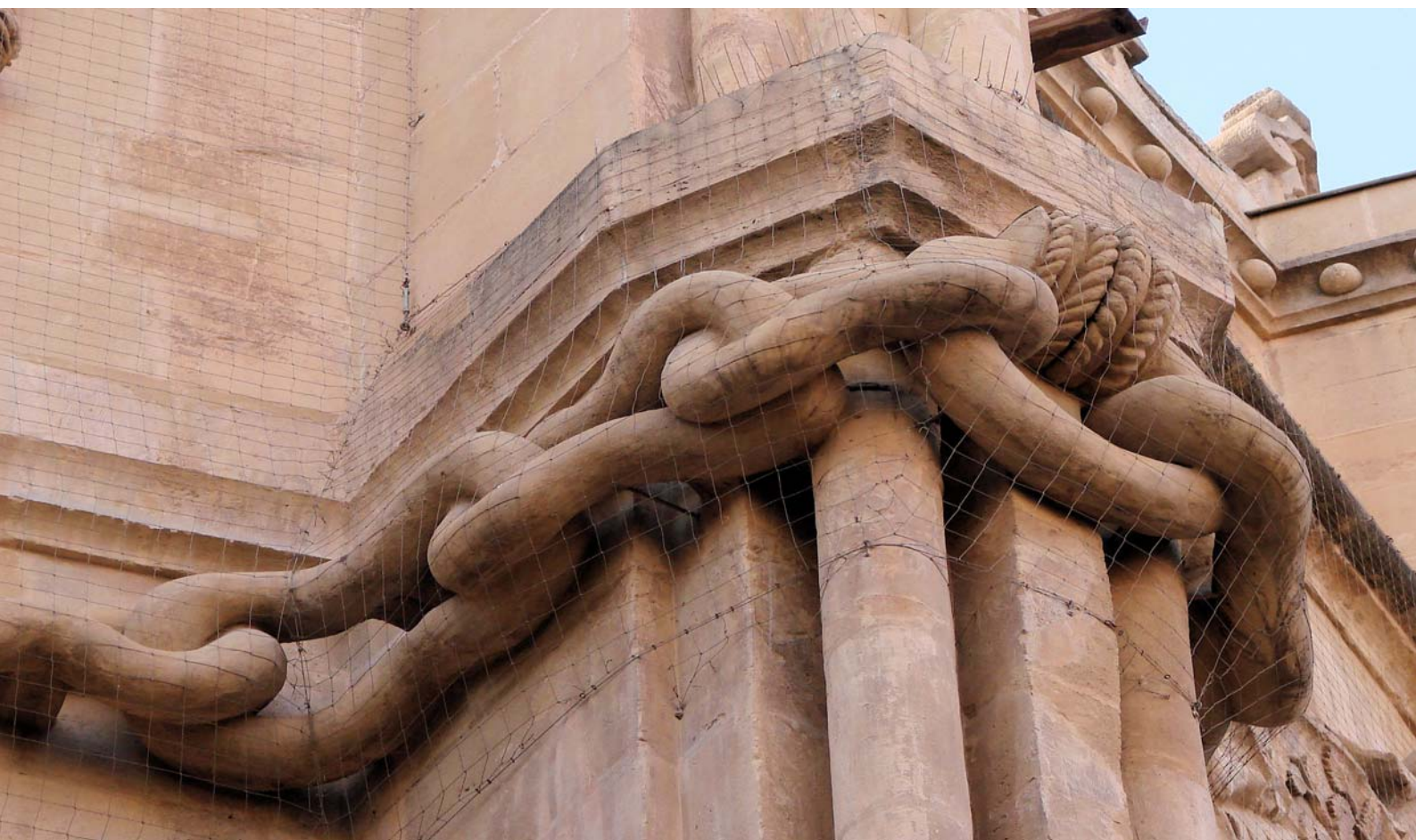


Global Compact Annual Communication on Progress 2009.





List of content

| | Page no. |
|-------------------------------------------------------------|-----------|
| Methodology | 03 |
| 1. Letter of the Managing Director | 04 |
| 2. Introduction. Description of business | 05 |
| 3. Policy: Mission, vision and values of the company | 06 |
| 4. United Nations Global Compact principles | |
| • Human Rights | |
| ○ Principle 1 | 11 |
| ○ Principle 2 | 20 |
| • Labour | |
| ○ Principle 3 | 27 |
| ○ Principle 4 | 35 |
| ○ Principle 5 | 41 |
| ○ Principle 6 | 45 |
| • Environment | |
| ○ Principle 7 | 52 |
| ○ Principle 8 | 56 |
| ○ Principle 9 | 62 |
| • Anti-corruption | |
| ○ Principle 10 | 68 |



METHODOLOGY

Diagnosis

It is necessary know the present situation in order to know what needs has the entity. The indicators of diagnosis allow us to identify what policies, actions and follow-up is done by every Principle.

Policy

They come gathered by means of qualitative indicators that define the frame of action in which there are structured the actions and the mechanisms of control and follow-up of the entity.

Actions

They are implemented to fulfil the policies. They come described by means of qualitative and quantitative indications. Input: It is necessary an input to know what type of actions should be implemented. Dispensing these inputs useless or unnecessary actions could be implemented.

Follow-up and Impact measurement

Evaluation and control of the results obtained of the implemented actions. It comes reflected in the qualitative raised indicators. Output: Necessary to announce the results to be able to receive again ideas on possible necessary improvements.



Letter from the management

To whom it may concern:

In this second Progress Report in Vicinay Cadenas reaffirms, on the tenth anniversary of the Global Compact our commitment to Principles which it promotes, at the same time communicating with total transparency our degree of progress in its implementation.

We have learned various, important lessons among which we highlight two: first the value of this commitment and the awareness of the growing need for real social responsibility that it creates and the second being the sensitivity of our customers who value, in their decisions, our commitment to the Global Compact.

We publish this document satisfied with the progress made, and the determination to continue advancing in those areas where we must improve, because by supporting, promoting and disseminating initiatives such as those required by the Ten Principles is something that, consistent with the sustainability which we strive for within our organization, should be part of the strategy and approach of a responsible business.

Signed:

Luis Cañada

Managing Director of Vicinay Cadenas

2010/10/01



The company

Introduction. Description of business

Vicinay Cadenas is a family owned company whose activity traces back to the mid eighteenth century and has grown into a modern organization.

On March 11, 1929 the company “Sons of Vicinay, Limited Partnership” was registered.

On January 2, 1986, Vicinay Cadenas, S.A. is founded.

We form part of the Vicinay Marine structure through which we share our business project.

What we do? We think, design, manufacture and give high-tech solutions and high added value mooring lines for the anchoring of floating systems in the Offshore Industry.

Web address: www.vicinaycadenas.com

Managing Director: Luís Cañada

Commitment Date: 31/07/2007

Industrial Sector: Metals & Mining

Interested parties: Customers, Employees, Shareholders, Investors, Suppliers, Local communities, Society, Government and Public Administrations, Environment, Mass Media and Unions.

Countries in which it is present: Vicinay Cadenas is present in Spain with two factories: Deusto and Galdames

Progress Report spreading inside the company: The progress report is shared through a work team sorted for a strategic project called Pegasus in which it is focused and managed the Social Responsibility together with the other organization implicated processes.

Submission date: 2010-10-27

Responsible: Tomás López

Report category: A



Philosophy

Policy

In the activity of design, manufacture and supply of products and services for the mooring of floating installations, Vicinay Cadenas' management undertakes:

- A special attention to the people integrated in this business project, permanently seeking to assure their safety, maintaining health and personal achievement on equal level.
- The achievement of clients' satisfaction and the highest economic viability of the company by means of responsibility and performance of the requirements requested by those who trust in our abilities and adapting to the coexistence.
- Generate an atmosphere of creativity aimed at the improvement of our productive activity as well as the materialization of all the solutions that the market could ask for.
- The social responsibility based on the integrity of its people and actions as an organization that focuses its efforts on the sustainability of its environment, improving everyday to become a reference amply recognized by its management.

Vicinay Cadenas complements and develops this policy communicating its Mission, Vision and Values in different documents that provide and enrich the culture and sensitivity of the Organization.



