

2010

Communication on Progress UN GLOBAL COMPACT



Dear Sirs / Madams:

We announced our commitment to growth in our cover letter to the first progress report. I must say that this has been the main trait that has characterised our performance throughout the year. We finished the 2009 fiscal year with 13,200 employees and a turnover of € 2030 M. At December 2010, we had reached 17,900 employees and a turnover of € 3170 M. Thus, we experienced a growth of approximately 35% with respect to the number of employees and 55% with respect to turnover.

In March 2010, the most significant milestone took place that explains this growth: the closure of the transaction to acquire 100% of the capital stock of the German company Edscha.

Within the automobile sector, Edscha is one of the world leaders in the sector of door-opening mechanisms; parts our clients believe provide absolute safety, as well as high added value. In addition to increasing our product range, this acquisition also entails a broadening of Gestamp's technological profile.

Another significant factor in the growth experienced in 2010 is due to the production start-up of new greenfield projects, 100% owned by the Group and executed both in emerging countries and in more mature markets, including Russia, India, Argentina and the United States. These new plants spotlight the growing and active trust that our clients place in Gestamp, as a preferential provider specialising in increasingly-complex project management.

This mission of growth is upheld in 2011, as we continue to undertake operations to consolidate the Group that, due to their technological profiles, help improve both Gestamp's positioning and its number of clients. In July, we acquired the ThyssenKrupp (TKMF) automobile metal components division, adding 5700 new employees to the Group and a further € 1100 M in turnover. The purchase of TKMF strengthens our leadership position in the production of metal components for vehicle bodies and allows us to become the main player in the design, development and production of chassis components. Therefore, we can say that we have taken a technological route in a very short period of time that, by leveraging our international presence, will lead to extremely strong future growth. It also gives us an industrial presence in Germany, matching the importance that our German clients place in our turnover figures.

Despite the particularly difficult situation that our sector is going through, we believe that it has also been an opportunity to advance in our long-term strategic development. At present, we are a leading provider in the automobile sector, with a global presence and the skills to design and supply products with high added value and solvency when executing increasingly complex projects throughout the world.

As can be imagined, the challenges entailed by this growth are both numerous and incredibly complex. On the one hand, it is essential to integrate the new Gestamp companies so that they share our values and policies and, on the other, recalling that some of the companies contribute to Gestamp's positioning for new products, technologies and clients, we must carry out this integration so that our strengths are maintained and even optimised.

Despite the aforesaid difficult time, we will strive for continued growth in upcoming years. We will do this by following the business principles for which we are known and as explained in the cover letter from last year: financial strength, profitability, prudence in risk management and respect for the different environments in which we operate.

Another factor that merits mention with respect to the environment and safety is our commitment to offering our clients lighter and safer products. With this policy, we want to contribute to reducing the

environmental impact of automobiles and increasing passenger and pedestrian safety. In this sense, we have increased our production of high-tensile steel parts by 25%, thus providing lighter parts with better behaviour in the event of accidents.

As an example of the work to improve personal safety that the Group actively pursues, the 'Pedestrian Protection Hood Hinge Project' must be pointed out, which is developed by Edscha in Germany and minimises pedestrian damages in the event of impact.

With regard to policies and actions that affect our employees, we would like to highlight the effort and resources we allocate to training professionals in the places where we execute our projects. We send highly-qualified professionals to train local employees or, conversely, we bring local employees to companies where production technologies have been optimised. In general, training is given by employees from companies in Western countries to employees in developing or emerging countries. We estimate that internal trainers devoted some 40,000 hours to this task in 2010, travelling to the companies to provide this training.

In turn, we work closely with universities, business schools and vocational training centres to generate an industrial culture and offer basic technical knowledge to the general population. In this way, we improve employability in the countries in which we operate.

Finally, I would like to make special mention of our Workplace Risk Prevention Policy. Aware that we are in a sector in which there is risk to our employees' safety, we have developed and are applying an innovative system to precisely measure companies' performances, to monitor advances and to extend this policy quickly and clearly throughout the entire organisation.

And, to conclude, I would like to repeat our commitment to the Global Compact. We employ the 10 principles established therein for reference and guidance and they are an essential part of our Business Principles.

Sincerely yours,

Francisco J. Riberas Mera

Chairman of Gestamp Automoción

GENERAL INFORMATION

ENTITY PROFILE: GESTAMP AUTOMOTIVE GROUP

Address: Alfonso XII, 16

Website: www.gestamp.com

Senior post: Francisco José Riberas Mera, CEO

Date joined the Company: 29/09/2008

Number of employees: 17,895

Sector: Automotive industry and materials for automobiles

Activity, main brands, products and/or services: Development and manufacture of metal components and sets for automobiles

Sales / revenues: € 3,170 million

Significant financial assistance received from government: Confidential information

Breakdown of stakeholders: Clients, employees, suppliers

Criteria followed to select the stakeholders: Each corporate and division director selects and manages Relations with their stakeholders.

Countries in which the Group is present (where the entity has the majority of its activity or significant activity with regard to sustainability) and markets attended: Spain, France, Portugal, UK, Sweden, Poland, Hungary, Germany, Slovakia, the Czech Republic, Russia, Turkey, USA, Mexico, Brazil, Argentina, India, China, Korea and Taiwan.

Scope of the Progress Report (countries for which the company provides information in the Progress Report) and its possible limitations, if applicable: The entire Group, taking the companies into account in which the Group is a majority shareholder and is responsible for their management.

The Edscha Group was incorporated with the Gestamp Group in 2010. The Edscha Group's policies and actions are sometimes shared by the Gestamp Group and, at other times, they are specific. For this reason, we use the following nomenclature in the report:

- Group: we are referring to all Group companies, including the companies in the Edscha Group.
- Gestamp: we are referring to companies in the Gestamp Group, without including the companies in the Edscha Group.
- Edscha: we are referring to companies in the Edscha Group.

How was materiality established and how were the most significant issues defined to be included in the Progress Report? To define the significant issues to be included in the report, we followed the following criteria in the order in which they are listed:

1. *Scope:* if a policy or action is for one company, one country, one division or for the entire Group.
2. *Cost and/or resources:* The cost and/or resources involved to promote a specific policy or action.
3. *Efficacy:* The positive and/or negative result of a policy or action.
4. *Originality:* If the policy or action is innovative.

How the Progress Report is being disseminated: Website

Prizes and distinctions received during the informative period: Among others:

- GM Supplier of the Year Prize awarded by General Motors to the Gestamp Group
- PSA Supplier Award by PSA to the Gestamp Group
- Second prize for “Integration of Suppliers in the Value Chain” and the “Ambassador of Spanish Purchases Abroad”, awarded by AERCE (Association of Procurement, Hiring and Provisioning Professionals in Spain) to the Gestamp Group

Period covered by the information contained in the report: 2010

Date of the most recent previous report: 2009

Presentation cycle for the Progress Report: Annual

STRATEGY AND GOVERNANCE

State how the entity incorporates stakeholders’ suggestions into its strategy and its decision-taking processes: The main Group directors and owners consider the need to include the main stakeholders’ suggestions in the strategy.

State the legal status of the entity, detailing its organisational chart: Business group

State if senior management debates the strategic issues of the 10 principles of the Global Compact and measures the progress with key performance indicators: Yes, we have specific indicators for several of the issues that are included in the 10 Global Compact Principles.

State the governance structure and who in senior management carries out the decision-taking and good governance decisions for the implementation of CSR in line with the Global Company Principles and if the chairman of the highest governing body also holds an executive post: There is a Board of Directors where the main Group shareholders are represented and a Steering Committee chaired by the CEO, composed of senior management members.

The implementation of CSR in line with the 10 Compact Principles is the decision of the CEO, who in turn consults the policies during the Board of Directors meetings and conveys them in the Steering Committee meetings. There is a department and a person specifically in charge of implementing the policies.

UNITED NATIONS OBJECTIVES AND SUBJECTS

State if the entity has any collaboration projects and if it develops support actions related to the United Nations objectives and subjects (UNICEF, UNWOMEN, Millennium Development Goals, Global Compact initiatives, etc.): No

FURTHER INFORMATION

Report publication date: Friday, 11 November 2011

Party in charge: René González Castro

Report type: A+B+C+D

*‘The entity has **providers** in developing countries.’*

*‘The entity has **activities** in developing countries.’*

*‘The entity has a **high environmental impact**.’*

METHODOLOGY

DIAGNOSIS

There is a need to know what exists in order to understand what needs the entity has. Diagnosis indicators let us identify what policies, actions and monitoring is done for each Principle.

POLICIES

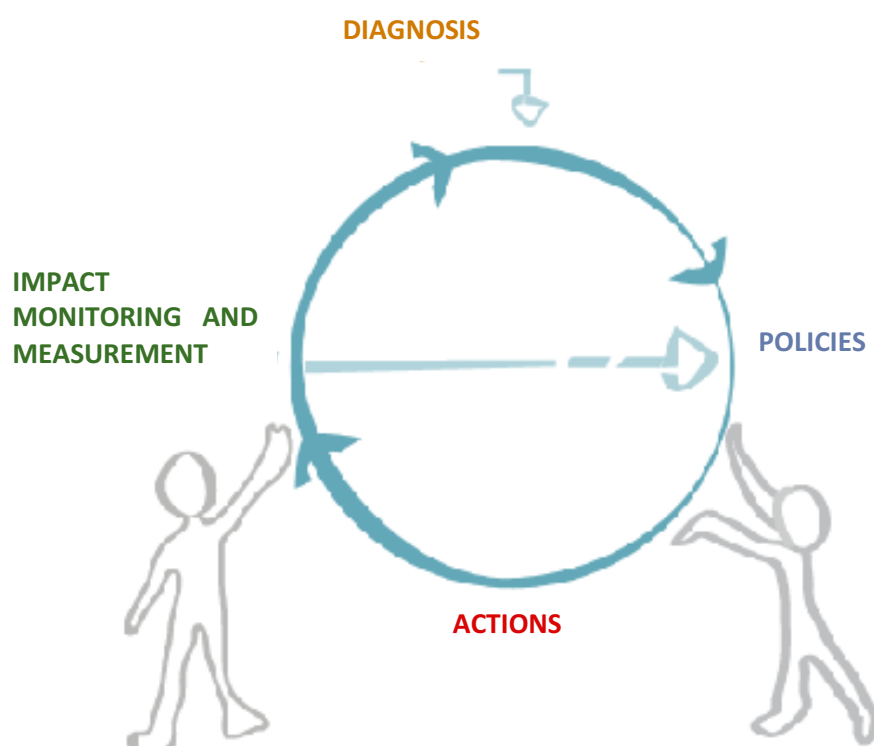
They are collected via qualitative indicators that define the framework of action in which the entity's actions, control mechanisms and monitoring are structured.

