



United Nations Global Compact **Communication on Progress 2009**

Grupo
pp Promon



Message from the Chief Executive Officer



Promon, which completes 50 years in 2010, is proud to have contributed to the development of Brazil and to have built its own history around the idea that it is possible to do business ethically and produce results consistently without neglecting the human dimension, which represents the essence of its existence as an organisation.

Participating in the Global Compact, which also commemorates an important milestone in 2010, its tenth anniversary, is a way of reaffirming publicly that our commitment to socio-environmental sustainability can and must go beyond the indispensable adoption of policies and practices aligned with the principles of corporate social responsibility.

We therefore hope dissemination of Promon's progress report contributes significantly to the spread of such policies and practices by encouraging other organisations to include sustainability among the fundamental elements of their culture and strategies.

A handwritten signature in blue ink, appearing to read 'Luiz Ernesto Gemignani'.

Luiz Ernesto Gemignani
CEO



Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights.

Commitment

Ethics are at the core of everything Promon does. In striving to harmonise the interests of its staff, clients, suppliers and other stakeholders, and prioritising respect for the human being in every relationship, Promon recognises its role as an agent of social development.

System: Organisational Culture

Action Ethical Guidelines

Performance

The “Campos do Jordão Charter” was drafted in 1970 by a group of leaders who reassembled in 2000 to update the document’s language and adapt it to contemporary circumstances. The result is expressed in the document “Vision, Mission & Values”.

A book entitled *Corpo & Alma* (“Body & Soul”) was published in 2009 and distributed to all staff and service providers, as well as some major clients, suppliers and partners, to share the history and culture of the Promon Group. The chapter “Our Conduct” describes Promon’s ethical position in its relationships with key stakeholders, especially clients, partners and staff, as well as society and the environment, shareholders, the public sphere and competitors.



System: Organisational

Action Ownership Structure

Performance

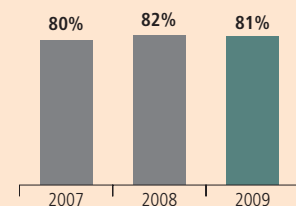
Promon’s employees are its sole shareholders. Equity ownership is open to all staff without exception on a voluntary basis. This ownership model enables Promon’s professionals to participate actively in corporate governance, including elections for senior executive positions by secret ballot. Members of the Board of Directors and Executive Committee are held every three years and independently audited.

All profit from operations is used for the benefit of employees, as follows:

- profit sharing (semiannual) for all staff, whether or not they are shareholders
- dividends paid to shareholders, all of whom are Promon employees
- reinvestment in the business, which in turn is reflected in the share price

Indicators

Proportion of workforce who own stock in the company

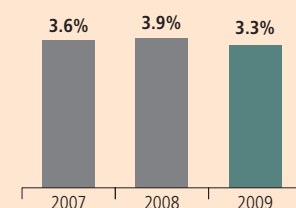


Source: Financial Management / Promon



One of the winners of the quality award *Prêmio Nacional da Qualidade* – 2007

Percentage of training man/hours conducted in the Workers Health and Safety in Operations vs. working man/hours



Source: Quality Management / Promon

System: People

Action Occupational Health & Safety

Performance

Promon’s occupational health, safety and environmental management systems are certified against OHSAS 18001 and ISO 14001. Actions to prevent accidents and comply with legal and regulatory requirements assure the provision of a safe and healthy working environment while minimising occupational accidents and disease.

Guidance for visitors and suppliers – Visitors to Promon’s offices are given leaflets with basic information on emergency action, emergency telephone numbers, escape routes, and information on recycling of materials. Worksite visitors and suppliers receive guidance and explanatory material on basic precautions to be taken while at the worksite.

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System: People

Action
Occupational Health & Safety

Performance

Office environment and worksite induction training – Information on Promon's Health, Safety & Environment Policy, its HSE Management System, workplace conditions and climate, risks inherent in the job, emergency telephone numbers, escape routes, and key work procedures and instructions is supplied to all office and worksite staff.

Worksite HSE toolbox talks – Talks held before work begins, led by site foreman or supervisor, to discuss risks and prevention for activities to be performed that day.

HSE kick-off meetings with subcontractors – Meetings led by the head of HSE to explain Promon's HSE guidelines, corporate policy, goals and targets, as well as targets for the activity in question.

Emergency drills – Evacuation drills, basic firefighting, procedures to respond to alarms resulting from a gas leak or chemical spill etc., assuring that all staff know what to do in an emergency or contingency.

Specific training – Provided whenever need is detected by surveys or required by non-compliance, accidents or emergency situations.

Safety campaigns – Organised by the company's accident prevention committees, for education and training on ergonomics, AIDS, STDs, stress, use of fire extinguishers, and safe behaviour.

Action
Quality -of-Life Programme

Performance

Open House – Annual event for employees' families to visit the company on a specific day and take part in specially planned activities.

Flextime – Introduced by Promon in 1973, flexible working hours allow staff to choose times to clock on and off, subject to agreement with managers and within predetermined periods.

Pension fund – Introduced in 1976 and available to all staff.

Loans – Personal loans from Promon are available to all staff, in amounts corresponding to up to 12 months' pay. The company finances purchases of company shares by employees.

Layout – Offices and other workspaces are mainly open-plan, with common rooms and furniture designed to facilitate integration of staff.

Short vacation internship – School students aged 17-21 (including employees' family members) are admitted as interns during school vacations to develop behavioural skills, prepare for the selection process and familiarise themselves with the world of business.

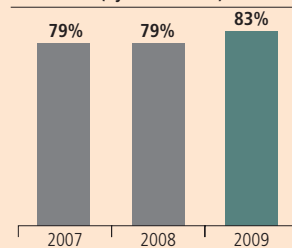
Happy Hour – Special quarterly event to enhance integration and communication, introduce new members of staff and celebrate birthdays that fall during the month.

Photos in Focus – Exhibition of photos taken by staff on topics of their choice or a set theme (regular show based on a suggestion by two employees).

Healthcare – First-class medical plan for all employees and for retirees who agree to pay the full contribution.

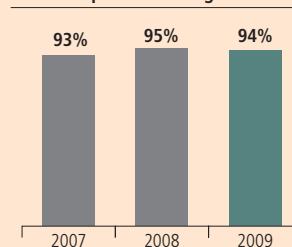
Indicators

The company encourages the balance of professional and personal lives of their employees ("yes" answers)



Source: "Melhores Empresas para Trabalhar", Época magazine and Great Place to Work Institute, 2009

Positive evaluation of the Open House Program



Source: "Pesquisa de Práticas", 2009 (Workplace Climate Survey)



Recognized in all editions of *Guia Exame Você S/A* as one of the best places to work in Brazil. Elected "Company of the Decade in 2006".

