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Global Compact  
Progress Report 2010

Atento



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## Global Compact Progress Report 2010

**ATENTO** ■ ■

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Estimadas Sras. y Srs.,

Me complace reafirmar el compromiso de Atento Inversiones y Teleservicios, S.A.U. (Atento) con el Pacto Mundial (*Global Compact*) de Naciones Unidas en este nuestro año de adhesión, con la publicación del primer **Informe de Progreso de Atento 2010**.

En Atento apoyamos los Diez Principios del Pacto Mundial a propósito de los derechos humanos y laborales, la protección del medio ambiente y la lucha contra la corrupción. Trabajamos por hacer de los Principios parte de nuestra estrategia, cultura y día a día de las operaciones de la compañía.

Así mismo, queremos promover su adopción en toda nuestra esfera de influencia y formar parte de aquellos proyectos de colaboración que supongan un avance de los objetivos generales de Naciones Unidas.

Reconocemos la importancia de los Informes de Progreso (IdP) como herramienta para comunicar los avances de Atento en materia de implementación de los Principios. Por eso y por nuestro compromiso con la transparencia y la participación de nuestros grupos de interés, nos comprometemos a la publicación de comunicaciones anuales en años sucesivos.

Atentamente,

Sr. Alejandro Reynal  
CEO de Atento



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## Global Compact Progress Report 2010

### General Information

#### Organization profile: Atento

• **Address:** Parque Empresarial Vía Norte 47; Quintanavides 17, 1ª planta.

• **Web address:** [www.atento.com](http://www.atento.com)

• **Senior executive:** Alejandro Reynal, CEO

• **Start date:** 16/02/2011

• **Number of employees:** 151.896

• **Sector:** Professional services (Telemarketing)

• **Activity, main brands, products and/or services:** Customer Service Activities (CRM) and BPO. • **Sales / Income:** 1.66 billion euros

• **Significant financial subsidies received from the government:** 1.34 million euros •

**Breakdown of Stakeholder Groups:** Clients, Employees

• **Breakdown of other Stakeholder Groups:**

• **Criteria followed to select Stakeholder Groups:** Stakeholder groups have been selected on the basis of a study to identify and prioritize stakeholders.

• **Countries in which the company has a presence (where the business carries out the majority of its activity and where it undertakes significant activity related to sustainability) and markets served:** Atento has a presence in 17 countries, grouped into 3 regions: EMEAA (Spain, France, Morocco and the Czech Republic), Americas (Argentina, Chile, Colombia, El Salvador, United States, Guatemala, Mexico, Panama, Peru, Puerto Rico, Uruguay and Venezuela) and Brazil, which, due to its significance, has region status (more information at [www.atento.com](http://www.atento.com)).

• **Scope of Progress Report (Countries on which information is included in the progress report) and possible limitations, if applicable:** This Progress Report covers all the activities undertaken by Atento in all the regions in which we operate.

• **How has the materiality of the report been established or how have the most significant issues to be included in the Progress Report been defined?** Through a materiality study conducted in three phases: 1) Identification of aspects (economic, social and environmental) which are or could become important for the business and for our stakeholders 2) Prioritization of certain aspects. To do this both internal and external criteria considered significant were taken into account 3) Reviews to confirm that these are internally and externally credible and to confirm that the organization has accepted them and considered their implications.

• **How the Progress Report is being disseminated:** To disseminate this, our first Progress Report, in addition to the publication produced by Global Compact and the Asociación Española del Pacto Mundial (Spanish Global Compact Association), we are planning to distribute among our stakeholders both the report itself and news of its publication, using a number of channels and formats (press release, internal publications, etc.).



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• *Awards and distinctions received during the report period:* • Socially Responsible Company logo (ESR) awarded by the Mexican Center for Philanthropy (CEMEFI) and the Alliance for Social Responsibility (AliaRSE) for our operations in Mexico, El Salvador and Guatemala and, at a regional level, to Atento Argentina, Brazil, Chile, Colombia, Puerto Rico, Peru and Venezuela. • Atento was recognized by the Great Place To Work (GPTW) Institute as one of the Best Workplaces in its operations in Argentina, El Salvador, Guatemala, Mexico, Peru and Puerto Rico. • Frost & Sullivan Latin America Market Share Leadership Award in the contact center outsourcing services sector. • 14 Amauta Awards, from the Latin American Association for Direct and Interactive Marketing (ALMADI) in 3 telemarketing categories: sales campaigns and programs, customer service and customer loyalty and relationship management.

• *Period covered by the information included in the report:* 2010

• *Progress report presentation cycle:* Yearly

### Strategy and governance

• *Give details of how the company incorporates stakeholder suggestions into its strategy and decision-making processes:* At the start of 2010, Atento conducted a stakeholder prioritization exercise based on two analysis criteria: the influence each stakeholder group might have on the attainment of Atento's strategic goals and the importance and particular characteristics of each stakeholder group. This led to the identification of 10 stakeholder groups which were then divided into priority groups (customers, employees, shareholders, social agents and media organizations) and other groups (public administrations, suppliers, NGOs, competitors and wider society). In addition, an internal study was conducted to put Atento's sustainability-related aspects into order based on their importance for all stakeholders. To prioritize the aspects identified, two criteria were taken into consideration: internal criteria, relating to their importance for the strategy and performance of the organization, and external criteria relating to the importance of each aspect for stakeholders. This has enabled the different aspects to be represented on a materiality and relevance matrix in order to identify aspects that are strategically significant, that is, sustainability aspects critical both to Atento and its stakeholders. The relevance analysis review began in 2010 through direct dialogue with stakeholders in the form of panel discussions which in 2011 are being extended to other stakeholder groups and the main operations. New policies and management systems are based on stakeholder expectations with regard to important issues. This ensures that Atento performs in a way that satisfies these expectations.

• *Give details of the legal status of the organization, providing the organizational chart:* Atento Inversiones y Teleservicios S.A.U. is a company owned wholly by Telefónica, S.A., and it is the parent company of the different subsidiaries around the world.

• *State whether the senior management team discuss strategic aspects of the 10 Principles of the Global Compact and measure their progress through key performance indicators:* (Yes) The Management Committee debates strategic aspects and measures their progress based on key performance indicators. The 10 Global Compact Principles will gradually be incorporated into these as of this, our first year as a signatory.



- Give details of the governance structure and state who, at management level, carry/ies out the decision-making and good governance processes for implementing the CSR in line with the Principles of the Global Compact and state whether the Chief Governance Officer also holds an executive position: The internal CSR & Sustainability structure at Atento & is comprised of four levels: The CSR & Sustainability Committee, attached to the Board of Directors, which gives guidance on Atento's general strategy and long-term sustainability vision. The Management Committee, the most senior executive body which is responsible for approving measures for implementing the Principles of the Global Compact. The People and Identity Committee, which specifically covers CSR and Sustainability, which discusses CSR actions and the implementation of the Principles. The Organization & Sustainability Division, attached to the People and Identity Division, which has its own structure in the corporate organizational chart as well as representatives in the three business regions: EMEAA, Brazil and Americas. Coordination between the different regions is carried out by the CSR & Sustainability Project Committee.

