other enterprises and people not only be acknowledged, but be effectively managed.

CORPORATE CITIZENSHIP COUNCIL

IBM's Corporate Citizenship Council is made up of representatives of major functions within our Corporate division. It is tasked with ensuring that corporate citizenship is integrated into all aspects of our business for every employee and department. This includes understanding the needs and interests of our clients, employees, investors and communities; assessing IBM's social, environmental and business practices to ensure they are in alignment with IBM's values; and integrating the company's corporate citizenship objectives throughout the business.

As a group, the council is charged with ensuring that IBM's business conduct meets the highest standards and with communicating company performance in a transparent manner to interested parties—including the publication and update of IBM's corporate responsibility reporting. Representatives of the council report to IBM Chairman and CEO Sam Palmisano on the company's corporate citizenship performance.

The Executive Committee of the Corporate Citizenship Council includes these IBM executives from the following departments and functions:

- *Wayne Balta, Corporate Environmental Affairs and Product Safety*
- *Chris Caine, Governmental Programs*
- *Rich Calo, Workforce Relations*
- *Richard Carroll, IBM Assistant Controller*
- *Ted Childs, Global Workforce Diversity*
- *Theo Fletcher, Integrated Supply Chain*
- *Stanley Litow, Corporate Community Relations*
- *Patricia Murphy, Investor Relations*
- *Harriet Pearson, Corporate Affairs*

Global Leadership Network

In 2003, IBM assembled a group of the world's top performing companies to take stock of management of corporate responsibility practice and its integration into core business processes. Ten of these companies have come together to create the Global Leadership Network for Corporate Citizenship (GLN). This international network focuses on the crucial question of what constitutes world-class performance in corporate citizenship.

Collectively, these leading companies—IBM, Cemex, General Electric, FedEx, Cargill, 3M, Diageo, Omron, Manpower and General Motors—represent more than \$544 billion in annual revenues, employ some 1.4 million people and have multinational operations that span the globe.

The willingness on the part of these companies to share their experiences will have a significant impact on other companies, especially those with fewer resources or those who have been late to recognize the importance of integrating corporate responsibility measures into their core business strategy. These leading companies are identifying elements of their corporate responsibility programs that not only improve but drive business performance. Capturing and harnessing this valuable knowledge is one of the key objectives of this unique business learning network.

IBM founded this network of like-minded global companies, which is chaired by IBM Vice President Stan Litow, because, in our view, higher-quality corporate citizenship and responsible social engagement is an important part of the long-term economic value of any company and must be managed with the same seriousness of purpose as any other core element of the business. By bringing together some of the most well-known, well-respected global corporations to study these questions, we believe we can, as a group, lead by example and have a profound impact on the way all major corporations think about and manage corporate citizenship.

The research is being conducted by the Center for Corporate Citizenship at Boston College and AccountAbility in the United Kingdom, with support from the Ford Foundation and each participating company.

This three-year research project is focusing on how the participating companies:

- **Align corporate citizenship** into the core business strategy by defining what activities are material to the company.
- **Respond to and learn from societal expectations** in a manner that creates value for the business and stakeholders.
- **Align corporate citizenship values** with operational excellence to ensure that ethics and the interests of good corporate governance are maintained.
- **Create opportunities for leadership** that allow companies to influence the best practices of others.