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System: People

Action
Quality-of-Life Programme

Performance

Voluntary check-up – On reaching certain ages, employees who have worked at Promon for more than a year can choose to have a general health check-up and receive medical advice based on the results (the company bears the cost of this programme).

Preventive tests – All employees have an opportunity to undergo preventive tests during Safety Week, including blood pressure, eyesight, eye pressure, early diabetes detection and cholesterol.

Gymnastics – Physical exercises in the workplace to improve fitness and physical performance, concentration, and posture.

Quick massage – Physical therapy in the workplace, focusing on body energy balance and muscle relaxation.

Fitness centre – Promon has a fully equipped fitness centre occupying about 100 square metres in the penthouse of its office complex.

Sports tournaments – Ongoing activities, including soccer and volleyball, as well as seasonal activities, such as sports tournaments for staff and families.

Walking – PE specialists supervise walking exercise for staff and families, with relatively undemanding options to cater for all ages and physical conditions.

Staff personal profile survey – Social and cultural interests are regularly surveyed as a basis for recommendations to further employees' personal development.

Publication – Articles on health, quality of life and related topics are regularly published on the intranet.

Action
Hiring & Induction

Performance

Promon does not permit discrimination on grounds of age, gender, colour, race, creed or sexual preference in recruitment and selection.

Inclusion of Persons with Special Needs – The company's "Attitude to Include" Programme is designed to extend its inclusion culture by hiring PSN, providing assistance and raising staff awareness.

Adolescent Apprenticeships – Specific two-year programme to include and train young people aged 17-20. Technical supervision by CIEE (Centro de Integração Empresa-Escola). Oversight by Human Relations and Communication.



Action
Internal Communication

Performance

Corporate portal – Created in 2002 to enable staff to access all the necessary company information.

Promon Comunidade – Monthly newsletter with articles about Promon on topics such as people, business, social responsibility and internal projects.

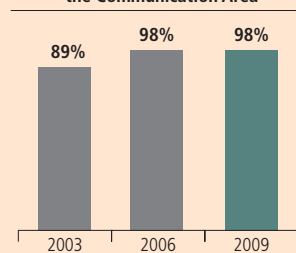
Specific meetings – Open to all staff to encourage discussion and dissemination of ideas and knowledge.

Regular forums – Lunchtime meetings known as Mastigando Idéias ("Chewing Ideas") held since 2000 to enable staff to swap experiences on subjects relevant to the company.

Blogs – Introduced on the intranet in 2007 to enhance communication and dissemination of content relating to matters of importance to the company. We currently have 16 blogs covering business, sustainability and the affairs of the Secretarial Development Committee.

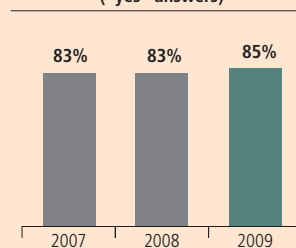
Indicators

Positive assessment of the Communication Area



Source: "Pesquisa de Práticas", 2009 (Workplace Climate Survey)

The company offers me training or other forms of development for my professional growth ("yes" answers)



Source: "Melhores Empresas para Trabalhar", Época magazine and Great Place to Work Institute, 2009

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System: People

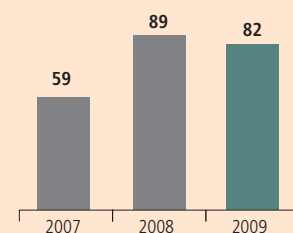
Action Internal Communication	Performance Roda Viva – Periodical meetings coordinated by HR and attended by CEO and senior executives. Open to all staff but limited to 20 people per meeting to assure effective and intense dialogue on topics of interest to participants. Chats with top management – Periodical meetings coordinated by HR and attended by CEO and senior executives, involving groups of ten employees with highly varied profiles, from new hires to outstanding performers. Opportunity for informal open-ended discussion of relevant topics, as well as knowledge sharing and integration.
	NEW
Action Pay	Performance Self-proposed salaries – Staff propose salary levels using a standard form with a justification for the parameters involved. After analysis and assessment by managers, including interaction with the individuals concerned, the results of the salary review are communicated to each professional.
Action Professional Development	Performance Promon does not permit discrimination on grounds of age, gender, colour, race, creed or sexual preference in its training processes.

System: Society & Environment

Action Engagement in Social Initiatives	Performance Signatory of National Compact to Eradicate Slave Labour in Brazil – Promon is a signatory of the Compact, based on a report by the International Labour Organisation (ILO), undertaking not to acquire goods whose production chain involves slave labour. Member of Movimento Todos Pela Educação – The “All for Education Movement” is an alliance of civil society, business, social organisations, educators and public administrators in education to guarantee basic schooling of high quality for all by 2022, when Brazil celebrates its independence bicentennial. Member of Movimento Nossa São Paulo: Outra Cidade – “Our São Paulo: Another City” is a movement comprising dozens of civil society organisations whose aim is to build a political, social and economic force through comprehensiveness, representativity, credibility, commitment and effectiveness that will engage society and successive governments with an agenda and a set of targets to offer a better quality of life to all inhabitants of the city. Member of Instituto Ethos de Empresas e Responsabilidade Social – Since 2000 (Instituto Ethos is a nonprofit whose mission is to promote CSR). Member of Instituto Akatu pelo Consumo Consciente – Since 2007 (Instituto Akatu is a nonprofit whose mission is to raise consumer consciousness of the value of sustainable goods and services). Member of Brazilian Global Compact Committee – The committee comprises 32 companies which voluntarily work with the Global Compact Network, provide guidance for signatories, and promote adoption of the Compact’s Principles by the management of companies operating in Brazil.
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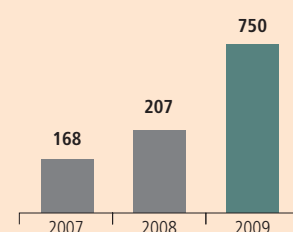
Indicators

Number of municipalities covered by Instituto Razão Social



Source: Instituto Razão Social

Number of educators benefiting from projects supported by Instituto Razão Social



Source: Instituto Razão Social

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System: Society & Environment

Action
Engagement in Social Initiatives

Performance

Member of Fundação Nacional da Qualidade – FNQ, the National Quality Foundation, is a non-governmental organisation created in 1991 to research and disseminate the fundamentals of management excellence, help enhance the competitiveness of Brazilian business and improve the quality of life for all Brazilians.

Member of GIFE (Group of Institutes, Foundations & Enterprises) – The first South American association of grantmakers and other private-sector organisations that fund or operate CSR projects (social, cultural and environmental). GIFE assists its members in developing efficient and effective CSR activities by supplying accurate information, offering training through workshops, courses and conferences with Brazilian and foreign experts, providing a space for the sharing of ideas and experiences, and stimulating SR partnerships between private enterprise, government and organised civil society.