## United Nations Objectives and Issues

- State whether the entity is involved in collaborative projects and whether it undertakes actions in support of the objectives and issues addressed by the United Nations (UNICEF, UNWOMEN, Millennium Development Goals, Global Compact initiatives, etc.): (Yes) Atento addresses the needs of the community through the program Voces que Ayudan (Voices that Help). Through this program our employees volunteer to provide telephone services for charitable initiatives. The first charity campaign was "Un Sol para los Chicos" (A sun for the Children), which has been running in Argentina since 2002 in collaboration with UNICEF. The volunteers from Atento handle the donations made by viewers while the program is being broadcast, funds which help to cover the running costs of the children's programs carried out by UNICEF in Argentina. Voces que Ayudan has subsequently extended to Uruguay and Peru, also in collaboration with UNICEF, and to other countries in collaboration with other social foundations, such as Teletón in Mexico and the Gala Inocente Inocente in Spain.

## More information

- Notes:
- Web address: <http://www.atento.com>
- Introducing other Stakeholders:
- Report Publication date: -not set-
- Manager: Iñaki Cebollero / Manuel Aguirre
- Type of report: A+B+C

"The business has **suppliers** in developing countries."

"The business has **activities** in developing countries."

## Methodology



### DIAGNOSTIC

In order to ascertain the needs of the business, you need to know what there is. The diagnostic indicators enable us to identify which policies, actions and follow-up are in place for each Principle.



### POLICIES

These are gathered through qualitative indicators that define the action framework for structuring the actions and the business' control and follow-up mechanisms.



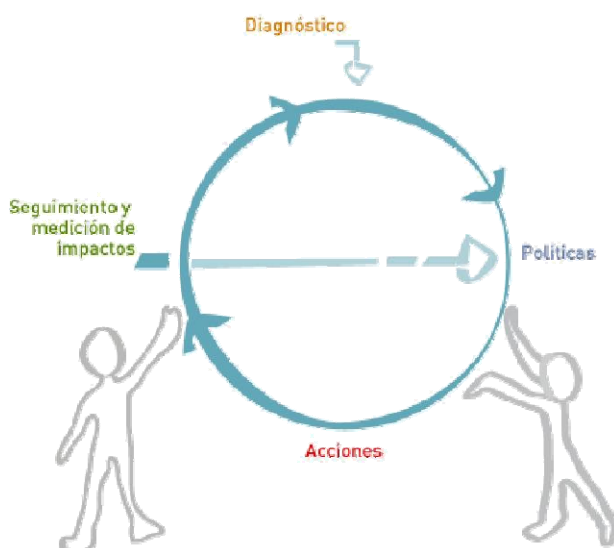
### ACTIONS

These are implemented to put the policies into practice. They are described in terms of qualitative and quantitative indicators. Input: An Input is required to find out what type of actions needs to be carried out. Without an Input you run the risk of implementing useless or unnecessary actions.



### FOLLOW-UP AND IMPACT MEASUREMENT

Evaluation and control of the results obtained from the actions implemented. This is reflected in the qualitative indicators established. Output: Needed in order to know the results to get new ideas for any improvements that might be necessary.





## • Principle 1

*Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.*



### DIAGNOSTIC

State whether the business has conducted a diagnostic in which Human Rights risk factors have been assessed. If so, give details of the risk and its impact (P1C2I1)

*Example: The business has conducted a Human Rights diagnostic and has identified as a risk lack of information and training on workplace risk prevention among its employees. The impact of this risk on the business would be an increase in workplace accidents.*

**Answer:** Yes

**Implementation:** In all its operations Atento conducts an internal work climate survey which, in the majority of operations, is complemented by another external survey conducted by the Great Place to Work Institute (GPTW). Based on the results of the surveys, action plans are put in place in order to improve employee satisfaction and the organization's work climate. In 2010, Atento was recognized as one of the Best Workplaces, according to GPTW in Argentina, El Salvador, Guatemala, Mexico, Peru and Puerto Rico, a list to which the operation in Spain was added at the start of 2011.

A customer and user satisfaction survey is also carried out, which establishes areas for improving satisfaction with our products and services.



### POLICIES

Does the business have written Human Rights policies? Describe in the notes field to what extent these have been implemented (P1C2I2)

**Answer:** Yes

**Implementation:** Atento has a set of Business Principles that establish the guidelines to be followed by its employees in order to comply with the law and respect human rights, Principles that are shared with stakeholder groups and business collaborators.

A Comprehensive Quality, Environment, Health and Safety Policy is currently being drafted.

[Download the attached document](#)



## ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P1C111)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.

State whether the results obtained through the Human Rights policy follow-up mechanisms are used in the business' strategic planning (P1C215)

*Answer:* Yes

*Implementation:* Atento and its Management Bodies undertake follow-up actions for all policies in order to carry out the strategic planning of the business. These include the Business Principles that are included in the organization's code of ethics.

State whether the business provides its customers with information on the safety of its products and services. If yes, say how (P1C411)

*Answer:* Yes

*Implementation:* In our communication with customers, we provide information on safety and security in our installations, both in relation to our assets and our employees, and on the technological security of the different hardware, data and information systems we use.



## FOLLOW-UP AND IMPACT MEASUREMENT

State whether you have mechanisms in place for following up the business' Human Rights policies. Give details (P1C213)

*Answer:* Yes

*Implementation:* Any Atento employee who has grounds to suspect any form of irregularity or breach in relation to accounting or auditing issues or failure to comply with the Business Principles, can report this to the Audit and Control Committee through the anonymous reporting channel.



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Percentage of employees who have been informed of and have received training on the Human Rights Principles by which the business is governed (P1C311)

*Answer:* 15 %

*Implementation:* In 2010, 15% of Atento employees received training on the Business Principles, which establish the human rights guidelines to be followed by employees.

State the number and type of: (P1C4I3)

\* Breaches of customer health and safety regulations: 0

\* Claims ratified by official regulatory bodies or similar for overseeing or regulating the salubrity and safety of products and services: 0

\* Breaches of regulations on information and labeling of products received: 0

*Implementation:* None of the above have occurred.

Amount of money invested in the community (in kind, products or services) (thousands of euros) (P1C511)

*Specific indicator for businesses that carry out activity in developing countries.*

*Answer:* 999999999

*Implementation:* The figure for 2010 is not available.

State whether the business conducts analysis of the projects it carries out in the communities in which it operates and if it undertakes educational campaigns or campaigns on other matters of public interest (P1C5I2)

*Specific indicator for businesses that carry out activity in developing countries.*

*Answer:* Yes

*Implementation:* Atento conducts prior analysis of the projects it undertakes in the community. The main community education initiative is Atentos al Futuro, in which volunteers from Atento train pre-university students to help them gain access to the labor market. The program is currently implemented in Argentina, Brazil and Chile (more information in the Atento Report 2010).

