

Communication on Progresso on Global the Compact 2010/2011

Preliminary:

Announce that since July 2010 we changed our name to Vecci, Rodvalho, Terra e Pimentel Lawyer's Office..

Objective: this report aims to assess the implementation of the objectives and principles of Global Compact in our structure.

Target audience:

- a) internal – shareholders, employers, partners and trainees;
- b) external – customers, suppliers, service providers, local community, government and civil society.

Rated period: July 2010 to July 2011

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Tools or sources of research information:

- a) Workforce;
- b) Accounting documents (invoices of suppliers, tax collection documents, balance sheets, receipts for salary payments, proof of discharge and social security contribution, invoices for water and energy consumption);
- c) Standing order, Cod of Conduct , Environmental Project and organizational structure;
- d) External public.

Methodology:

With reference to the Global Compact principles, the research took into account actions taken on the following topics:

- a) Self regulation of conduct in which the ethical commitments are valued, their scope and degree of rooting in organizational culture;
- b) evaluates corporate governance practices in relation to human rights and goals of the Global compact;
- a) relations with the competition which assesses the policies of their relationship in relation to the market;
- b) relations with the company evaluates its public relations with internal and external , Social Statement of its activities;
- c) specifically in relation to its domestic audience were evaluated issues relating to labor legislation and social security , respect for the rights of children, adolescents women and the promotion of racial and gender equity, remuneration policy and safety and occupational medicine;
- d) the environmental issues were assessed – the significance of environmental impacts cause by its activity in relation to inputs, energy and water consumption, disposal of solid waste, and environmental education;
- e) about its external audience evaluated the criteria for contracting suppliers and their chain of custody, the social dimension of consumption, customer relations, relationship with the local community, social activities and funding of social

action, as well as their actions with the political community, campaign finance and anti-corruption and bribery.

Once these issues were raised indicators to assess the degree of development of actions in relation to the proposed themes. Altogether 33 indicators were established, distributed as follows:

Indicators

Self regulations of conduct:

1 - Ethical commitments

Stage set for the team:

Stage 2 – the company's values are being incorporated into work processes and attitudes and behaviors.

Additional information:

The company (yes or no):

Publicly exposes its ethical commitments through institutional material on the internet or in a manner appropriate to their stake holders? Yes.

The cod of conduct and/or values statement of the organization:

Include the following stakeholders: employees, suppliers, customers, clients, community, government, and minority stakeholders? Yes.

Expressly prohibit the use of illegal practices (bribery, corruption, extortion) for commercial advantage? Yes

They are explicit about the commitment to ethics in the management of privileged information or privately obtained during the company's processes with its stakeholders (customers, employer, suppliers, etc)? Yes.

They are explicit about commitment to transparency and accuracy of information provided to stakeholders? Yes

The cod of conduct and/or values statement of the organization covering such topics as:

Compliance with laws and paying taxes? Yes.

Concussion, questionable payments or receipts? Yes

Explicit rules in the relationship with government officials? Yes.

Conflict of interest? Yes.

Donations? Yes.

Active and passive corruption? Yes.

Administrative misconduct? Yes.

Fraud in public bidding? Yes.

Limits on political contribution and activities? Yes.

Community relations? Yes.

Nepotism? Yes.

Fraud and prevention and treatment? Yes.

The company has:

Committee, board or formal charge internally for ethical? No.

Committee responsible for advice or ethical issues outside? No.

Encourages consistency between the values and ethical principles and the individual attitude of its employees? Yes.

Explicitly links the performance of accounting and legal advisory services to the code of conduct and principles? Yes.

In addition to meeting all the legislation in place to exercise and keep up with their taxes, have procedures for all employees knows the laws that are submitted, whether they refer to as the professional activities that benefit to that can fully comply with them? Yes.

What can be done about this indicator?

In the medium term – the dissemination of this Code of Conduct to their external audience.

Indicator 2 - rooted in organizational culture

With regard to effectiveness in the dissemination of values and ethical principles:

Stage set for the team:

Stage 2 – the values and principles are transmitted to the internal audience at specific moments.

What can be done about this indicator?

After planning – public disclosure of the Code of Conduct and its incorporation into the company's strategic planning.

Indicator 3 - Corporate Governance

Regarding the organizational structure and corporate governance practices.

Stage set for the team:

In the implementation stage.

Additional information:

Company management:

It includes respect for human rights as a formal criterion in their purchasing decisions and investment? Yes.

Carry out its operations according to a statement from the International Labor Organization on fundamental principles at work? Yes.