Member of RioVoluntário – Rio de Janeiro-based NGO set up in 1997 to support volunteering. Currently works with some 500 groups, providing courses and consultancy, among other forms of assistance.



Action
Social Investment

Performance

Instituto Razão Social – The IRS is a nonprofit institution founded by Promon and other companies to help improve the quality of public education in Brazil. It is currently funded by Gerdau and Instituto Camargo Corrêa as well as Promon.

IRS initiatives

Programa Além das Letras – “Beyond Letters” is a programme that includes a set of prizes awarded to outstanding initiatives in literacy teaching all over Brazil. The winners are invited to join the first Virtual Network of Literacy Instructors, sharing experience and disseminating didactic content and teaching methods with the support of Instituto Avisa Lá.

Progestão – This programme trains school administrators to be leaders committed to the construction of a democratic management project focusing on the success of school students.



Ação Comunitária do Brasil – ACB is a nonprofit that since 1967 has run programmes in education, culture and citizenship to advance social inclusion for people in situations of social vulnerability. It currently focuses on capacity building and networking for community leaders, providing legal support for the creation of neighbourhood associations, and mobilising residents.

ACB initiatives

Projeto Eu, Tu, Nós – “I, You, We” aims to instal computer labs, set up internet networks and produce community newspapers in poor neighbourhoods.



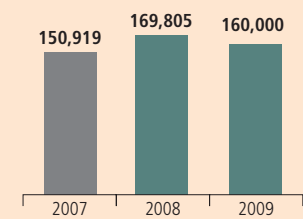
Projeto Crê-Ser – “Growing & Becoming” aims to help schools network with families and communities to protect children and defend their rights, while enabling them to experience high-quality education in such areas as reading and writing, visual and plastic arts, music, games, and developing study habits.

Projeto Som, Ritmo e Movimento – “Sound, Rhythm & Movement” runs cultural activities in music, dance and other performing arts, as well as sport and capoeira.



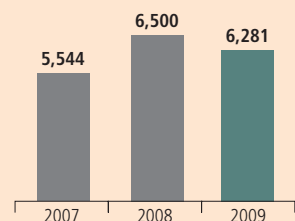
Indicators

Number of students benefiting from projects supported by Instituto Razão Social



Source: Instituto Razão Social

Number of people benefiting from projects supported by Ação Comunitária do Brasil



Source: Ação Comunitária do Brasil

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System: Society & Environment

Action
Social Investment

Performance

SORRI-Brasil – Nonprofit that promotes the rehabilitation, education, training and inclusion of people with disabilities, as well as combating prejudice and raising social awareness of the issue.

SORRI-Brasil initiatives

Contando História – Convivendo com as Crianças com Deficiência – “Storytelling and Living with Children with Disabilities” is a project designed to make teachers and children in São Paulo’s nursery schools aware of issues relating to children with disabilities via games and art.

Casa do Zezinho – NGO assisting children and young people in one of São Paulo City’s poorest and most dangerous areas. Currently assists 1,200 at-risk individuals aged between 6 and 21. Founded in 1994 to use education as a means of forming conscious and autonomous citizens.

Casa do Zezinho initiatives

Programa Arte na Periferia – “Art on the Outskirts” provides art workshops and recreation at weekends for poor children as well as running income generation projects.

Educação de Jovens para o Século XXI – “21st Century Education for Young People” provides courses in reading and writing, arithmetic, English, Spanish and computer skills for adolescents aged 14-18 to promote social inclusion, equality of opportunity and citizenship.



Associação Junior Achievement – Junior Achievement is an organisation dedicated to educating children about work readiness, entrepreneurship and financial literacy through experiential, hands-on programmes while they are still at school. Its main goal is to stimulate personal development, help them build a clear vision of the world of business, and facilitate access to the labour market.

JA initiatives

Programa Introdução ao Mundo dos Negócios – “Introduction to the World of Business” provides practical information for children and adolescents to develop awareness and knowledge of the way business is done in a free-market society.

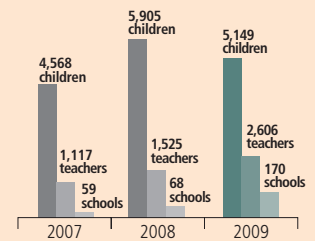
Programa Nosso Mundo – “Our World” is an educational programme that aims to teach children about the basics of world trade through play and simulated marketing projects.

Programa Nossos Recursos – “Our Resources” teaches children and adolescents about entrepreneurship while conserving human, natural and financial capital.

Programa Economia Pessoal – “Personal Economics” is an educational programme designed to teach children and adolescents about budgeting, managing personal and family finance, and investing and spending wisely, as well as the pros and cons of credit.

Indicators

Number of people benefiting from projects supported by SORRI-Brasil



Source: SORRI-Brasil



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System: Society & Environment

Action
Voluntary Service Programme

Performance

Promon encourages employees to engage in volunteering and social responsibility activities. These are considered part of the company's responsibility to the nation and aim to assure maximum social returns on the resources used and the time spent by the employees concerned. The Promon Voluntary Service Programme, which was restructured in 2009, now focuses on three areas: education, work readiness, and infrastructure for NGOs working with children in the vicinity of the company's offices.

Entity benefited

Programa Social Gotas de Flor com Amor

Founded in 1992 to provide educational and recreational activities for at-risk children and families in poor areas in the south of São Paulo City, including courses in music, drama, dance, choral singing, sexual and reproductive health, Spanish, English, computing, arts and crafts, and administrative skills.

Activities

Introduction to the World of Business – Partnership with Associação Junior Achievement. Volunteers present concepts and basic principles of business management through games and other fun activities in five one-hour classes on one day each week. The idea is to help students develop awareness while acquiring skills and practical knowledge of business in a free-market society.

Our World – Also a partnership with Associação Junior Achievement, is an educational programme comprising five one-hour classes delivered by volunteers on one day each week to teach children about the basics, benefits and complexities of world trade. Activities include games and the development of a small international marketing project.

Work Readiness – Adolescents and young adults aged 16-21 visit Promon's offices for presentations by volunteers, group dynamics, testimonials and technical visits to different departments, receiving information on employability, personal and professional development, and the Promon selection process, including mock interviews.

Management Support – Support with fund raising to enhance the entity's economic sustainability, and intermediation of computer equipment donations.

Entity benefited

Casa do Zezinho

Casa do Zezinho is an NGO that assists children and young people in one of São Paulo City's poorest and most dangerous areas. It currently assists 1,200 at-risk individuals aged between 6 and 21. It was founded in 1994 to use education as a means of forming conscious and autonomous citizens.