Number of actions undertaken by the business to prevent Human Rights breaches by contract security forces in its sphere of action. Give details (P1C6I1)

*Specific indicator for businesses that carry out activity in developing countries.*



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Answer: 0

Implementation: Atento does not have any contract security forces.

### Summary of implementation:

| Diagnostic         |  |            |
|--------------------|--|------------|
| Stakeholder Groups | Risks  | Objectives |
| Clients            | Lack of quality<br>Lack of communication and Transparency<br>Breaches of the Data Protection Act (LOPD)<br>Client dissatisfaction and poor Reputation<br>Poor accessibility of the products and services |            |
| Employees          | Workplace accidents<br>Lack of employee commitment to the business<br>Lack of communication<br>Negative workplace atmosphere   |            |

| Policies           |   |  |
|--------------------|---|--|
| Stakeholder Groups | Policies  | Objectives   |
| Clients            | Code of Conduct<br>Code of Ethics<br>Customer service policy or System<br>Internal management policies                          | Not taken into account in 2011.<br>Not taken into account in 2011.<br>Not taken into account in 2011.<br>Not taken into account in 2011.   |
| Employees          | Code of Conduct<br>Code of Ethics<br>CSR Plan<br>Human Resources policy<br>Internal management policies<br>Internal regulations | Identification and development of required policy/ies<br>Identification and development of required policy/ies<br>Identification and development of required policy/ies<br>Identification and development of required policy/ies<br>Identification and development of required policy/ies<br>Identification and development of required policy/ies |

| Actions            |               |  |
|--------------------|---------------|--|
| Stakeholder Groups | Actions       | Objectives   |
| Clients            | Social action | Extension of the Voces que Ayudan program.                               |
|                    | CSR           | Extension of the Voces que Ayudan program.                               |
| Employees          | Social action | Launch a global program to provide training on the Principles of Action. |
|                    | CSR           | Launch a global program to provide training on the Principles of Action. |

| Follow-up          |                                  |   |
|--------------------|----------------------------------|---|
| Stakeholder Groups | Follow-up and impact Measurement | Objectives  |
| Clients            | Surveys                          | 80% of clients satisfied or very satisfied to be working with Atento.       |
|                    | Incident management Procedure    | 80% of clients satisfied or very satisfied to be working with Atento.       |
|                    | Customer services                | 80% of clients satisfied or very satisfied to be working with Atento.       |
| Employees          | Suggestions box                  | 70% of employees satisfied or very very satisfied to be working for Atento. |
|                    | Communication channels           | 70% of employees satisfied or very very satisfied to be working for Atento. |
|                    | Human Resource Management        | 70% of employees satisfied or very very satisfied to be working for Atento. |
|                    | Survey                           | 70% of employees satisfied or very very satisfied to be working for Atento. |
|                    | Others                           | 70% of employees satisfied or very very satisfied to be working for Atento. |



## • Principle 2

*Businesses should make sure they are not complicit in human rights abuses.*



### DIAGNOSTIC

State whether the business has conducted a diagnostic in which it evaluates Human Rights risk factors in its supply chain (suppliers, contractors, etc.) or among its business partners. If so, give details of the risk and its impact (P1C2I1)

*Answer:* No

*Implementation:* Due to the type of products and services that Atento contracts, it is understood that the risk derived from suppliers is low.



### POLICIES

Does the business have written policies that regulate relationships with suppliers based on respect for Human Rights? (P2C3I2)

*Answer:* Yes

*Implementation:* Atento is developing a set of General Conditions for Contracting in which suppliers are asked to commit to the Principles of the Global Compact, which include ensuring that labor conditions do not pose a risk to the lives of workers and the elimination of inhumane treatment in the workplace.



### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P1C1I1)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.



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## FOLLOW-UP AND IMPACT MEASUREMENT

State the percentage of suppliers that have certification (P2C2I2)

*Answer:* 9999 %

*Implementation:* No figures available.

State the percentage of workshops inspected in your supply chain, out of the total number of suppliers or subcontractors that the business has (P2C3I1)

*Specific indicator for businesses that have suppliers in developing countries.*

*Answer:* 9999 %

*Implementation:* In 2010 more than 90% of Atento's purchases were made through its parent company Telefónica, which this year audited 37 suppliers considered a risk using a standard model. (The percentage this amounts to is unknown).

State the number of complaints and queries made by/about suppliers (P2 C3 I3)

*Answer:* 999999999



*Implementation:* In some operations half-yearly assessments and ratings are carried out on suppliers. A random list of suppliers the company has worked with in the previous six months is sent to user areas and they carry out an appraisal based on established quality levels. However, the number of complaints and queries made is not known.

## • Implementation summary:

| Diagnostic         |                |  |
|--------------------|----------------|--|
| Stakeholder Groups | Risks          | Objectives   |
| Suppliers          | Others         |  |
| Policies           |                |  |
| Stakeholder Groups | Policies       | Objectives   |
| Suppliers          | Others         | Adoption and creation of general conditions of contract. |
|                    | Quality policy | Adoption and creation of general conditions of contract. |



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|  <b>Actions</b>   |   |  |
|--|---|--|
| <b>Stakeholder Groups</b>  | <b>Actions</b>                          | <b>Objectives</b>                        |
| Suppliers  | CSR                                     | Panel discussions extended to suppliers. |
|  <b>Follow-up</b> |   |  |
| <b>Stakeholder Groups</b>  | <b>Follow-up and impact Measurement</b> | <b>Objectives</b>                        |



## • Principle 3

*Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.*



### DIAGNOSTIC

Give details of any risk factors that might compromise effective recognition of the right to collective bargaining (P3C3I2)

*Answer:* None

*Implementation:* The right to collective bargaining is recognized as provided for in the terms of applicable legislation in each country.

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### POLICIES

Does the business have an information, consultation and negotiation policy for employees on changes to the operations of informer organizations (for example, the restructuring of a company)? (P3C2I1)

*Answer:* Yes

*Implementation:* Although there is no specific global policy relating to this point, Atento maintains a permanent dialogue with worker representatives and has procedures for communicating significant changes in the organization of operations.

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### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P1C1I1)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.

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## FOLLOW-UP AND IMPACT MEASUREMENT

Does the business have follow-up and measurement procedures that guarantee the formal representation of workers in the decision-making processes or management of the organization? If so, please give details (P3C2I2)

*Answer:* Yes

*Implementation:* In addition to guaranteeing employees' right to join the Trade Union Organization of their choice, Atento also has Business Committees that act as joint dialogue and participation bodies for workers, as provided for in the labor legislation and collective agreements of the various countries in which we operate.

Does the business have mechanisms for listening to, evaluating and monitoring the opinions, concerns, suggestions, criticisms of employees in order to learn and acquire new knowledge? If so, please give details (P3C2I2)

*Answer:* Yes

*Implementation:* In some operations follow-up is carried out when executives join Atento, and in other cases, exit interviews are conducted to gather the suggestions of outgoing employees.