ACTIONS

They are implemented to fulfil the policies. They are described by means of qualitative and quantitative indicators. Input: Needed to understand what types of actions must be carried out. If this input is not employed, there is a risk of implementing useless or unnecessary actions.

IMPACT MONITORING AND MEASUREMENT

Evaluation and control of the results obtained from the implemented actions. They are reflected in the qualitative indicators outlined. Output: Needed to publicise the results to be able to receive new ideas about possible improvements that are needed.



PRINCIPLE 1

Businesses must support and respect the protection of internationally proclaimed human rights, within their scope of influence.

DIAGNOSIS

State if the entity has performed a diagnosis in which human rights risk factors are evaluated. If affirmative, state the risk and its impact (P1C2I1)

Example: The entity performed a human rights diagnosis and identified lack of information and training on occupational risk prevention for employees as a risk. The impact of this risk on the entity would be an increase in occupational accidents.

Response: Yes

Implementation: We performed diagnoses of the fundamental factors on human rights that affect our company.

In last year's Progress Report, we explained that child labour and forced labour were not risk factors, due to the importance of the technological component and the high qualifications required for employees at all levels. We do not believe that this situation has changed with the acquisition of Edscha and the growth experienced in 2010.

We uphold a strict and objective selection and promotion policy that exclusively heeds the academic and professional merits of people and the Group's needs. We make a great effort to not discriminate against people for issues such as race, religion, gender, age, nationality, sexual orientation, civil status or disabilities. We have opened centres and companies have joined the Group that operate in countries where we did not operate before. Furthermore, some of these companies have their own business principles and their own policies with regard to discriminatory treatment and equal opportunities. The result of the diagnosis is that in all places in which the Group operates, this policy must be applied as quickly as possible.

In terms of health and safety, we are aware of the danger involved in our activity. We have a policy that assures that both our employees and employees from other companies working in our facilities have a safe and healthy working environment.

According to this policy, we employ the same criteria when assessing the performance of any company with regard to health and safety and no difference is established between companies operating in developing countries and those operating, for example, in Europe. Using an in-house indicator that we call IGPR (Gestamp Occupational Risk Prevention Index), we monitor the state of working conditions and the degree of implementation of management systems that put the policy into practice.

The result of our diagnoses in the area of health and safety is that we must implement our policy at Edscha and in the new companies that are joining the Group, as well as speeding up the implementation of the policy at newly-established companies. To do so, we should have a new organisational structure that assures and controls the implementation of this policy in all places where we operate and we must extend

the working conditions standard that we have defined in order to consider Edscha's particular characteristics, as its activity is different to that of Gestamp.

Training is essential in a Group that is experiencing such fast growth. We must assure that the people who join the Group know our values and policies and acquire sufficient knowledge to perform their jobs safely and efficiently.

POLICIES

Does the entity have written human rights policies? Describe to what degree they have been implemented in the comments field (P1C2I2)

Response: Yes

Implementation: Since 2009, the Group has been elaborating a Global Code of Conduct for all the companies, which unifies the documents existing at present and that considers the human rights issues that we consider relevant.

In parallel to the drafting of the Code of Conduct, and in line with the comments in the section on diagnosis of the need to transfer our principles and policies to the new companies, the Group is working on designing a Corporate New Employee Welcome Handbook (entitled 'Onboarding'), common to all employees. The objective of this programme is to equip all new Group employees with a structured and guided procedure that makes their joining the Company faster and easier, and reduces their adaptation period, improving their efficiency and providing them with greater security in their daily activities. The aim is to integrate all new employees through a social network that will enable them to quickly learn about the Group, the business and the most common global procedures (Code of Conduct, Business Travel Policy, Health & Safety & Environment Policies, etc.). This guidance plan does not eliminate the local programmes for new hires and its objective will be centred exclusively on providing new employees with an overall vision of its international dimension and its global organisation. It pursues the following objectives:

- Generate greater security in executing tasks by fully understanding the technologies, processes, products, global procedures, etc.
- Contribute to improving their professional efficiency via forums on best practices, fostering contacts between professionals, etc.
- Promote a feeling of awareness of being part of a group.

In addition to the Onboarding Programme, all Group employees receive professional training, attending to the needs detected for each employee and for each post. In this way, professional training is promoted and employability is increased. This work is done fairly and in all countries in which the Group operates, including developing countries. In this regard, the work done by support teams is very important, when dealing with new companies that are established in countries and regions where there is no industrial culture.

With respect to Occupational Health & Safety, aware of the danger involved in our activity and as stated in the diagnosis section, we have a highly ambitious Occupational Health & Safety Policy and we allocate extensive resources to assuring good working conditions and efficient risk management. This policy, which

includes a standard for workplace conditions, is implemented at all Group companies, independently of the country, and is used as a basis for all new projects and expansions.

Through the IGPR, we assess the performance of companies with respect to our Occupational Health & Safety Policy. This evaluation is done based on the scores obtained for different factors. The factors are broken down by sections in Working Conditions (level of safety of working equipment, noise levels, ergonomic condition at work stations, warehouses, corridors, etc.) and Management (specific training, risk control, control of safety devices and condition of equipment, risk evaluations, etc.).

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P1C1I1)

Response: Yes

Implementation: In 2010, we continued drafting the Global Code of Conduct that was started in 2009. There is also work being done to design a specific portal on Corporate Social Responsibility for common use of the entire Group, which will contain all the directives and common guidelines on this subject. It will be used as a communication channel between the Company, employees and other stakeholders and will have a channel for filing claims and complaints.

With regard to Occupational Health & Safety, we have continued to implement our policy in 2010. In 2009, we evaluated performance based on our IGPR at 70% of the companies. Now, in 2010, 100% of these have been implemented at all Gestamp manufacturing companies. Furthermore, like every year, we review the policy and the IGPR. In the 2010 review, we varied criteria, making specific factors more demanding and we encourage the implementation of new improvements and solutions.

In turn, we want to implement the IGPR at Edscha so that we can measure the performance of its companies with the same criteria used at Gestamp. To do so, we have started to carry out specific developments, given that Edscha's activity is different and the working conditions section that the IGPR currently contains does not adapt to its particular characteristics.

We have changed the organisational structure in the area of Prevention and the Environment, thinking about having enough resources to transfer the policy to all companies.

The IGPR has continued to be a reference for new facilities in 2010, in terms of working conditions, regardless of the country.

With regard to training, in 2010 the Group gave a total of 745,777 training hours, representing an investment of € 2,642 K. Each employee received an average of 46 hours of training, of which 88% were held during working hours.

This task was even more intensive in regions where there is no industrial culture or a lack of professionals, generally in developing countries. At these sites, we professionally train employees until they have attained the level of qualification needed, with the teaching support of teams with experience from other Group

companies, who travel to teach and oversee training (support teams). In 2010, the support teams represented an investment of € 2,800 K and some 40,000 hours.

We particularly emphasise online training for employees on Microsoft products (Office, servers and databases). This training is fully funded by the company. Although available for any Group employee, we have detected that the companies located in developing countries are those that most use the training.

We must point out, as a special case, that an agreement was signed in 2010 with the Regional Government of Andalusia, through which a project was carried out to improve employability: people at risk of social or employment exclusion (coming from the construction sector, for example), received training at different Group factories with the aim of improving their vocational training at a European level and so they can access the job market under better conditions.

State if you use the results obtained from the monitoring mechanisms for human rights policies in the entity's strategic planning (P1C2I5)

Response: No

Implementation: Gestamp strategic plans are focused on specific actions to expand and uphold business according to the interests of the company and the situation of the markets at any given time. However, the Group's action policy has several solid ethical principles and if any factor to be improved is detected with respect to human rights, the measures necessary to resolve it are taken.

State if the entity notifies its clients about the safety of its products and services. If the response is affirmative, state how (P1C4I1)

Response: Yes

Implementation: All products that the Group manufactures comply with the technical and safety specifications that clients demand. Our Group fulfils all safety regulations required for the automobile sector and the specific regulations for each country. All companies follow quality control processes (all companies hold ISO TS 16949 and ISO 9001 certifications and the new Group companies are granted a one-year period to be certified). The Group also requires that its suppliers comply with product safety. Due to the characteristics of the sector and how the Group operates, contact with suppliers and clients is continuous and seamless, and our facilities are audited by clients regularly, which assures that controls for the safety of our products are constant and effective.

During 2010, the Gestamp / Edscha Group and many of the Group companies –as individual entities- have received numerous prizes and recognitions that show their commitment to the quality and safety of their products and services. The most noteworthy of these awards include:

- “GM Supplier of the Year Prize”, awarded by General Motors to the Gestamp Group
- “PSA Supplier Award” granted by PSA to the Gestamp Group

- Second prize for “Integration of Suppliers in the Value Chain” and “Ambassador of Spanish Purchases Abroad” awarded by AERCE (Association of Procurement, Hiring and Provisioning Professionals in Spain) to the Gestamp Group
- Prize for the “Improvement of Quality and Dissemination, Deployment, Awareness-raising on Quality Knowledge”, awarded by the AEC (Spanish Quality Association) to Gestamp Linares
- “PSA Industrial Excellence Award” granted by PSA to Gestamp Ronchamp (France)
- “Commercial Performance Prize”, awarded by Honda to Gestamp Paraná (Brazil)
- “Manufacturing Excellence Award” (MX Award) given to Griwe Westerborg
- “SuPer Programme Prize” (Supplier Performance) in 2010 for Fiat Auto Argentina SA to Gestamp Cordoba
- “Michigan Safety & Health Achievement Recognition Program Prize” awarded to Gestamp Mason
- “Volkswagen Group Award 2009” awarded by Volkswagen to Edscha Hauzenberg

IMPACT MONITORING AND MEASUREMENT

State if the entity has mechanisms in place for monitoring its human rights policies. Describe them (P1C2I3)

Response: Yes

Implementation: With regard to Occupational Health & Safety, each company reports on the IGPR every quarter with the improvements implemented and/or carried out in this period. Using an audit system, we verify that these improvements comply with the criteria established in the standard, to be able to guarantee their responsibility and comparability between all companies. The results are published on the intranet. The IGPR is one of the key performance indicators operated and managed by senior management.

Evaluations are also done on the training sessions given from different points of view: employees assess the training they received and the parties in charge of the training evaluate the employees’ attitudes. Lastly, an evaluation is done on how the training received has improved each employee’s professional skills with regard to the post they hold in the company.