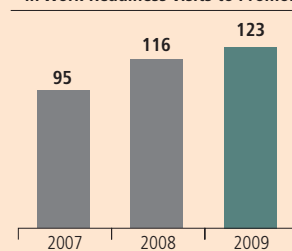
Activities

Help with school work – Volunteers help children and adolescents with school work in mathematics, physics, chemistry and Portuguese.



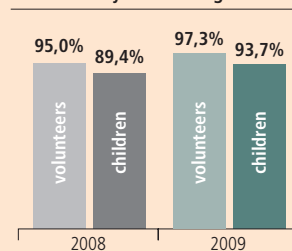
Indicators

Number of young participants in Work Readiness visits to Promon



Source: Human Resources Management / Promon

Percentage of positive responses (excellent) of the volunteers and children participating in Voluntary Service Programme



Source: Human Resources Management / Promon

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System: Society & Environment

Action
**Voluntary
Service
Programme**

Performance

Entity benefited

Ação Comunitária do Brasil

ACB is a nonprofit that since 1967 has run programmes in education, culture and citizenship to advance social inclusion for people in situations of social vulnerability. It currently focuses on capacity building and networking for community leaders, providing legal support for the creation of neighbourhood associations, and mobilising residents.

Activities

Work Readiness – Adolescents and young adults aged 16-21 visit Promon's offices for presentations by volunteers, group dynamics, testimonials and technical visits to different departments, receiving information on employability, personal and professional development, and the Promon selection process, including mock interviews.

Entity benefited

CCA Lar Escola Recanto Cristão

Supplementary education for at-risk children and adolescents, plus meals, arts and crafts, sport, and computer labs.

Activities

Help with school work – Volunteers help children and adolescents with school work in reading, writing and arithmetic.

Introduction to computing – Volunteers teach children and adolescents basic computer basic skills (Word, Excel, PowerPoint, internet).

Infrastructure – Diagnostics, analysis, review of alternatives and refurbishment of computer lab, plus acquisition of equipment for internet access and maintenance of existing equipment.

Entity benefited

CCA Santa Teresa de Jesus

Founded in 1988 to improve the quality of life for children and adolescents through education, providing help with school work and courses in arts and crafts, music and computing, as well as recreation.

Activities

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Our World – Also a partnership with Associação Junior Achievement. Course comprising five one-hour classes delivered by volunteers on one day each week to teach children about the basics, benefits and complexities of world trade. Activities include games and the development of a small international marketing project.

Help with school work – Volunteers help children and adolescents with school work in reading, writing and arithmetic.

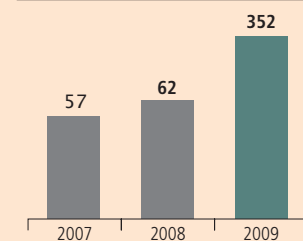
Introduction to computing – Volunteers teach children and adolescents basic computer basic skills (Word, Excel, PowerPoint, internet).

Infrastructure – Diagnostics, analysis, review of alternatives and refurbishment of computer lab, plus acquisition of equipment for internet access and maintenance of existing equipment.



Indicators

Number of employee volunteers



Source: Human Resources Management / Promon

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System: Society & Environment

Action
Voluntary Service Programme

Performance

Entity benefited

Creche Santa Teresa de Jesus

Daycare center for 120 children aged 1-3, providing educational and recreational activities.

Activities

Infrastructure – Diagnostics, analysis and review of technical alternatives for refurbishment of play space.

Entity benefited

Círculo de Amigos do Menino Patrulheiro de Vila Isabel (Camp – Vila Isabel)

Founded in 1985 to provide vocational education for adolescents aged 14-18. Operating at the Rio de Janeiro offices of the Brazilian Red Cross, this NGO provides courses in reading, writing and arithmetic, work readiness, computing and personal hygiene, among other subjects. Courses are free of charge and held every morning. Some 80 adolescents graduate from the clerical course each year.

Activities

Introduction to the World of Business – Partnership with Associação Junior Achievement. Volunteers present concepts and basic principles of business management through games and other fun activities in five one-hour classes on one day each week. The idea is to help students develop awareness while acquiring skills and practical knowledge of business.

Personal Economics – Course designed in partnership with Associação Junior Achievement to teach adolescents in ten one-hour classes on one day each week about budgeting, managing personal and family finance, and investing and spending wisely, as well as the pros and cons of credit.

Work Readiness – Adolescents and young adults aged 16-21 visit Promon's offices for presentations by volunteers, group dynamics, testimonials and technical visits to different departments, receiving information on employability, personal and professional development, and the Promon selection process, including mock interviews.

Entity benefited

Associação Ser Cidadão

Vocational education for adolescents and young adults aged 16-20 from poor communities. Formally set up four years ago, the association has a 20-year history grounded in the activities developed by Educação de Trabalho (Education for Work).

All courses have two modules: a basic youth protagonism module, comprising art education, music, reading, drama, environment and citizenship; and a specialised module. The association also works with students' families.

Activities

Personal Economics – Course designed in partnership with Associação Junior Achievement to teach adolescents in ten one-hour classes on one day each week about budgeting, managing personal and family finance, and investing and spending wisely, as well as the pros and cons of credit.

Work Readiness – Adolescents and young adults aged 16-21 visit Promon's offices for presentations by volunteers, group dynamics, testimonials and technical visits to different departments, receiving information on employability, personal and professional development, and the Promon selection process, including mock interviews.

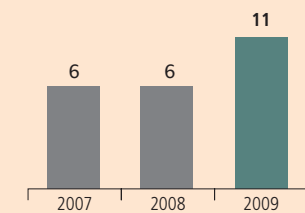
Management Support – Volunteers assist the entity in management and strategic planning.

Book Donation Campaign – Volunteers collect book donations for a library.



Indicators

Number of entities benefited by Voluntary Service Programme



Source: Human Resources Management / Promon

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System: Society & Environment

Action
Voluntary Service Programme

Performance

Entity benefited

Asylo João Evangelista

Founded in 1927 thanks to an endowment by Adelaide Augusta Câmara, a spiritist. Provides educational activities for girls.

Activities

Help with school work – Volunteers help children and adolescents with school work in reading, writing and arithmetic.



System: Partners & Suppliers

Action
CSR Clause in Supplier Contract

Performance

Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures.

Action
Assessments for Supplier Qualification & Monitoring

Performance

Supplier selection and performance assessment based on documents that prove the legality of their activities in the marketplace.

Action
Initiative to Share Values & Principles

Performance

Promon Integra 2009 – Periodic event bringing together key suppliers to share ethical principles and develop Promon's network of suppliers, especially in joint activities relating to labour law commitments.