Global Reporting Initiative Index

GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
VISION AND STRATEGY		
1.1	Statement of the organization's sustainability vision and strategy regarding its contribution to sustainable development	Accountability and Sustainability*
1.2	Statement from the CEO (or equivalent senior manager) describing key elements of the report	Chairman's Letter*
PROFILE		
2.1	Name of reporting organization	International Business Machines Corporation
2.2	Major products and services	Corporate Profile: Business Model* Other information available online**
2.3	Operational structure of the organization	Other information available online**
2.4	Description of major divisions, operating companies, subsidiaries and joint ventures	Other information available online**
2.5	Countries in which the organization's operations are located	Other information available online**
2.6	Nature of ownership; legal form	Other information available online**
2.7	Nature of markets served	Other information available online**
2.8	Scale of the reporting organization	Other information available online**
2.9	List of stakeholders	Relationships*
REPORT SCOPE		
2.10	Contact person(s) for the report, including e-mail and Web addresses	Other information available online**
2.11	Reporting period (e.g. fiscal /calendar year) for information provided	All full-year data on the IBM Corporate Responsibility site is for calendar 2003, unless 2004 is available.
2.12	Date of most recent previous report (if any)	Last content update: April 13, 2005
2.13	Boundaries of report (countries/regions, products/services, divisions/facilities/joint ventures/subsidiaries) and any specific limitations on the scope	IBM's Corporate Responsibility site is intended to give insight into IBM's corporate responsibility strategy and performance as related to the company and its wholly owned subsidiaries. More detailed information can be found in some areas at About IBM (www.ibm.com/ibm) and in the publication <i>Understanding Our Company: An IBM Prospectus</i> , and in the IBM Annual Report for 2004 (www.ibm.com/annualreport/2004/)
2.14	Significant changes in size, structure, ownership, or products/services that have occurred since the previous report	Other information available online**
2.15	Basis for reporting on joint ventures, partially owned subsidiaries, leased facilities, outsourced operations and other situations that can significantly affect comparability from period to period and/or between reporting organizations	
2.16	Explanation of the nature and effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement	No restatements at this time

* IBM Corporate Responsibility site: www.ibm.com/ibm/responsibility
 ** GRI Index: www.ibm.com/ibm/responsibility/sustainability/gri-index.shtml

GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
REPORT PROFILE		
2.17	Decisions not to apply GRI principles or protocols in the preparation of the report	The GRI was one of a series of frameworks used in the preparation of this report.
2.18	Criteria/definitions used in any accounting for economic, environmental, and social costs and benefits	Unless otherwise noted, dollar amounts represent U.S. dollars Measurements are metric, unless otherwise noted.
2.19	Significant changes from previous years in the measurement methods applied to key economic, environmental and social information	No significant changes
2.2	Policies and internal practices to enhance and provide assurance about the accuracy, completeness, and reliability that can be placed on the sustainability report	Management System*
2.21	Policy and current practice with regard to providing independent assurance for the report	IBM has not engaged an external party to provide independent assurance of the Corporate Responsibility report
2.22	Means by which report users can obtain additional information and reports about economic, environmental and social aspects of the organization's activities, including facility-specific information (if available)	Other information available online**
GOVERNANCE STRUCTURE AND MANAGEMENT SYSTEMS		
STRUCTURE AND GOVERNANCE		
3.1	Governance structure of the organization, including major committees under the board of directors that are responsible for setting strategy and for oversight of the organization	Corporate Governance* Other information available online**
3.2	Percentage of the board of directors that are independent, non-executive directors	Corporate Governance* Other information available online**
3.3	Process for determining the expertise board members needed to guide the strategic direction of the organization, including with regard to environmental and social risks and opportunities	Corporate Governance: Leadership*
3.4	Board-level processes for overseeing the organization's identification and management of economic, environmental, and social risks and opportunities	Corporate Governance: Leadership*
3.5	Linkage between executive compensation and achievement of the organization's financial and non-financial goals	Corporate Governance: Leadership* Compensation and Benefits: Executive Compensation* Other information available online**
3.6	Organizational structure and key individuals responsible for oversight, implementation, and audit of economic, environmental, social and related policies	Accountability and Sustainability: Corporate Citizenship*
3.7	Mission and values statements, internally developed codes of conduct or principles, and policies relevant to economic, environmental and social performance and the status of implementation	Corporate Profile: Values* Accountability and Sustainability* Management System: Business Conduct Guidelines*
3.8	Mechanisms for shareholders to provide recommendations or direction to the board of directors	Other information available online**
STAKEHOLDER ENGAGEMENT		
3.9	Basis for identification and selection of major stakeholders	Relationships*
3.10	Approaches to stakeholder consultation reported in terms of frequency of consultations by type and by stakeholder group	Relationships*
3.11	Type of information generated by stakeholder consultations	Relationships*
3.12	Use of information resulting from stakeholder engagements	Relationships*