Percentage of employees out of the total who are notified and trained on the Human Rights Principles by which the entity is governed (P1C3I1)

Response: 100 %

Implementation: The different documents in force at the different Group companies that contain the codes of conduct reaches all employees through the Welcome Handbooks that are handed out to new hires, through the intranet and through internal publications, so that we can confirm that 100% of Group employees are informed.

100% of employees are trained and notified about the Occupational Health & Safety Policy.

The same thing happens with training: each new hire is submitted to an analysis to detect training needs and each employee is then notified of the conclusions. They also receive information on all the training

options that the Group has available, so that we believe that 100% of Group employees are also informed in this area.

State the number and type of: (P1C4I3)

** Non-compliance with regulations on clients' health and safety: 1*

** Demands ratified by official regulatory institutions or similar bodies for the supervision and regulation of product and service healthfulness and safety: 0*

** Non-compliance with regulations on information and labelling of products received: 0.19*

Implementation: There is a procedure for handling these situations. When non-compliance is detected, the party in question has a two-day period in which to take immediate actions, one week in which to carry out corrective actions and one month in which to measure the effectiveness of the actions taken and to establish preventive measures. In this way, we assure that all incidents are resolved and the possibility of them happening again is prevented. For problems with bills of lading and EDI (electronic data interchange) communications, the action period is freely agreed between Gestamp's logistics departments and the client.

Edscha has a similar procedure in place and also has a 'client portal', which mentions the possible incidents on quality and delivery of finished products.

In all cases, these anomalies are resolved between the automobile manufacturers and the Group and do not generate any inconvenience for the end clients.

*Amount of money invested in the community (in kind, products or services) (thousands of euros) (P1C5I1)
Specific indicator for entities that have activities in developing countries.*

Response: 163

Implementation: The Group encourages its employees to participate in development initiatives and activities in the local community. 60% of companies carry out some type of action in occasional community work and 35% of companies undertake some type of ongoing sponsorship, patronage or social action with different organisations and/or foundations that work in different social or environmental topics. The total amount of money allocated to these purposes during 2010 was € 163,000.

This figure only includes the money invested and does not include contributions in kind or services, as it has not been possible to quantify them.

It merits mention that both training in local communities and improving employability, as mentioned in previous sections, are the main contributions that the Group makes and in which it centres its greatest efforts.

State if the entity performs an analysis of the projects it develops in the communities in which it is present and if it carries out education campaigns or campaigns with other characteristics that are of public interest in these communities (P1C5I2)

Specific indicator for entities that have activities in developing countries.

Response: Yes

Implementation: Our Group is committed to the social growth of the communities in which its companies are located through the creation of sources of stable employment and working with local agents on those issues that could provide value.

72% of the Group offers training and vocational training opportunities to people in the communities in which the companies are located, through employment apprenticeship programmes. In 2010, 559 people participated in some type of apprenticeship programme at some Group company. They received a total of 215,470 hours of training, of which 99,584 were taught by our employees (including tutoring by employees at a company during a work experience period).

We have received awards and recognitions for this work. One example is the IES Almussafes Recognition and the Bancaja Award for the Grant Holders' Final Degree Project received by Gestamp Levante.

Number of initiatives undertaken by the entity in order to prevent the infringement of human rights by the security forces hired in their scope of action. Describe them (P1C6I1)

Specific indicator for entities that have activities in developing countries.

Response: 0

Implementation: Gestamp does not have security forces to protect its facilities. It only hires private caretakers and private security who comply with the regulations applicable to this sector.

PRINCIPLE 2

Entities must assure that their companies are not accomplices in human rights abuses

DIAGNOSIS

State if the entity has performed a diagnosis in which human rights risk factors are evaluated for their supply chain (suppliers, subcontractors, etc.) or their business partners. If affirmative, state the risk and its impact (P2C2I1)

Response: Yes

Implementation: There is classification of suppliers in the Group, which attends to the type of product or service that each one provides. In this way, suppliers are broken down into four different types: raw materials, components, machinery and tools and indirect purchases.

Suppliers commit to comply with the Group's values and principles. Any purchase that is made either in Gestamp or Edscha is obligatorily done through the Supplier Portal, which is on each company's respective website. Each supplier has an access code and a password, with which they access a private area. When a contract is formalised, all suppliers accept a commitment to comply with the corporate conditions imposed.

At Gestamp, it is compulsory for suppliers of direct materials and suppliers of raw materials to hold either ISO TS 16,949 or ISO 9,001 certification. At Edscha, suppliers are required to hold ISO TS 16,949 or ISO 9,001 certification, as well as ISO 14,001 certification.

With regard to external companies that perform jobs at our facilities, 100% of Group companies have implemented a procedure for Business Activity Coordination to assure that the employees at these external companies that visit the company work under optimal health and safety conditions that do not compromise employees' health or safety.

POLICIES

Does the entity have written policies that regulate relations with suppliers that are based on respecting human rights? (P2C3I2)

Response: Yes

Implementation: The Group obliges all its suppliers to sign a commitment to comply with business conditions, which includes respecting human rights. This is done through their respective Supplier Portals. Furthermore, all Group companies are certified under ISO TS 16,049 and ISO 9,001 standards and the majority also have ISO 14,001. Thus, they have quality and environmental policies that require them to strictly control the conditions of all suppliers.

Moreover, we also have procedures to guarantee Business Activity Coordination when external companies come to carry out jobs at our centres. In these procedures, in addition to establishing training and information requirements for all employees, there is verification that they do not abuse the human rights of employees at external companies, which include not employing child labour, absence of forced labour and compliance with hiring regulations.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P2C1I1)

Response: Yes

Implementation: During 2010, at Gestamp we finished the implementation for the Supplier Portal by including the companies located in Asian countries. This led to 1,400 of our suppliers registering with the Portal in 2010. The Portal was implemented gradually: we started with Spain and Europe and started to extend its use to the rest of the Group companies around the world. The fact of having a Supplier Portal at all companies has led to greater control over all suppliers, trying to assure compliance with human rights in the supply chain, given that in order to confirm any purchases; they are obligated to sign the commitment to comply with the purchase conditions.

Gestamp has some 27% of its suppliers in developing countries. All of them have accepted compliance with the corporate conditions imposed by Gestamp, which include respecting human rights.

In 2010, Gestamp and Edscha started to work jointly on drawing up a procedure to evaluate and accept suppliers. Suppliers must fill out several questionnaires that deal with issues such as Quality, Sustainability, and the Environment, among others. They obtain a score through this process that lets us determine their level of acceptance with pre-established standards.

Those suppliers that obtain a low score or are considered at risk of breaching any of the minimum requirements established by the Group may be audited or, depending on their circumstances, even invalidated as suppliers.

IMPACT MONITORING AND MEASUREMENT

State the percentage of suppliers that hold certification out of the total (P2C2I2)

Response: 72 %

Implementation: At Gestamp, we require that all suppliers of raw materials and components hold ISO TS 16,949 or ISO 9,001 certification or undergo an internal audit performed by Gestamp. These two groups represent 70% of Gestamp's total suppliers, although we know that part of the suppliers from the other two groups also have this certification, so that the percentage of certified suppliers would be somewhat higher than 70%.

At Edscha, it is an essential requirement for all suppliers to have ISO TS 16,949 or ISO 9,001 and ISO 14,001 certification. At present, they estimate that approximately 90% of its suppliers fulfil this requirement.

State the percentage of workshops in your supply chain that have been inspected, out of the total suppliers and subcontractors at the entity (P2C3I1)

Specific indicator for entities that have suppliers in developing countries.

Response: 30 %

Implementation: ISO TS 16,949, ISO 9,001 and ISO 14,001 certifications, compulsory for all Group companies, by policy at both Gestamp and Edscha, establish control over their suppliers as a requirement. Supplier audits, independent to these certifications and done at the initiative of individual Group companies, are not systematised: both Gestamp and Edscha have only done them when there is mistrust or suspicion that a given supplier could be breaching the terms and conditions of their contract. Even so, we estimate that we have audited around 30% of the Group's suppliers.

The Business Activity Coordination Procedure is implemented at 100% of the Group's production companies, where it is established that an outsourced company can only work at our facilities if it meets certain requirements. If an external company does not accept them or breaches any of the requirements, it cannot work at our facilities.

State the number of complaints and enquiries from / about suppliers (P2 C3 I3)

Response: 3

Implementation: It is very difficult to estimate the number of enquiries made by suppliers, as contact between personnel in Procurement and suppliers is continuous and no express records are kept of this contact. The Supplier Portal is the communication platform between the Group's suppliers. If there is any question or technical problem, they are resolved through the technical support provided on the Portal. If the query is related to the sales conditions or another type of problem after the purchase has been awarded, the supplier then directly contacts the person in the Group's Procurement Department who has been involved in the transaction. In both cases, relations with suppliers are quick and seamless and all incidents are resolved with the maximum speed.

With regard to complaints, there is knowledge of the existence of three processes filed during 2010 for which it was necessary to receive advisory services from the Group's Legal Department.

PRINCIPLE 3

Entities must uphold the freedom of association and the effective recognition of the right of collective bargaining.

DIAGNOSIS

State if there are risk factors that could put the effective recognition of the right to collective bargaining in danger (P3C3I2)

Response: Yes

Implementation: Although the right to collective bargaining at the majority of Group companies is established by legislation in the countries in which they are located, there is nonetheless a risk in specific countries in which we operate, given that the legal framework does not guarantee, and at times does not allow, the freedom of association.

It is in these regions where the Group is particularly vigilant about the existence of channels where employees can express their opinions (suggestion boxes, meetings with HR, etc.) and where satisfaction surveys are carried out. In this way, the Group tries to attain that, even in these countries, there is direct communications between the company and its employees and they, in turn, have the freedom needed to find out about and defend their rights.

In 2010, 88% of Group companies had formal communications channels, through which employees can express their opinions about the different aspects of company management and make complaints and suggestions for improvement. Although the total percentage of Group companies that has these mechanisms has decrease with regard to 2009 (95%), due to the new companies that have joined the Group, we can nonetheless assure that 100% of the companies located in countries in which the freedom of association is not permitted or in which there are no collective bargaining agreements, have the existence and operation of these types of communication channels.

In the rest of the countries, the legal framework guarantees that employees are formally represented, due to which 100% of the Group employees have one way or another of expressing their opinions and participating in decision making.

POLICIES

Does the entity have a policy to request information, make enquiries and negotiate with employees in the operations with the organisations that provide information (for example, about the restructuring of a company)? (P3C2I1)

Response: Yes

Implementation: We continue to make a great effort to work with unions and other bodies that the employees collectively select to represent them within the legal framework.

In the majority of the countries in which the Group operates, there is legal coverage to guarantee employee representation in the organisation's decision taking. Employees, through their legal representatives, are informed and consulted when significant changes take place in the operations of the companies that belong to the Group.