Action
Technical Inspection to Verify Best Practice in Social & Environmental Responsibility

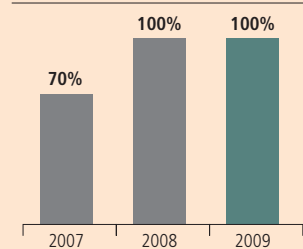
Performance

Promon staff visit suppliers for inspection of social and environmental practices.



Indicators

Inclusion of sustainability requirements in supplier contracts



Source: Procurement Department / Promon

Principle 2
Businesses should make sure they are not complicit in human rights abuses.

Commitment
Promon is committed to ensuring that all business units of the organisation avoid complicity in human rights abuses.

System: People

Action Hiring & Induction

Performance
Promon does not permit discrimination on grounds of age, gender, colour, race, creed or sexual preference in recruitment and selection.

Inclusion of Persons with Special Needs – The company's "Attitude to Include" Programme is designed to extend its inclusion culture by hiring PSN, providing assistance and raising staff awareness.

Adolescent Apprenticeships – Specific two-year programme to include and train young people aged 17-20. Technical supervision by CIEE (Centro de Integração Empresa-Escola). Oversight by Human Relations and Communication.



Action Professional Development

Performance
Promon does not permit discrimination on grounds of age, gender, colour, race, creed or sexual preference in its training processes.

System: Society & Environment

Action IBASE CSR Report

Performance
Statistical survey of workforce by gender, age (over 45), hierarchical level and ethnicity for publication in CSR report according to standard developed by IBASE (Instituto Brasileiro de Análises Sociais e Econômicas), a nonprofit founded in 1981 to build democracy by fighting inequalities and stimulating citizens' participation through research, surveys, advocacy and solidarity campaigning.

System: Partners & Suppliers

Action CSR Clause in Supplier Contract

Performance
Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of SA8000 compliance.

Action Assessments for Supplier Qualification & Monitoring

Performance
Supplier selection and performance assessment based on documents that prove the legality of their activities in the marketplace.

Action Technical Inspection to Verify Best Practice in Social & Environmental Responsibility

Performance
Promon staff visit suppliers for inspection of social and environmental practices.



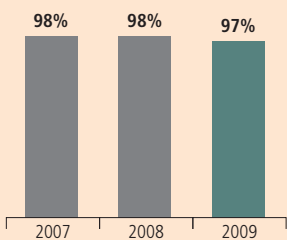
Action Initiative to Share Values & Principles

Performance
Promon Integra 2009 – Periodic event bringing together key suppliers to share ethical principles and develop Promon's network of suppliers, especially in joint activities relating to labour law commitments.



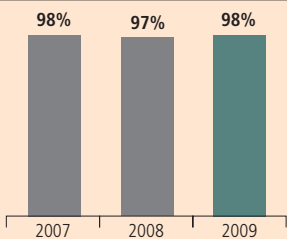
Indicators

Proportion completely agreeing that "people here are treated well regardless of colour or ethnicity"



Source: "Melhores Empresas para se Trabalhar", Época magazine and Great Place to Work Institute, 2009

Proportion completely agreeing that "people here are treated well regardless of gender"



Source: "Melhores Empresas para se Trabalhar", Época magazine and Great Place to Work Institute, 2009

Principle 3
Businesses should uphold freedom of association and effective recognition of the right to collective bargaining.

Commitment

Promon respects the right of employees to join the associations of their choice, values other forms of voluntary association by its staff, and encourages suppliers to do the same.

System: Organisation

Action	Performance
Ownership Structure	<p>Promon's employees are its sole shareholders. Equity ownership is open to all staff without exception on a voluntary basis. This ownership model enables Promon's professionals to participate actively in corporate governance, including elections for senior executive positions by secret ballot. Members of the Board of Directors and Executive Committee are held every three years and independently audited.</p> <p>All profit from operations is used for the benefit of employees, as follows:</p> <ul style="list-style-type: none"> ▪ profit sharing (semiannual) for all staff, whether or not they are shareholders ▪ dividends paid to shareholders, all of whom are Promon employees ▪ reinvestment in the business, which in turn is reflected in the share price

System: People

Action	Performance
Freedom of Association	<p>Promon respects the right of employees to join professional associations and trade unions and engage in collective bargaining, thus respecting the freedom of association and other collective rights enshrined in Brazilian law.</p>
Action	Performance
Pay	<p>Self-proposed salaries – Staff propose salary levels using a standard form with a justification for the parameters involved. After analysis and assessment by managers, including interaction with the individuals concerned, the results of the salary review are communicated to each professional.</p>

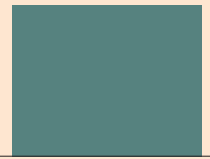
System: Partners & Suppliers

Action	Performance
CSR Clause in Supplier Contract	<p>Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of SA8000 compliance.</p>
Action	Performance
Assessments for Supplier Qualification & Monitoring	<p>Supplier selection and performance assessment based on documents that prove the legality of their activities in the marketplace.</p>
Action	Performance
Technical Inspection to Verify Best Practice in Social & Environmental Responsibility	<p>Promon staff visit suppliers for inspection of social and environmental practices.</p>
Action	Performance
Initiative to Share Values & Principles	<p>Promon Integra 2009 – Periodic event bringing together key suppliers to share ethical principles and develop Promon's network of suppliers, especially in joint activities relating to labour law commitments.</p>

Indicators

Freedom of association

100% of Promon's employees are represented by trade unions and/or professional associations



Source: Human Resources Management / Promon

Principle 4 Businesses should uphold the elimination of all forms of forced and compulsory labour.



Commitment

Promon will not tolerate worker exploitation under any circumstances and has no business or contractual relations with organisations that use any form of forced or compulsory labour.

System: Society & Environment

Action	Performance
Engagement in Social Initiatives	Signatory of National Compact to Eradicate Slave Labour in Brazil – Promon is a signatory of the Compact, based on a report by the International Labour Organisation (ILO), undertaking not to tolerate slave labour in the production chain.

System: Partners & Suppliers

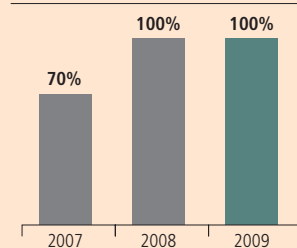
Action	Performance
CSR Clause in Supplier Contract	All contracts signed by suppliers of goods and services include a clause repudiating and prohibiting the use of any form of forced labour or child labour throughout the supply chain.
Documents Required	Supplier selection based on documents that prove the legality of their activities in the marketplace.
Inclusion in supplier selection and assessment policies of specific criteria assuring the elimination of all forms of forced or compulsory labour	Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of SA8000 compliance.
Assessments for Supplier Qualification & Monitoring	Supplier selection and performance assessment based on documents that prove the legality of their activities in the marketplace.
Technical Inspection to Verify Best Practice in Social & Environmental Responsibility	Promon staff visit suppliers for inspection of social and environmental practices. 
Initiative to Share Values & Principles	Promon Integra 2009 – Periodic event bringing together key suppliers to share ethical principles and develop Promon's network of suppliers, especially in joint activities relating to labour law commitments. 