Philosophy

Mission

VCSA, in its vocation for being a world-reference, bases its Company Project on the following principles:

- In the conception, design, manufacture and supply of products and services with High Added Value, with innovation, health and safety, quality and environmental responsibility, adapted to the client and oriented mainly to the offshore industry.
- Developing its activity as a socially responsible “Glocal” Organization, based on the ability and “emotalent” of its people.
- Striving for competitiveness and benefit in order to benefit in turn its people, its shareholders, to the company itself, society at large and to the planet.
- Reliance on its Allies, Clients, Suppliers, Centres of Learning and the rest of identified interested parties.
- A worldwide projection from a local base in Bizkaia

Vision 2015

VCSA builds for the future:

- With the expectation and hope that our Company will be a meeting place for people and a place where people feel fulfilled through the achievement of our company's objectives.
- Relying on a Human Team that knows how to take advantage of diversity and make the most of uncertainty in a dynamic world.
- With the hope of be recognized as one of the best companies in the world because of its results in all our fields of endeavour.



Values of the company

| | | |
|-------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Philosophy | Respect | Treat other people the way we would like to be treated. |
| | Service | Respect the needs of the other stakeholders as I would like others to respect my needs, in accordance with the Mission, Values and Objectives of the Organization |
| | Share | Consider the Company Project as my own, sharing successes, failures, emotions and talent |
| | Safety | The right and personal responsibility to work in such a way as to avoid hurting other people and damaging infrastructure and the environment |
| | Innovation | Commitment to apply “emotalento” (the combination of emotion and talent) to find new ways of doing things and giving added value to our people and Organization and accepting the risk of failure |



Values of the company

| | | |
|------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Philosophy | Given word | Recognize the value of the “Word” as a personal commitment |
| | Learning | Excitement and effort needed to keep our knowledge constantly up to date and to apply it to our Company Project. |
| | Membership | Pride to be in and with VCSA |
| | Responsibility | Active and continuous commitment with the Company, the society it which it is integrated, our spheres of interest and the planet on which we live |
| | Benefit | Contribute to the sustainability of the company, through obtaining benefits, in order to guarantee the employability of our personnel and the satisfaction of our shareholders and stakeholders |

Human Rights





Principle 1

**Businesses should support and
respect the protection of
internationally proclaimed human
rights**



Human Rights

Principle 1

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

Diagnosis

Which are its risks as for Human rights? Of what way has them? Indicate the risks in the cabin of key word and indicate the aims to reduce them in the cabin of aims.

Implantation

Vicinay Cadenas, S.A. (VCSA) supports the protection of Human Rights in everything related to its own activity, and the groups of interest that have previously been identified.

Target

For this reason VCSA improves its processes and technologies in a permanent search for the resources and conditions necessary for a healthy and safe performance, which are also respectful with the Environment, based on the commitment and the creativity of everybody who collaborates in the project.

Heath and Safety Management is a strategic aim for the company. It extends to the groups of interest in the measure in which it can exercise influence, and always aligned with social responsibility

HSE scores 2009

- Frequency rate: 103.88
- Severity rate: 1.37
- Incidence: 138.27
- Penalties and fines = 0
- Neighbour's complains = 0
- Environmental impacts = 0
- Hazardous waste generated = <10.000 kg



Human Rights

Principle 1

Policy

Has the entity defined clearly and in written its policy, its values and procedures?

Response: Yes

Implantation

VCSA reviewed in 2009 its integrated policy, complementing the above mentioned document with an updated definition of the Mission, Vision and Values of the organization. These documents have been circulated and explained among the groups of interest.

Target

The implication of all the entities that collaborate with VCSA is required as this is considered the right strategy in order to achieve management improvement so VCSA becomes a reference for another enterprises.

This is why VCSA has stressed that all the people in the company take part in its design.

Providing at least to 80% of the suppliers the above mentioned documents.

Editing a diptych with these texts for delivery to customers and suppliers. Furthermore, these new reviews will be included in the Improvement Report Book and in the Sustainability Report 2009 (both edited and delivered in the year 2010).

Actions

Describe the actions carried out, in relation to this Principle, during the previous year indicating the Group of interest which they are related to.



Human Rights

Principle 1

Implantation

VCSA has evaluated the client perception in order to increase their satisfaction, and has developed actions to correct dissatisfaction using suggestions for improving. Despite the efforts made, the percentage of questionnaires been sent back has been lower than expected, probably because the current economic situation and the fact that there is a concentration of request in the same customers, which made less interesting to fill in and send back similar questionnaires.

As part of the reception plan, all the new employees receive some training that offers a global vision of the entity.

3.33 % of the total work time has been used for training, being 63% internal training and 37% external training

The financial resources destined for sponsorships, supporting NGO that guard over Human Rights (such as Amnesty International or Vicente Ferrer Foundation) have been increased

Scores 2009

Client Satisfaction 2009 = 4.14 on 5

Response to questionnaires = 60 % of relevant contracts

Suppliers not quality cost = 80 Euro/ton chain

Non-conformities of suppliers: Reduction 12 %

Training = 3.33 % of active time

Human mistake cost = 20.9 Euro/ton chain



Principle 1

Follow-up and Impact Measurement

Has the entity mechanisms of follow-up of its policy of Human Rights? Describe them?

Response: Yes

Implantation

VCSA has improved the preventive information pushed on to clients, subcontractors and visitors so they achieve a safe and healthy stay at VCSA plants. This has become extensive to shareholders and investors when they have visited us.

The above mentioned management of the health and safety conditions of all who collaborate with the managerial project or visit us (staff, subcontractors and visitors) is evaluated for its efficiency.

The funds destined to support social activities have increased in number and economic quantity (10%). VCSA collaborates with Charity Organizations, Choral Ensemble, Cultural Associations, Football and Rowing clubs Neighbour Association, focusing besides other activities related to youth and infancy.

In spite of the current situation, the stability has been promoted as far as employment is regarded, with 18 new indefinite contracts in 2009, being a total of 241 employees in VCSA.

The follow-up of the environmental management has been constant, and no significant incident happened in 2009.



Human Rights

Principle 1

Target

Monthly follow-up of the health and safety statistics with are articulated to the whole staff in the monthly meeting of Integrated Systems of Management

Monthly following-up of the indicators of penalty for legal breach. Permanent management of possible inconveniences to neighbours.

Periodic meetings with the Social Representatives to deal not only those subjects concerning to Health and Safety (Committee of Security) but also with those relative to the agreements among company and collaborators.

Annual Health and Safety improvement suggestions Award.

Edition of the of Sustainability Report 2009 (that is published in 2010)

Indicate the percentage of employees informed about the ethical policy by which the entity is ruled.

Response: 100 %

Implantation

The ethical principles formulated, commented and circulated by means of the documents called Integrated Policy, Mission, Vision and Values, have been discussed in detail in meetings attended by the whole staff, and in small group contact meetings of the Socrates and Symbiosis projects in which all the employees have taken part.

The above mentioned documents have been displayed in strategic points of the company, fully accessible to all the staff.

Furthermore, every year these Principles are given to all the employees because they are included as the preamble of the Improvement Report Book.



Implantation Summary Principle 1

| Principle 1 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|--------------|--------------------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Customers | A: Economic rights T: 100% product specification fulfilment | A: Policy, Mission and Values T: specifications fulfilment | A: Satisfaction and faithfulness T: 4.5 on 5 | A: Safety Zero accidents involving customer visitors |
| Employees | A: Unsafe working conditions T: Decent and steady work | A: Policy, Mission and Values T: Decrease accidental rates | A: Health and Safety T: 100% workers properly trained | A: Health and Safety T: Decrease accidental rates |
| Shareholders | A: Economic rights T: Profit | A: Policy, Mission and Values T: Safety and profit | A: Safety and economic viability T: Profit | A: Safety and economic viability Zero accidents involving shareholder visitors |
| Investors | A: Economic rights T: Profit | A: Policy, Mission and Values T: Safety and a better return of the investment | A: Safety and economic viability T: Profit | A: Safety and economic viability Zero accidents involving investor visitors |
| Suppliers | A: Economic rights T: Fulfil VCSA requirements | A: Policy, Mission and Values T: Company Management | A: Fulfil VCSA requirements T: Requirements and delivery endline | A: Safety Zero accidents involving subcontractors in VCSA plants |