In addition to their rights, they are protected by collective bargaining agreements, which are negotiated periodically and detail their working conditions, rights and duties. Communications and negotiations are carried out with employees in accordance with what is established by law. In those countries in which there is no freedom of association, the Group has internal communications policies that promote direct relations with all employees.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P3C1I1)

Response: Yes

Implementation: During 2009 and 2010, employee satisfaction surveys were carried out at all Group companies.

Because the frequency of these surveys is defined individually by each company and may be annual or biannual, we cannot give the Group's development with regard to this action during 2010. However, we can say that close to 90% of Group employees have been consulted about different aspects of company management.

IMPACT MONITORING AND MEASUREMENT

Does the entity have monitoring and measurement procedures that guarantee the formal representation of employees in decisions making and in the management of the organisation? If affirmative, describe them (P3C2I2)

Response: Yes

Implementation: 100% of Group companies are submitted to regular audits pursuant to the ISO TS 16,049, ISO 9,001 and ISO 14,001 standards, which consider HR issues and include internal communications with employees.

Does the entity have mechanisms to listen, to evaluate and monitor the outlooks, concerns, suggestions and criticisms of employees, with the aim of learning from and acquiring new knowledge? If affirmative, describe them (P3C3I1)

Response: Yes

Implementation: Among the main official communication channels implemented by the Group so that employees can express their opinions are:

- Suggestion box
- Set times for offering attention to employees
- Interdisciplinary work groups for continuous improvement
- Departmental meetings
- Surveys on the workplace climate

PRINCIPLE 4

Entities must support the elimination of all forms of forced and compulsory labour.

DIAGNOSIS

State if forced labour is a factor of risk at your entity, given the type of activity in which it works (P4C2I1)

Response: No

Implementation: Forced labour is not considered a factor of risk at the Group. Employees handle and operate machinery and technology that requires a high level of education and specialisation, so that forced labour is not liable to take place at any of our work centres.

For the case of suppliers and external companies, via the acceptance of conditions through the Supplier Portal, as well as control via the procedure on Business Activity Coordination, we try to assure that no forced labour exists when they carry out any of their activities.

POLICIES

State if the entity has written policies that regulate the number of working hours established and the remuneration that its employees receive. Describe them (P4C2I2)

Response: Yes

Implementation: The working hours established are detailed in the collective bargaining agreements and/or in current legislation in force, so that they may vary from one company to another, depending on the country in which they are located. Employees are notified, via computer tools and/or printed documents, of the calendar in force for each year. Furthermore, in the majority of Group companies, employees working hours and conditions in specific posts may end up changing due to individual agreements that promote the reconciliation of work and family life.

With respect to employees' remuneration, all Group companies have clear wage policies for the different categories and professional levels that are established in virtue of collective bargaining agreements and negotiations with employees, always respecting the legal framework. Wage policies never reflect differences depending on age, gender, religion, etc.

In parallel to the drawing up of the Global Code of Conduct, an Ethics Committee is being created and the communications channels are being defined so that both employees and third parties or other parties in the supply chain, can communicate any possible breach or abuse of the conducts detailed in the Code of Conduct.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P4C1I1)

Response: Yes

Implementation: Many of the Group companies have specific actions with regard to work and family life reconciliation that affect different groups of employees.

In countries in which there is little social coverage of some field, the company provides aids that compensate for this situation, for example health insurance, life/accident insurance, aid for meals, child day-care or schooling...

State if the entity carries out actions that let its principles and values be transferred to the supply chain, with regard to good working conditions and the absence of forced labour (P4C3I2)

Specific indicator for entities that have suppliers in developing countries.

Response: Yes

Implementation: All suppliers that become part of the Group's panel of suppliers must accept the terms and conditions on Human Rights, Occupational Health & Safety, the Environment and Product and Service Quality that are established as requirements for suppliers.

As mentioned in previous principles, special controls are carried out for external companies that are operating inside the Group companies facilities, where this surveillance is detailed in the Occupational Health & Safety Policy.

During 2010, we defined, in parallel with drawing up the Global Code of Conduct, an Ethics Committee that can resolve cases in which the conditions included in this code are infringed upon or breached. This Committee will be in force after the code is implemented.

Furthermore, a network of communications channels was created in order to notify these breaches that can be used by employees, by members of the supply chain or by third parties that may be directly or indirectly affected by these violations.

IMPACT MONITORING AND MEASUREMENT

State if the entity verifies that its suppliers are faithful in complying with a reasonable number of working hours for their employees (P4C3I1)

Specific indicator for entities that have suppliers in developing countries.

Response: Yes

Implementation: At Gestamp, we do not perform specific audits on compliance with this indicator. However, there are verification and/or audit mechanisms in place at all companies for evaluating suppliers,

taking the requirements into account that try to assure product quality and a supply guarantee. These requirements oblige the supplier to have controls in place of their processes and a level of qualification for their employees that minimises the risk of violating factors related to human rights.

In the case of external companies, the Group directly watches over compliance with the working conditions through administrative controls of the external companies that come to work at our facilities, as well as WRP audits.

State if the entity controls and verifies abidance with labour laws and standards or holds certification of standards that prohibit forced labour (i.e. SA 8000) (P4C4I1)

Specific indicator for entities that have activities in developing countries.

Response: No

Implementation: At the Group, we assure that all laws applicable to its operations are fulfilled. However, given that forced labour is not considered a factor of risk, the Group does not have any certification in this respect.

PRINCIPLE 5

Entities must support the eradication of child labour.

DIAGNOSIS

State if child labour is a factor of risk at your entity, given the type of activity in which it works (P5C2I1)

Response: No

Implementation: During the production processes carried out at Group companies, employees handle and operate machinery and technology that requires a high level of training and specialisation, so that child labour is not liable to take place at any of our work centres.

POLICIES

State if the entity has written policies on the prohibition of child labour (for normal jobs, employees younger than 15 years of age, or 18, for dangerous jobs) that are openly communicated (P5C2I2)

Response: No

Implementation: Owing to the type of activity, child labour is not considered a risk factor at our companies, so that we have not deemed it necessary to write action directives to this end.

In the majority of countries where the Group operates, there is legislation in force that sets forth the prohibition of child labour or people work under collective bargaining agreements that establish a regulatory age limit. In all cases, the Group assures compliance with this regulation.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P5C1I1)

Response: No

Implementation: We have not executed any specific action on this principle, as there is no child labour at the Group companies. The characteristics of the activity done by the Group make child labour incompatible with the majority of jobs. Only duly qualified and trained personnel are allowed to operate machinery.

State if the entity carries out actions that let its principles and values be transferred to the supply chain, with regard to the absence of child labour (P5C3I2)

Specific indicator for entities that have suppliers in developing countries.

Response: Yes

Implementation: All suppliers that become part of the Group's panel of suppliers must accept the terms and conditions on Human Rights, Occupational Health & Safety, the Environment and Product and Service Quality that are established as requirements for suppliers. As mentioned above, special controls are carried out for external companies and those suppliers that work inside the facilities of the Group companies, where this surveillance is detailed in the Occupational Health & Safety Policy.

State if the entity holds certification for the standards that prohibit child labour (i.e. SA 8000; p 1) (P5C4I1)

Specific indicator for entities that have activities in developing countries.

Response: No

Implementation: Given the characteristics of the activities carried out at Group companies, we have not deemed it necessary to obtain this certification.

IMPACT MONITORING AND MEASUREMENT

Number of satisfactory verifications done in the year to rule out the employment of child labour among its suppliers (P5C3I1)

Specific indicator for entities that have suppliers in developing countries.

Response: 0

Implementation: The number of verifications performed during 2010 has not been tabulated.

In the case of suppliers, verifications are done when a possible case of non-compliance is detected with respect to any of the conditions signed via the Supplier Portal. They are not systematic verifications.

For the external companies that work at the Group's facilities, control is exercised over their employees via a procedure on Business Activity Coordination. We ensure that employees from external companies comply with the minimum age established by employing this control, thus ensuring the absence of child labour.

Number of employees under 15 years of age, or 18 when dealing with dangerous job posts. In the comments field, state the number of these employees that are associated with aid programmes (P5C4I2)

Specific indicator for entities that have suppliers in developing countries.

Response: 0

Implementation: Given the characteristics of the activities done by the Group, there is no employee that meets these circumstances.

*Number of verifications done by the Human Resources Department to detect cases of child labour (P5C4I3)
Specific indicator for entities that have activities in developing countries.*

Response: 0

Implementation: We have no records that any type of verification has been done.

PRINCIPLE 6

Entities must support the elimination of discrimination in respect of employment and occupation.

DIAGNOSIS

State if the entity has performed a diagnosis in which the risk factors for discrimination in hiring, training and promotion have been evaluated. If affirmative, state the risk and its impact (P6C2I2)

Response: Yes

Implementation: The HR Departments at each of the Group companies are responsible for performing detailed analyses on the characteristics of all job openings that arise. They are also responsible for establishing the requirements that each employee must comply with and providing them with training and pertinent career planning, looking exclusively at candidates' academic, personal and professional merits and the needs of the Group.

Similarly, the HR Departments at each company also have a detailed description of the functions of each job post and the corresponding hierarchies. Wage reviews and promotions are established based on evaluations of each employee's individual performance, thus eliminating any risk of discrimination.

All Group companies are subject to audits, which include HR issues, which help ensure that there is no type of workplace discrimination for reasons of gender, race, religion, etc.

POLICIES

Does the entity have a written anti-discrimination and/or equal opportunity policy? Describe it (P6C2I3)

Response: Yes

Implementation: The collective bargaining agreements in force at the different Group companies establish clear directives with regard to discrimination and equal opportunity. Furthermore, as described in previous sections, 87% of Group companies have written codes of conduct or similar documents that establish their viewpoints on this subject.

Besides these two types of documents, 32% of the Group companies have drawn up and implemented their own procedures to detect and handle cases of discrimination, harassment, abuse and bullying; 33% have equal opportunity plans aimed at attaining equal treatment and equal opportunities and 48% have internal policies on professional development.

The Global Code of Conduct that we are currently drawing up explicitly details that the Group Selection and Promotion Policy shall only take candidates' academic, personal and professional merits and the Group's needs into consideration, without allowing issues such as race, religion, gender, age, nationality, sexual orientation, gender identity, civil status or disabilities to have any influence on their decisions.

