Statements

Confidential

FIDUCIAL OFFICE SOLUTIONS has 5 fundamental commitments to its customers:

- Offer a product and service range that is continuously updated in order to meet our customers' expectations,
- Give priority to proximity with our customers in order to better understand and satisfy their needs.
- Ensure an efficient and personalized logistic service, in accordance with our customers' expectations,
- Continuously improve our efficiency and productivity in order to be more competitive,
- Take responsibility with regards to Sustainable Development.

Company values, both collective and individual, include:

- Customers' satisfaction,
- Profitable growth,
- Respect and promotion of our collaborators.
 This value has always been part of the DECLARATION AND STATEMENT OF MANAGEMENT, part of our quality management system.

A diagnosis was run in 2007 by an independent expert (on the basis of the AFNOR SD 21000 standard) in order to get recommendations to adapt the management system with Sustainable Development objectives.

After the audit was done, a SWOT grid was used to cover 34 subjects defined by the SD 21000 standard, mandatory in the major areas of environmental organization:

- Governance and managerial practices
- Sustainable Development and economic performance
- Sustainable Development and corporate social responsibility
- Sustainable Development and environmental responsibility
- Sustainable Development and cross-cutting approach

This work resulted in the launch of an operational "excellence" workshop dedicated to Sustainable Development.

FIDUCIAL OFFICE SOLUTIONS joins and is committed to enforce and make progress on its environment, according to the **10 principles of the UN Global Compact**, Human Rights, labour standards, environment, and fight against corruption (Declaration signed in 2008).

Our business model is organized by process, with an **annual roadmap** follow-up regarding Sustainable Development. This enables FIDUCIAL OFFICE SOLUTIONS to continuously improvement its management of the environment, based on the 10 principles of the UN Global Compact.

Many subjects mentioned in this COP are already covered in our **financial annual report**.

We will strengthen this exhaustive communication on our actions within this COP to strengthen even more our commitment to the UN Global Compact.

Gérard MARTIN General Manager

Our objectives for 2010 objectives are included in the attached **Self-assessment Board**.

Description of concrete actions

(Commitments, policies, systems, and activities, including created partnerships to implement the Global Compact principles)

Human Rights Labor Standards

<u>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights</u>

<u>Principle 4: the elimination of all forms of forced and compulsory labour</u>

Principle 5: the effective abolition of child labour

FIDUCIAL OFFICE SOLUTIONS ensure its suppliers sign a code of ethics. It is in based on the principles of ethics, morality, professionalism, transparency and responsibility, shared by all partners, in the form of a **Charter**.

For instance, ordered products must comply in all aspects with laws and regulations, particularly with regards to:

- Quality, contents, presentation and labeling of the products,
- Employment and labor law: in any case, suppliers will not sell products which could have been produced by under-aged children,
- The provisions of International Conventions on the Child's Rights, and more particularly, those related to child labor,
- Environmental law.

Our suppliers must approve this code of ethics.

97% of our suppliers signed this code of ethics. They therefore committed to the 3 pillars of Sustainable Development (environmental / social / economics).

FIDUCIAL OFFICE SOLUTIONS has been working with Achats Concept Eco in order to qualify the green products it is distributing. Our product catalog was analyzed through the following items:

- Environmental and social characteristics
- Evaluation of the Sustainable Development policy
- Labels

FIDUCIAL group has many sports partnerships and organizes some patronages:

- FIDUCIAL is sponsoring EM Lyon Foundation (European Business school) in two projects: "Entrepreneurship for the world" and "Global Master France USA China entrepreneurship". These projects are promoting entrepreneurial values and social responsibility.
- Since 1999, FIDUCIAL is sponsoring CLIMSO, which is a solar astronomical instrument based on the Observatoire du Pic du Midi. It is used by the Observateurs Associés.
- FIDUCIAL OFFICE SOLUTIONS takes part in social and collective actions:
 - o Products donations (end of life) to charities
 - o FIDUCIAL OFFICE SOLUTIONS is regularly working with protected workshops.
 - o Sponsoring of the Bourgoin rugby team and participation in an associative project for recovering lost products from its logistical preparation Center.