Indicators

Number of violations of ban on forced labour imputed to Promon by Ministry of Labour inspectors

0	0	0
2007	2008	2009
Source: Human Resources Management / Promon		

Inclusion of sustainability requirements in supplier contracts



Source: Procurement Department / Promon

Principle 5
Businesses should uphold the effective abolition of child labour.

Commitment

Promon will not tolerate under any circumstances the exploitation of children and young people under legal working age, and has no business or contractual relations with organisations that use child labour in any form.



System: People

Action
Hiring & Induction

Performance

Adolescent Apprenticeships – Specific two-year programme to include and train young people aged 17-20. Technical supervision by CIEE (Centro de Integração Empresa-Escola). Oversight by Human Relations and Communication.



System: Society & Environment

Action
Engagement in Social Initiatives

Performance

Signatory of National Compact to Eradicate Slave Labour in Brazil – Promon is a signatory of the Compact, based on a report by the International Labour Organisation (ILO), undertaking not to tolerate slave labour in the production chain.

Member of Movimento Todos Pela Educação –

The “All for Education Movement” is an alliance of civil society, business, social organisations, educators and public administrators in education to guarantee basic schooling of high quality for all by 2022. It has five major aims: all children aged 4-17 to attend school; all children to be fully literate by the age of 8; all children to attain a level of learning appropriate for their grade; all children to complete secondary schooling by the age of 19; rising, well-managed and rising investment in education.

Funding member of Fundação Abrinq pelos

Direitos da Criança e do Adolescente – The Abrinq Foundation was set up in 1990 to defend the rights and citizenship of children and adolescents.

Action
Voluntary Service Programme

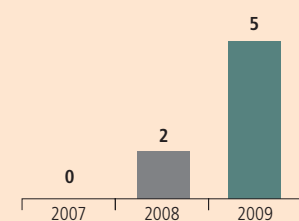
Performance

Adolescents and young adults aged 16-21 from Ação Comunitária do Brasil and Programa Social Gotas de Flor com Amor visit Promon’s offices for presentations by volunteers, group dynamics, testimonials and technical visits to different departments, receiving information on employability, personal and professional development, and the Promon selection process, including mock interviews.



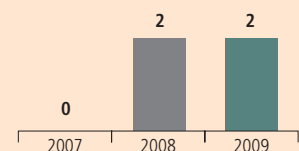
Indicators

Number of under-age apprentices



Source: Human Resources Management / Promon

Number of under-age apprentices hired at end of apprenticeship



Source: Human Resources Management / Promon

Principle 5
Businesses should uphold the effective abolition of child labour.

Commitment

Promon will not tolerate under any circumstances the exploitation of children and young people under legal working age, and has no business or contractual relations with organisations that use child labour in any form.



System: Partners & Suppliers

Action	Performance
CSR Clause in Supplier Contract	All contracts signed by suppliers of goods and services include a clause repudiating and prohibiting the use of any form of forced labour or child labour throughout the supply chain.
Action	Performance
Documents Required	Supplier selection based on documents that prove the legality of their activities in the marketplace.
Action	Performance
Inclusion in supplier selection and assessment policies of specific criteria assuring the elimination of all forms of forced or compulsory labour	Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of SA8000 compliance.
Action	Performance
Assessments for Supplier Qualification & Monitoring	Supplier selection and performance assessment based on documents that prove the legality of their activities in the marketplace.
Action	Performance
Technical Inspection to Verify Best Practice in Social & Environmental Responsibility	Promon staff visit suppliers for inspection of social and environmental practices.



Indicators

Number of violations of ban on child labour imputed to Promon by Ministry of Labour inspectors

0	0	0
2007	2008	2009
Source: Human Resources Management / Promon		

Principle 6
Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Commitment

Promon is committed to human relations policies geared to justice, transparency, impartiality and professionalism. No form of discrimination based on race, gender, social orientation, colour, religion, age, ethnic origin or any other factor is allowed in any business processes or in the workplace.

System: Organisation

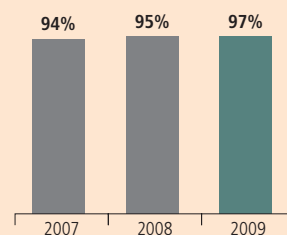
Action	Performance
Ownership Structure	<p>Promon's employees are its sole shareholders. Equity ownership is open to all staff without exception on a voluntary basis. This ownership model enables Promon's professionals to participate actively in corporate governance, including elections for senior executive positions by secret ballot. Members of the Board of Directors and Executive Committee are held every three years and independently audited.</p> <p>All profit from operations is used for the benefit of employees, as follows:</p> <ul style="list-style-type: none"> ▪ profit sharing (semiannual) for all staff, whether or not they are shareholders ▪ dividends paid to shareholders, all of whom are Promon employees ▪ reinvestment in the business, which in turn is reflected in the share price

System: People

Action	Performance
Hiring & Induction	<p>HR conducts the selection and accession process entirely in line with Promon's commitment to eliminate discrimination in the organisation. Candidates participate in all stages of the selection process regardless of job description or hierarchical level.</p> <p>Inclusion of Persons with Special Needs – The company's "Attitude to Include" Programme is designed to extend its inclusion culture by hiring PSN, providing assistance and raising staff awareness.</p>
Action	Performance
Pay	<p>The same benefits, including pay, medical care and retirement plans, are available to all professionals regardless of hierarchical level, function, gender, ethnicity, religion and age.</p>
Action	Performance
Professional Development, Education & Training	<p>Promotion strictly by merit, with no discrimination based on hierarchical level, function, gender, ethnicity, religion or age. The performance assessment system is the same for all staff regardless of hierarchical level, function, gender, ethnicity, religion or age. Professional development programmes are offered to all staff regardless of hierarchical level, function, gender, ethnicity, religion and age.</p>
Action	Performance
Separation	<p>Employees participate in all stages of the separation process regardless of job description or hierarchical level. HR assists employees with the production and dissemination of their CVs. Following separation, ex-employees may opt to continue paying for the pension plan provided they bear the full cost of the premium.</p>

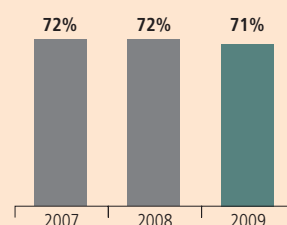
Indicators

Proportion rating top management honest and ethical in conducting the company's business



Source: "Melhores Empresas para Trabalhar", Época magazine and Great Place to Work Institute, 2009

All employees have the opportunity to receive special recognition ("yes" answers)



Source: "Melhores Empresas para Trabalhar", Época magazine and Great Place to Work Institute, 2009



Principle 6
Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Commitment

Promon is committed to human relations policies geared to justice, transparency, impartiality and professionalism. No form of discrimination based on race, gender, social orientation, colour, religion, age, ethnic origin or any other factor is allowed in any business processes or in the workplace.