If a situation of infringement of employees' rights does take place, the party affected will be able to turn to the Ethics Committee, which is going to be established when the Global Code of Conduct is implemented.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P6C1I1)

Response: Yes

Implementation: 33% of the Group companies are developing an Equality Plan that will guarantee equal opportunity between men and women. The actions detailed in this plan include:

- Redefinition of the characteristics of the job posts, modifying the text to employ language that is non-discriminatory
- Information for all new hires on equality policies
- Improvement of the processes for evaluating employees and improved access to the equal opportunity plan for management posts
- Improvement of contact with employees during maternity / paternity leave and planning of activities for their return, particularly useful in countries where these leaves can extend for several years
- Training directors and raising awareness of their responsibility during selection and appraisal tasks

67% of the Group companies have implemented internal policies on professional development. In this regard, many of the other Group companies are working in this direction to obtain a career plan for all their employees: Up to 75% of companies perform systematic personal performance appraisals and periodic appraisals when handling employees' wage reviews and promotion reviews to thus ensure complete objectivity and impartiality during these processes.

In 2010, the percentage of employees with some type of disability was 1.4%. The integration of these people at the companies is done both in countries whose legal framework requires it and in those countries in which there is no legislation and the companies decide to undertake this initiative voluntarily.

Furthermore, 37% of the Group companies have specific actions in place as alternatives to hiring disabled people, which are aimed at the disabled or other groups with risk of social exclusion. The majority of these plans have to do with agreements with special employment centres.

IMPACT MONITORING AND MEASUREMENT

State the percentage composition of the management bodies for corporate governance (including the Board of Directors) and all other employees by category, gender, age and other diversity indicators (P6C2I1)

Directors versus employees: 0 %

Female directors: 0 %

Male directors: 0 %

Women: 16 %

Men: 84 %

Employees older than 45: 24 %

Employees younger than 30: 47 %

Foreign employees: 0 %

Employees with permanent contracts: 91 %

Implementation: The HR Departments at each of the companies keep records on the composition ratios of senior management and governing bodies, but this information is not made public.

In all the countries in which the Group operates, there are foreign employees, but we do not keep records of these data.

With regard to the rest of the employees, staff distribution within the Group is the following, broken down by indicators of age, gender, level of education and years worked:

1. Gender
 - 16% women
 - 85% men
2. Age
 - 47% of the staff is under 35 years of age
 - 30% of the staff is between 36 and 45 years of age
 - 18% of the staff is between 46 and 55 years of age
 - The remaining 6% of the staff is older than 56
3. Level of education
 - Basic: 28% of the staff
 - Specialised technician: 57%
 - University graduates: 16%
4. Years at company
 - Less than 1 year: 17%
 - 1-5 years: 36%
 - 6-10 years: 23%
 - 11-15 years: 12%
 - 16-20 years: 5%
 - 21-25 years: 4%
 - More than 25 years: 3%

State if the entity publicises the composition of governance bodies and the rest of the employees. If affirmative, state where this information is published (P6C2I4)

Response: No

Implementation: The composition of senior management and governing bodies is not made public. With regard to the ratios for the rest of the employees, they are available on the website, in the Global Compact Progress Report and in specific company presentation reports.

Does the entity have a mechanism or a party in charge of handling and managing accusations of discrimination, harassment, abuse and bullying? (P6C3I1)

Response: Yes

Implementation: At present and at all companies, the handling and management of possible cases is done through the HR Department, always guaranteeing the confidentiality that is required for these situations. In deciding how to act, the departments are guided by the in-house processes at their companies on discrimination and abuse or by the terms related to these subjects that are established in the codes of conduct or in the collective bargaining agreements in force at any given time.

Starting next year, there can be more comprehensive monitoring at a Group level, thanks to the creation of the Ethics Committee, where situations of infringement of employees' human rights may be presented to file reports and/or notify.

Number of cases opened and resolved that are related to accusations of harassment, abuse or bullying in the workplace (P6C3I2)

Response: 3

Implementation: During 2010, three cases were opened and then resolved due to issues of harassment, abuse or bullying. All of them were resolved internally and none of the cases has gone to court.

PRINCIPLE 7

Entities should support a precautionary approach to environmental challenges.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P7C1I1)

Response: Yes

Implementation: We are continuing with the stocktaking of greenhouse gas emissions that we started in 2008. We have also continued to work on calculating the Group's carbon footprint.

In 2010, we finished the stocktaking of direct emissions into the atmosphere, indirect emissions due to the consumption of electricity, transport and business travel. Furthermore, in 2010 we added the calculation of CH₄ and N₂O as gases responsible for –along with CO₂– the greenhouse effect, allowing us to calculate equivalent CO₂ emissions.

Furthermore, 22% of Group companies carry out promotional activities on good environmental practices outside the company, among which we can cite:

- Environmental speeches, conferences and promotional trade fairs
- Publication of reports on environmental results to publicise them among the main stakeholders
- Promotion of environmental certification among local companies
- Participation in reforestation conferences
- Participation in “Environmental Weeks” and visits to local schools

State if the entity has initiatives in place focused on reducing the consumption of energy, water, atmospheric emissions, water discharges or initiatives focused on improving biodiversity (P7C2I2)

Response: Yes

Implementation: Among the environmental initiatives that we have undertaken during 2010, we can cite:

1. Reduction of waste generation:

- Increase in groups of waste separation with the aim of contributing to the recycling of several other materials and preventing them from being sent to rubbish tips
- Installation of filters that allow oil to be reused
- Change in the methods for the reception of raw materials and shipment of finished products to clients on wood pallets or in reusable containers and less generation of cardboard and plastic packaging
- Reduction in the generation of polluted absorbent materials by searching for other new materials with better absorption capacities and their reuse (after washing) as many times possible before their destruction

2. Reduction in energy consumption: the measures detailed below have led to a saving of 2,300 MWh with respect to 2009:
 - Change of all computer equipment to new ones with lower consumption
 - Fixing and control of leaks in compressed-air facilities
 - Optimisation of heat and lighting operation by using thermostats and automatic shut-off systems
 - Recirculation of hot air inside the factories in winter to reduce heating consumptions
3. Reduction of water consumption and generation of liquid waste:
 - Waterproofing and sealing of different areas of the factories (chemical products warehouse, waste areas, etc.)
 - Good practices at the plants, which lead to a reduction in the generation of cleaning waters and their purification in oil separators at the factories
 - Placement of automatic purges that let consumption be reduced in the cooling towers
 - Placement of filters in the water circuits that allow water to be recirculated instead of periodic emptying for cleaning

PRINCIPLE 8

Entities must undertake initiatives to promote greater environmental responsibility.

DIAGNOSIS

State if the entity has identified its risks and responsibilities in environmental issues, taking its sector of activity into account (P8C2I4)

Response: Yes

Implementation: One of the Group's directives obligates all companies to implement an Environmental Management System. In 2010, 78% of the companies were certified under at least the ISO 14,001 Standard. The percentage of certified companies has dropped with regard to 2009, due to the acquisition of Edscha and other companies, as well as the start-up of companies like Gestamp Kaluga.

Newly constructed and recently added companies have a specific period of time in which to obtain environmental certification. The Group's objective is for 100% of companies to be certified.

In the Group, it is compulsory for all companies to fill out and submit an Environmental Indicator to the Group, which details all monthly energy consumptions and waste generation. It is reviewed each year and the information required is improved, so that its results depict the situation at each of the companies with regard to environmental issues and, if they exist, also their risks. This indicator is implemented at all Gestamp companies, even those that do not hold environmental certification, so that we can say that 100% of Gestamp companies have correctly identified their environmental risks.

The Group's objective for 2011 is for this indicator to be implemented in Edscha.

State if the entity carries out preliminary reports on the scope of the impacts that could be generated in the environment (p8C4I1)

Specific indicator for entities with high environmental impact.

Response: Yes

Implementation: Each company creates and executes their own environmental reports in order to comply with requirements on environmental certification. In parallel and using the information from the Environmental Indicator, global reports are drawn up that depict the change of the two environmental factors that –due to their characteristics- have the greatest environmental impact for the Group: energy consumption and waste generation.

Using this information on energy consumption, they are also working on calculating the Group's carbon footprint during its production activities.

These reports are made available to all Group companies on the Environmental and Prevention Portal. This portal is a web platform for communication where the environmental and Occupational Health & Safety

professionals can find documentation of interest (Management System, presentations on indicators...), express their questions and share experiences that can help others at their companies.

POLICIES

State if the entity has a written environmental policy, either independent or integrated into another series of policies (P8C2I1)

Response: Yes

Implementation: It is compulsory to have an environmental policy in order to obtain environmental certification. Each company has their own, but all detail the following principles:

- Compliance with legislation
- Continuous improvement
- Prevention of pollution and environmental impact
- Reduction in consumptions and waste production

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P8C1I1)

Response: Yes

Implementation: During 2010, we continued the process of environmental certification at all companies and ISO 14,001 was implemented at the following companies: Gestamp Polska, G. Saint Petersburg, G. Baires PI3, G. Mexico and G. Kunshan (China).

We have also improved the Environmental Indicator with respect to 2009, with the aim of evaluating the most significant environmental issues related to our activity in greater detail. The 2010 indicator has allowed us to calculate the following indexes:

- EEI: Energy Efficiency Indicator, defined as the energy consumption in MWh for every € 100 of added value
- WMI: Waste Management Indicator, defined as the cost of waste management for every € 10,000 of added value
- WPI: Waste Production Indicator, defined as the production of tonnes of waste for every € 1000 of added value

All companies are requested to submit the amounts of waste produced each quarter, breaking them down into hazardous and non-hazardous wastes and the main waste categories that are produced during normal production activities in our sector.

We are continuing with the stocktaking of greenhouse gas emissions that we started in 2008. We have also continued to work on calculating the Group's carbon footprint. In 2010, we finished the stocktaking of

direct emissions into the atmosphere, indirect emissions due to the consumption of electricity, transport and business travel. Furthermore, in 2010 we added the calculation of CH₄ and N₂O as gases responsible for –along with CO₂– the greenhouse effect, allowing us to calculate equivalent CO₂ emissions.

Data obtained in 2010 are only for the Gestamp Group and the inclusion of data from Edscha is an objective for 2011.

IMPACT MONITORING AND MEASUREMENT

State if the entity has effective mechanisms in place for evaluating environmental issues (P8C2I2)

Response: Yes

Implementation: In 2010, every Group company has at least one person in charge of environmental issues. In turn and by employing the Environmental Indicator that is reported quarterly by every company, the Group monitors and evaluates the environmental behaviour of all companies.

State if the entity has quantifiable environmental objectives and goals for the entire company (P8C2I3)
Specific indicator for entities with high environmental impact.

Response: Yes

Implementation: It is a Group requirement that all companies are certified in line with an environmental management system, so that the environmental objective is to progressively continue to increase the number of companies certified, until achieving 100%.