Principle 2: make sure that they are not complicit in Human Rights abuses

FIDUCIAL OFFICE SOLUTIONS is regularly conducting assessments of its suppliers' performance in terms of quality of service and compliance with established processes and commitments.

Asian suppliers are audited by the Purchasing Direction on the **fight for fundamental Human Rights**.

FIDUCIAL OFFICE SOLUTIONS is also auditing suppliers. Our auditors take into account social and environmental sites, and most specifically:

- Labor law and employment: ban suppliers who would sale products made by children
- The provisions of international conventions, and in particular those relating to child labor

FIDUCIAL OFFICE SOLUTIONS is committed to constantly increase its ethical and environmentally product offer. For example, we increased the share of FSC/PEFC certified distributors' products and the share of products having the Rainforest Alliance label.

FIDUCIAL OFFICE SOLUTIONS' printing-house SACIPRINT is FSC certified. SACIPRINT ensures respect of forest ecosystems and local populations and allow them to develop a sustainable economic resource.

Some of our 'green' facility management products have the Rainforest Alliance label. These products meet **social** and environmental **standards**, and they are on the way to a genuine sustainability (forests, rivers, soil, fauna and flora are protected, and **workers are treated** with respect, get a decent wage, are properly fitted and have access to education and health care)

<u>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining</u>

The Company values include as a principle, respect and promotion of all employees, from a collective and individual perspective.

The work environment, in which F.O.S staff is working, contributes to social and personal individual development. The company has **staff restaurants** and **parking lots reserved for its staff**. The company allows **customization of offices** and invests in the furniture and the equipment necessary for the comfort of its employees (wrists rests, air-conditioning etc).

Development and maintenance of premises was undertaken in 2008 and 2009 to help staff comfort (for an amount of 120 000 €).

A "Committee of health, safety and working conditions" is the dedicated group to any question related to hygiene, health and safety at work.

The company promotes **working time arrangements** (part-time...) so that any employee may combine their professional and private lives.

F.O.S organizes **regional and national integration seminars**, to develop a sense of belonging to the Group and among employees. The company puts a strong emphasis on

training and promotes the **individual right to training** so that employees are proactive on their wishes of promotion and evolution.

FOS gives great importance to communication. This communication should be done transparently. Every employee has a yearly appointment with his manager.

The company newsletter «Infos» is sent regularly to all employees, informing them about the results, the on-going projects and their contributors, the new employees joining the company.

The company is constantly adapting its organization to fit its business.

The **Management Committee makes decisions about organization changes.** These decisions are then presented to the Staff representative bodies. The minutes of the meeting with the Staff representative bodies are displayed on communication boards throughout the company.

In this context, the role of each manager with his team is crucial in informing the staff of internal organization changes.

<u>Principle 6: the elimination of discrimination in respect of employment and occupation</u>

FOS has a strong culture based on values, which are both collective and individual. These values include, beyond others, respect for and promotion of all employees.

FIDUCIAL OFFICE SOLUTIONS is committed to employing disabled workers.

The company is completely discharged of its obligations following the labour code and articles L 5212. Please note that it is hard for the company to know whether some workers have a disability.

Therefore, FIDUCIAL OFFICE SOLUTIONS is assuming its duty through the employment of disabled workers (1.4% of its staff). It is paying a **financial contribution** to the Association for management of the funds for the vocational integration of disabled people with (Agefiph).

FIDUCIAL OFFICE SOLUTIONS makes sure that all employees are equally treated (employment, wage, career plan and training progress). The recruitment process makes no distinction of sex, age, nor disability.

In terms of staff, at the end of December 2008, FIDUCIAL OFFICE SOLUTIONS was employing **423 women and 365 men**.

