

AVVOCATO MICHELA COCCHI
STUDIO LEGALE

Avvocato Michela Cocchi – Studio Legale
Global Compact
End of Year COP
2010 Communication On Progress

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Preamble

"Avvocato Michela Cocchi" was founded in 1994
in Bologna, Italy
where Michela Cocchi is born,
and still today, in Bologna it is headquartered,
growing geographically
as well as expanding its services
across all national territory
and the international marketplace,
from West to East.

With its global practice,
the firm offers clients
a tremendous breadth and depth of legal expertise.

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Foreword

The following COP is submitted after the UN Summit on the Millennium Development Goals, that has been held in New York on 20-22 September 2010.

So, we have chosen to outline our future plans of action both taking into consideration the aims to which the 2010 UN Private Sector Forum – part of that UN Summit – has tended and in the perspective of the key messages that emerge from MDGs outcome document “Keeping the promise: united to achieve the Millennium Development Goals” adopted by the General Assembly by consensus on 2010 September 22nd.

We want to reaffirm our resolve to work together for the promotion of the economic and social advancement of all peoples.

We want to reaffirm that we continue to be guided by the purposes and principles of the Charter of the United Nations, with full respect for international law and its principles.

We want to reaffirm that we continue to work with all our stakeholders and strengthen partnerships in achieving the Millennium Development Goals.

Companies everywhere must conduct business in a responsible manner that is aligned with fundamental environmental and social values.

The time has come to bring innovations, initiatives and partnerships to scale, through a retooling of standard business models, that include:

regulatory frameworks upholding property rights, accelerating entry to the formal economy and rooting out corruption;

capacity building and access to finance, in particular for SMEs (Small-and Medium-sized Enterprises);

securing the necessary investments into core infrastructure;

promotion of a fair, competitive and non-discriminatory global market.

Message from the Founder and CEO⁽¹⁾

(¹) In order to be considered notable, the part of COP “Message from the Founder and CEO”, in addition to meeting the basic requirement of the Statement of Continued Support for the UNGC, meets also the following criteria:

- Statement is signed by CEO;
- Statement is part of COP, not a stand-alone document;
- Reasons and/or benefits for supporting the UNGC are given;
- Statement is linked with major actions/outcomes in implementing the Global Compact principles and/or with major actions and outcomes in undertaking partnership projects;
- Description of active participation at UNGC events or in local networks and/or support for the initiative was expressed in public interviews or public speeches.

The Call of a Lawyer

I'd like to talk with you about our calling, as lawyers, to do good works.

There has always been and there always will be people who do what lawyers do. Whether they are called lawyer, or attorney, or barrister, or advocate, or judge, or justice, or notary, or legislator, or tribal leader, or monarch is not the determinative factor.

Lawyers write and administer laws for the benefit of people in order to solve their problems and then interpret, and apply the laws to and for those people.

Lawyers have power. Power to make lasting contributions to the betterment of our communities and our world.

We are in a unique position to heal, to eliminate inequities that can make life unnecessarily hard for some people and unnecessarily easy for others.

That is what lawyers have done throughout history. They have stood up in defense of a system of justice that is fair, and they have worked to change the system when it wasn't fair.

That is our mission. We bring resolution to issues that seem so incredibly unjust and so irresolute by bringing the power of our words, our knowledge, our compassion.

Anticipating the Future

Anticipating the future, for a lawyer, will always be dependent upon three factors:

- the needs of society;
- who will fulfill those needs;
- the means by which those needs are fulfilled.

Today, all over the world, what was once the unauthorized practice of law by non lawyers has increasingly become the authorized practice of law by non lawyers.

Increasingly people have been turning away from lawyers to fulfill their legal needs.

The commercialization of law and lawyers has impaired or destroyed much of the personal relationship that in the past existed between the lawyer and the client.

Legal services have, in many cases, become commercialized to the point that people really do not care who timely fulfills their legal needs at costs they can afford. Legal services have in many cases become a commodity with decisions based on price alone.

"Faster and cheaper" is the mantra of that commercialization. Lost in the furor and noise is

the statement "it's not about you it's about the client".

Bearing in mind that statement, our commitment is "just the best": it's just about the client.

World is at a critical juncture.

Future advances in global integration, poverty reduction, protection of our planet and, ultimately, peace critically depend on our ability to collectively address the most pressing global challenges.