Guide its operations in accordance with the Global Compact Principles or in support of the Millennium Development Goals? Yes.

The company's vision and strategy of the organization include contributions with regard to sustainable development? Yes.

It has formal mechanisms or systems for periodic evaluation of its members? Yes.

What can be done about this indicator?

Immediately – dissemination and application of governance principles in relation to the workforce;

After planning – disclosure to the general public.

Indicator 4 - relations with the competition

As for the political relationship with competitors organizations with the same purpose, the company:

Stage set for the team:

Stage 2 – follows common practice of price competition to the market, comply with legislation, seeks a fair position and applies the its principles of corporate governance and Global Compact.

Transparency relationship with the society:

Additional information:

Does the company publicly and frequently its principles regarding competition? Yes.

Has a policy of not demonstrating the shortcomings of the competition to promote their services? Yes.

The unfair competition policy covers the production chain? Yes.

Unfair competition policy covers the following items:

- a) piracy? Yes.
- b) Tax evasion? Yes.
- c) Contraband? Yes.
- d) Brand or product tampering? Yes.
- e) Product counterfeiting? Yes.

What can be done about this indicator?

Immediately – dissemination and application of the code of conduct to workforce.

After planning – disclosure to the general public.

Indicator 5 – Dialogue and engagement with stakeholders:

Stage set for the team:

Stage 2 – know the specific dilemmas and attributes of some of them (employees, customers, clients, partners) and establishing channels of dialogue for maintaining these relations.

What can be done about this indicator?

After planning – disclosure of actions performed for the internal and external audiences.

Indicator 6 – Social Statement

Stage set for the team:

Stage 1 – produces irregularly set with a social information on their social environmental activities.

What can be done about this indicator?

Immediately – formalizations of the processes of social reporting.

After planning – disclosure of actions performed for the internal and external audiences.

INTERNAL AUDIENCE:

Dialogue and Participation

Indicator 7 - relations with trade unions

Stage set for the team:

Stage 1 – do not put pressure on employees involved in union activities.

What can be done about this indicator?

After planning – the dissemination of the Code of Conduct for internal and external audiences.

Indicator 8 - Participatory management

Considering the involvement of employees in management, the company:

Stage set for the team:

Stage 3 – Owns and implements corporate governance process that among other topics include information about the company (history, vision, mission, organizational structure, markets, key partners, clients); trains employees at the time of admission, integration programs in training on new products and a services, seminars and lectures on new policies and strategies so that they can understand it, analyze them and implement them.

What can be done about this indicator?

After planning – the dissemination of the Code of Conduct for external audience.

Respect for the individual

Indicator 9 - Commitment to the future of children

In addressing the issue of combating child labor, the company:

Stage set for the team:

Respect the Brazilian legislation, which prohibits the employment of persons under 16 (except as an apprentice, between 14 and 18), discuss and share promotes awareness about the consequences of child labor.

What can be done about this indicator?

Immediately – evaluation of actions and dissemination of results.

Indicator 10 - commitment to child development

Considering its contribution to child development in the country and commitment to children's right, the company:

Stage set for the team:

Stage 3 – complies with legislation on the protection of mother hood, fatherhood, breastfeeding, formally forbidding any discrimination for pregnant women and employees (women and men, including outsourcing) with children under 6 years of age in the admission process, in promotion and internal mobility system and maintains support for maternity, including daycare for children under 6 years.

What can be done about this indicator?

Immediately – evaluation of actions and dissemination of results.

Indicator 11 - Valuing Diversity

Recognizing the ethical obligation of companies to combat all forms of discrimination and enhance the opportunities offered by the rich diversity of our society, the company:

Stage set for the team:

Stage 2 – follows strictly the laws related prejudice and negative discrimination against states and behaviors that do not promote equal opportunities at work and relationship with clients, suppliers and surrounding community.

What can be done about this indicator?

Immediately – promotion of awareness-raising among the public internal and external.
After planning – evaluation of actions taken and dissemination of results.

Indicator 12 – Commitment to non-discrimination and promote racial equality

Stage set for the team:

Stage 2 – strictly follow legislation prohibiting racial discrimination in the work and takes a stance against any kind of prejudice towards all stakeholders.

What can be done about this indicator?

Immediately – promotion of awareness-raising among the public internal and external.
After planning – evaluation of actions taken and dissemination of results.