At the end of June 2009, **14% of FIDUCIAL OFFICE SOLUTIONS' employees were over 50**. Please note that the company is currently working on a plan for senior employees (recruitment and retention in employment).

FIDUCIAL OFFICE SOLUTIONS is granting specific training to all employees to:

- Enable the acquisition of new skills
- Maintain alignment of their skills with the evolution of employment,
- Promote the acquisition of new skills, complementary to those required for their current position in order to get a promotion.

As a distributor, FIDUCIAL OFFICE SOLUTIONS is putting the client at the heart of its concerns. Specific trainings to develop customer relationship are organized as well as trainings to get the **necessary knowledge about products and services** offered by FOS.

Anti-Corruption

<u>Principle 10: Businesses should work against all forms of corruption, including extortion and bribery</u>

FIDUCIAL OFFICE SOLUTIONS is preventing all kind of corruption, whether direct or indirect. The principle of integrity is based on a commitment to respect the core values of integrity, transparency and responsibility. The company makes sure to create and maintain a culture of trust which does not tolerate corruption.

The company has implemented reliable procedures to eliminate any risk of corruption (for example, every order captured by a Commercial Assistant is made via a secure information system. If the order exceeds a certain amount, a validation by the hierarchy is required). The management has a monitoring role in the implementation of measures and staff missions and gives a feedback to its hierarchy of any observed malfunctioning. FIDUCIAL has an internal audit department that performs audits of FIDUCIAL OFFICE SOLUTIONS' structure to control the application of good practice and prevent bribery. A legal audit is also carried out.

FOS encourages dialogue with all **representative instances staff**, that are the first "warning" and warn about any problem related to illegal practices in business.

Environment

<u>Principle 7: Businesses should support a precautionary approach to environmental challenges</u>

We integrate many different and varied elements in the environmental pillar of our approach to Sustainable Development.

Aware of the issues in this area, we have implemented a **Global Progress Plan**, which is translated into concrete actions:

- Carbon assessment to **measure the quantity of GHG** (greenhouse gas) emissions performed in 2008
- Equipment of our delivery vans with particle filters and Start & stop systems
- Adequacy with the **EURO V standard** for our delivery vans
- Use of 100% recycled paper for the printing of our media, envelopes 100% recyclable and biodegradable bags used for packing orders
- Compliance with the REACH directive: signature by our suppliers of an attestation and a commitment, and indirect controls from third-party external auditing of our organization quality certified ISO 9001, on regulatory aspects (examples: guidelines REACH and WEEE, RoHS Regulation).
- **FSC/PEFC Certification** for SACIPRINT (printing-house)

We also ensure that all our economic actions contribute to Sustainable Development:

- Regionalization of our paper stock (limiting GHG)
- Administrative dematerialization (internet and purchasing card orders)
- Consolidation of orders and limitation of small orders

FOS performed a **carbon assessment** ® according to the method developed by the Agency for environment and energy management (ADEME) in France. The objective is to determine greenhouse gas emissions caused by direct and indirect activity of FOS, associated to a progress plan to reduce gas emissions.

Our progress plan to reduce GHG emissions was implemented in 2008:

Logistics:

> Transportation:

- Advanced regional platforms where paper is stocked (route from our logistics centre: economy of an average 200 km)
- o Semi-trailers have a 70% to 90% filling rate at our logistics center
- o Complete renewal of delivery vans with the European EURO IV standard
- Delivery planning optimization standards
- o Adaptation of vehicles based on the activity volume (20, 13, 12 and 10 m³)

Packaging:

- Wrapping paper, envelopes and bags for picking orders are either made from recycled paper, 100% recyclable or biodegradable
- Remove shrink film setting intra-package (substantial savings of plastic tonnage) and deleting using any type of setting
- o Use of envelopes for small orders (economy of 125 000 boxes per year)
- Use of 4 different box sizes, in order to optimize truck loads, reducing the number of deliveries
- o Reduce our packaging weight by 40% using an equal quality cardboard
- Sort industrial waste and cardboard in our logistics centre and valorize the cardboard volume by specialized companies