Implantation Summary Principle 1

| Principle 1 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|--------------------------------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| NGO and Corporative Social Responsibility with the Community | A: Social responsibility T: Different sponsorships | A: Policy, Mission and Values T: Different sponsorships | A: Social responsibility T: Different sponsorships | A: Social responsibility T: Different sponsorships |
| Local communities | A: Respect to the environment and managerial social responsibility T: Neighbour's complains | A: Policy, Mission and Values. Respect to the environment and managerial social responsibility T: Neighbour's complains | A: Respect to the environment and managerial social responsibility T: Support the local associations | A: Respect to the environment and managerial social responsibility T: Neighbour's complains and support the local associations |
| Society | A: Create wealth and employment 241 employees | A: Policy, Mission and Values. Create wealth and employment 241 employees | A: Create wealth and employment 241 employees | A: Create wealth and employment 241 employees |
| Government and Public Administrations | A: Legal fulfilment T: Zero penalties | A: Policy, Mission and Values. Legal fulfilment T: Zero fines. Go beyond the legal fulfilment | A: Legal fulfilment T: Zero penalties | A: Legal fulfilment T: Zero penalties and fines |



Implantation Summary Principle 1

| Principle 1 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|---------------|--------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Environmental | A: Protect the environmental T: zero environmental impacts | A: Policy, Mission and Values. Protect the environment T: zero environmental impacts | A: Protect the environmental T: zero environmental impacts | A: Protect the environmental T: zero environmental impacts |
| Mass Media | A: Share information about activity T: Good practice information | A: Share information about VCSA T: Good practice information | A: Share the working experience T: Share good practice information | A: Share information about activity T: Edit Improvement Report Book and Sustainability Report |
| Unions | A: Agreement and social peace T: Economical and social agreement until 2010 | A: Policy, Mission and Values. Agreement and social peace T: Economical and social agreement until 2010 | A: Agreement and social peace T: Implication in attainment of targets | A: Agreement and social peace T: Economical and social agreement until 2010 |
| Knowledge Web | A: New safe and non contaminant products T: New product and solutions | A: New safe and non contaminant products T: New product and solutions | A: Develop new safe and non contaminant products T: New products | A: New developments T: New products |

A: Answer

T: Target



Principle 2

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



Human Rights

Principle 2

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

Diagnosis

Has the entity a classification of suppliers depending on risk of Human Rights violations? Specify the risk and indicate whether those that have certifications are favoured.

Response: Others

Implantation

The suppliers are approved by VCSA after the necessary alignment of strategies and conformity of values has been verified as well as the necessary conformity in relation to the requirements communicated at the beginning of the managerial relation. Demonstrated fulfilment of the following is formally requested:

1. Contracting
2. Health and Safety at work
3. Fulfilment of Health and Safety legislation
4. Waste management
5. Adequate training of subcontracted workers
6. Ethical behaviour commitment, which is even more significant in the current economical situation.

After checking the fulfilment of these conditions, a report is signed by both parts.

Audit planning together with the existing follow-up methodology for suppliers and subcontractors in which the fulfilment of the former points is checked, allows the annual evaluation and conformity of the suppliers.



Human Rights

Principle 2

Target

100 % of the approved suppliers / subcontractors must fulfil the VCSA requirements as shown in the applicable procedure VQM 16 form (attached)

Annual evaluation of the performance of 100 % of suppliers for their incorporation and permanency in the list of approved suppliers.

Policy

Has the entity a formal policy of purchases or does it use a system of selection of products and services, according with its managerial social responsibility policy?

Response: Others

Implantation

Since 2009, VCSA, member of the Basque Companies Association for the Sustainability and Managerial Social Responsibility IZAITE, is adopting certain elements of the Model of Traction over the Supply Chain proposed by this association.

Significant improvements have been achieved in the implantation of the Managerial Social Responsibility in VCSA, applying IZAITE's methodology and other relevant considerations that VCSA gets by other ways.

VCSA has evaluated in 2009 the performance, in a wide sense of the term, of suppliers and subcontractors in order to check the degree of conformity in the fulfilment of VCSA's requirements.

During these evaluations the Integrated System of Management is taken into account, giving special importance to Health and Safety and Environmental protection.

The selection of products and services has been carried out using the list of approved suppliers, and this documentation is used for planning visits and audits, having in target the traction of our suppliers.



Human Rights

Principle 2

Targets

Standardizing approaches and development of activity and management with significant suppliers and subcontractors.

Promoting the Integrated Management System implementation, when such a possibility exists, as well as introducing in the corporative social responsibility to those companies that have not begun to develop those activities or that, having had interest to do so, have not developed a clear strategy yet.

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation

In 2009 VCSA has kept the follow-up and permanent evaluation systematic, with an annual summary of behaviour, management efficiency and demanded requirements fulfilment. Also, and for the first time, the CSR has been included as an aspect to audit in the most advanced companies VCSA works with.

The difficult situation that unfortunately almost all of our groups of interest are living, and in special way some of our subcontractors, due to the crisis, has persuaded to attempt an additional sensibility in order to make an equitable distribution of orders, trying to favour the continuity and viability of these organizations.

Experience exchange with other organizations has been kept, being sustainability and CSR the subjects that have devoted more attention and effort to the Managing Director and the Integrated Management System Process.

Beyond its influence capability, VCSA has supported the implantation of Integrated Management Systems, principally Health and Safety at work and Environmental Protection systems, demanding the fulfilment of certain basic Human Rights such as labour risk prevention and environmental protection to companies whose dimension or capability has made difficult to approach this fundamental aim



Human Rights

Principle 2

VCSA has kept incorporating to personnel of subcontracted companies of frequent presence in VCSA in training activities to extend good work practices.

Target

Introducing the CSR consideration in the suppliers most advanced in this field. This issue has been discussed in the contacts with all the subcontractors.

Promoting the implantation and certification of Health and Safety and Environmental Protection systems in two suppliers.

Fulfilment of 100 % of the Annual Plan of Audit to Suppliers, checking the fulfilment of the requirements of the VCSA Integrated Management Systems and promoting the implantation of the actions agreed in former audits.

Follow-up and Impact Measurement

Indicate the percentage of the suppliers that have a certification (example: SA 8000, ISO 9001)

Response: 38 %

Implantation

One of every three significant suppliers, taking into account the supply or the service they provide, has ISO 14001 or OHSAS 18001 certification.

It has been expressed in a clear way to the suppliers and subcontractors who show interest at implementing a management system the VCSA's helping disposition to communicate experiences and learned lessons, as well as to provide the knowledge and documentation that could be useful to them.

Target


Achieving the implantation system certification of management systems on the basis of ISO14001 - 18001 to two more subcontractors.



Implantation Summary Principle 2

| Principle 2 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|-------------|-------------------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------|----------------------------------|
| Suppliers | A: Approved suppliers T: List of VCSA approved suppliers | A: Approved suppliers T: List of VCSA approved suppliers | A: Approved suppliers T: List of VCSA approved suppliers | |

A: Answer T: Target

 No apply for this Principle

Labour





Principle 3

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



Labour

Principle 3

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

Diagnosis

Indicate if risk factors exist that could put in danger the effective recognition of collective negotiation right.

Response: No

Implantation

VCSA, according to the current legislation, takes part in the Metal Agreement (in Spain the labour conditions depend on activity sectors) and the affairs related to the Unions representation are clearly defined and regulated by law in the Statute of the Workers and the Biscay Metal Agreement.

VCSA strictly fulfils the second section of the Statute of the Workers, that regulates "the rights of collective representation and of meeting of the workers in the company".

VCSA helps the workers' representatives to do their duty letting them a full equipped room for their meetings and planning the meetings in their working hours.

Target

Guarantee union freedom, freedom of the workers' representatives in their union functions and affiliation freedom of its workers.

Policy

Has the entity a policy of consulting the most company relevant matters with the employees?

Response: Others



Implantation

VCSA realizes strong efforts to support a fluid communication among the persons of the managerial project. VCSA has created discussion and information forums that create spaces for the exchange of opinions, suggestions, etc. The most relevant forums and communication channels for sharing information are:

1. Monthly Integrated Management System Meetings: Meetings in the mornings and afternoons with all the workers to comment on the relevant aspects of the last month in relation to health and safety, quality, order book, etc.
2. Symbiosis Meetings: Ad hoc meetings in the morning, evening and night shifts with all the staff to comment on the most relevant information about annual results, management planning, sales forecast, etc.
3. Company Day: Annual meeting with the whole staff for the presentation of the turnover, annual management plan, sales forecast, etc.
4. Weekly AyCpC meetings (AyCpC means “Aprender y Conocer para Compartir”, that is “Learn and Know to Share”). Weekly meetings that last 1-3 hours, where different topics related to the managerial, technical, humanist or industrial subjects are discussed. External speakers of relevant companies, associations, etc, usually take part in these meetings in order to share their experience.
5. MRF meetings (Marco de Relaciones Futuras, future relationships framework). The management team organizes interviews with two employees each time, and the target is to measure the satisfaction rate of the employees about subjects related to the work, such as Health&safety, quality, productivity and recognition. These interviews last about one hour, depending of the employees.