Moreover, within the individual companies that are already certified, an Environmental Management Programme is established annually that is managed according to the requirements of the ISO 14,001 Standard. Based on this programme, each company establishes a series of objectives and goals that are aimed at the continuous improvement of their environmental behaviour, performing monitoring to ensure their compliance and, in the event of deviations, to rectify the situations.

Percentage of suppliers and subcontractors of goods and/or services with environmental management systems implemented by type (i.e. ISO 14,001, EMAS, etc.) % (P8C3I1)

Response: 39 %

Implementation: Compared to the 10% of suppliers that were certified as ISO 14,001 compliant at Gestamp in 2009, we can ensure that 38% of suppliers that are registered on the Gestamp Quality Platform have this certification in force in 2010. At Edscha, this percentage is 90% of the suppliers that are registered on its Procurement Portal.

Number of episodes and fines associated with non-compliance with the agreements / treaties / statements of international application, as well as with local, regional, subnational and national regulations associated with environmental issues (P8C4I2)

Specific indicator for entities with high environmental impact.

Response: 0

Implementation: There is no knowledge of the existence of any episode of environmental non-compliance or fines during 2010.

State the direct consumption of energy at your entity (GJ) (P8C5I1)

Specific indicator for entities with high environmental impact.

Response: 1,900,274 GJ

Implementation: Gestamp energy consumption in 2010 was 527,854 MWh, approximately 1,900,274 GJ, of which 72% was for electricity consumption, 23% for natural gas consumption, 3% for the consumption of LPG and 1% for the consumption of diesel and other fuels.

An objective for 2011 is to have energy consumption data for Edscha.

State the total water consumption of the entity (m³/year) (P8C5I2)

Specific indicator for entities with high environmental impact.

Response: 0

Implementation: Water consumption is information that is controlled individually by each company and that was not centralised in 2010. Hence, global data cannot be provided and the attainment of this information is an objective for 2012.

State the total use of materials other than water by types (thousands of tonnes) (P8C5I3)

Specific indicator for entities with high environmental impact.

Specify material and quantity: Steel

Specify material and quantity: Oils

Specify material and quantity: Paint

Implementation: The three materials other than water that are most consumed by the Group are steel, oils and paint.

State the total amount of wastes generated by your entity, broken down by types, level of danger and destination (P8C5I4)

Specific indicator for entities with high environmental impact.

Specify waste and quantity: Paper / cardboard

Specify waste and quantity: Wood

Specify waste and quantity: Polluted waters

Implementation: At Gestamp in 2010 and within the group of non-hazardous wastes, the most frequently generated wastes were wood, paper and cardboard, which are being completely recycled.

With regard to hazardous wastes, polluted materials and polluted waters are those with the largest volume produced. For both types, the majority of companies have objectives for the reduction and implementation of good practices that will let them be reused.

Having all waste production data from Edscha is an objective for 2011.

Does your entity have any other indirect use of energy (business trips, management of product lifecycles, employing raw materials that generate a large quantity of energy, etc.)? (P8C6I1)

Specific indicator for entities with high environmental impact.

Response: Yes

Implementation: Indirect energy is consumed for transport (raw materials from suppliers, finished products to clients) and on company travel done by Gestamp personnel during the normal development of their activities.

In 2010 at Gestamp, strict control of these consumptions was kept and they are included for the calculation of the carbon footprint. Having all indirect energy consumption for Edscha is an objective for 2011.

Has your entity's water consumption significantly affected surrounding ecosystems or habitats? (P8C7I1)

Specific indicator for entities with high environmental impact.

Response: No

Implementation: There is no record of any affects to surrounding ecosystems or habitats due to any of the activities carried out at the Group.

Annual extraction of underground and surface waters, as a percentage of the annual renewable quantity of water, available from all sources. If there is none, write in 0 (P8C7I2)

Specific indicator for entities with high environmental impact.

Surface: 0

Underground: 0

Public water system: 100

Implementation: There are no records of the exact percentage of surface / underground waters consumed, but all Group companies are primarily supplied by water from the public water system. Due to the characteristics of the activity done and the location of the factories in industrial complexes, it is not necessary to top up supplies from the public network by extracting other types of surface or underground water.

State what amount of materials used by your entity are wastes (processed and unprocessed) from external or internal sources of the reporting organisation (KG) (number, tonnes) (P8C8I1)

Specific indicator for entities with high environmental impact.

Response: 25

Implementation: During steel manufacturing, 25% of scrap metal is provided for the production process, so that we can say that all of our products are manufactured with one-fourth of recycled materials.

During the industrial processes carried out by the Group, scrap metal is generated, which is managed as a by-product and incorporated again into the steel production cycle.

What is your entity's level of greenhouse gas emissions (CO₂, CH₄, N₂O, HFC, PFC and SF₆) and of NO_x, SO_x and other indirectly air polluting emissions? Expressed in TM (local laws and regulations, Stockholm Convention on POP, Rotterdam Convention on PIC and Helsinki, Sofia and Geneva Protocols with respect to the Convention on Long Range Trans boundary Air Pollution). If there are none, write in 0 (P8C9I1)

Specific indicator for entities with high environmental impact.

CO₂: 181,373

CH₄: 0.6

N₂O: 0.1

HFC: 0

PFC: 0

SF₆: 0

NO_x: 0

SO_x: 0

Implementation: The figures above are for Gestamp emissions in 2010. 83% of the emissions detailed are indirect emissions from the consumption of electricity. Direct emissions are wastes whose majority come from burning natural gas, which led us to not calculating certain polluting gases (NO_x and SO_x).

Controlling the level of emissions at Edscha is an objective for 2011.

State if the entity uses and emits substances that deplete the ozone layer (Montreal Protocol) (P9C9I2)
Specific indicator for entities with high environmental impact.

Response: No

Implementation: No substances are emitted at the Group that deplete the ozone layer. However, in some cases there are old air conditioner units that contain the gas R22. All companies that have detected their presence have objectives to eliminate them by the progressive replacement of the apparatuses or by the progressive change to new replacement gases such as R427A that do not emit gases that deplete the ozone layer.

Identify and measure (in tonnes) the amount of environmental wastes (chemical substances, oils, fuels, etc.) that your entity creates. (P8C10I1)
Specific indicator for entities with high environmental impact.

Response: 0

Implementation: The amount of environmental waste is information that is controlled individually by each company and that was not centralised in 2010. Hence, global data cannot be provided and the attainment of this information is an objective for 2012.

State if your entity has produced, transported or imported hazardous wastes and state if it has initiatives and has carried out actions to improve waste management (P8C10I2)
Specific indicator for entities with high environmental impact.

Response: Yes

Implementation: While executing Group production activities, some hazardous wastes are produced, above all wastewaters polluted with oils, polluted materials (cloths, gloves and absorbent materials), sludge and used oils. All companies have objectives in place to reduce and implement good practices that improve their management, for example:

- Installation of filters that allow oil to be reused a greater number of times
- Reduction in the generation of polluted absorbent materials by searching for other new materials with better absorption capacities
- Reuse of gloves and cloths after washing them
- Installation of systems that allow polluted waters to be reused (settling basins, etc.)

State if your entity has initiatives and has carried out actions to improve waste management (P8C10I3)
Specific indicator for entities with high environmental impact.

Response: Yes

Implementation: In addition to the measures to reduce the production of hazardous wastes and improve how they are managed, which were mentioned in the last question, measures have also been carried out at the Group to improve non-hazardous waste management (primarily scrap metal, wood, paper and cardboard), among which we can cite:

- Change in the methods for the reception of raw materials and shipment of finished products to clients on wood pallets or in reusable containers and less generation of cardboard and plastic packaging
- Rubbish compacters that reduce the volume of waste generated
- Increase in the groups of waste that are separated, with the aim of facilitating the recycling of a higher quantity of materials

What percentage of products sold can be recycled at the end of their useful lives? % (P8C11I1)
Specific indicator for entities with high environmental impact.

Response: 100 %

Implementation: The Group produces metal components for automobiles and given that metal is 100% recyclable; all of our products can be recycled at the end of their useful lives.

Total calculation of water recycling and reuse (including wastewaters and other types of waters used, such as for example cooling water) (thousands of tonnes) (P8C11I2)
Specific indicator for entities with high environmental impact.

Response: 0

Implementation: Although we know that the percentage of recycled water used by Group companies is high, the total calculation is information that is controlled individually by each company and that was not centralised in 2010. Hence, global data cannot be provided and the attainment of this information is an objective for 2012.

State if your entity has caused impacts due to its activities and operations in land, sea and fresh-water environments, in protected and sensitive areas, rich in biodiversity (i.e. zones protected by state legal ordinances, categories 1-4 of IUCN protected areas, zones declared as world heritage sites and biosphere reserves) (P8C12I1)
Specific indicator for entities with high environmental impact.

Response: No

Implementation: There is no record of any affects to surrounding ecosystems or habitats due to any of the activities carried out at the Group.

All certified companies have an Environmental Emergencies Plan that is correctly implemented. In the event of detecting any incident, these plans let them react quickly and effectively with the aim of minimising any type of damage that could be produced.

PRINCIPLE 9

Entities must encourage the development and dissemination of environmentally friendly technologies.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P9C1I1)

Response: Yes

Implementation: Gestamp employs and has a commitment to technologies that enable parts be manufactured from high-tensile steels. The most noteworthy technology in this regard is hot stamping. It allows for the production of steel parts with ultra-high strength, which leads to more lightweight products that are more resistant to impacts that take place during hypothetical accidents. The use of high-resistance structural reinforcements lets the weight of a 1,500 kg vehicle be reduced by up to 10%, which represents a subsequent emissions reduction of 10-20 g CO₂/km, while maintaining the same level of safety.

In turn, Edscha has also established an objective to reduce the weight of its products, as a way of contributing to the reduction of vehicles' CO₂ emissions at the end of the production chain. Thus, it has started to develop in-house manufacturing processes such as plastics modelling and works jointly with its suppliers on joint production strategies in order to reach optimal solutions.

The mission of the Gestamp R&D Department is closely related to safety and the reduction of CO₂ emissions: 'offering the most suitable and innovative solutions, adapted to each specific need, obtaining the best results in weight reduction, safety and comfort.' In this regard, we actively participate in national and international projects for the development of innovative solutions, along with other partners in the sector. Among the most outstanding projects, we can cite:

- **FORM 0 Project:** Through technological and new material developments, we will be capable of offering a range of components created from AHSS steels, which provide higher safety levels to passengers and are much more lightweight than current steels, with the subsequent saving in fuel consumption and, thus, attaining levels of CO₂ emissions that were inconceivable until now. (www.forma0.com)
- **In collaboration with ARCELOR:** Gestamp shares its commitment to develop increasing safer and more ecological products with world steel leaders like ARCELOR, working to jointly develop and industrialise new materials.
- **INVITER Project (7th Framework Programme):** The challenge is to get vehicles approval via simulations, thus avoiding the need to have to develop complete vehicle crash tests.
- **ADAPTA Project:** Consists of the development of adaptive vehicle body structure connected to pre-crash systems.