System: Partners & Suppliers

Action	Performance
CSR Clause in Supplier Contract	All contracts signed by suppliers of goods and services include a clause repudiating and prohibiting all forms of discrimination in respect of employment and occupation.
Action	Performance
Documents Required	Supplier selection is based on documents that prove the legality of their activities in the marketplace.
Action	Performance
Inclusion in Supplier Selection & Assessment Policies of Specific Criteria Assuring the Elimination of Discrimination in Employment & Occupation	Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of SA8000 compliance.
Action	Performance
Assessments for Supplier Qualification & Monitoring	Supplier selection and performance assessment are based on documents that prove the legality of their activities in the marketplace.
Action	Performance
Technical Inspection to Verify Best Practice in Social & Environmental Responsibility	Promon staff visit suppliers for inspection of social and environmental practices. 
Action	Performance
Initiative to Share Values & Principles	Promon Integra 2009 – Periodic event bringing together key suppliers to share ethical principles and develop Promon’s network of suppliers, especially in joint activities relating to labour law commitments. 

Indicators

Number of violations reported by use of forced labour in the production chain

0	0	0
2007	2008	2009

Source: Ethos indicators for Social Responsibility, 2009

Principle 7
Businesses should support a precautionary approach to environmental challenges.

Commitment

Promon acts to protect the environment wherever it does business. It uses natural resources rationally, preferring recyclable materials wherever possible and taking other steps to mitigate pollution of the air, water and soil as well as noise and visual pollution.



System: Society & Environment

Action
HSE Management System

Performance
 Promon is certified against ISO 14001, the most widely recognised international standard for environmental management. The key component of its HSE Management System is the identification and preventive treatment of potential causes of damage to the environment, society or property, in full compliance with ISO 14001.

Action
Environmental Engineering Discipline

Performance
 Promon includes environmental engineering among the various disciplines it uses to develop solutions, aiming to guarantee compliance with environmental law and develop a technical approach to identify the best environmental solutions for its projects and clients.



Action
Environmental Working Groups

Performance
 In 2009 Promon Engenharia created working groups comprising professionals from various technical areas of engineering. They are coordinated by the environmental engineering discipline and their remit is to procure and disseminate available technologies that minimise the environmental impact of the company's projects. The results are procedures and a checklist of environmental items to be implemented during the project planning stage:

- Use of solar power for shower water heating
- Environmental feasibility of the use of dry-type power transformers instead of conventional oil-immersed transformers
- Reuse of grey water for floor washing



Action
Socio-Environmental Awareness Raising

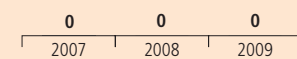
Performance
 Programmes to conserve or substitute non-renewable resources and maximise the use of renewable resources, both in management of the organisation's facilities and in the supply of products and services to clients and at worksites. Recycling of paper, plastic cups and fluorescent bulbs, use of recycled paper, collection and proper disposal of batteries used in offices, office furniture made of certified wood and reduction of electricity and water consumption are some of the preventive measures taken to address environmental challenges.

Action
Environmental Aspects & Impacts

Performance
 Environmental aspect and impact registers for project implementation and operation are used to identify and deploy intelligent solutions with superior environmental performance in plant construction and operation.

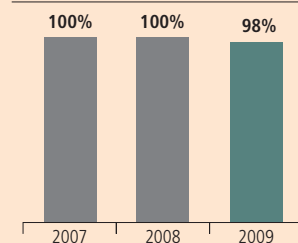
Indicators

Number of notices of environmental violations



Source: Quality Department / Promon

Consumption of recycled paper as percentage of total paper consumption (by São Paulo and Rio de Janeiro offices)



Source: Administration Department / Promon

Principle 8
Businesses should undertake initiatives to promote greater environmental responsibility.

Commitment
Promon promotes environmental responsibility in its regular operations and through environmental education and conscientious consumption programmes.



System: Society & Environment

Action Materials Recycling

Performance

Recycling of paper, fluorescent bulbs and plastic cups, use of recycled paper, collection and proper disposal of batteries used in Promon's offices.

Action Reduction of Resource Consumption

Performance

Continuous programme to reduce office consumption of water and electricity. Worksite waste, residue and effluent are properly collected, stored and disposed of in accordance with guidelines and specific procedures for each project. Engineering develops design solutions to reduce consumption of raw materials in plant construction and operation. Worksite design includes programmes to mitigate environmental impacts by reducing air pollution and water consumption, as well as promoting reuse of materials.

All engineering designs, blueprints and other technical documents are now digital. This economises paper, printing, plotting and copying. Other items that indirectly entail resource consumption (e.g. filing cabinets, stamps, correcting fluid, cardboard boxes etc.) have been reduced or eliminated. This economy of paper and other materials also reduces consumption of power, water and trees.



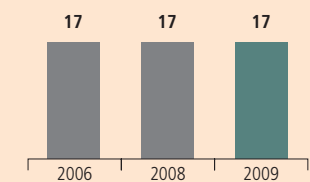
Action Socio- Environmental Awareness Raising

Performance

HSE toolbox talks lasting at most 15 minutes daily are held at every worksite for Promon and contractor personnel. All new employees take an induction course that includes specific lectures on environmental management. Alongside awareness-raising events, including lectures and worksite campaigns, the annual calendar of internal events includes a meeting of the entire staff to discuss environmental and other issues with senior management, regular forums called Mastigando Idéias ("Chewing Ideas"), and engineering meetings coordinated by HR and Administration.

Indicators

Water consumption (litres per day per person)



Source: Administration
Department / Promon

Principle 9
Businesses should encourage the development and diffusion of environmentally friendly technologies.

Commitment

Promon is committed to developing and adopting sustainable technologies as an intrinsic part of its business.