Principle 3

6. Second Satisfaction Survey, made in December of 2009. It is remarkable that being the system of scoring from 1 to 5, the two best valued questions are “Do you value the Management team commitment for keeping and increasing the employment during the financial crisis situation? with a score of 4.03 out of 5, and “Do you feel proud of working in VCSA? with a score of 3.94 out of 5.

Target

Improve a 10 % the satisfaction of the employees

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation

VCSA strictly fulfils the current legislation that guarantees “the affiliation freedom and the effective recognition of the right to the collective negotiation”.

Having the “Biscay Metal Agreement” as reference frame about labour legislation, VCSA has an internal social agreement, better adapted for the necessities of company and employees. These internal social agreements are negotiated with the workers’ representatives, who have the right to represent all the employees of VCSA.

There are Union elections every four years, and VCSA Management and the former worker representatives guarantee that the elections are carried out in a clean and regulated way.

VCSA management team agrees with the workers’ representatives subjects such as the annual working calendar, economical agreements and ad hoc agreements about other subjects that could affect to any part.



Labour

Principle 3

The most relevant agreement in 2009 was the “2009 and 2010 flexibility agreement”. Due to the world financial situation, VCSA activity has suffered strong demand changes that have required a quick adaptation of the industrial organization to customers’ request.

The workers’ representatives highly value the VCSA commitment for keeping and increasing the employment, despite the crisis.

Likewise, and in order to provide the workers’ representatives with information enough about the company situation for taking decisions and fulfilling their functions:

1. VCSA Management organizes three-monthly meetings to give information relative to turnovers, order book, sale forecast, etc.
2. The president of the workers’ representatives is invited every month to the discussion forums of the Management team so he is reported at all time on the relevant facts of the company.
3. It is on schedule an AyCpC meeting about the following topic “What should be done to improve VCSA sustainability in the future?” UGT, CCOO, USO and ELA Union’s managers, through their VCSA workers’ representatives, have been invited.

Target

Managing the company in a transparent way, with suitable communication channels, helping the workers’ representatives’ to do their duty.



Follow-up and Impact Measurement

Has the entity ways for listening, evaluating and doing the follow-up of the attitudes, worries, suggestions, critics of the workers with the intention of learning and acquiring new knowledge? Describe them.

Response: Yes

Implantation

VCSA has ways for listening, evaluating and doing the follow-up of the attitudes, worries, suggestions and critics of the workers. These ways consist basically of communication channels and forums created as exchange-places in a friendly environment, the most relevant being:

1.- Monthly Integrated Management System Meetings: Meetings in the mornings and afternoons with all the workers to comment on the relevant aspects of the last month in relation to health and safety, quality, order book, etc.

2.- Symbiosis Meetings:

Ad hoc meetings in the morning, evening and night shifts with all the staff to comment on the most relevant information about annual results, management planning, sales forecast, etc.

3.- Company Day: Annual meeting with the whole staff for the presentation of the turnover, annual management plan, sales forecast, etc.

4.- Weekly AyCpC meetings (AyCpC means “Aprender y Conocer para Compartir”, that is “Learn and Know to Share”). Weekly meetings that last 1-3 hours, where different topics related to the managerial, technical, humanist or industrial subjects are discussed. External speakers of relevant companies, associations, etc, usually take part in these meetings in order to share their experience.



Labour

Principle 3

5. MRF meetings (Marco de Relaciones Futuras, future relationships framework). The management team organizes interviews with two employees each time, and the target is to measure the satisfaction rate of the employees about subjects related to the work, such as Health & Safety, quality, productivity and recognition. These interviews last about one hour, depending of the employees.

6. Second Satisfaction Survey, made in December of 2009. The results will be used to develop Action Plans that will be developed during 2010.

The crisis which affected us, led us to adopt of specific policies to address it and specially not to affect employment and the healthy financial financial situation of the company

Target

To Know for learning and improving, having as a final purpose the increase of the satisfaction of VCSA employees.



Implantation Summary Principle 3

| Principle 3 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|-------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------------------|
| Employees | <p>A: Workers' representatives</p> <p>T: Free election of the workers' representatives</p> | <p>A: Happy employees</p> <p>T: Increase the employees happiness</p> | <p>A: Happy employees and workers' representatives</p> <p>T: Increase the employees happiness</p> | |

A: Answer T: Target



No apply for this Principle



Principle 4

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



Labour

Principle 4

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

Diagnosis

Indicate if forced labour is a risk factor in the entity, in view of the type of activity it develops.

Response: No

Implantation

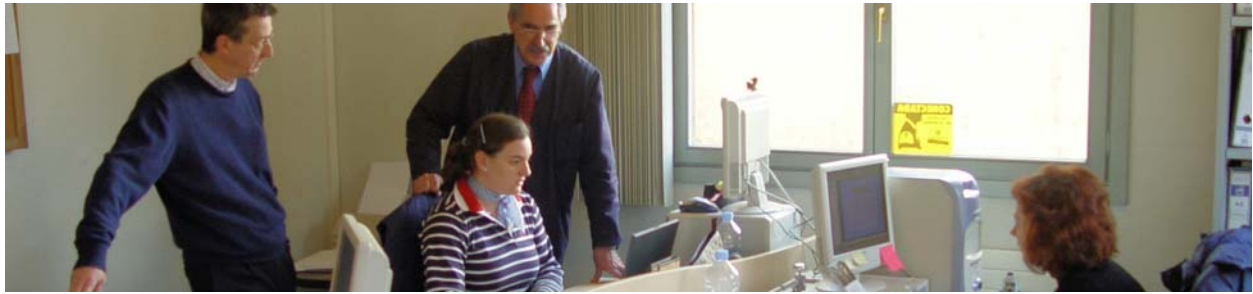
There is a process called “People development”, known in other companies as “Human Resources” devoted to everything related to the persons. Its mission is “to satisfy the needs of all the persons who collaborate in VCSA's project with the purpose of turning the company into a meeting place where it is possible to share, make up, take part and collaborate in such a form and way that all of them feel valued, satisfied, highly qualified, flexible and self-managed so they can develop their career in a safe environment, and in a climate of harmony, respect and confidence.”

Target

Regarding work not only as a source of income but also as a factor of development that complements and enriches personal, familiar and of any other type experiences and activities out of VCSA.

Does the entity offer facilities to its employees to balance professional and personal life, for example, a schedule of flexible work or working from home? Describe them.

Response: Yes



Labour

Principle 4

Implantation

In VCSA balance measures have been improved in 2009 by increasing the steady staff, so the new organization and assignment of functions have allowed that the balance between personal and professional life has extended to work positions where this had not been possible before, attending the needs of the company without neglecting those of the persons

Part of the staff enjoys daily flexitime, and other options such as part-time work, agreed exchanges of shift among workers, flexible summer hours, or working from home have been added

Target

Achieving the development and satisfaction of the persons who are employed at VCSA.

Policy

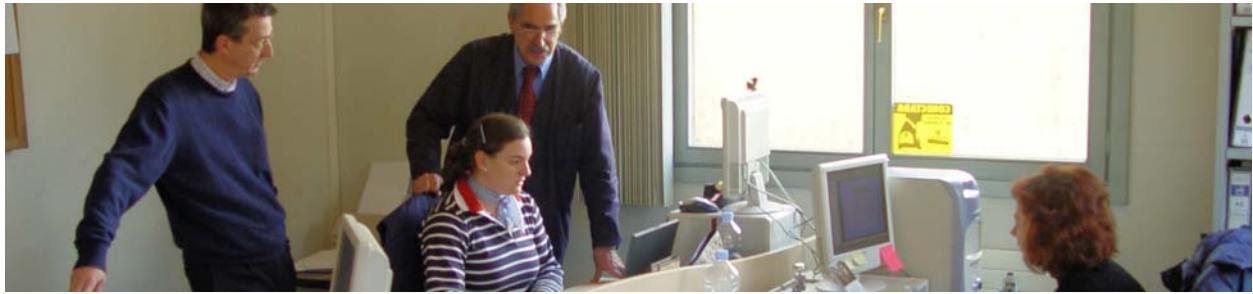
Has the entity a clear written policy, or there is an agreement, where the number of working hours and the salaries of the employees is determined?