In turn, the mission of the Edscha R&D Department also considers the "reduction of greenhouse gas emissions through weight reduction systems, while ensuring driver and pedestrian safety and with a commitment to knowledge as a competitive advantage". Edscha has two innovative projects:

- Weight Reduction Door Hinge: via specific designs, it is possible to reduce the weight of hinges by up to 40%. In a four-door vehicle, this entails a total weight reduction of approximately 2 kg.
- Pedestrian Protection Hood Hinge: pyrotechnic hood hinges. This latter project is more focused on safety, developing a system that can protect pedestrians in the event of collision.

IMPACT MONITORING AND MEASUREMENT

Number of studies, reports written and communications sent during the year to increase the dissemination of technologies that are environmentally-friendly and that improve energy efficiency (P9C2I1).

Response: 500

Implementation: We estimate that some 500 studies and reports have been performed that are related to developing technologies that are environmentally-friendly and that improve energy efficiency. However, it is impossible for us to quantify the exact number.

With the incorporation of EDSCHA, the Group's R&D team has grown considerably: As mentioned in the previous section, Gestamp had 342 people devoted to obtaining more lightweight and safer products in 2010.

Moreover, the different companies, attending to clients' requirements, commit to technologies that lead to the production of lighter products, that are subsequently more environmentally-friendly. The means of production are thus being renovated or replaced by others that are more modern and efficient, which in turn indirectly contributes to respecting the environment.

In addition to the improvements that are being carried out due to the typical dynamics of this business, 40% of the companies have made significant improvements with regard to energy efficiency, among which are the following:

1. Replacement of equipment and technical improvements to facilities:
 - Modifications to roofs that allow the better use of natural light
 - Protection with sun protection film on highly-exposed windows
 - Change of artificial lighting sources for others that are low-consumption and more efficient
2. Technical improvements to machines and production processes:
 - Optimisation of processes to reduce energy consumption
 - Replacement of obsolete machinery for new and more efficient machinery
 - Improvement to existing machinery with the help of devices that improve leaks in compressors and amp reducers, which decrease the initial start-up consumption
3. Organisational measures:
 - Savings due to good practices in the control of lighting, heat and air-conditioning use (sealing openings that lead to the outside, automatic switch-off of lights in unused work stations, etc.)
 - Disconnection of specific equipment (compressors) at night / weekends when this doesn't affect the production chain
 - Use of hot air from the compressors to heat some facilities

Financial investment, out of the total gross revenues, in the current year for the development and publicising of technologies that are not aggressive to the environment (P9C2I2)

Response: 4

Implementation: 4% is the percentage investment in the development and publicising of technologies that reduce the environmental impact of our products and processes out of total gross revenues.

All technologies entail a greater or lesser degree of environmental impact, so that we understand this indicator to mean the investments allocated to improving products and processes from the viewpoint of environmental impact, and expenses earmarked for controlling the environmental impact of processes. We can thus quantify:

- R&D investments: as explained in a previous indicator, the mission of the R&D Department is closely related to emissions reductions by means of reducing the weight of parts
- Investments in the implementation of new technologies that enable us to provide more lightweight products with respect to the sector's traditional products, which contribute to reducing emissions by reducing vehicle consumptions.
- Investment in the measures that have been carried out focused on energy efficiency at existing facilities and that were detailed above
- Expenses stemming from the control of environmental issues and protecting and improving the environment

PRINCIPLE 10

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

DIAGNOSIS

State if the entity has performed a diagnosis to find out the areas of greatest internal risk at the organisation and in its sector of activity and identify what these risks are and their impacts (P10C3I1)

Response: Yes

Implementation: The Group does not participate in any political activity or make financial donations of a political nature in any country of the world, so that any risk of corruption that could hypothetically arise would have to be related to the acceptance of gifts from suppliers, favouritism to them or unfair competition with clients. However, all of these situations are closely controlled through different mechanisms implemented; such as for example account audits and the Suppliers Portal, so that we can conclude that the risk of corruption within the Group is low.

At Gestamp, managing procurement through the Suppliers Portal follows the directives established in the UNECWA 15896 Standards, which detail operations' traceability and transparency as ways to prevent corruption. Furthermore, the Suppliers Portal is managed through a specialised external consultant, which provides additional controls against any possible types of corruption.

EDSCHA also has a standardised supplier selection process in which different departments and levels participate in all dealings with suppliers. In this way, they try to prevent any possible cases of corruption.

POLICIES

State if the entity has a written policy defined against corruption, extortion and money laundering (P10C2I2)

Response: Yes

Implementation: The different codes of conduct in force at companies contain anti-corruption sections. Besides these documents, close to 27% of the Group companies have specific procedures that describe directives for preventing corruption and the methods of action if corruption is detected. 47% of companies state that they have in-house controls and procedures with respect to gifts, invitations and business expenses.

With regard to relations with suppliers, Gestamp has drawn up a Corporate Procurement Model that defines how the entire process is managed, from the time a need is detected until the purchase is awarded, including regulations on contracts and relations with suppliers.

For its part, Edscha has a Standardised Supplier Selection Process that has been implemented and disseminated, which pursues the same objectives.

Since 2009, the Group has been working on a Global Code of Conduct, which will establish the appropriate guidelines for handling corruption.

Does the entity's policy include controls and procedures with respect to gifts, invitations and business expenses, including their limits and information channels? (P10C5I1)

Response: Yes

Implementation: The Group's policy states that no gifts or courtesies can be accepted that influence, could influence or could be interpreted as influencing decision taking. When there are doubts about what is acceptable or not, the offer must be declined or, where applicable, dealt with beforehand with the immediate hierarchical superior.

As mentioned above, all procurement management at Gestamp is based on UNE-CWA 15,896 Standards, which explicitly includes directives to prevent corruption and ensure operational traceability and transparency.

Given that the Procurement System is global and has general access and is compulsory for all suppliers and buyers, this strengthens controls against corruption in supplier relations. There is also a Procurement Control and Process Department whose responsibilities include supervision of the directives established by the Corporate Procurement Model and its implementation at all companies.

Edscha, within its Standardised Supplier Selection Process, makes it compulsory to submit all purchases made within the Group to a Cost Analysis Team. Thus, an independent team evaluates potential suppliers, analysing the quality of their goods and services compared to the associated costs.

ACTIONS

Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it (P10C1I1)

Response: Yes

Implementation: Annual account audits represent additional support to the control systems against fraudulent practices within the organisation. The different Group companies consolidate their earnings annually, so that there is additional supervision of cash and banks at a corporate level, making the existence or possibility of fraudulent practices extremely difficult.

IMPACT MONITORING AND MEASUREMENT

State the percentage of the total, broken down by each stakeholder, which has been notified of the codes of conduct and policies to fight corruption and bribery at the entity (P10C2I1)

Clients: 100

Employees: 91

Suppliers: 100

Implementation: Relations with clients are continuous, smooth and direct, due to which knowledge of the Group's internal directives is conveyed directly and effectively to them.

99% of Group employees are acquainted with the codes of conduct and similar documents in force at the different companies that are included in the directives on corruption.

With respect to suppliers, in 2010 100% of them obligatorily executed all operations through the Suppliers Portal, both at Gestamp and at EDSCHA, so that they were obligated to be notified of operating conditions.

Are all donations to charities and sponsorships transparent and done in accordance with pertinent laws? (P10C4I1)

Response: Yes

Implementation: The donations and sponsorships made by the Group are managed and documented in accordance with the applicable legislation in each country. Account audits ensure that no irregularity takes place in these actions.

The majority of countries in which the Group operates have laws that prohibit corruption and bribery, even if these acts are committed outside of the borders of the country in question. Any violation of these laws represents a serious offence that can entail fines for companies and jail sentences for individuals.

State if the entity has mechanisms in place to manage anti-corruption incidents (P10C6I1)

Response: Yes

Implementation: At present, the mechanisms for managing anti-corruption incidents are established by the respective procedures and individual codes of conduct that are currently in force at the different companies.

The Group has an objective to create an Ethics Committee that will be responsible in the future for managing anti-corruption incidents, as well as other tasks mentioned above.

TABLE OF CONTENTS

This table of contents details the connexion of the indicators from the United Nations Spanish Network Progress Report to GRI indicators. In order to obtain level C reporting in the GRI initiative, the entity must fulfil the points detailed below:

- Indicators on general information about the entity (Entity profile, strategy, governance, objectives and United Nations subjects: 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 at least one for each field: Economic (EC), Social (LA, PR, HR, SO) and Environmental (EN).

For further information about the exact requirements of GRI reporting, we recommend that you consult GRI's G3 and G3.1 reports.

GLOBAL COMPACT		GRI
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1	Entity's cover letter of commitment	1.1
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2	Address	2.4
3	Entity name	2.1
4	Contact person	3.4
5	Number of employees	2.8
6	Sector:	2.2
7	Activity, main brands, products and/or services	2.2
8	Sales and revenues	2.8
9	Significant financial aid received from governments	EC4
10	Identification of stakeholders	4.14
11	State which criteria were followed in selecting the stakeholders	4.15
12	Countries in which it is present (where the entity has the majority of its activities or where it has a significant level of activity on sustainability) and the markets served	2.5, 2.7
13		2.9
14	Scope of the Progress Report (countries for which the entity reports information in the Progress Report) and its possible limitations, if there are any	3.6, 3.7
15	How have the materiality and most significant issues been established for inclusion in the Progress Report?	3.5
16		3.8