Back office recycling:

- ➤ Back office employees sort paper & cardboards
- Incentives of personnel employed by public transit (financial assistance to the regional transport costs)

New action implemented in 2009 (examples):

Economy program linked to the direct and indirect costs due to product returns: complaints and requests for customer service management optimization

FIDUCIAL OFFICE SOLUTIONS and Sustainable Development:

- ISO 9001 certification, version 2000 (for all sites), since 2004
- Our printing-house SACIPRINT:
 - FSC/PEFC certification, since 2009:
 - IMPRIM' VERT certification, since 2004 (treatment of polluting industrial wastes)

<u>Principle 8: undertake initiatives to promote greater environmental</u> responsibility

FIDUCIAL OFFICE SOLUTIONS performs **audits of suppliers** performed by its staff, who checks the environmental aspects of their sites and the fundamental aspects of our Charter: The supplier agrees to comply with the law n°2001-420 of May 15, 2001 on new economic regulations including (so-called 'NRE' Act) and its related Decree n°2002-221 20 th February

2002. Upon FIDUCIAL OFFICE SOLUTIONS' request, suppliers may be requested to communicate on the consequences of their activity on the environment.

The first audit includes examination of the following items:

- Consumption of water, raw materials and energy resources, and the measures taken to improve energy efficiency and the use of renewable energy, land use, air, water and soil releases, auditory or olfactory pollution and waste;
- Measures taken to limit breaches to the biological balance in natural environment, to protected animals and plant species;
- Evaluation or **certification** steps taken for the environment;
- Measures taken to ensure the company's activity compliance with **applicable legislative** and **regulatory obligations**;
- Expenses paid to prevent the consequences of the company's activity on the environment; the existence of internal training on environmental management and information on the employees devoted to **reducing risks**;
- Pollution breaches measures taken to ensure compliance of the company's activity with applicable legislative and regulatory obligations;
- Reserves and warranties for environmental risks and amount of penalties paid in the year pursuant to a court decision to compensate environmental damages.

Quality and Sustainable Development represent **30% of the suppliers' rating**, each criterion being calculated with a coefficient. Audited areas related to Sustainable Development are the ones with the highest ratios.

Audited areas related to Sustainable Development are the following:

- Labels and product standards: coefficient 3
- Sustainable Development program: coefficient 2
- Selective sorting and waste collection: coefficient 2
- Finally criteria of general recognition:
 - o ISO 9001 environmental certification: coefficient 1
 - o Membership in the Global Compact : coefficient 1

Other actions:

- Consideration of the control flow in the housing master plan:
 For the energy consumption: real estate has implemented follow-up ratio of energy consumption for major sites and determine a patrimonial maintenance plan based on the sites' effective consumption.

 The FIDUCIAL Group is considering installing photovoltaic panels on the roofs of the buildings to be renovated. This possibility is also considered for our printing-house SACIPRINT.
- Insulation improvements: on the new buildings but also while renovating insulation, glazing actions are regularly made to **decrease energy consumption**.

FIDUCIAL's real estate department has cut down the electric consumption in the offices, dividing the needed voltage by a coefficient ranging between 3 and 4 from the former Charter types.

<u>Principle 9: encourage the development and diffusion of environmentally friendly technologies</u>

FIDUCIAL OFFICE SOLUTIONS is committed to constantly increase respect of the environmental, by increasing the share of branded products and generic products offer, certified or recognized by environmental labels ("green" product catalog).

Implementation of an **eco-design** for green products by product family:

1. Paper:

- 84% of our products are Blue Angel labeled (European eco-Label European). The Blue Angel label provides warranties on the use of recycled paper and on non-use of certain substances in the production process. This label is monitored by independent agencies and the German public authorities.

This European eco-label ensures that at all stages of the product lifecycle, energy consumption, gas emissions, effluents, origin of filters, forest management, use of chemicals, waste management are monitored.

- 63% of our products are FSC and PEFC certified.