System: Society & Environment

<p>Action</p> <p>Design of New Sustainable Technologies</p>	<p>Performance</p> <p>Duque de Caxias Refinery (Reduc) – Promon designed a solution to close the refinery's cooling system using ultrafiltration for water treatment. Ultrafiltration offers many advantages over conventional treatment, including production of raw water of satisfactory quality without using chemicals.</p>
<p>Action</p> <p>Procedure to Identify & Treat Environmental Aspects & Impacts</p>	<p>Performance</p> <p>Henrique Lage Refinery (Revap) – Promon designed a diesel hydrotreater unit (DHTU) to increase diesel production from various different types of crude oil while reducing sulphur content, as well as a hydrogen generation unit (HGU) and an acid water rectification unit. During the design process Promon also researched and implemented solutions with an environmental performance better than that originally called for both in the finished plant and in provisional facilities.</p> <p>Alberto Pasqualini Refinery (Refap) – Promon designed a naphtha hydrodesulphuriser, a diethanolamine (DEA) unit and a wastewater unit.</p> <p>Presidente Getúlio Vargas Refinery (Repar) – Promon is designing Repar's new unit for retarded coking, a thermal cracking process used in oil refineries to convert vacuum residue, decanted oil and other residues of distillation into lighter, higher value added products that pollute less, as well as producing coke.</p> <p>Capuava Refinery (Recap) – This refinery is installing diesel and gasoline hydrotreatment units to comply with new quality specifications by converting sulphur into hydrogen sulfide (H₂S), which will be extracted as a residual gas stream. H₂S will be removed before the gas is released into the atmosphere. Petrobras chose the modified Claus process for removal of H₂S, in addition to an amine unit for treatment of residual gas. The volume of sulphur removed from the fuels is expected to average 13 metric tonnes per day, equivalent to 26 tpd of sulphur dioxide (SO₂) in emissions. The amine unit will also treat gas from the existing sulphur recovery unit, which emits about 1 tpd of SO₂. As a result, emissions of SO₂ will fall to 0.3 tpd even with the new sulphur unit. In sum, SO₂ emissions will be cut by 26 tpd once the hydrotreatment and sulphur recovery units (including the amine unit) are in operation.</p>
<p>Action</p> <p>Design Involving New Energy Sources</p>	<p>Performance</p> <p>For COSAN, Brazil's leading sugar and ethanol producer, Promon designed a plant to produce ethanol from sugarcane and generate electricity for consumption and sale of surplus power to the grid. The design called for the use of proven technologies such as diffuser extraction, treatment of juice using a clarifier with low retention time, heat regeneration, juice evaporation to generate process steam and reduce steam consumption, batch fermentation, yeast recovery by centrifugation, and distillation by direct heating with steam generation.</p>



System: Business Portfolio

<p>Action</p> <p>Offer and use products and services involving the concept of sustainable information and communications technology</p>	<p>Performance</p> <p>Telepresence, videoconferencing and collaboration tools: solutions that increase the capacity for interaction via virtual meetings, reducing the need for travel and hence the volume of greenhouse gas emissions.</p> <p>Server and network virtualisation: virtualisation enhances data centre productivity and energy efficiency, thereby reducing greenhouse gas emissions.</p>
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Indicators



Recognized as one of the 20 model companies in corporate sustainability by Guia Exame de Sustentabilidade

Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery.

Commitment

Promon does not tolerate corruption in any shape or form. All business processes include instruments that explicitly prohibit professionals from accepting or encouraging inducements or favours of any kind.

System: Organisation

Action	Performance
Guidelines & Practices	Guidelines for business conduct and accountability to shareholders. Guidelines for auditing.
Action	Performance
Guidelines & Practices	<p><i>Corpo & Alma</i> ("Body & Soul") was published in 2009 to share the company's history and culture. Distributed to all staff and service providers, as well as major clients, suppliers and partners, the book sets out to translate at least partly the motivations for engagement and the results of the dedication of all those who have contributed to the company's development.</p> <p>The chapter "Our Conduct" describes Promon's ethical worldview, which prioritises mutual respect, protection of the environment, transparency and excellence in all activities and relations with stakeholders. This chapter of the book seeks to present the positions developed by Promon during its entire history.</p>

NEW

System: People

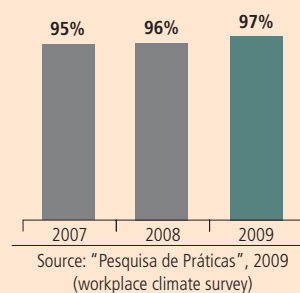
Action	Performance
Guidelines & Practices	<p>Conduct in respect of hiring, timekeeping, worktime accounts, holidays, pay and benefits, employee mobility, use of the healthcare plan, compliance with safety standards, occupational health and environmental protection.</p> <p>Guidelines on access control, shipping, reimbursement, security, handling of internal and external documents and pouches, use of telephones, vehicles, and buying, selling, donating, transfer and safekeeping of property.</p> <p>Policies for use of hardware and software, internet use, email and telephony.</p> <p>Conduct in handling information relating to business management, clients and other stakeholders.</p> <p>Secrecy, transparency in relationships, commitment to technical solutions, and integrity in complying with all contractual and legal requirements.</p> <p>Clarity and objectivity in complying with technical and commercial requirements.</p> <p>Guidelines on relationships with internal and external stakeholders, visual identity, and publicity material.</p>

System: Society & Environment

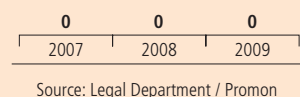
Action	Performance
Engagement in Social Initiatives	<p>Signature of Business Compact For Integrity & Against Corruption in Brazil – The anti-corruption compact (2006) comprises a set of guidelines and procedures governing relations between government and business organisations or other types of signatory.</p>
Action	Performance
Guidelines & Practices	<p>Commitment to environmental and social improvements and transparency in informing the public about social and environmental impacts.</p>

Indicators

Perception of ethics (respondents rated Promon an ethical company)



Number of violations reported to weights and measures, public health surveillance, consumer defence authorities, government, NGOs etc. (irregularities in processes, services or products)



Principle 10
Businesses should work against corruption in all its forms, including extortion and bribery.

Commitment

Promon does not tolerate corruption in any shape or form. All business processes include instruments that explicitly prohibit professionals from accepting or encouraging inducements or favours of any kind.



System: Clients

Action	Performance
Guidelines & Practices	Ethics, secrecy, and compliance with technical and commercial requirements. Guidelines on understanding and meeting legal requirements relating to contracts with clients. Compliance with contractual requirements in payment process.

System: Partners & Suppliers

Action	Performance
Guidelines & Practices	Ethical principles in supplier relations. Guidelines on managing contracts with partners.
Action	Performance
Assessments for Supplier Qualification & Monitoring	Supplier selection and performance assessment are based on documents that prove the legality of their activities in the marketplace.
Action	Performance
Initiative to Share Values & Principles	Promon Integra 2009 – Periodic event bringing together key suppliers to share ethical principles and develop Promon’s network of suppliers, especially in joint activities relating to labour law commitments.



Indicators

Number of unfair trading complaints to antitrust and competition defence authority (CADE)

0	0	0
2007	2008	2009
Source: Legal Department / Promon		

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