17		3.10
18		3.11
19	How is the Progress Report being disseminated?	
20	Awards and distinctions received during the reporting period	2.10
21	Period covered by the information contained in the report	3.1
22	Date of the most recent past report	3.2
23	Progress Report presentation cycle	3.3
STRATEGY AND GOVERNANCE		
24	State how the entity incorporates stakeholders' suggestions into its strategy and decision taking processes	4.17
25	State the entity's legal status, detailing the organisation chart	2.3, 2.6
26	State if senior management has discussed the strategic aspects of the 10 principles of the Global Compact and if it has measured progress by using the key performance indicators	
27	State the governing structure and who at a management level carries out the decision-taking and good-governance processes for the implementation of CSR in line with the principles of the Global Compact and state whether the chairman of the highest governing body also holds an executive position.	4.1, 4.2
28		4.3
29		4.4
UNITED NATIONS OBJECTIVES AND SUBJECTS		
30	State if the entity has joint projects and undertakes support initiatives related to the United Nation's objectives and subjects (UNICEF, UNWOMEN, Millennium Development Objectives, Global Compact initiatives, etc.)	
PRINCIPLE 1		
P1C2I1	State if the business has performed a diagnosis in which human rights risk factors are evaluated. If affirmative, state the risk and its impact	
P1C2I2	Does the entity have written human rights policies? Describe to what degree they have been implemented in the comments field	Areas: Social / Human rights / Policy
P1C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	
P1C2I5	State if you use the results obtained from the monitoring mechanisms for human rights policies in the entity's strategic planning	
P1C4I1	State if the entity notifies its clients about the safety of its products and services. If the response is affirmative, state how	
P1C2I3	State if the entity has mechanisms in place for monitoring its human rights policies. Describe them	Areas: Social / Human rights / Evaluation & monitoring

P1C3I1	Percentage of employees out of the total who are notified and trained on the Human Rights Principles by which the entity is governed	
P1C4I3	State the number and type of:	PR4
P1C5I1 - C	Amount of money invested in the community (in kind, products or services) (thousands of euros)	
P1C5I2 - C	State if the entity performs an analysis of the projects it develops in the communities in which it is present and if its carries out education campaigns or campaigns with other characteristics that are of public interest in these communities	
P1C6I1 - C	Number of initiatives undertaken by the entity in order to prevent the infringement of human rights by the security forces hired in their scope of action. Describe them	
PRINCIPLE 2		
P2C2I1	State if the entity has performed a diagnosis in which human rights risk factors are evaluated for their supply chain (suppliers, subcontractors, etc.) or their business partners. If affirmative, state the risk and its impact	
P2C3I2	Does the entity have written policies that regulate relations with suppliers that are based on respect for human rights?	Areas: Social / Human rights / Policy
P2C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	
P2C2I2	State the percentage of suppliers that hold certification out of the total	Areas: Social / Human rights / Evaluation & monitoring
P2C3I3	State the number of complaints and enquiries from / about suppliers (P2 C3 I3)	
P2C3I1	State the percentage of workshops in your supply chain that have been inspected, out of the total suppliers and subcontractors at the entity	
PRINCIPLE 3		
P3C3I2	State if there are risk factors that could put the effective recognition of the right to collective bargaining in danger	HR5
P3C2I1	Does the entity have a policy to request information, make enquiries and negotiate with employees about changes in the operations of the organisations that provide information (for example, about the restructuring of a company)?	Areas: Social / Employment practices and work ethics / Policy
P3C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	
P3C2I2	Does the entity have monitoring and measurement procedures that guarantee the formal representation of employees in decision making and managing the organisation? If affirmative, describe them	
P3C3I1	Does the entity has mechanisms to listen, to evaluate and monitor the outlooks, concerns, suggestions and criticisms of employees, with the aim of learning from and acquiring new knowledge? If affirmative, describe them	
PRINCIPLE 4		
P4C2I1	State if forced labour is a factor of risk at your entity, given the type of activity in which it works	HR7

P4C2I2	State if the entity has written policies that regulate the number of working hours established and the remuneration that its employees receive. Describe them	Areas: Social / Employment practices and work ethics / Policy
P4C1I1	Does the entity have a specific action in place with respect to this principle that has been carried out during the present year? If affirmative, describe it	
P4C3I2 - B	State if the entity carries out actions that let its principles and values be transferred to the supply chain, with regard to good working conditions and the absence of forced labour	
P4C3I1 - B	State if the entity verifies that its suppliers are faithful in complying with a reasonable number of working hours for their employees	
P4C4I1 - C	State if the entity controls and verifies abidance with labour laws and standards or holds certification of standards that prohibit forced labour (i.e. SA 8000)	Areas: Social / Employment practices and work ethics / Evaluation & monitoring
PRINCIPLE 5		
P5C2I1	State if child labour is a risk factor at your entity, given the type of activity in which it works	HR6
P5C2I2	State if the entity has written policies on the prohibition of child labour (for normal jobs, employees younger than 15 years of age, or 18, for dangerous jobs) that are openly communicated	Areas: Social / Employment practices and work ethics / Policy
P5C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	
P5C3I2 - B	State if the entity carries out actions that let its principles and values be transferred to the supply chain, with regard to the absence of child labour	
P5C4I1 - C	State if the entity holds certification for the standards that prohibit child labour (i.e. SA 8000; p 1)	Areas: Social / Employment practices and work ethics / Evaluation & monitoring
P5C3I1 - C	Number of satisfactory verifications done in the year to rule out the employment of child labour among its suppliers	
P5C4I1 - C	State if the entity holds certification for the standards that prohibit child labour (i.e. SA 8000; p 1)	
P5C4I3 - C	Number of verifications done by the Human Resources Department to detect cases of child labour	
PRINCIPLE 6		
P6C2I2	State if the entity has performed a diagnosis in which the factors of risks of discrimination in hiring, training and promotion have been evaluated. If affirmative, state the risk and its impact	
P6C2I3	Does the entity have a written anti-discrimination and/or equal opportunity policy? Describe it	Areas: Social / Employment practices and work ethics / Policy
P6C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	

P6C2I1	State the percentage of the composition of the management bodies of corporate governance (including the Board of Directors) and all other employees by category, gender, age and other diversity indicators	LA13
P6C2I4	State if the entity publicises the composition of governance bodies and the rest of the employees. If affirmative, state where this information is published	
P6C3I1	State the percentage composition of the management bodies of corporate governance (including the Board of Directors) and all other employees by category, gender, age and other diversity indicators	
P6C3I2	Number of cases opened and resolved that are related to accusations of harassment, abuse or bullying in the workplace	HR4
PRINCIPLE 7		
P7C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	Areas: Environment / Training & awareness raising
P7C2I2	State if the entity has initiatives in place focused on reducing the consumption of energy, water, atmospheric emissions, water discharges or initiatives focused on improving biodiversity	
PRINCIPLE 8		
P8C2I4	State if the entity has identified its risks and responsibilities in environmental issues, taking its sector of activity into account	
P8C4I1 - D	State if the entity executes preliminary reports on the scope of the impacts that can be generated in the environment	
P8C2I1	State if the entity has a written environmental policy, either independent or integrated into another series of policies	
P8C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	
P8C2I2	State if the entity has effective mechanisms in place for evaluating environmental issues	
P8C2I3 - D	State if the entity has quantifiable environmental objectives and goals for the entire company	
P8C3I1	Percentage of suppliers and subcontractors of goods and/or services with environmental management systems implemented by type (i.e. ISO 14,001, EMAS, etc.) %	
P8C4I2 - D	Number of episodes and fines associated to non-compliance with the agreements / treaties / statements of international application, as well as with local, regional, subnational and national regulations associated to environmental issues	EN28
P8C5I1 - D	State the direct consumption of energy at your entity (GJ)	EN3
P8C5I2 - D	State the total water consumption of the entity (m ³ /year)	EN8
P8C5I3 - D	State the total use of materials other than water by types (thousands of tonnes)	EN1
P8C5I4 - D	State the total amount of wastes generated by your entity, broken down by types, level of danger and destination	EN22
P8C6I1 - D	Does your entity have any other indirect use of energy (business trips, management of product lifecycles, employing raw materials that generate a large quantity of energy, etc.)?	EN4/EN29

P8C7I1 - D	Has your entity's water consumption significantly affected surrounding ecosystems or habitats?	EN9
P8C7I2 - D	Annual extraction of underground and surface waters, as a percentage of the annual renewable quantity of water, available from all sources. If there is none, write in 0	
P8C8I1 - D	State what amount of materials used by your entity are wastes (processed and unprocessed) from external or internal sources of the reporting organisation (KG) (number, tonnes)	EN2
P8C9I1 - D	What is your entity's level of greenhouse gas emissions (CO ₂ , CH ₄ , N ₂ O, HFC, PFC and SF ₆) and of NO _x , SO _x and other indirectly air polluting emissions? Expressed in TM (local laws and regulations, Stockholm Convention on POP, Rotterdam Convention on PIC and Helsinki, Sofia and Geneva Protocols with respect to the Convention on Long Range Trans boundary Air Pollution). If there are none, write in 0	EN16 / EN17 / EN20
P8C9I2 - D	State if the entity uses and emits substances that deplete the ozone layer (Montreal Protocol)	EN19
P8C10I1 - D	Identify and measure (in tonnes) the amount of environmental wastes (chemical substances, oils, fuels, etc.) that your entity creates.	
P8C10I2 - D	State if your entity has produced, transported or imported hazardous wastes and state if it has initiatives and has carried out actions to improve waste management	
P8C10I3 - D	State if your entity has initiatives and has carried out actions to improve waste management	
P8C11I1 - D	What percentage of products sold can be recycled at the end of their useful lives? %	EN27
P8C11I2 - D	Total calculation of water recycling and reuse (including wastewaters and other types of waters used, such as for example cooling water (thousands of tonnes)	EN10
P8C12I1 - D	State if your entity has caused impacts due to its activities and operations in land, sea and fresh-water environments, in protected and sensitive areas, rich in biodiversity (i.e. zones protected by state legal ordinances, categories 1-4 of IUCN protected areas, zones declared as world heritage sites and biosphere reserves)	EN12
PRINCIPLE 9		
P9C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	
P9C2I1	Number of studies, reports written and communications sent during the year to increase the dissemination of environmentally-friendly technologies and to improve energy efficiency	
P9C2I2	Financial investment, out of the total gross revenues, in the current year for the development and publicising of technologies that are not aggressive to the environment	
PRINCIPLE 10		
P10C3I1	State if the entity has performed a diagnosis to find out the areas of greatest internal risk at the organisation and in its sector of activity and identify what these risks are and their impacts	
P10C2I2	State if the entity has a written policy defined against corruption, extortion and money laundering	Areas: Social / Society / Policy

P10C5I1	Does the entity's policy include controls and procedures related to gifts, invitations and business expenses, including their limits and channels of information?	
P10C1I1	Does the entity have a specific action with respect to this principle that was carried out this year? If affirmative, describe it	Areas: Social / Society / Training & raising awareness
P10C2I1	State the percentage of the total, broken down by each stakeholder, that has been notified of the codes of conduct and policies to fight corruption and bribery at the entity	
P10C4I1	Are all donations to charities and sponsorships transparent and done in accordance with pertinent laws?	
P10C6I1	State if the entity has mechanisms in place to manage anti-corruption incidents	SO4 and Areas: Social / Society / Evaluation & monitoring
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