Accelerating the practice of corporate sustainability and responsibility is an urgent task in these complex times, when crises – from financial market break downs to environmental degradation – are increasingly global and connected.

There is no magic in the marketplace.

Markets function efficiently and sustainably only when certain institutional parameters are in place.

The preconditions for success are generally assumed to include the protection of property rights; the enforceability of contracts; competition; and the smooth flow of information.

History demonstrates that without adequate institutional underpinnings, markets will fail to deliver their full benefits and may even become socially unsustainable.

In recent decades, especially the 1990s, global markets expanded significantly as a result of trade agreements, bilateral investment treaties, and domestic liberalization and privatization.

The rights of transnational corporations became more securely anchored in national laws and increasingly defended through compulsory arbitration before international tribunals.

Globalization has contributed to impressive poverty reduction in major emerging market countries and overall welfare in the industrialized world. But it also imposes costs on people and communities - including corporate-related human rights abuses.

This is the time of multiple crises. Economies are in trouble. Trust has eroded. The crises we face have been building for years and are global in scope.

These are the challenges.

The best way to predict the future is to create it yourself .

Stay Connected

We stand at a crossroads. We have to realize we have a choice.

The new set of crises requires a renewed sense of mission.

We live in a new era.

Its challenges can all be solved by cooperation, and only by cooperation.

Our times demand a new definition of leadership, global leadership.

We must break the tyranny of short-term thinking in favor of long-term solutions. We must break the tyranny of the "or" in favor of the liberty of the "and".

Good to great. Built to last.

This will demand a renewed commitment to core principles. A renewed commitment to universal Human Rights principles.

Statement of Continued Support for the UNGC

We have now been a signatory of the UNGC for 2009.

In that time, I have been privileged to be part of our firm's transition to one where the Global Compact's principles are fully embedded within the culture of the organisation, applying equally to our internal activities, to our relationships, and to our external stakeholders.

We remain committed to identifying further and new long-lasting ways of meeting our commitment to the UNGC and in 2009-2010 we agreed as an organisation to increase the momentum and take practical steps in this respect.

This has involved focusing upon the power related to our lawyer's activity to meet new standards of corporate responsibility according to UNGC Principles.

As lawyers, we have a significant role to play in advocating and building awareness of the UNGC's corporate citizenship principles and promoting the activities of other signatories worldwide.

Specific policies and procedures document the results of our initiatives.

Nevertheless, I have to say that it seems as though we are still at the start of our journey.

There remains a lot to be done.

It is a part of our responsibility to address UNGC Principles issue.

Our COP reflects our story, our vision.

As a private business, not traded on any stock exchange, with no requirement to disclose data and not scrutinized on a regular basis by analysts and investors, this report is a statement of our commitment, our transparency and our leading position in the market.

Work in Progress

A key element to embed the Global Compact principles in our practice is our active participation at UNGC events and local networks initiatives, that, during 2009-2010, has evolved from the first UNGC Network Italy Welcome Meeting, held in Rome on 28 January 2010 to the last UNGC Network Italy Sustaining Members Annual Meeting, held in Rome on 20 September 2010, through my attendance of the UNGC Leaders Summit “Building a New Era of Sustainability”, held in New York on 24-25 June 2010, at which our activity has been presented among the best practices collected within the publication “Global Compact Network Italy 2010”.

My support for UNGC is and is going to be repeatedly expressed in public interviews and public speeches. Just to mention some examples: on 29 October 2009 at 53rd UIA – *Union Internationale des Avocats* Congress as chair of the Business and Human Rights Commission Session; in the monthly column I have edited starting from January 2010 on “*IM - Imprenditori*”; on 31 October 2010 at 54th UIA - *Union Internationale des Avocats* Istanbul Congress, presentation of my report “Sustainability and Competitiveness: anticipating the future of CSR - The Tomorrow’s Win-Win Markets”, an economic analysis of human rights within business, according to UNGC Principles.

Now, the attention is focused upon a recent initiative of ours: the support for the creation, structure, improvement, and progression of Millenium Development Goals Working Group of Global Compact Italy network.