Response: Yes

Implantation

VCSA has kept the integrity of the economic-labour agreement accorded in 2006 with the worker' representatives, which also was approved by the majority of the employees, with a 5 years duration (until 2010). This agreement has been managed without relevant discrepancies, allowing new approaches to collective bargaining.

This agreement meant an improvement comparing to the sector's conditions, and a clear attempt to introduce improvements related to organization, remuneration and flexibility.



Labour

Principle 4

Target:

Establish the guidelines of agreement necessary for a stability in the relations during the period (2006-10) making it easier to attain the strategic aims of the company, paying special attention to the sustainability of the company.

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation:

1. Daily flexitime or part-time work for persons with personal needs.
2. Training in labour time for those persons from whom qualification is asked or who request improvement in their training.
3. Agreed exchange of shift when there is availability.
4. Flexible summer hours when the work post allows it.
5. Special shift work hours to decrease stress.

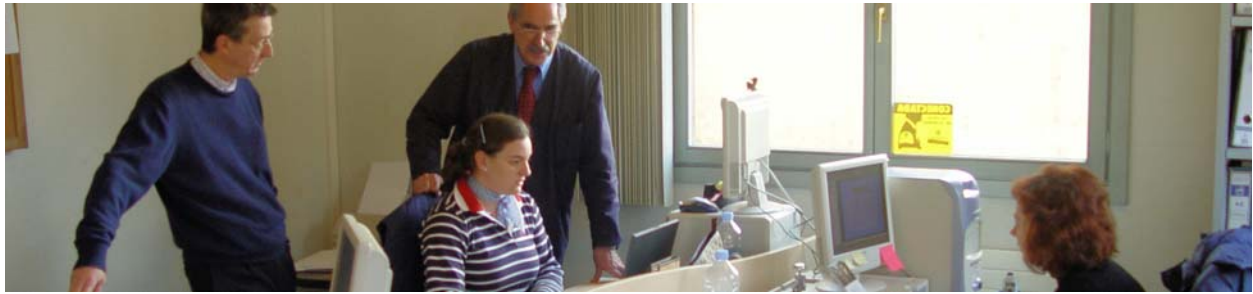
Target:

Achieve the best possible balance between employees' needs and the company's needs.

Improve work environment

Facilitate personal and professional development.

Increase productivity.



Follow-up and Impact Measurement

Has the entity control mechanisms that guarantee the fulfilment of the established policies related to work timetable, flexibility, over time, and balancing personal and professional life? Describe them.

Response: Yes

Implantation

The Process “People Development” guards for the fulfilment of the policy, searching for a right balance among personal and professional life, and controls the use of part-time work and flexitime depending on the personal situation and dependents. VCSA has among its strategic aims the significant reduction of overtime, understanding this measure as an approach to its total elimination since overtime is considered an organizational deficiency.

Target

1. To determine and to control the working hour modalities.
2. Fulfilment of the working hours
3. Minimization up to the elimination of overtime



Implantation Summary Principle 4

| Principle 4 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|-------------|----------------------------------------------|-------------------------------------------------|-------------------------------------------|----------------------------------------------|
| Employees | A: Plan the work with the adequate staff. | A: Right salary policy, without discriminations | A: Safe, decent and equitable work | A: Fulfilment of working hours policy |
| | T: Balance of personal and professional life | T: Majority accepted economical agreement | T: Majority accepted economical agreement | T: Balance of personal and professional life |

A: Answer

T: Target



Principle 5

Businesses should uphold the effective abolition of child labour.



Labour

Principle 5

Businesses should uphold the effective abolition of child labour.

Diagnosis

Indicate if the child labour is a risk factor in the entity, in view of the type of activity it develops.

Response: No

Implantation

VCSA continues without detecting child labour among its risk factors, as we clearly assured in the last report. Although VCSA understands that it could be possible in any of the groups of interest that identifies, there is not evidence anywhere of this unwanted activity. VCSA identifies suppliers, NGOs, Local communities and Society as its groups of interest, but the knowledge, influence and control over them are logically limited.

VCSA is part of the managerial group Vicinay Marine, that also possesses factories in Brazil and China. There is total evidence of not child labour in these factories, and does not even have news that it could take place in its chain of supply.

VCSA, in its CSR policy, has an special sensitivity to the infantile world, orientating a part of its sponsorship to activities for children

Policy

Has the entity a clear written policy, where child labour is forbidden, and communicate it?

Response: No



Principle 5

Implantation

VCSA, as it has been told in the last section, does not have child labour as a risk factor in its factories and surrounding groups of interest, and also has total evidence that there is no child labour at all in the China and Brazil plants, where management is comparable to the Basque Country plants management.

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation

VCSA has shared with the other companies in the Vicinay Marine Group the best practices in daily activities, exchanging experience and knowledge regarded to this important principle.

VCSA has learned from the experience of the Brazil and China plants, and has communicated that it is interested in both plants developing CSR, although VCSA is aware that the problematic is very different due to the geographical and cultural distance. Management systems implementation, certified by prestigious societies and related to prestigious international standards is a reality in both centers (and very advanced in Brazil), so understanding and good communication in relation to this subject is satisfactory.



Implantation Summary Principle 5

| Principle 5 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|--------------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------|----------------------------------|
| Employees | | A: Child Labour T: Influence in order that it is not admitted | A: Child Labour T: Eradicate 100 % in the influence area | |
| Suppliers | A: Child Labour T: Influence in order that it is not admitted | | | |
| NGO and Corporative Social Responsibility with the Community | A: Child Labour T: Influence in order that it is not admitted | | | |
| Local communities | A: Child Labour T: Influence in order that it is not admitted | | | |
| Society | A: Child Labour T: Influence in order that it is not admitted | | | |

A: Answer T: Target



No apply for this Principle



Principle 6

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



Labour

Principle 6

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

Diagnosis

Indicate the direct or indirect risks identified for each group of interest in your entity related to this Principle.

Implantation

VCSA gives equal treatment and does not practise any type of discrimination among the different interested parts in relation to the above mentioned groups of interest.

During 2009 VCSA has continued reducing the subcontracted and temporary staff, incorporating them as steady workers.

The equal policy in the remuneration (same work and performance, same salary) has naturally been maintained.

The contracting of the necessary staff has been done following the policy of equality.

The relation with suppliers and subcontractors has been established on the basis of the competitiveness and searching an equal distribution to favour all the interested parties; it has had a special relevancy in 2009 due to the crisis situation that affects part of our chain of supply. VCSA concern is not only the viability of these companies, but also adequate work conditions.

There has been no breach of law related to employment policy.

Equality of opportunities has been promoted, allowing the access of any qualified and competent person to responsibility positions.

Functions and relation have been decided inside the processes and among the processes of the organization.

The stability of the staff has been a priority for VCSA.



Labour

Principle 6

Policy

Has the entity formulated policies, plans and / or programs of integration and not discrimination of disadvantaged groups such as persons with disability, young people searching their first employment, unemployed major of 45 years, immigrant persons or people in risk of exclusion?

Response: Others

Implantation

VCSA has continued improving during 2009 its plan of rejuvenation of the staff in those work positions where the physical condition can suppose problem for the most veteran workers, reducing subcontracted employees and giving priority to the contracting of young unemployed people and / or searching their first employment; this plan has been applied although this year the production has gone under almost 30 % due to the lack of demand in the markets.

As far as people with a disability is concerned, VCSA fulfils the current legislation.

Target

Rejuvenating the staff by a retirement plant that fully satisfies those who finishes their working life.

Offering their first job to qualified young people.

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.



Labour

Principle 6

Implantation

The permanent staff has been increased in 15 people, reducing the subcontracted and temporary staff. VCSA has continued the policy of contracting young people demanding their first job.

Does the entity promotes the effective equality of opportunities between men and women in all aspects, including the access to senior-level management position? Indicate what way.

Response: Yes

Implantation

Due to the industrial activity of a metal company like VCSA, which manufacture mooring lines, a product that demands certain physical strength in several points of the production process, VCSA has continued developing the equality between men and women in all those functions in which the physical qualities do not fully condition the personnel selection .

Related to company management, women have been incorporated to all different positions, even process direction and coordination.

The company organization in 2009, as shown in the attached document "Process map VCSA rev. 18", is an evidence of the effectiveness of VCSA equal policy.

The internal social agreement grants that the maternity leave is two weeks longer for the mother and one week longer for the father what the law states.

Target

Perfecting equality of opportunities for blue collar workers.



Follow-up and Impact Measurement

Does the entity publish the composition of the Management team and rest of the employees by category, sex, age and other diversity indicators?