Indicator 13 – Commitment to the promotion of gender equity

Stage set for the team:

Stage 3 – closely follows the Brazilian Constitution which prohibits gender discrimination in the workplace and assumes the position internally against any kind of prejudice towards all stakeholders, participates in projects for the empowerment of women, is a founding member of UNIFEN, publishes and promotes actions and discussions on the issue of women in the labor market.

What can be done about this indicator?

Immediately – evaluation of actions taken and dissemination of results.

Indicator 14- Policy of compensation, benefits and career:

In its policy of compensation, benefits and career, the company:

Stage set for the team:

Stage 2 - treats employees as a resource, encouraging them through compensation and investment professional, taking into account the skills needed for their current performance.

What can be done about this indicator?

Immediately - dissemination and implementation of remuneration policy to workforce.

After planning – assessment mechanisms adopted and dissemination of results.

Indicator 15 - health care, condition and safety

In order to ensure good working conditions health and safety, the company:

Stage set for the team:

Stage 2 - strictly complies with the legislation and implement plans, actions and goals to meet the standards of excellence in health, safety and working conditions.

What can be done about this indicator?

Immediately - dissemination and implementation of its actions to workforce.

After planning – assessment mechanisms adopted and dissemination of results.

Indicator 16 – Commitment to professional development and employability

To develop its human resources, the company:

Stage set for the team:

Stage 2 – keep training and development activities, aimed at continuous improvement of all its staff and considering the application in their current promotions.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Additional Information:

Data of 2010

Number of hours of professional development per employee/year: 50

Percentage of women with primary education II (6th to 9th grade) complete the workforce: 9%

Percentage of women with secondary education in the workforce: 9%

Percentage of women with higher education in the workforce: 82%

Percentage of men with higher education in the workforce: 71%

Indicator 17 - Behavior of layoffs

To conduct dismissal processes, the company:

Stage set for the team:

Stage 1 - strictly follow the laws in force and provides guidelines for the fired the necessary procedures. In case of need to cut staff, looks for ways to contain and reduce costs, to avoid mass layoffs.

What can be done about this indicator?

Immediately - dissemination of its policy of personnel management and application to workforce.

After planning – assessment mechanisms adopted and dissemination of results.

Indicator 18 - Preparing for retirement

In order to prepare employees for retirement, the company:

Stage set for the team:

Stage 1 – offers background information on obtaining retirement.

What can be done about this indicator?

Immediately – implementation of its policy of personnel management.

After planning – assessment mechanisms adopted and dissemination of results.

ENVIRONMENT:

Responsibility to future generations

To deal with due importance and responsibility environmental impacts of its activities, the company:

Stage set for the team:

Stage 3 – complies strictly with requirements and parameters required by national legislation, develop internal programs for environmental improvement also prioritizes preventive policies and has an area responsible for the environment; participates in committees/local councils to discuss environmental issues with government and society; already implemented processes mapping and analysis to improve environmental quality.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 19- Education and environmental awareness:

To contribute to public awareness about the environmental challenges resulting from human activity and growing social and environmental responsibility, the company:

Stage set for the team:

Stage 3 – systematically develop environmental education activities focused on the workforce, supplies and clients; performs internal actions to promote responsible consumption, disposal of solid waste, and to reducing water and energy consumption.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 20 – Management of impacts on the environmental life cycle of products and services

Considering the environmental impacts caused by its processes or services, the company:

Stage set for the team:

Stage 3 – in addition to meeting the legal obligation, it seeks to discover and develop actions to prevent major impacts caused by its processes and services.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 21 - Sustainability in forestry

In order to contribute to the conservation of forests and combat their illegal and predatory, as well as protect biodiversity, the company:

Stage set for the team:

Stage 3 – the timber supplies used in daily activities have certification of origin and chain of custody.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 22 – Reduction of inputs and outputs of materials

In order to prevent and reduce environmental damage and optimize processes, the company:

Stage set for the team:

Stage 3 – has invested in technological upgrading, targeting and/or reduced use of inputs and environmental certification of origin and reuse of waste, sustainable consumption of energy and water. It has control of chain of custody of materials and solid waste releases results to internal and external audiences.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

SUPPLIERS:

Indicator 23 – Selection criteria and evaluation of suppliers:

To regulate its relations with suppliers and partners, the company:

Stage set for the team:

Stage 2 – has a policy of selection and evaluation based on factors such as quality, price, period.

What can be done about this indicator?

Immediately – dissemination and implementation of the policy approved by the internal public.

After obtaining better information – implementation of policy selection and evaluation into account the commitment of suppliers to the major socio-environmental.