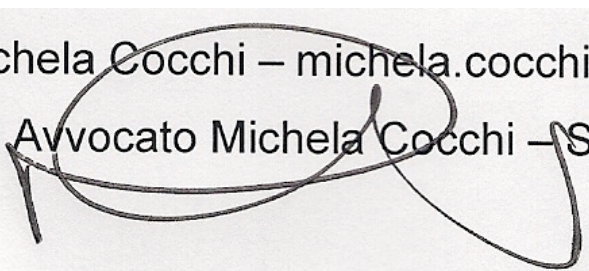
Thanks you for reading, and for your reactions

Bologna, 2010 September 29th

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Our Impacts⁽²⁾

⁽²⁾In order to be considered notable, the part of COP “Our Impacts”, in addition to meeting the basic requirement of the Description of Practical Actions, meets also the following criteria:

- Commitments and actions are linked to business relevance of UN Global Compact principles;
- Reflection on the firm’s sphere of influence;
- UNGC principles are reflected in management systems;
- Actions are integrated into core business processes;
- Actions are fully described in a way that allows readers to learn from and replicate them;
- A future plan of action has been outlined;
- Description of partnership projects in support of broad UN goals.

Commitments, Actions, and UNGC Principles

Founded in 1994 by Michela Cocchi, the firm is open to the world.

Universality is the character of our law practice, respecting the diversity of judicial systems and cultures and defending the interests of our clients, through the defence of the rule of law, free from all political and religious considerations, in compliance with Italian ethical code for lawyers as passed by *CNF - Consiglio Nazionale Forense* and in force, the Code of Conduct for European Lawyers as adopted by *CCBE - Conseil des Barreaux Européens*, and the Principles of Professional Conduct for the Legal Profession of *UIA - Union Internationale des Avocats*.

Today, we are operating in over 110 countries, from West to East, counting hundreds relationships with local law firms, bar associations, organizations, and federations.

We represent any sized business entities from all areas of the world and economic sectors.

Our objectives, entirely and uniquely focused upon our practice as lawyers, are to promote and defend, in the interest of our clients, the essential principles of the rule of law and the system of justice, using all appropriate means, including organizing international/national congresses and seminars, issuing publications and distributing them through all media channels, co-operating with all national/international organisations having similar interests or able to facilitate the realisation of these objectives.

At a time of confusion concerning the role of the lawyer and when some consider lawyer's assistance to be a commercial service, we have affirmed that the principal role of a lawyer is to assist his client in a spirit of humanity and of service, with due observance of professional ethical obligations, and to extend legal services without commercial considerations being paramount.

Independence is our key word, and forms the prerequisite in the free and effective discharge of our professional functions.

When you work with and through the legal system to assure your clients the best results and services you can possibly provide, that is when you assure your own survival into the future.

By nature and tradition, we embrace, support and enact, within our sphere of influence, the UNGC set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

- we support and respect the protection of internationally proclaimed human rights, making sure that we are not complicit in human rights abuses;
- we uphold the freedom of association and the effective recognition of the right to collective bargaining;
- we uphold the elimination of all forms of forced and compulsory labour;
- we uphold the effective abolition of child labour;
- we uphold the elimination of discrimination in respect of employment and occupation;
- we support a precautionary approach to environmental challenges;
- we undertake initiatives to promote greater environmental responsibility;
- we encourage the development and diffusion of environmentally friendly technologies;
- we work against corruption in all its forms, including extortion and bribery.

Join with us in that endeavor, and we all will prosper.

Reflection on Our Sphere of Influence and Management System

Through forming standards and guidelines to determine which individuals, organizations, and institutions, as well as which issues, the firm is willing to represent, it has the opportunity to enhance its contribution to society.

When evaluating potential clients, the client company's business area and standard practices are the factors that are taken into consideration.

So, embedding UNGC Principles in business programs is also viewed as the opportunity for the firm, along with its clients, to influence and contribute to an open global discussion on corporate responsibility.

Assisting individuals, organizations, institutions, and communities around the world, we support positive CSR initiatives through focusing upon key issues and helping to form a consensus of best UNGC Principles practices for corporations, and the general public.

As a result of its expertise, the firm has designed a campaign that, within the four areas of UNGC Principles - human rights, labour, environment, anti-corruption - highlights four aspects:

- product quality,
- economic transparency,
- environmental practices,
- social responsibility.

With reference to the above, clients assisted by the firm must meet minimum requirements that vary according to sector, size, and localization of their business.