Response: Yes


Implantation

In the Sustainability Report 2009, VCSA publish the composition of the Management team, the responsible of each process and the staff changes giving information about qualification, sex and some extra data related to this chapter that are distributed in the report.



| Principle 6 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|----------------------------|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Employees | <p>A: Discrimination at work</p> <p>T: Assure the equality and no-discrimination</p> | <p>A: First job appliers</p> <p>T: Replace senior workers due to retire with juniors</p> | <p>A: Equality between men and women. Young people applying for a job</p> <p>T: Equal equality in managerial positions. Reduce subcontracted workers and contract young workers</p> | |
| Several groups of interest | | | | A: Diversity indicators |
| | | | | T: Equal opportunities |

A: Answer T: Target

 No apply for this Principle

Environment





Principle 7

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



Principle 7

Business should support a precautionary approach to environmental challenges.

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation:

Contamination prevention:

1. Follow-up and control of the preventive plan to avoid hydrocarbon leaks.
2. Regeneration and cleaning of used oils picked up in the machines during maintenance operations.
3. Oil release through official recycling company for its recovery and reuse.
4. Soundproof covering of the TSA/TSC tower, in order to avoid noise emission and disturbance of the neighbourhood.
5. Hazardous waste generation reduction.
6. Reuse of generated waste (scrap, refractory concrete).

Energetic efficiency. Consumption management

1. Reduction of energetic consumptions (natural gas, electricity).
2. Reduction of recycled paper consumption.
3. Use of environmental friendly consumables (paints for the identification of the links).
4. CO₂ emissions reduction.
5. Installation of low consume lighting instead of sodium vapour lamps.
6. Gas preheating furnace elimination, installation of an electric induction heater.

Target:

5% reduction in natural gas and electricity consumption



Follow-up and Impact Measurement

Indicate the number of hours dedicated to environmental training and global investment in environmental protection project.

Response: 727

Implantation

The number of hours dedicated to environmental training and awareness raising ensues from the following activities:

1. Environmental subjects treated in the monthly meetings with 50% of the staff (depending of the shifts): 481 hours.
2. Specific environmental training for the Integrated Management System Audit Group.: 6 hours
3. Environmental coordinator training (external and internal): 120 hours
4. Meetings specifically related to environmental matters: 90 hours
5. Environmental training included in the reception plan for all the new VCSA employees: 30 hours

Target

There is not a specific target related to number of hours dedicated to environmental training, although it is assured that 5 % of the total working hours dedicated to training are dedicated to this matter.



Implantation Summary Principle 7

| Principle 7 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|----------------------------|-----------|--------|-----------------------------------------------------------------------------------------------------------|----------------------------------|
| Several groups of interest | | | <p>A: Industrial sustainability</p> <p>T: Avoid contamination and promote the responsible consumption</p> | |

A: Answer T: Target



No apply for this Principle



Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility.



Environment

Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility.

Diagnosis

Indicate the environmental risks and responsibilities of your entity, in view of the type of activity it develops.

Implantation:

The identified risks, due to the fact that the company is located in a residential-industrial mixed use area, are:

1. Disturbance to neighbours because of noise emission:

- a) Chain movement, loading and unloading.
- b) Machinery.

2. Soil contamination due to:

- a) Leaks of hydraulic oil in the machinery.
- b) Hazardous waste generation (used oil and absorbent impregnated with hydrocarbon).

Target:

Risk 1 target: No complaints for neighbour disturbance, as chain and unloads of the raw material are done during the day, and as the factory doors close during the night.



Principle 8

Risk 2 target:

- a) Follow-up of the preventive plan of control and elimination of oil leaks,
- b) Regeneration and cleaning of used oils picked up in the machines during maintenance operations.
- c) Oil releasing through official recycling company for its recovery and industrial reuse.
- d) Replacing mineral absorbent with a textile that it is washed for its reuse.

Actions

Has the entity an integrated management policy or a methodology based on an environmental management policy to assure fulfilment of the legality regarding environmental subjects, taking into account the environment in the organization process, as well as the prevention and management of environmental risks?

Response: Yes

Implantation

VCSA has since 2006 an integrated management system for Quality, Environmental and Health and Safety, and has got accreditation of the Quality standard ISO 9001:2008, Environmental standard ISO14001:2004 and Health and Safety standard OHSAS 18001:2007.

Target:

Improving the application of the commitments publicized in the Integrated Management Policy.



Environment

Principle 8

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation

1. VCSA, is managed by processes, the daily environmental management is developed in each process, and the Integrated Management System Process coordinates environmental actions.
2. Employees. Raising environmental awareness of the personnel at the different levels of the organization through the following forums/measures:
 - a) Monthly meetings with the whole staff where they are informed about different environmental issues of the company, including the monthly amount of CO₂ emissions.
 - b) Environmental training meetings.
 - c) There is a daily newspaper in VCSA called “cadenero” (linker), where articles related to environmental protection are published. It also includes a daily section with advices about environmentally friendly practices.
 - d) Coordination meetings with the Processes’ managers.
 - e) AyCpC meetings (AyCpC means “Aprender y Conocer para Compartir”, that is “Learn and Know to Share”) dedicated to environmental matters, such as the BP oil platform accident for example.
 - f) New bike parking at the factory main entrance.
 - g) Monthly environmental communication; there is a notice board near the main entrance of the factory where monthly environmental advices and communications are displayed.
3. Suppliers. VCSA has a clear policy regarding to this group of interest, defined along the following lines:
 - a) Helping other companies in the Environmental Management System implementation, whenever this is possible.
 - b) Conducting external environmental audits to VCSA’s suppliers.
 - c) Circulating good environmental practices among suppliers.



4. Environmental - Local community: The following actions were taken last year:

- a) VCSA has earned the EPD declaration (Environmental Product Declaration) Label Type III for its products R4 and R5 quality mooring chain with the Swedish organism Environdec. This shows the emissions of greenhouse gases, expressed in CO₂-equivalents, based on verified results from a lifecycle assessment performed in accordance with ISO 14025.
- b) Declaration, through the "Stop CO2" Basque Country government project, of VCSA's CO₂ emissions, and compromise of their annual reduction through an action plan.
- c) VCSA takes part in forums and meetings organized by IZAITE (Basque Country Companies Association for the Sustainability) where its environmentally friendly activities are explained.
- d) Soundproof insulation of the Thermal Sprayed Aluminium (TSA) application tower.
- e) Soundproof panel installation in the refrigeration towers.
- f) New high-efficiency cutting-saw to avoid night work.

Follow-up and Impact Measurement

Indicate the electricity, water and paper consumption data in the year:

Electricity: 11.069.660 kWh

Water: 36.447 m³

Paper: 1.150 five hundred sheet packs

Electricity, water and paper consumptions are detailed in the two files attached, because they are related to two different plants. Other consumptions are detailed, together with the scores obtained in previous years, and tendencies.

Target


The targets are detailed in the attached files, in separated way for the both VCSA working plants of Deusto and Galdames.



Implantation Summary Principle 8

| Principle 8 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|----------------------------|---------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------|
| Several groups of interest | <p>A: Soil and acoustic contamination</p> <p>T: Zero neighbour complains and 5% decrease of absorbent use</p> | <p>A: Integrated Policy of Health and Safety, Quality and Environmental</p> <p>T: Make equal the management areas</p> | <p>A: Environmental responsibility</p> <p>T: Environmental management in each process</p> | |

A: Answer T: Target

 No apply for this Principle



Principle 9

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



Principle 9

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

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation

1. VCSA has developed a brand new installation to coat chain with Thermal Sprayed Aluminium, so the sprayed chain is much more resistant to corrosion.
 - a) The environmental behaviour of the chain during its lifecycle is improved because the corrosion is much smaller.
 - b) Raw material consumption is lower, because it is not necessary to oversize the chain to offset corrosion damage. The new installation includes both the application system and the soundproof insulation.
 - c) The installation also includes a vacuum system to avoid the emission of aluminium particles, and makes it possible to recycle them. The cost has been 90.000 euros.
2. VCSA has improved the technology of its gas and electricity meters, for a better energetic management (13.000 euros).
 - a) Gas and electricity consumptions are limited in real time depending on production, helping consumptions sustainability and optimizing the production process.

Trying to increase Environmental Awareness, VCSA takes active part in IZAITE (Basque Country Companies Association for the Sustainability) sharing environmentally friendly practices, technologies and experiences with other members of the organization.



Environment

Principle 9

VCSA is VIP member of the “Stop CO₂” Basque Country government project, which consists in the measuring of the company CO₂ emission, and prepare an annual plan to reduce them.