### Summary of implementation:

| Diagnostic         |  |  |
|--------------------|--|--|
| Stakeholder Groups | Risks  | Objectives   |
| Employees          | There is no risk   |  |
| Policies           |  |  |
| Stakeholder Groups | Policies   | Objectives   |
| Employees          | Code of Conduct<br>Collective agreement<br>Internal communication policy<br>Human Resources policy | Not taken into account in 2011.<br>Not taken into account in 2011.<br>Not taken into account in 2011.<br>Not taken into account in 2011. |
| Actions            |  |  |
| Stakeholder Groups | Actions  | Objectives   |
| Employees          | CSR  | Panel discussions extended to employees.   |



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| Follow-up          |   |  |
|--------------------|---|--|
| Stakeholder Groups | Follow-up and impact measurement  | Objectives   |
| Employees          | <p>Suggestions box</p> <p>Surveys and questionnaires on satisfaction</p> <p>Annual assessments</p> <p>Others</p> <p>Team meetings</p> | <p>Incorporation of sustainability indicators into information systems</p> <p>Incorporation of sustainability indicators into information systems</p> <p>Incorporation of sustainability indicators into information systems</p> <p>Incorporation of sustainability indicators into information systems</p> <p>Incorporation of sustainability indicators into information systems</p> |



### • Principle 4

*Businesses should uphold the elimination of all forms of forced and compulsory labor.*



#### DIAGNOSTIC

State whether forced labor is a risk factor within your business, given the type of activity you undertake (P4C2I1)

*Answer:* No

*Implementation:* We do not consider there to be a risk factor per se associated with our type of activity.

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#### POLICIES

State whether the business has written policies regulating the fixed number of working hours and remuneration of workers. Give details (P4C2I2)

*Answer:* Yes

*Implementation:* Atento has various Human Resources policies, such as the Remuneration and International Mobility Policies.

Although there is no Conciliation Policy as such, in some operations conciliation is favored through the availability of uninterrupted working days during the summer period.

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#### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P1C1I1)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.

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State whether the business carries out actions that enable its principles and values relating to good working conditions and the elimination of forced labor to be transferred to the supply chain (P4C3I2)

*Specific indicator for businesses that have suppliers in developing countries.*

*Answer:* Yes

*Implementation:* Atento is developing a set of General Conditions of Contract in which suppliers are asked to commit to the Principles of the Global Compact, which include upholding the elimination of forced labor.



### FOLLOW-UP AND IMPACT MEASUREMENT

State whether the business checks that its suppliers are committed to ensuring their workers work a reasonable number of hours (P4C3I1)

*Specific indicator for businesses that have suppliers in developing countries.*

*Answer:* No

*Implementation:* No information available.

State whether the business controls and verifies compliance with labor laws and regulations or has certification of the standards that prohibit forced labor (e.g. SA 8000) (P4C4I1)

*Specific indicator for businesses that carry out activity in developing countries.*

*Answer:* Yes

*Implementation:* Atento controls and verifies compliance with labor laws and regulations in its operations and also requires its suppliers to comply with labor laws and regulations. Specifically we are implementing social responsibility standard SA8000 in Brazil, with the idea of subsequently extending this to other operations.

Furthermore, all Atento's operations in Latin America have ESR certification which certifies them as socially responsible operations and there are a number of countries in which Atento has been recognized as one of the Best Workplaces, according to GPTW: Argentina, El Salvador, Guatemala, Mexico, Peru and Puerto Rico, a list to which the operation in Spain was added at the start of 2011.



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### • Implementation summary:

| Diagnostic         |                  |            |
|--------------------|------------------|------------|
| Stakeholder Groups | Risks            | Objectives |
| Employees          | There is no risk |            |

| Policies           |                        |                                 |
|--------------------|------------------------|---------------------------------|
| Stakeholder Groups | Policies               | Objectives                      |
| Employees          | Code of ethics/conduct | Not taken into account in 2011. |
|                    | Work contract          | Not taken into account in 2011. |
|                    | Collective agreement   | Not taken into account in 2011. |
|                    | Internal regulations   | Not taken into account in 2011. |
|                    | Others                 | Not taken into account in 2011. |
|                    | Human Resources policy | Not taken into account in 2011. |
|                    | LRP                    | Not taken into account in 2011. |

| Actions            |         |  |
|--------------------|---------|--|
| Stakeholder Groups | Actions | Objectives                               |
| Employees          | CSR     | Panel discussions extended to employees. |

| Follow-up          |                                  |            |  |
|--------------------|----------------------------------|------------|--|
| Stakeholder Groups | Follow-up and impact measurement | Objectives |  |
| Employees          |                                  |            |  |



## • Principle 5

*Businesses should uphold the effective abolition of child labor.*



### DIAGNOSTIC

State whether child labor is a risk factor within your business, given the type of activity you undertake (P4C211)

*Answer:* No

*Implementation:* We do not consider there to be a risk factor per se associated with our type of activity.



### POLICIES

State whether the business has written policies prohibiting child labor (for normal jobs, workers under 15 years of age, or 18 years of age in the case of dangerous jobs) which it openly communicates (P5C212)

*Answer:* Yes

*Implementation:* Atento has a set of Business Principles that establish the guidelines to be followed by its employees in order to comply with the law and respect human rights, Principles that are shared with stakeholder groups and business collaborators.



### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P5C111)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.

State whether the business carries out actions that enable its principles and values on child labor to be transferred to the supply chain (P5C312)



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Specific indicator for businesses that have suppliers in developing countries.

Answer: Yes

*Implementation:* Atento is developing a set of General Conditions of Contract in which suppliers are asked to commit to the Principles of the Global Compact, which include upholding the elimination of child labor.

State whether the business has certification of the standards that prohibit child labor (e.g. SA 8000; ppo.1) (P5C4I1)

Specific indicator for businesses that carry out activity in developing countries.

Answer: Yes

*Implementation:* Atento is in the process of implementing the social responsibility standard SA8000 in its operations in Brazil, with the idea of subsequently extending this to other operations.



### FOLLOW-UP AND IMPACT MEASUREMENT

Number of satisfactory inspections conducted during the year to rule out the use of child labor among its suppliers (P5C3I1)

Specific indicator for businesses that have suppliers in developing countries.

Answer: 0

*Implementation:* No specific inspections have been carried out in relation to this issue.

Number of employees under 15 years of age, 18 in the case of dangerous jobs. State, in the note field, the number of said employees that are associated with aid programs (P5C4I2)

Specific indicator for businesses that carry out activity in developing countries.

Answer: 0

*Implementation:* No Atento employee is under 15 years of age.


Number of inspections carried out by the Human Resources department to identify cases of child labor (P5C4I3)


Specific indicator for businesses that carry out activity in developing countries.


Answer: 0


Implementation: No specific inspections have been carried out in relation to this issue.