The firm's internal ethics training program and disclosure guidelines play a crucial role in the process of learning how to manage CSR issues, within the framework of UNGC Principles.

There are various ways in which these Principles are articulated within business including:

- having legitimacy;
- managing legal and operational risk;
- modeling due diligence and quality control;
- motivation of staff, workers, and management;
- meeting investor expectations;
- codification of existing practice;
- strategic positioning in key markets or emerging markets.

Mutual trust and dialogue between the firm and its clients are vital for the success of a strategy for growth.

Three key lessons from our campaign:

- identify human rights issues according to the Universal Declaration adopted and proclaimed by the General Assembly of the United Nations on December 10, 1948,
- identify the client's spheres of influence and responsibilities,
- identify actions to be taken.

And three key concepts: commitment, awareness and transparency.

Actions

A Lasting Experience

Starting just in the starting of XXI century, we introduced the embedding of human rights in business policy within our services and products of lawyer's practice.

In this perspective, we realized a framework to standardize, improve and track the results of the programmes, which we contributed to create and develop for our clients, using the 1948 Universal Declaration of Human Rights as the normative framework for the adoption and strengthening of business strategies and initiatives.

We have developed human rights standards as guides for business conduct, that explicitly list the UNGC Principles.

Somewhere the Principles are already in place; somewhere else their application has to be improved.

As a result, we have converted the culture of ours and our clients into a systematic effort to actively promote those Principles.

For 2009

For us, embedding human rights and UNGC Principles in business is no more an optional policy choice or a gesture of charity: it has become an instrument to give legitimacy to the investments of our clients, and protect them.

Our activity illustrates how law practice can be used to raise awareness of UNGC Principles issues and promote respect for them.

It is based on our support of UNGC Principles. In particular, our programmes and services emphasise UNGC Principles, that within their sphere of influence, businesses should support and respect.

The inclusion of media, government and NGOs creates a network not only for support, but also for constructive critique and improvement, that differentiates the strategic use of corporate social responsibility from general philanthropy.

Our grid of provided services and programmes follow our traditional grid within Business and Human Rights matter, that comply with the UNGC Framework, according to a step-by-step path:

I - Getting Started

II - Strategy

III - Policy

IV - Processes & Procedures

V - Communications

VI - Training

VII - Measuring Impact & Auditing

VIII – Reporting

The questions and issues we have explored include:

- What is the business case for adopting a proactive approach in dealing with UNGC Principles?
- How can companies formulate comprehensive UNGC Principles policies, and what are

the benefits of doing so?

- What are the boundaries of a company's UNGC Principles responsibilities?
- What are the success factors for integration of UNGC Principles into business practices?
- What methodologies are available to decide if and how to operate in a country with weak governance and/or serious UNGC Principles concerns?
- What are the risks, challenges and opportunities in engaging in multi-stakeholder dialogue?
- What are examples of strategies for more effectively tackling UNGC Principles issues in the supply chain?

Standards, tools, and initiatives we have used are, among others:

- Business Leaders Initiative on Human Rights
- Ceres
- Council for Responsible Jewellery Practices
- Danish Institute for Human Rights Compliance Assessment
- Danish Institute for Human Rights Country Risk Assessment
- Danish Institute for Human Rights Quick Check
- Draft UN Norms for Transnational Companies
- Equator Principles
- Extractive Industries Transparency Initiative
- Fair Labor Association
- Flower Label Programme Code of Conduct
- Fund for Peace Human Rights and Business Roundtable
- Global Alliance for Improved Nutrition
- Global Business Coalition on HIV/AIDS
- Global Reporting Initiative
- Global Responsible Leadership Initiative
- Global Sullivan Principles
- ICMM 10 Principles of Sustainable Development
- IFC's Performance Standard on Involuntary Relocation
- ILO Standards and Conventions
- Institute of Social and Ethical Accountability AA 1000
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and, Cultural Rights

- ISO 14000
- ISO 14001
- Milieu Programma Sierteelt (MPS) Certification Programme for the Cut-Flower Industry
- Millennium Development Goals
- Multi-Fiber Agreement
- OECD Guidelines
- OECD Guidelines for Aid Agencies on Involuntary Displacement and Resettlement in Developing Projects
- OHCHR Briefing Paper, The Global Compact and, Human Rights: Understanding Sphere of Influence and Complicity
- OHSAS 18001
- Partnering Against Corruption Initiative
- Universal Declaration of Human Rights
- Voluntary Principles on Security and Human Rights
- World Bank Guidelines on Involuntary Resettlement (OP/BP 4.12)
- World Bank policies and procedures

Towards 2015: the Millenium Development Goals Task Force

In recent months, millions of people on every continent have been rapidly pushed into poverty and extreme poverty as a result of the downturn in the financial markets in developed countries and the resulting slowdown of the global economy .