After planning - assessment mechanisms adopted and dissemination of results.

Indicator 24 - Forced or analogous to slave

Stage set for the team:

Stage 1 – the company internally and externally discusses the consequences of the forced or slave labor.

What can be done about this indicator?

Immediately – dissemination and implementation of the policy approved by the internal public.

After planning - assessment mechanisms adopted and dissemination of results.

Indicator 25 – Supporting the development of suppliers

With respect to providers of similar or smaller size, the company

Stage set for the team:

Stage 2 – the company uses transparently negotiates and establishes contractual relations on the basis of commercial, environmental and social responsibility.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results to internal audience.

After planning – adoption of criteria for environmental responsibility in relations with suppliers.

CUSTOMERS AND CONSUMERS:

The social dimension of consumption.

Indicator 25 - Business Communication Policy

Stage set for the team:

Stage 3 – the company has a communication policy in line with their values and principles, which covers corporate governance and highlights their shares of social and environmental responsibility covering all your communication materials.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 26 - Excellence in service

As for its commitment to the quality of clients service, the company:

Stage set for the team:

Stage 3 – provides easy access to clients service, or information of interest, records and communicates internally manifestations resolved quickly and has individual demands and processes to improve the procedures adopted.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

COMMUNITY:

Relations with the local community

Indicator 27 – Management of the company's impact on the surrounding community

Stage set for the team:

Stage 2 – the company seeks to take remedial action in response to complaints protest from community and maintains constant dialogue with to prevent harmful actions.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 28 - Relations with local organizations

With respect to community organizations, NGOs and public facilities present in their environment, the company:

Stage set for the team:

Stage 3 – supports and collaborates with various organizations with donations; participates in projects and successful actions.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 29 - Financing of social action

The financing of social action is based:

Stage set for the team:

Stage 2 – defined in the annual budget funds managed transparently as previous established criteria.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 30 - Involvement in social action

To provide its social action, the company:

Stage set for the team:

Stage 2 – makes product donations and financial resources and encourage volunteer work of its employees and collaborators.

What can be done about this indicator?

Immediately - formalization of social policy

After planning - assessment mechanisms adopted and dissemination of results.

GOVERNMENT AND SOCIETY

Transparency policy

Indicator 30 – contributions to political campaigns

Stage set for the team:

Stage 1 – when finances, is limited the parameters established by legislation.

What can be done about this indicator?

Immediately – formalizing its policy on relations with government and political class.

After planning - assessment mechanisms adopted and dissemination of results.

Indicator 31 – Construction of citizenship by companies

In relation to its role in building citizenship, the company:

Stage set for the team:

Stage 3 – developing activities of education for citizenship and supports organizations that theme, conducting discussion forums in order to ensure conscious vote.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 31 - Anti-Corruption and antipropina

In the relationship with authorities, tax officials of public authorities at all levels, the company:

Stage set for the team:

Stage 3 – made public commitments to combat corruption and bribery and maintains posture recognized by internal and external audiences about the prohibition of direct or indirect encouragement of government agents.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 32 - Leadership and social influence

Seeking to exercises their citizenship through associations and business forums, the company:

Stage set for the team:

Stage 3 – participates actively contributing to human rights resources, process of preparing proposal for social and environmental public interest.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Indicator 33 – Participation in government social projects

In its involvement with social activities carried out by government agencies, the company:

Stage set for the team:

Stage 2 – occasionally helps with the government in carrying out specific activities and projects of public power in response to requests from authorities.

What can be done about this indicator?

Immediately - assessment mechanisms adopted and dissemination of results.

Comments:

- After the report found that the company has several practical actions aligned with the objectives and principles of Global Compact, essentially missing the formalization of the processes for implementation of policies already adopted, and evaluation mechanisms that allow the development of goals monitoring of systemic processes.
- It was also found that the company has not met its goals with respect to disclosure of their actions or in relation to workforce, whether in relation to external audience, as well as the need for implementation planning its communication policy.
- In addition, the collection of information has allowed us to observe that despite failures of communication found the company can promote its principles and code of conduct to both the internal and external public and is well evaluated by its employees, clients, competitors, government, class political and local community.

Opportunities to explore:

Through the dissemination of the Global Compact to establish themselves as local and regional business class to implement the Millennium Goals and expand their business opportunities.

Target for the next application:

- Completion and implementation of the formalization of the processes mentioned in this report;
- Map, evaluate and correct the flaws in the implementation
- Expand disclosure forms of actions and policies undertaken by the company with the public.