Finally, VCSA has taken part in other environmental related forums, and has given talks on CSR and industrial sustainability.

VCSA has tried to improve environmental awareness in the visitors, becoming a reference of CSR.

VCSA has earned the EPD declaration (Environmental Product Declaration) Label Type III of its products R4 and R5 quality mooring chain with the Swedish organism Environdec. It shows the emissions of greenhouse gases, expressed in CO₂-equivalents, based on verified results from a lifecycle assessment performed in accordance with ISO 14025.

Targets

- Reduction of electricity, gas and water consumptions
- Reduction of CO₂ emission
- Reduction of oxidation and corrosion of the chain
- Environmental awareness of VCSA's visitors
- EPD registration

Total investment on the total gross income in the year, for the development and the spreading of environmentally friendly technologies.

Response: 1.06%



Implantation

VCSA has integrated the environmental considerations in all its activities and processes, for example I+D+i is applied to the new qualities designs focusing on minimizing their possible impacts during the whole lifecycle.

This includes minimizing the consumption of resources necessary to get the laminated bar, our raw material, manufacture of the chain, its service life, dismantling and final recycling. The amount of the investment in these high quality chains was 3% more than in 2008.

Soundproof insulation of the TSA application tower with a cost of 10.000 euros.

The vacuum system and gas treatment for the TSA tower with a cost of 90.000 euros.

The new gas and electricity meters with a cost of 13.000 euros.

The improvement of the lighting of workshops with a cost of 12.980 euros.

The total these four concepts sum is 125.980 euros.


VCSA, in an effort to reduce the CO₂ emissions is replacing the gas powered furnaces with electric heaters. The light chain furnaces have been already replaced, and the heavy chain furnaces replacement will be reported in the next global compact report.



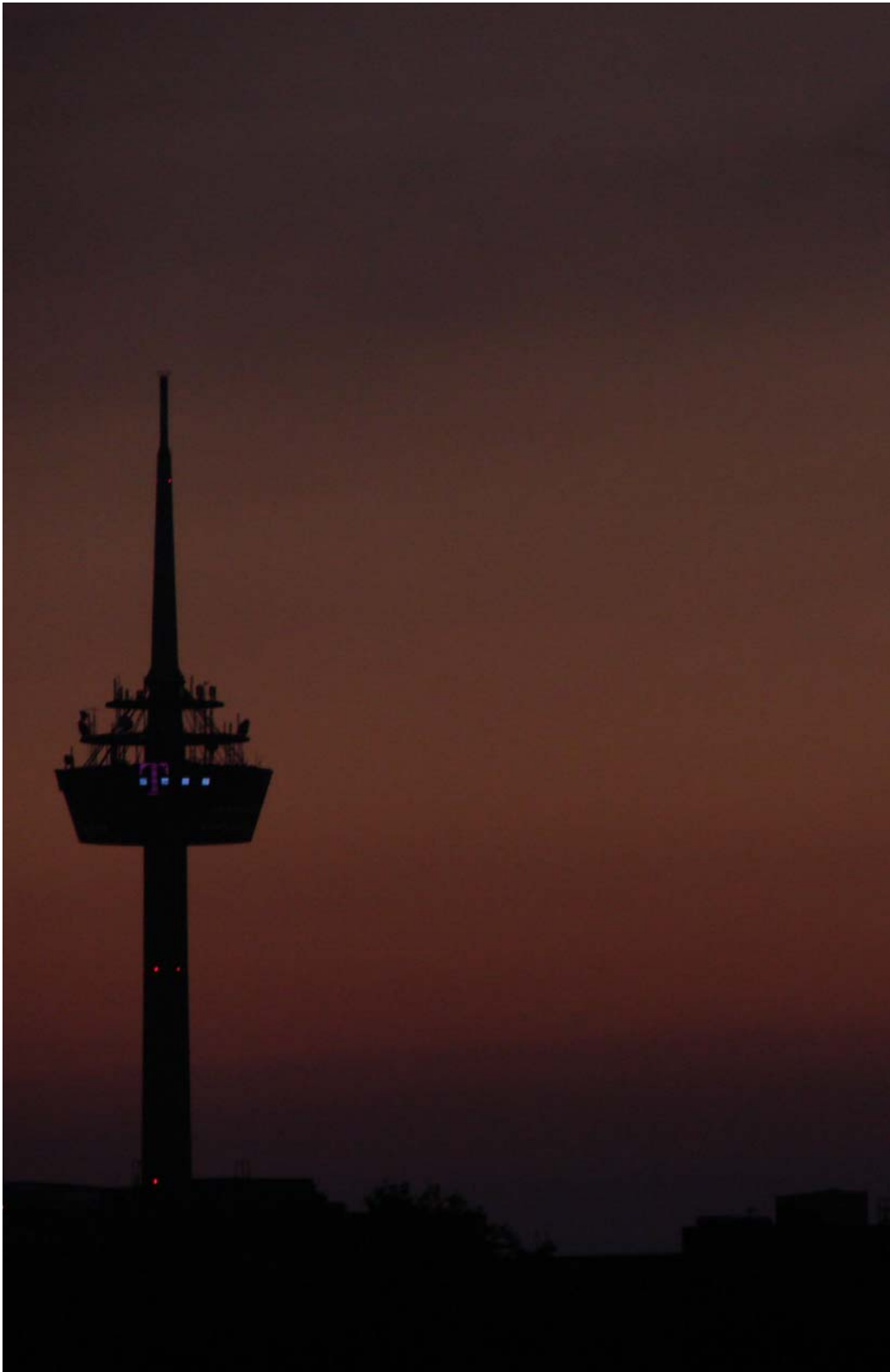
Implantation Summary Principle 9

| Principle 9 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|----------------------------|-----------|--------|-------------------------------------------------------------------------------------------------|----------------------------------|
| Several groups of interest | | | A: Environmentally friendly technology T: Energy efficiency and environmentally friendly | |

A: Answer T: Target

 No apply for this Principle

Anti-corruption





Principle 10

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



Principle 10

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

Diagnosis

Does the entity make a diagnosis to know the riskiest areas inside the entity and in its activity sector?

Response: Yes

Implantation

VCSA has done a risk evaluation about no ethical behaviour in its activity sector, even more important in the present economical situation, and although VCSA has detected no corruption evidence, it is considered that it is very important to keep on watchful.

Has the entity a defined written policy or does it use any method of explicit rejection against corruption, extortion and capital laundering procedures?

Response: Others

Implantation

VCSA asks in the 2009 revision of its Policy an integrity commitment to its employees and groups of interest, not allowing in any way reprehensible misbehaviours such as corruption. Furthermore, nowadays there is a total concordance among all the members of VCSA about the relevance of this principle.



Principle 10

Target

All the persons who work and collaborate with VCSA must act with integrity and sharing a common ethical behaviour.

Actions

Describe the actions carried out related to this principle during the last year, indicating the group of interest which it is focused.

Implantation

VCSA has always been in compliance with current legislation, and all its contractual relation are exempted from any kind of irregularity, avoiding corrupt practises and searching a mutual profitable understanding with all the parts involved.

VCSA offers its products to its customers on the basis of price lists, established and communicated before signing the contract. A five year social agreement has been signed with the social representatives, which has been working satisfactorily during 2009. The result of the business has been communicated to shareholders and investors, and there have been no relevant discrepancies to relate. Suppliers and subcontractors have collaborated with VCSA under a reasonable understanding climate, without irregularities regarding to corruption, and always trying to share the workload as fairly as possible in order to help their viability. The funds destined to support social activities (described in the first chapter) have been used strictly under an application of CSR criteria.



Anti-corruption

Principle 10

Collaboration with the administration keeps on smoothly, without any law breach, attending to any requirement and taking part in joint events. Pollution generation has been prevented, using efficient energy consumption techniques, attending to the neighbour's complaints and comments (VCSA is located on a mixed residential / industrial area), searching mutual benefit.

The management team maintains a fluid relationship with trade unions, attempting to reduce the historical gap among employers and employees.

The brand new high technology products provide our customers environmentally friendly and ethically produced chains and accessories.

The management team often speaks with the workers' representatives in order to reduce the gap of historical antagonism.

Follow-up and Impact Measurement

Indicate if the company has communicated to its groups of interest the entity conduct codes and policies against corruption and bribery. Indicate in the note field the percentage of every group of interest who know them.