The unprecedented impact of the current global crisis is very alarming.

We are called to place people at the centre of policy and strategy measures.

The crisis has had devastating consequences on the enjoyment of human rights, especially among vulnerable groups, and this demands immediate attention and action.

We are aware that the vocation of a lawyer, by the very nature of our role of providing advice, assistance and defence, is to contribute to social harmony, necessary for peace and development, and that it is the responsibility of a lawyer to include participation in all works of peace and development in our role.

Considering that the inalienable rights of every member of the human family are the very basis for freedom, justice, peace and international security, considering also that the right to development is an inalienable right of every human person and all peoples, enabling the human person to effectively exercise all his inalienable rights, recalling the principles of the

United Nations Charter, the Universal Declaration of Human Rights and the International Covenant on Economic, Social and Cultural Rights, which are aimed at development, progress and cooperation in economic fields on the basis of equality and independence, we have decided to focus our next years activity upon the needs of society to achieve MDGs.

In doing so, our both starting and arrival point is the duty of a lawyer of ensuring the right to legal advice, assistance and defence to every individual in complete independence, as well as the right to access to justice and the law without any distinction or discrimination, the duty of a lawyer to create or contribute to the creation of national and international conditions that are favourable to the realisation of the right to development, making all efforts, at national and international level, to reinforce peace and understanding between peoples, in order to enhance exchanges in every field, without any distinction of race, gender, language or religion.

More than ever, businesses are needed to contribute, invest, and partner.

Within this framework, we assist and are going to assist them to successfully implement the UNGC principles, that constitutes, in itself, a direct and valuable contribution to development.

The essence of business is creativity and innovation, and both of those phenomena play an essential part in the contribution to the MDGs.

Over time, however, various trends have begun to define the involvement of business in development.

Of particular interest to our activity are the trends that: 1) prove their value as supporters of the MDGs, and 2) can be scaled up and replicated both within and across industries. However, each trend may affect some MDGs more than others, and the constraints we encounter as we try to replicate positive results may differ from trend to trend, from sector to sector, from size to size.

Four action streams to be taken for our clients:

- Development or adaptation of products for underserved populations;
- Provision of financial services;
- Localizing the business value chain;
- Integrating practices that protect and preserve the environment.

Collaboration between us and our clients towards embedding the ten UNGC principles in business is no longer new and it has become engrained in the way we function.

Previously, most of our clients considered those principles part of their problems. Now

many accept that they make business part of the solution in confronting the complexity of global challenges and achieving development goals, in a view to manage the risk of damaging human rights with the perspective to avoiding it.

This is just the “end of the beginning”. There is a number of other key trends that are fundamentally changing the way we engage with our clients.

We are “learning by doing”. After a decade of experimentation the debate is finally shifting toward demonstrating impact, comparative advantage and scalability.

This involves a new emphasis of quality over quantity, strategic fit among partners, embedding UNGC principles into businesses, ensuring alignment between global and local programmes and more and better engagement with SMEs (Small- and Medium-sized Enterprises).

In this context, the focus is being placed by efforts to collaboratively promote business development, change business behaviour along the supply chain to reflect UNGC principles and harness the expertise, products and services of our clients to make more strategic investments.

The activities are increasingly being directed at areas where there is considerable value in collaboration and measurable impact.

The rise of multistakeholder issue networks is combining key aspects of all partnership types to bring all relevant actors to the table to scale up activities while ensuring alignment among global and local initiatives.

These are major steps on our part. Nevertheless, there is still work to be done.

First, scope remains for significant progress in developing a more coherent brand management system.

Second, many collaborations are still in “pilot mode”. A promising step is the launch of our “Corporate Sustainable Leadership List”, which incorporates current and emerging leadership practices by companies, addresses performance gaps, and builds new opportunities.