The PEFC certification guaranties that used wood come from sustainably managed forests.

The FSC certification ensures respect of forests' ecosystems and enables local populations to develop a sustainable economic resource.

The APUR brand guarantees the percentage of recycled paper fiber used for the manufacture of the product.

Examples in our product range:

- EVERCOPY: APUR label (100% recycled) and Blue Angel label;
- EVOLVE: 100% recycled and FSC certification.

2. Classification, dispatch, labeling and envelopes:

Recognitions in application in these green products and markings are: Blue Angel, NF environment and FSC/PEFC certification (79% of Etiquetages family green products are certified FSC, and 52% of green products family shaped are under label NF environment) The label NF environment ensures that the product meets environmental criteria, based on an analysis of the product life cycle. This is an independent label assigned and monitored by independent (Afnor) and Government agencies.

3. Printing materials:

Our main suppliers guarantee:

- An ISO 9001 certification of their manufacturing sites
- The collection and recycling of used cartridges

Manufacturers' commitments exist on all environmental issues (see example of ink cartridges below):

- Reduction of waste (remanufactured cartridges, environmental NF certification on a selection of laser cartridges, 100% recycled cardboard packaging...)
- Own production (30% and 10% on the manufacturing sites, Nordik Swan certification electricity and waste reduction objectives)
- Proximity services to collect the used cartridges
- Guarantee a 100% recycling:
 - o Dismantling, products valuation in specialized courses
 - o No landfill
 - Ban of implementation in landfills
 - o No export
 - No production waste incineration

4. Writing instruments:

Our providers offer a wide range of pens which main characteristics are related to Sustainable Development:

- Refillable pens (up to 64% of our product range)
- 100% recycled according to the ISO 14021 standard, in major segments of writing and iso-technology hardware
- ISO 14001 certified production sites.

5. Facility management:

These "green" products have one of the following labels:

- European eco-label (for 14% of these "green" products)
- NF environmental label
- Rainforest Alliance certification.

FIDUCIAL OFFICE SOLUTIONS is collecting used ink cartridges.

Our strengths:

- Used ink cartridges collection in specified boxes our customers can order with their office furniture
- Collection of the boxes containing the used ink cartridges by our drivers almost everywhere in France and in Belgium
- A perfectly ecological recycling process through our NEW LIFE program membership:
 - o Sorting of ink cartridges
 - Upgrade of re-usable cartridges (0% of waste at the end of treatment) and 100% recovery (spare parts are being re-used and re-use of remaining materials)
 - A 100% environmentally friendly process (0% for incineration and 0% landfill processing mode)
 - o A process generating industrial employment
- A total traceability of materials ensured even in small quantities: discount can be a full mass balance of each batch
- Ecological packaging (recycled cardboard and vegetable ink printing)

Self assessment board

(commitments, policies, systems, and activities, including partnerships created, to implement the Global Compact principles)

Focus	Indicators	Global Compact	Our goals	Our performance in	2011 and future
		equivalent		2009/2010	targets
Global activities	% of suppliers who signed our Charter	All	99%	97%	98%
	% of suppliers who are ISO 14001 certified	Environment Principle 7 Principle 8 Principle 9	35%	23%	30%
	Decrease of Carbon Assessment	_	20% (since 2007)	15%	20%
	Order Carbon Assessment (kg equ. CO ₂)	Principle 7	15	20	15
Logistics	Adequacy with the European EURO V standard	Principle 9	100%	70%	90%
	Advanced regional platforms paper stocks	Principle 8	Total sold paper	Nearly complete	Organization checkout
Management/ Organization	Women/men parity		to be maintained	48% S2% Men 48%	
	Employability of employees over 50 years old	Labor standards Principle 6	to be improved	> 50 years old: 14%	
	% of products certified or having environmental labels	Labor standards Principle 4 & 5	50%	40%	45%
Purchases	% of products with environmental labels among green products	Environment Principle 9	50%	32%	40%