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GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
OVERARCHING POLICIES AND MANAGEMENT SYSTEMS		
3.13	Explanation of whether and how the precautionary approach or principle is addressed by the organization	Accountability and Sustainability: Global Leadership Network*
3.14	Externally developed, voluntary economic, environmental and social charters, sets of principles, or other initiatives to which the organization subscribes or which it endorses	
3.15	Principle memberships in industry and business associations, as well as national/international advocacy organizations	Accountability and Sustainability: Global Leadership Network* Security and Privacy: Relationships* Other information available online**
3.16	Policies and/or systems for managing upstream and downstream impacts, including: <ul style="list-style-type: none"> • Supply chain management as it pertains to outsourcing and supplier environmental and social performance • Product and service stewardship initiatives 	Relationships: Suppliers* Supply Chain* Environmental Protection: Product Stewardship* Other information available online**
3.17	Reporting organization's approach to managing indirect economic, environmental, and social impacts resulting from its activities	Management System* Employee Well-being: Managing Well-being* Environmental Protection: Management System*
3.18	Major decisions during the reporting period regarding the location of, or changes in, operations	Other information available online**
3.19	Programs and procedures pertaining to economic, environmental and social performance. Include discussion of: <ul style="list-style-type: none"> • priority and target setting; • major programs to improve performance; • internal communication and training; • performance monitoring; • internal and external auditing; and • senior management review 	Management System: Objectives* Management System: Personal Business Commitments* Collaboration and Communications* Learning and Opportunity* Accountability and Sustainability: Corporate Citizenship* Corporate Governance: External Audits* Management System: Internal Audits* Corporate Governance: Leadership*
3.20	Status of certification pertaining to economic, environmental and social management systems	Employee Well-being: Managing Well-being* Environmental Protection: Management System* Other information available online**
GRI CONTENT INDEX		
4.1	A table identifying location of each element of the GRI Report Content, by section and indicator	Accountability and Sustainability: GRI Index**
ECONOMIC PERFORMANCE INDICATORS		
CUSTOMERS		
EC1	Net sales	Revenue: \$96.3 billion (2004) Net income: \$8.4 billion (2004)
EC2	Geographic breakdown of markets	Corporate Profile* Other information available online**
SUPPLIERS		
EC3	Cost of all goods, materials, and services purchased	\$39 billion (2004)
EC4	Percent of contracts that were paid in accordance with agreed terms (e.g. scheduling of payments, form of payment etc)	
EC11	Supplier breakdown by organization and country	
EMPLOYEES		
EC5	Total payroll and benefits expense (incl. wages, pension, redundancy payments) broken down by country or region	Other information available online**

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** GRI Index: www.ibm.com/ibm/responsibility/sustainability/gri-index.shtml

GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
PROVIDERS OF CAPITAL		
EC6	Distributions to providers of capital broken down by interest on debt and borrowings, and dividends on all classes of shares	Other information available online**
EC7	Increase/decrease in retained earnings at end of period	Other information available online**
PUBLIC SECTOR		
EC8	Total sum of taxes of all types paid, broken down by country	Other information available online**
EC9	Subsidies received broken down by country or region	Corporate Profile* Other information available online**
EC10	Donations to community, civil society, and other groups broken down in terms of cash and in-kind donations per type group	Contributing to Communities* Other information available online**
EC12	Total spent on noncore business infrastructure development	
INDIRECT ECONOMIC IMPACTS		
EC13	Describe the organization's indirect economic impacts	Contributing to Communities: On Demand Community* Governments and Public Policy: e-government* Other information available online**
ENVIRONMENTAL PERFORMANCE INDICATORS		
MATERIALS		
EN1	Total materials use other than water by type (report in tons, kg or volume)	
EN2	Percentage of materials used that are wastes (processed or unprocessed) from sources external to the reporting organization. (Refers to both post-consumer recycled material and waste from industrial sources)	Environmental Protection: Product Stewardship*
ENERGY		
EN3	Direct energy use segmented by primary source	Environmental Protection: Energy*
EN4	Indirect energy use	Environmental Protection: Energy*
EN17	Initiatives to use renewable energy sources and increase energy efficiency	Environmental Protection: Energy*
EN18	Energy consumption footprint (i.e. annualized lifetime energy requirements) of major products	
EN19	Other indirect (upstream/downstream) energy use and implications, such as organizational travel, product lifecycle management and use of energy-intensive materials	Environmental Protection: Product Stewardship*
WATER		
EN5	Total water use	Environmental Protection: Water Conservation*
EN20	Identify water sources and related ecosystems/habitats significantly affected by the organization's use of water	
EN21	Annual withdrawals of ground and surface water as a percent of annual renewable quantity of water available from the sources	
EN22	Total recycling and reuse of water. Includes wastewater and other used water (e.g. cooling water)	Environmental Protection: Water Conservation*