## Implementationsummary:

|   |                  |                   |
|---|------------------|-------------------|
|  <b>Diagnostic</b> |                  |                   |
| <b>Stakeholders Groups</b>  | <b>Risks</b>     | <b>Objectives</b> |
| Employees   | There is no risk |                   |

|   |  |  |
|---|--|--|
|  <b>Policies</b> |  |  |
| <b>Stakeholders Groups</b>  | <b>Policies</b>  | <b>Objectives</b>  |
| Employees   | Code of Ethics<br>Collective agreement<br>Current legislation<br>Purchase policy | Not taken into account in 2011.<br><br>Not taken into account in 2011.<br><br>Not taken into account in 2011.<br><br>Not taken into account in 2011. |

|   |                |                                 |
|---|----------------|---------------------------------|
|  <b>Acciones</b> |                |                                 |
| <b>Stakeholders Groups</b>  | <b>Actions</b> | <b>Objectives</b>               |
| Employees   | CSR            | Not taken into account in 2011. |

|  |   |                   |  |
|--|---|-------------------|--|
|  <b>Follow-up</b> |   |                   |  |
| <b>Stakeholders Groups</b>   | <b>Follow-up and impact measurement</b> | <b>Objectives</b> |  |
| Employees  |   |                   |  |



## • Principle 6

*Businesses should uphold the elimination of discrimination in respect of employment and occupation.*



### DIAGNOSTIC

State whether the business has conducted a diagnostic which evaluated discrimination risk factors in relation to hiring, training and promotion. If so, give details of the risk and its impact (P1C2I1)

*Answer:* No

*Implementation:* n/a

---



### POLICIES

Does the business have a written anti-discrimination and/or equal opportunities policy? Give details (P6C2I3)

*Answer:* Yes

*Implementation:* Atento has a set of Business Principles that establish the guidelines to be followed by its employees in order to comply with the law and respect human rights, and is in the process of devising a specific policy.

---



### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P5C1I1)

*Answer:* Yes

*Implementation:* Atento promotes the labor integration of people with different abilities and minority groups that have difficulty accessing the labor market or who are at risk of social exclusion.  
In Spain, the integration of people with different abilities is channeled through Impulsa, a subsidiary that in 2010 incorporated 167 people at its 5 work centers.

---



### FOLLOW-UP AND IMPACT MEASUREMENT

Give details of the composition of the corporate governance management bodies (including the Board of Directors) and all other employee groups giving percentages by category, gender, age and other diversity indicators(P6C2I1)

*Managers to employees:* 0.06 %

*Female managers:* 24.2 %

*Male managers:* 75.8 %

*Women:* 67.7 %

*Men:* 32.3 %

*Over 45s:* 1.9 % *Under 30s:* 71.5 %

*Non-national employees:* 999999 %

*Employees with permanent contract:*

70 %

*Implementation:* The percentage of non-national employees is not known.

The figure of 1.9% for over 45s corresponds to the % of employees aged over 50, which is the figure available.

---

State whether the business publishes the composition of management bodies and all other employee groups. Below, state where this information is published (P6C2I4)

*Answer:* Yes

*Implementation:* There are no notes on this matter.

---

Does your business have a mechanism or a person responsible for processing and managing claims of discrimination, harassment, abuse or intimidation? (P6C3I1)

*Answer:* Yes

*Implementation:* Atento has a reporting channel through which employees are able to report any breaches of the Business Principles, such as cases of discrimination, harassment, abuse and intimidation.

---

Number of ongoing and resolved claims of harassment, abuse or intimidation in the workplace (P6C3I2)

*Answer:* 3

*Implementation:* There are currently 3 cases going through the legal process: 1 in Argentina and 2 in Uruguay. In none of the cases have the plaintiffs provided evidence of the events that led to the claims being made.



## Global Compact Progress Report 2010

### Summary of implementation:

| Diagnostic         |                                  |   |
|--------------------|----------------------------------|---|
| Stakeholder Groups | Risks                            | Objectives  |
| Employees          | There is no risk                 |   |
| Policies           |                                  |   |
| Stakeholder Groups | Policies                         | Objectives  |
| Employees          | Code of ethics/conduct           | Identification and development of required policy/ies               |
|                    | Collective agreement             | Identification and development of required policy/ies               |
|                    | Others                           | Identification and development of required policy/ies               |
|                    | Human Resources policy           | Identification and development of required policy/ies               |
| Actions            |                                  |   |
| Stakeholder Groups | Actions                          | Objectives  |
| Employees          | Training                         | Extension of labor integration programs.                            |
|                    | Careers plan                     | Extension of labor integration programs.                            |
|                    | Employment insertion project     | Extension of labor integration programs.                            |
| Follow-up          |                                  |   |
| Stakeholder Groups | Follow-up and impact measurement | Objectives  |
| Employees          | Sustainability report            | Incorporation of sustainability indicators into information systems |



## • Principle 7

*Businesses should support a precautionary approach to environmental challenges.*



### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P7C1I1)

*Answer:* Yes

*Implementation:* Atento designs increasingly efficient products and services that enable it to compete in markets with growing environmental demands. At the same time it is fully aware of the impact of the business itself in relation to the consumption of resources, mainly water, electricity and paper, waste generation and indirect emissions of greenhouse gases, either resulting from our own energy consumption or from the work-related journeys we make.

---

State whether the business has in place initiatives aimed at reducing power and water consumption, atmospheric emissions, liquid waste, or initiatives aimed at improving biodiversity (P7C2I2)

*Answer:* Yes

*Implementation:* As part of its environmental commitment, Atento has initiatives for:

- reducing resource and energy consumption
- reusing and recycling resources
- mitigating climate change
- raising environmental awareness

## • Implementation summary:

| Diagnostic         |       |            |  |
|--------------------|-------|------------|--|
| Stakeholder Groups | Risks | Objectives |  |
| Not specified      |       |            |  |



## Global Compact Progress Report 2010

| <div> <b>Policies</b> </div> |          |            |  |
|------------------------------|----------|------------|--|
| Stakeholder Groups           | Policies | Objectives |  |
| Not specified                |          |            |  |

| <div> <b>Actions</b> </div> |   |   |
|-----------------------------|---|---|
| Stakeholder Groups          | Actions                                   | Objectives  |
| Not specified               | Social action (environmental projects)    | Conduct a diagnostic of energy use and devise an ecoefficiency plan |
|                             | Raising awareness of environmental issues | Conduct a diagnostic of energy use and devise an ecoefficiency plan |

| <div> <b>Follow-up</b> </div> |                                  |            |  |
|-------------------------------|----------------------------------|------------|--|
| Stakeholder Groups            | Follow-up and impact measurement | Objectives |  |
| Not specified                 |                                  |            |  |



## • Principle 8

*Businesses should undertake initiatives to promote greater environmental responsibility.*



### DIAGNOSTIC

State whether the business has identified its environmental risks and responsibilities, taking into account its activity sector (P8C2I4)

*Answer:* No

*Implementation:* We do not consider that our type of activity poses a significant risk to the environment.