Response: Others

Implantation

The company has not established an official communication channel about its conduct code towards its groups of interest, because there have been no cases of misconduct. However, the company has a close relationship with its groups of interest, whereby letting them know that VCSA ethical conduct and integrity of the persons is a fundamental principle.



Anti-corruption

Principle 10

Target

The aim of the company is to carry out an ethical managerial practices that allow its groups of interest to keep the confidence in their mutual relationship.

Has the entity a well structured economic-financial management system ruled by the commitment and transparency (according to the current legislation). Indicate acquired commitments.

Response: Others

Implantation

The company operates under a well structured economic-financial management system that follows a policy of transparency and right government, although a specific regulation in this aspect is not developed.

Target

The company is ruled by an economic-financial management system whose aim is to assure the business profitability so VCSA can fairly remunerate all its groups of interest, keeping the financial viability of the company and contributing to the development of its social environment in a transparent way.



Implantation Summary Principle 10

| Principle 10 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|--------------|----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------|
| Customers | A: Market research and necessities T: Managerial leadership and satisfaction of the customers | A: Integrity in the contractual relationship T: Fulfil the requirements | A: Upright contractual relationship T: Fulfil the requirements | |
| Employees | A: Lack of involvement in the project T: Persons who live of, in and with VCSA | A: Integrity in the contractual relationship T: Satisfied and involved persons | A: Upright contractual relationship T: Satisfied and involved persons | |
| Shareholders | A: Deficient investment return T: economical profitability | A: Persons involved in the project T: economical profitability that attracts the capital | A: Persons involved in the project T: economical profitability | |
| Investors | A: Changing markets that dissuade the investment T: Efficient management in order to get economical profitability | A: People who trust the management T: Satisfactory return of the investment | A: People who trust the management T: Satisfactory return of the investment | |



Implantation Summary Principle 10

| Principle 10 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|----------------------------------|
| Suppliers | <p>A: Lack of feeling as an ally</p> <p>T: Involve the suppliers in the project</p> | <p>A: Integrity in the contractual relationship</p> <p>T: Relation mutually satisfactory</p> | <p>A: Integrity in the contractual relationship</p> <p>T: Product/service OK. Profitable relationship</p> | |
| NGO and Corporative Social Responsibility with the Community | <p>A: Approach not aligned with the strategy</p> <p>T: Involve to all the company un the Corporative Social Responsibility</p> | <p>A: Social responsibility</p> <p>T: Support the reduction of the corruption</p> | <p>A: Social responsibility</p> <p>T: Support the reduction of the corruption</p> | |
| Local communities | <p>A: Lack of involvement with the neighbourhood</p> <p>T: Help the local communities and not to disturb</p> | <p>A: Social responsibility</p> <p>T: Support the reduction of the corruption</p> | <p>A: Social responsibility</p> <p>T: Support the reduction of the corruption</p> | |
| Society | <p>A: Offshoring of the company</p> <p>T: Keep the plants in Biscay</p> | <p>A: Social responsibility</p> <p>T: Support the reduction of the corruption</p> | <p>A: Social responsibility</p> <p>T: Support the reduction of the corruption</p> | |



Implantation Summary Principle 10


| Principle 10 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------------------|
| Government and Public Administrations | <p>A: Legislation sometimes not very realistic</p> <p>T: Collaborate with the administrations for a better fulfilment</p> | <p>A: Go beyond the legal fulfilment</p> <p>T: Fully collaboration with the administration</p> | <p>A: Go beyond the legal fulfilment</p> <p>T: Fully collaboration with the administration</p> | |
| Environmental | <p>A: Pollution</p> <p>T: Prevent the pollution and decrease the generated noise</p> | <p>A: Protect the environment through sustainability</p> <p>T: Prevent the pollution</p> | <p>A: Protect the environment through sustainability</p> <p>T: Prevent the pollution</p> | |
| Mass Media | <p>A: Lack of analysis while transmitting news</p> <p>T: Communicate and collaborate</p> | <p>A: Be clear and communicative with the media</p> <p>T: Share our know-how with the society</p> | <p>A: Be clear and communicative with the media</p> <p>T: Share our know-how with the society</p> | |
| Unions | <p>A: Historical prejudice that supports the confrontation</p> | <p>A: Management for the labour conditions improvement</p> | <p>A: Management for the labour conditions improvement</p> | |

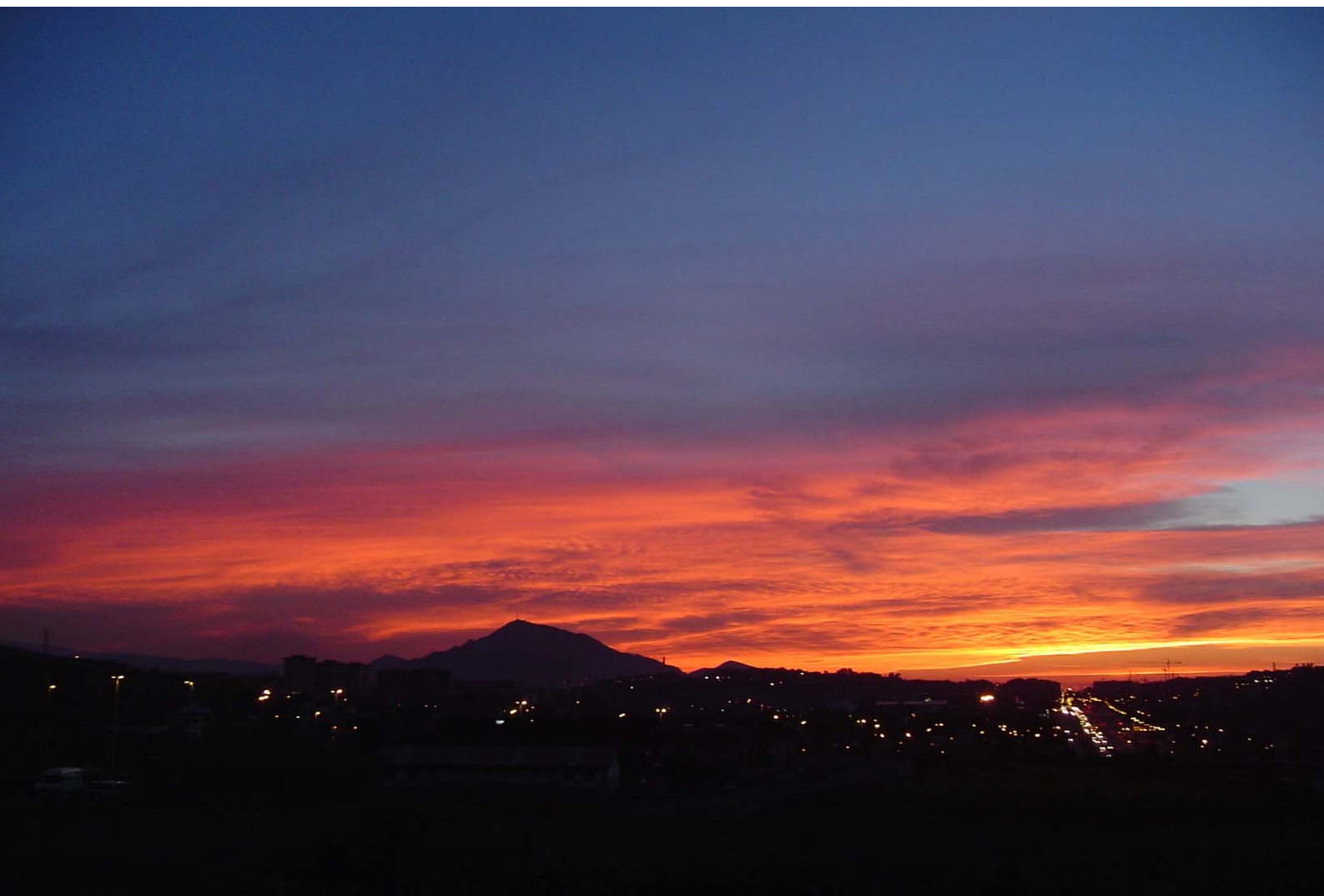


Implantation Summary Principle 10

| Principle 10 | Diagnosis | Policy | Actions | Follow-up and Impact Measurement |
|--------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------|
| Knowledge Web | A: Deficient knowledge management T: Improve the self knowledge | A: New ideas development T: Improvements clean and environmentally friendly | A: New ideas development T: Improvements clean and environmentally friendly | |
| Other groups of interest | | | | A: Right government T: Social profit with transparency |

A: Answer T: Target

 No apply for this Principle



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