* IBM Corporate Responsibility site: www.ibm.com/ibm/responsibility
** GRI Index: www.ibm.com/ibm/responsibility/sustainability/gri-index.shtml

GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
BIODIVERSITY		
EN6	Location and size of land owned, leased, or managed in biodiversity-rich habitats (info on these pending from GRI)	Environmental Protection: Management System*
EN7	Description of the major impacts on biodiversity associated with the organization's activities and/or products and services in terrestrial, freshwater, and marine environments	
EN23	Total amount of land owned, leased, or managed for production activities or extractive use by the organization	
EN24	Amount of impermeable surface as a percentage of land purchased or leased	
EN25	Impacts of organization's activities and operations on protected and sensitive areas	
EN26	Changes to natural habitats resulting from activities and percentage of habitat protected or restored	
EN27	Objectives, programs and targets for protecting and restoring native ecosystems and species in degraded areas	
EN28	Number of IUCN Red List species with habitats in areas affected by operations	
EN29	List business units currently operating or planning operations in or around protected or sensitive areas	
EMISSIONS, EFFLUENTS AND WASTE		
EN8	Greenhouse gas emissions	Environmental Protection: Climate Change*
EN9	Use and emissions of ozone-depleting substances	Eliminated in 1993
EN10	NOx, SOx and other significant air emissions by type.	Environmental Protection: Climate Change*
EN11	Total amount of waste by type and destination	Environmental Protection: Pollution Prevention*
EN12	Significant discharges to water by type	Environmental Protection: Releases*
EN13	Significant spills of chemicals, oils and fuels in terms of total number and total volume (significance defined in terms of both the size of the spill and impact on the surrounding environment)	Environmental Protection: Audits and Compliance*
EN30	Other relevant indirect greenhouse gas emissions Environmental protection: energy conservation	
EN31	Identify all production, transport, import or export of any waste deemed "hazardous" under the terms of the Basel Convention Annex I, II, III and VIII	
EN32	Water sources and related ecosystems/habitats significantly affected by the organization's discharges of water and runoff	
SUPPLIERS		
EN33	Performance of suppliers relative to environmental components of programs and procedures described in response to Governance Structure and Management Systems section	Environmental Protection: Management System* Supply Chain: Supplier Conduct* Relationships: Suppliers*
PRODUCTS AND SERVICES		
EN14	Significant environmental impacts of principle products and services	
EN15	Percentage of the weight of products sold that is reclaimable at the end of the products' useful life and percentage that is actually reclaimed	Environmental Protection: Product Stewardship*
COMPLIANCE		
EN16	Incidents of and fines for non-compliance with all applicable international declarations/conventions/treaties, and national, subnational, regional, and local regulations associated with environmental issues	Environmental Protection: Audits and Compliance*