---



### POLICIES

State whether the business has a written environmental policy, either separate or integrated into another set of policies (P8C2I1)

*Answer:* Yes

*Implementation:* A Comprehensive Quality, Environment, Health and Safety Policy is currently being drafted.

---



### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P5C1I1)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.

---



### FOLLOW-UP AND IMPACT MEASUREMENT



## Global Compact Progress Report 2010

State whether the business has effective mechanisms for assessing environmental issues (P8C2I2)

*Answer:* Yes

*Implementation:* Reviews by internal working groups and external verification of sustainability information.

Percentage of goods and/or service suppliers and subcontractors currently implementing environmental management systems by type (e.g. ISO 14001, EMAS, etc.) % (P8C3I1)

*Answer:* 9999 %

*Implementation:* Figure not available.

### Summary of implementation:

| Diagnostic         |   |   |
|--------------------|---|---|
| Stakeholders group | Risks   | Objectives  |
| Not specified      | There are no risks  |   |
| Policies           |   |   |
| Stakeholders group | Policies  | Objectives  |
| Not specified      | Others  | Identification and development of required policy/ies               |
| Actions            |   |   |
| Stakeholders group | Acciones  | Objectives  |
| Not specified      | CSR   | Not taken into account in 2011.                                     |
| Follow-up          |   |   |
| Stakeholders group | Follow-up and impact measurement                              | Objectives  |
| Not specified      | Mechanisms for evaluating attainment of environmental targets | Incorporation of sustainability indicators into information systems |



## • Principle 9

*Businesses should encourage the development and diffusion of environmentally friendly technologies.*



### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year? If so, please give details. (P9C1I1)

*Answer:* Yes

*Implementation:* Atento carries out a number of CSR initiatives, within the framework of its CSR and Sustainability Plan for 2010 – 2012, as detailed in the Atento 2010 Report.



### FOLLOW-UP AND IMPACT MEASUREMENT

Number of studies conducted, reports produced or communications sent during the year to increase the diffusion of environmentally friendly technologies and improve energy efficiency (P9C2I1)

*Answer:* 999999999

*Implementation:* Figure not available. One of the most significant has been the viability study prior to the installation of three telepresence rooms connected to 7 video conferencing rooms distributed among all Atento's operations, which reduce the need for travel and its associated impact.

Financial investment, out of total gross income, during the current year, for developing and diffusing technologies that do not harm the environment (P9C2I2)





*Answer:* 999999999

*Implementation:* Figure not available.

## • Implementation summary:



## Global Compact Progress Report 2010

|   |                                  |   |  |
|---|----------------------------------|---|--|
|  Diagnostic  |                                  |   |  |
| Stakeholder Groups  | Risks                            | Objectives                                |  |
| Not specified   |                                  |   |  |
|  Policies    |                                  |   |  |
| Stakeholder Groups  | Policies                         | Objectives                                |  |
| Not specified   |                                  |   |  |
|  Actions     |                                  |   |  |
| Stakeholder Groups  | Actions                          | Objectives                                |  |
| Not specified   | CSR                              | Putting telepresence rooms into operation |  |
|  Follow-up |                                  |   |  |
| Stakeholder Groups  | Follow-up and impact measurement | Objectives                                |  |
| Not specified   |                                  |   |  |



## Global Compact Progress Report 2010

### • Principle 10

*Businesses should work against corruption in all its forms, including extortion and bribery.*



#### DIAGNOSTIC

State whether the business has conducted a diagnostic to ascertain the greatest risk areas, both internally within the organization, and in its activity sector and give details of the risks and their impact (P10C3I1)

*Answer:* Yes

*Implementation:* Atento has an Internal Audit and Control Division that seeks to identify fraud and corruption.



#### POLICIES

State whether the business has a written anti-corruption, extortion and money laundering policy (P10C2I2)

*Answer:* Yes

*Implementation:* Atento has a set of Business Principles that establish the guidelines to be followed by its employees relating to the fight against corruption, Principles that are shared with stakeholder groups and business collaborators.

Does the business' policy include controls and procedures relating to gifts, invitations and business expenses including limits and information channels for these. (P10C5I1)

*Answer:* No

*Implementation:* Currently being devised.



#### ACTIONS

Does your business have a specific course of action relating to this principle, which has been put into practice this year?



If so, please give details. (P5C1I1)

*Answer:* Yes

*Implementation:* Audits and inspections have been carried out in relation to this point.



### FOLLOW-UP AND IMPACT MEASUREMENT

Give the percentage, broken down by stakeholder group, of stakeholders who are aware of the business' codes of conduct and anti-corruption and anti-bribery policies (P10C2I1)

*Clients:* 999999999

*Employees:* 15,1

*Implementation:* Number of clients not known. The percentage of 15.1% refers to the proportion of employees who have received training on the Business Principles.

Are all charitable donations and sponsorships transparent and made in accordance with applicable legislation? (P10C4I1)

*Answer:* Yes

*Implementation:* All sponsorships respect the laws of the land and are 100% governed by contracts signed between the organizations and Atento.

Sponsorship proposals are assessed by the Brand and Communication Department in the Corporate Division and we only sponsor legally established organizations that are up-to-date with the social, fiscal and tax obligations.

State whether the business has mechanisms for managing anti-corruption incidents (P10C6I1)

*Answer:* Yes

*Implementation:* Any Atento employee who has grounds to suspect any form of irregularity or breach in relation to accounting or auditing issues or failure to comply with the Business Principles, can report this to the Audit and Control Committee through the anonymous reporting channel.

### • Implementation summary:



## Global Compact Progress Report 2010

| Diagnostic         |  |            |
|--------------------|--|------------|
| Stakeholder Groups | Risks  | Objectives |
| Clients            | Unfair competition<br>Misleading information<br>Favoritism<br>Breaches of regulations<br>Misappropriation of funds<br>Traffic of influence |            |
| Employees          | Acceptance of gifts<br>Extortion<br>Favoritism<br>Bribery  |            |

| Policies           |                                   |  |
|--------------------|-----------------------------------|--|
| Stakeholder Groups | Policies                          | Objectives   |
| Clients            | Code of Conduct<br>Code of Ethics | Not taken into account in 2011.<br>Not taken into account in 2011.   |
| Employees          | Code of Conduct<br>Code of Ethics | Identification and development of required policy/ies<br>Identification and development of required policy/ies |

| Actions            |         |   |
|--------------------|---------|---|
| Stakeholder Groups | Actions | Objectives                              |
| Clients            | Others  | Panel discussions extended to clients.  |
| Employees          | Others  | Panel discussions extended to employees |



## Global Compact Progress Report 2010

| Follow-up          |                                  |   |
|--------------------|----------------------------------|---|
| Stakeholder Groups | Follow-up and impact measurement | Objectives  |
| Clients            | Audits                           | Incorporation of sustainability indicators into information systems |
| Employees          | Audits                           | Incorporation of sustainability indicators into information systems |
|                    | Suggestions box                  | Incorporation of sustainability indicators into information systems |
|                    | Ethics channel                   | Incorporation of sustainability indicators into information systems |
|                    | Management committees            | Incorporation of sustainability indicators into information systems |



# Global Compact Progress Report 2010

## • Table of contents

This table of contents presents the correspondence between the Spanish Global Compact Network Progress Report and the GRI indicators. To achieve GRI reporting level C, the business must attain the scores given below:

- General business information indicators (business profile, strategy and governance and United Nations objectives and issues: 1.1; 2.1 - 2.10; 3.1 - 3.8, 3.10 - 3.12; 4.1 - 4.4, 4.14 - 4.15)
- A minimum of 10 performance indicators and a minimum of one for each area: Economic (EC), Social (LA, PR, HR, SO) and Environmental (EN).

For more information on the precise GRI reporting requirements, it is recommended that you see GRI reports G3 and G3.1.

| Global Compact     |   | GRI       |
|--------------------|---|-----------|
| Indicator          | Renewal of commitment   | Indicator |
| <a href="#">1</a>  | Charter of Business Commitment  | 1.1       |
| <a href="#">2</a>  | Address:  | 2.4       |
| <a href="#">3</a>  | Name of the organization:   | 2.1       |
| <a href="#">4</a>  | Contact person  | 3.4       |
| <a href="#">5</a>  | Number of employees:  | 2.8       |
| <a href="#">6</a>  | Sector  | 2.2       |
| <a href="#">7</a>  | Activity, main brands, products and/or services:  | 2.2       |
| <a href="#">8</a>  | Sales and income:   | 2.8       |
| <a href="#">9</a>  | Significant financial subsidies received from the government:   | EC4       |
| <a href="#">10</a> | Identification of stakeholder groups  | 4.14      |
| <a href="#">11</a> | State the criteria used to select stakeholder groups  | 4.15      |
| <a href="#">12</a> | Countries in which the company has a presence (where the business carries out the majority of its activity or where it undertakes significant activity relating to sustainability) and markets served | 2.5, 2.7  |
| <a href="#">13</a> |   | 2.9       |
| <a href="#">14</a> | Scope of Progress Report (countries on which the company includes information in the progress report) and possible limitations, if applicable   | 3.6, 3.7  |
| <a href="#">15</a> | How has the materiality been established and how have the most significant issues to be included in the progress report been defined?   | 3.5       |
| <a href="#">16</a> |   | 3.8       |
| <a href="#">17</a> |   | 3.10      |
| <a href="#">18</a> |   | 3.11      |
| <a href="#">19</a> | How is the Progress Report being disseminated?  |           |



WE SUPPORT

## Global Compact Progress Report 2010

|                        |   |   |
|------------------------|---|---|
| <a href="#">20</a>     | Awards and distinctions received during the report period   | 2.10  |
| <a href="#">21</a>     | Period covered by the information included in the report:   | 3.1   |
| <a href="#">22</a>     | Date of most recent prior report  | 3.2   |
| <a href="#">23</a>     | Progress report presentation cycle  | 3.3   |
|                        |   |   |
| <a href="#">24</a>     | Give details of how the business incorporates the suggestions made by stakeholder groups into its strategy and decision-making processes  | 4.17  |
| <a href="#">25</a>     | Give details of the legal status of the business, providing the organizational chart  | 2.3, 2.6  |
| <a href="#">26</a>     | State whether the executive management team discuss strategic aspects of the 10 principles of the Global Compact and measure their progress through key performance indicators  |   |
| <a href="#">27</a>     | Give details of the governance structure and state who, at management level, carry/ies out the decision-making and good governance processes for implementing the CSR in line with the Principles of the Global Compact and state whether the chief governance officer also holds an executive position | 4.1, 4.2  |
| <a href="#">28</a>     |   | 4.3   |
| <a href="#">29</a>     |   | 4.4   |
|                        |   |   |
| <a href="#">30</a>     | State whether the business is involved in collaboration projects and whether it undertakes actions in support of the objectives and issues addressed by the United Nations (UNICEF, UNWOMEN, Millennium Development Goals, Global Compact initiatives, etc.)  |   |
|                        |   |   |
| <a href="#">P1C2I1</a> | State whether the business has conducted a diagnostic in which Human Rights risk factors have been assessed. If so, please give details of the risk and its impact  |   |
| <a href="#">P1C2I2</a> | Does the business have written Human Rights policies? Describe in the notes field to what extent these have been implemented  | Social/Human rights/<br>Policy dimension                  |
| <a href="#">P1C1I1</a> | Does your business have a specific course of action relating to Principle which has been put into practice this year? If so, please give details  |   |
| <a href="#">P1C2I5</a> | State whether the results obtained through the Human Rights policy follow-up mechanisms are used in the business' strategic planning  |   |
| <a href="#">P1C4I1</a> | State whether the business provides its customers with information on the safety of its products and services. If yes, say how  |   |
| <a href="#">P1C2I3</a> | State whether mechanisms are in place for monitoring the business' Human Rights policies. Please give details   | Social/Human rights<br>Evaluation and follow-up dimension |
| <a href="#">P1C3I1</a> | Percentage of all employees who have received training on the Human Rights Principles by which the organization is governed   |   |



|                            |  |  |
|----------------------------|--|--|
|                            |  |  |
| <a href="#">P1C4I3</a>     | State the number and type of:  | PR4  |
| <a href="#">P1C5I1 - C</a> | Amount of money invested in the community (in kind, products or services (thousands of euros)  |  |
| <a href="#">P1C5I2 - C</a> | State whether the business conducts analysis of the projects it undertakes in the communities in which it operates and if it conducts educational campaigns or campaigns on other matters of public interest                                 |  |
| <a href="#">P1C6I1 - C</a> | Number of actions undertaken by the business to prevent Human Rights breaches by contract security forces in its sphere of action. Please give details   |  |
|                            |  |  |
| <a href="#">P2C2I1</a>     | State whether the business has conducted a diagnostic in which it evaluates Human Rights risk factors in its supply chain (suppliers, subcontractors, etc. ) or among its business partners. If so, give details of the risk and its impact. |  |
| <a href="#">P2C3I2</a>     | Does the business have written policies that regulate relationships with suppliers based on respect for Human Rights?  | Social/Human rights<br>Policy dimension                            |
| <a href="#">P2C1I1</a>     | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |  |
| <a href="#">P2C2I2</a>     | State the percentage of suppliers that have certification out of the total number  | Social/Human rights<br>Evaluation and follow-up dimension          |
| <a href="#">P2C3I3</a>     | State the number of complaints and queries made by/about suppliers (P2 C3 I3)  |  |
| <a href="#">P2C3I1</a>     | State the percentage of workshops inspected in your supply chain out of the total number of suppliers and subcontractors the business has  |  |
|                            |  |  |
| <a href="#">P3C3I2</a>     | Give details of any risk factors that might compromise the effective recognition of the right to collective bargaining   | HR5  |
| <a href="#">P3C2I1</a>     | Does the business have an information, consultation and negotiation policy for employees on changes to the operations of informer organizations (for example, the restructuring of a company)?   | Social dimension/ workplace practices<br>workplace ethics/policies |
| <a href="#">P3C1I1</a>     | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |  |
| <a href="#">P3C2I2</a>     | Does the business have follow-up and measurement procedures that guarantee the formal representation of workers in the decision-making processes and management of the organization? If so, please give details                              |  |
| <a href="#">P3C3I1</a>     | Does the business have mechanisms for listening to, evaluating and monitoring the opinions, concerns, suggestions, criticisms of employees in order to learn and acquire new knowledge? If so, please give details                           |  |
|                            |  |  |