* IBM Corporate Responsibility site: www.ibm.com/ibm/responsibility

GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
TRANSPORT		
EN34	Describe significant environmental impacts of transportation used for logistical purposes	
OVERALL		
EN35	Total environmental expenditures by type	Environmental Protection: Management System*
LABOR PRACTICES AND DECENT WORK		
EMPLOYMENT		
LA1	Breakdown of workforce, where possible, by region/country, status (employee/nonemployee, employment type (full time/part time), and by employment contract (indefinite or permanent/fixed term or temporary). Also identify workforce retained in conjunction with other employers (temporary agency workers or workers in co-employment relationships), segmented by region/country.	Other information available online**
LA2	Net employment creation and average turnover segmented by region/country	
LA12	Employee benefits beyond those legally mandated	Employee Well-being: Promoting Health and Well-being* Employee Well-being: Incentives to Health* Employee Well-being: Work/life Balance* Learning and Opportunity* Compensation and Benefits: Health and Retirement* Compensation and Benefits: Awards and Recognition* Compensation and Benefits: Equity Ownership*
LABOR/MANAGEMENT RELATIONS		
LA3	Percentage of employees represented by independent union organizations or other bona fide employee trade representatives, broken down geographically, OR percentage covered by collective bargaining agreements, broken down by region/country.	
LA4	Policy and procedures involving information, consultation and negotiation with employees over changes in the reporting organization's operations (e.g., restructuring)	Employee Well-being: Workforce Relations* Collaboration and Communications: Internal Appeals* Collaboration and Communications: Online Jams*
LA13	Provision for formal worker representation in decision making or management, including corporate governance	Learning and Opportunity: Employee Opportunity* Employee Well-being: Workforce Relations* Collaboration and Communications: Internal Appeals* Corporate Governance: Leadership*
HEALTH AND SAFETY		
LA5	Practices on recording and notification of occupational accidents and diseases, and how they relate to the ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases	
LA6	Description of formal joint health and safety committees comprising management and worker representatives and proportion of workforce covered by any such committees	
LA7	Standard injury, lost day and absentee rates and number of work-related fatalities (including subcontracted workers)	Employee Well-being: Workplace Safety*
LA8	Description of policies or programs (for the workplace and beyond) on HIV/AIDS	
LA14	Evidence of substantial compliance with the ILO Guidelines for Occupational Health Management Systems	
LA15	Description of formal agreements with trade unions or other bona fide employee representatives covering health and safety at work and proportion of the workforce covered by any such agreements	

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GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
TRAINING AND EDUCATION		
LA9	Average hours of training per year per employee by category of employee	Learning and Opportunity*
LA16	Description of programs to support the continued employability of employees and to manage career endings	Learning and Opportunity: Employee Opportunity*
LA17	Specific policies and programs for skills management or for lifelong learning	Learning and Opportunity: People Development* Learning and Opportunity: Leadership Development* Other information available online**
DIVERSITY AND OPPORTUNITY		
LA10	Description of equal opportunity policies or programs, as well as monitoring systems to ensure compliance and results of monitoring	Workforce Diversity*
LA11	Composition of senior management and corporate governance bodies (including board of directors), including female/male ratio and other indicators of diversity as culturally appropriate	Workforce Diversity: Diversity as Strategy* Corporate Governance: Leadership* Other information available online**
HUMAN RIGHTS		
STRATEGY AND MANAGEMENT		
HR1	Description of policies, guidelines, corporate structure and procedures to deal with all aspects of human rights relevant to the reporter's operations, including monitoring mechanisms and results	Management System: Policies— Global Employment Standards* Supply Chain Principles*
HR2	Evidence of consideration of human rights impacts as part of investment and procurement decisions, including selection of suppliers/contractors	Supply Chain: Supplier Conduct*
HR3	Description of policies and procedures to evaluate and address human rights performance within the supply chain and contractors, including monitoring systems and results of monitoring	Supply Chain: Supplier Conduct*
HR8	Employee training on policies and practices concerning all aspects of human rights relevant to operations	Management System: Business Conduct Guidelines*
NONDISCRIMINATION		
HR4	Description of global policy and procedures/programs preventing all forms of discrimination in operations, including monitoring systems and results of monitoring	Workforce Diversity: Training* Workforce Diversity: Task Forces, Councils, and Network Groups* Workforce Diversity: Government Requirements* Collaboration and Communications: Internal Appeals*
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		
HR5	Description of freedom of association policy and extent to which it is universally applied independent of local laws, and description of procedures/programs to address this issue	Management System: Policies— Global Employment Standards*
CHILD LABOR		
HR6	Description of policy excluding child labor as defined by the ILO Convention 138 and extent to which this policy is visibly stated and applied, as well as description of procedures/programs to address this issue, including monitoring systems and results of monitoring	Management System: Policies— Global Employment Standards*