|                            |  |  |
|----------------------------|--|--|
| <a href="#">P4C211</a>     | State whether forced labor is a risk factor in your business, given the type of activity you undertake   | HR7  |
| <a href="#">P4C212</a>     | State whether the business has written policies that regulate the fixed number of working hours and remuneration of workers. Please give details   | Social dimension/ workplace practices<br>workplace ethics/policies                     |
| <a href="#">P4C111</a>     | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |  |
| <a href="#">P4C312 - B</a> | State whether the business carries out actions that enable its principles and values relating to good working conditions and the elimination of forced labor to be transferred to the supply chain |  |
| <a href="#">P4C311 - B</a> | State whether the business checks that its suppliers are committed to ensuring their workers work a reasonable number of hours   |  |
| <a href="#">P4C411 - C</a> | State whether the business controls and verifies compliance with labor laws and regulations or has certification of the standards that prohibit forced labor (e.g. SA 8000)                        | Social dimension/ workplace practices<br>workplace ethics/Evaluation and Follow-up     |
| <a href="#">P5C211</a>     | State whether child labor is a risk factor within your business, given the type of activity you undertake  | HR6  |
| <a href="#">P5C212</a>     | State whether the business has written policies prohibiting child labor (for normal jobs, workers under 15 years of age, or 18 in the case of dangerous jobs) that it openly communicates          | Social dimension/ workplace practices<br>workplace ethics/policies                     |
| <a href="#">P5C111</a>     | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |  |
| <a href="#">P5C312 - B</a> | State whether the business carries out actions that enable its principles and values on the elimination of child labor to be transferred to its supply chain                                       |  |
| <a href="#">P5C411 - C</a> | State whether the business has certification of the standards that prohibit child labor (e.g. SA 8000; ppo.1)  | Social dimension/ workplace practices<br>and workplace ethics/Evaluation and Follow-up |
| <a href="#">P5C311 - C</a> | Number of satisfactory inspections carried out during the year to rule out the use of child labor among its suppliers  |  |
| <a href="#">P5C411 - C</a> | State whether the business has certification of the standards that prohibit child labor (e.g. SA 8000; ppo.1)  |  |
| <a href="#">P5C413 - C</a> | Number of inspections carried out by the Human Resources department to identify cases of child labor   |  |
| <a href="#">P6C212</a>     | State whether the business has conducted a diagnostic which evaluated discrimination risk factors in relation to hiring, training and promotion. If so, give details of the risk and its impact    |  |
| <a href="#">P6C213</a>     | Does the business have a written anti-discrimination and/or equal opportunities policy? Give details   | Social dimension/ workplace practices<br>workplace ethics/policies                     |
| <a href="#">P6C111</a>     | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |  |
|                            | Give details of the composition of the corporate governance management bodies (including   |  |

|                         |  |                                      |
|-------------------------|--|--------------------------------------|
| <a href="#">P6C2I1</a>  | the Board of Directors) and all other employee groups, giving the percentage by category, gender, age and other indicators of diversity  | LA13                                 |
| <a href="#">P6C2I4</a>  | State whether the business publishes the composition of management bodies and all other employee groups. Below state where this information is published   |                                      |
| <a href="#">P6C3I1</a>  | Give details of the composition of the corporate governance management bodies (including the Board of Directors) and all other employee groups, giving the percentage by category, gender, age and other indicators of diversity |                                      |
| <a href="#">P6C3I2</a>  | Number of ongoing and resolved claims of harassment, abuse or intimidation in the workplace  | HR4                                  |
|                         |  |                                      |
| <a href="#">P7C1I1</a>  | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  | Environmental/Training and awareness |
| <a href="#">P7C2I2</a>  | State whether the business has initiatives in place aimed at reducing energy and water consumption, atmospheric emissions, liquid waste or initiatives for improving biodiversity  |                                      |
|                         |  |                                      |
| <a href="#">P8C2I4</a>  | State whether the business has identified its environmental risks and responsibilities taking into account its activity sector   |                                      |
| <a href="#">P8C2I1</a>  | State whether the business has a written environmental policy, either separate or integrated into another set of policies  |                                      |
| <a href="#">P8C1I1</a>  | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |                                      |
| <a href="#">P8C2I2</a>  | State whether the business has effective mechanisms for assessing environmental issues   |                                      |
| <a href="#">P8C3I1</a>  | Percentage of goods and/or service suppliers and subcontractors currently implementing environmental management systems by type (e.g. ISO 14001, EMAS, etc.) %   |                                      |
|                         |  |                                      |
| <a href="#">P9C1I1</a>  | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details  |                                      |
| <a href="#">P9C2I1</a>  | Number of studies conducted, reports produced or communications sent during the year to increase the diffusion of environmentally friendly technologies and to improve energy efficiency   |                                      |
| <a href="#">P9C2I2</a>  | Financial investment, out of total gross income, during the current year for developing and diffusing technologies that do not harm the environment  |                                      |
|                         |  |                                      |
| <a href="#">P10C3I1</a> | State whether the business has conducted a diagnosis to ascertain the greatest risk areas, both internally within the organization, and in its activity sector and give details of the risks and their impact                    |                                      |
| <a href="#">P10C2I2</a> | State whether the business has a written anti-corruption, extortion and money laundering policy  | Social dimension/society/Policy      |
| <a href="#">P10C5I1</a> | Does the business' policy include controls and procedures relating to gifts, invitations and business expenses including   |                                      |



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|                         |  |   |
|-------------------------|--|---|
|                         | limits and information channels for these?   |   |
| <a href="#">P10C1I1</a> | Does the business have a specific course of action relating to this Principle which has been put into practice this year?<br>If so, please give details                  | Dimension<br>social/society/Training and<br>awareness         |
| <a href="#">P10C2I1</a> | Give the percentage, broken down by stakeholder group,<br>of stakeholders who are aware of the business' codes of conduct<br>and<br>anti-corruption and bribery policies |   |
| <a href="#">P10C4I1</a> | Are all charitable donations and sponsorships transparent and<br>made in accordance with applicable legislation?   |   |
| <a href="#">P10C6I1</a> | State whether the business has mechanisms for managing<br>anti-corruption incidents  | SO4 / Dimension<br>social/society/Evaluation and<br>Follow-up |
|                         |  |   |
| <a href="#">Table</a>   | Correspondence table between Global Compact - GRI indicators   | 3.12  |