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GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
FORCED AND COMPULSORY LABOR		
HR7	Description of policy to prevent force and compulsory labor and extent to which this policy is visibly stated and applied, as well as description of procedures/programs to address this issue, including monitoring systems and results of monitoring	Management System: Policies— Global Employment Standards*
DISCIPLINARY PRACTICES		
HR9	Description of appeal practices, including, but not limited to, human rights issues	Collaboration and Communications: Internal Appeals*
HR10	Description of non-retaliation policy and effective, confidential employee grievance system (including, but not limited to, its impact on human rights)	Collaboration and Communications: Internal Appeals*
SECURITY PRACTICES		
HR11	Human rights training for security personnel	
INDIGENOUS RIGHTS		
HR12	Description of policies, guidelines, and procedures to address the needs of indigenous people	
HR13	Description of jointly managed community grievance mechanisms/authority	
HR14	Share of operating revenues from the area of operations that are redistributed to local communities	
SOCIETY		
COMMUNITY		
SO1	Description of policies to manage impacts on communities in areas affected by activities, as well as description of procedures/programs to address this issue, including monitoring systems and results of monitoring	Relationships: Communities*
SO4	Awards received relevant to social, ethical and environmental performance	Employee Well-being* Workforce Diversity* Learning and Opportunity* Contributing to Communities* Environmental Protection* Security and Privacy*
BRIBERY AND CORRUPTION		
SO2	Description of the policy, procedures/management systems, and compliance mechanisms for organizations and employees addressing bribery and corruption	Management System: Policies— Business Conduct* Management System: Business Conduct Guidelines*
POLITICAL CONTRIBUTIONS		
SO3	Description policy, procedures/management systems and compliance mechanisms for managing political lobbying and contributions	Management System: Policies— Politics*
SO5	Amount of money paid political parties and institutions whose prime function is to fund political parties or their candidates	Management System: Policies— Politics*
COMPETITION AND PRICING		
SO6	Court decisions regarding cases pertaining to anti-trust and monopoly regulations	
SO7	Description of policy, procedures/management systems, and compliance mechanisms for preventing anti-competitive behavior	

* IBM Corporate Responsibility site: www.ibm.com/ibm/responsibility

GRI SECTION	DESCRIPTION	RELATED INFORMATION FROM IBM
PRODUCT RESPONSIBILITY		
CUSTOMER HEALTH AND SAFETY		
PR1	Description of policy for preserving customer health and safety during use of products and services, and extent to which this policy is visibly stated and applied, as well as description of procedures/programs to address this issue, including monitoring systems and results of monitoring	Management System: Policies—Well-being and Safety*
PR4	Number and type of instances of non-compliance with regulations concerning customer health and safety, including the penalties and fines assessed for these breaches	
PR5	Number of complaints upheld by regulatory or similar bodies to oversee or regulate the health and safety of products and services	
PR6	Voluntary code compliance, product labels or awards with respect to social and/or environmental responsibility that the reporter is qualified to use or has received	Environmental Protection*
PRODUCTS AND SERVICES		
PR2	Description of policy, procedures/management systems, and compliance mechanisms related to product information and labeling	Environmental Protection: Product Stewardship*
PR7	Number and type of instances of noncompliance with regulations concerning product information and labeling, including any penalties or fines assessed for these breaches	
PR8	Description policy, procedures/management systems, and compliance mechanisms related to customer satisfaction, including results of surveys measuring customer satisfaction. Identify geographic areas covered by policy.	Relationships: Clients*
ADVERTISING		
PR9	Description policies, procedures/management systems and compliance mechanisms for adherence to standards and voluntary codes related to advertising	
PR10	Number and types of breaches of advertising and marketing regulations	
RESPECT FOR PRIVACY		
PR3	Description policy, procedures/management systems and compliance mechanisms for consumer privacy	Security and Privacy: Privacy Commitment*
PR11	Number of substantiated complaints regarding breaches of consumer privacy	

* IBM Corporate Responsibility site: www.ibm.com/ibm/responsibility