Third, vast differences persist within the framework of our clients between those ones who are implementing more strategic programmes and those who are still in the initial, experimental phases. To address this asymmetry in sophistication, continuing and expanding intra-organizational exchange and learning is highly recommendable.

Fourth, while we have improved our processes in dealing with our clients, scope for significant improvement remains in addressing cultural differences, as well as procedural and legal difficulties. Greater efforts to bridge these will enhance the effectiveness of our

activity.

Finally, as promising innovations often come from the ground level, more needs to be done to improve the effectiveness of our approach or similar coordination efforts to speak with one, united voice to potential clients sector. This would also have a significant effect on our ability to improve, promote and protect our brand value.

Partnership Projects: Timeline

For 1994: Member of UIA – *Union Internationale des Avocats*, Paris, France

From 2002 to 2007: President of UIA Media Law Commission

For 2003: Member of ABA - American Bar Association Member, Chicago, Illinois US

For 2007: President of UIA Business and Human Rights Commission

2010: Chair of the Section “Corruption in an International Context” at “Corruption and the Rule of Law” Seminar, organized in Macau – Macau Special Administrative Region on May 14-15th by Macau Lawyers Association

2010: contact to set about a partnership with CDC Foundation Yellow, UNIFEM, UNAIDS, BUSINESS CALL TO ACTION

Measurement⁽³⁾ and Reporting⁽⁴⁾

⁽³⁾In order to be considered notable, the part of COP “Measurement”, in addition to meeting the basic requirement of the Description of Practical Actions, meets also the following criteria:

- Performance indicators are clearly defined or a full set of standard indicators is used (GRI, Ethos institute etc.);
- Performance is shown for several years, allowing to check progress;
- The report presents positive and negative aspects of the organization’s performance to enable a reasoned assessment of overall performance;
- Targets for the following year(s) are specified;
- Performance relates to the ten principles of the UN Global Compact, even if the emphasis is placed in the implementation of some specific principles.

⁽⁴⁾ In order to be considered notable, the part of COP “Reporting”, in addition to meeting the basic requirement of the Description of Practical Actions, meets also the following criteria:

- Assurance: Information and processes used in the preparation of the COPs are externally assured by peer review, stakeholder audits/consultations, in-depth thirdparty assurance based on standards, etc.;
- Dissemination and stakeholder engagement: COP is actively shared with relevant stakeholders such as employees, shareholders, suppliers, customers, local communities, financial analysts, civil society organizations etc. and special efforts for stakeholder engagement are described;
- Clarity of COP: Information is made available in a manner that is understandable and accessible to stakeholders using the report;
- Timeliness of COP: The publication of the COP is aligned with the sustainability reporting schedule or the COP is posted on the UN Global Compact website no later than six months after the end of reporting period.

GRI G3 Disclosure

STRATEGY AND ANALYSIS	
Profile Disclosure 1.1 – Statement from the most senior decision-maker of the organization (e.g., CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy. Statement of Continuing Support	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, “ <i>Message from the Founder and CEO</i> ”, pages 5-9, and, in particular, the Section “ <i>Statement of Continued Support for the UNGC</i> ”, pages 8-9
Profile Disclosure 1.2 – Description of key impacts, risks, and opportunities. Statement of Continuing Support. Beyond stating ongoing commitment to the GC, the CEO letter might also mention how the Global Compact influences strategy and management, and refer to key actions and achievements that support the principles	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, “ <i>Message from the Founder and CEO</i> ”, pages 5-9, and, in particular, the Sections “ <i>The Call of a Lawyer</i> ”, page 6, “ <i>Anticipating the Future</i> ”, pages 6-7, “ <i>Stay Connected</i> ”, page 8, “ <i>Work in Progress</i> ” page 9
ORGANIZATIONAL PROFILE	
Profile Disclosure 2.1 – Name of the organization	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, front-page
Profile Disclosure 2.2 – Primary brands, products, and/or services	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, preamble

<p>Profile Disclosure 2.3 – Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12</p>
<p>Profile Disclosure 2.4 – Location of organization’s headquarters</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, preamble</p>
<p>Profile Disclosure 2.5 – Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12</p>
<p>Profile Disclosure 2.6 – Nature of ownership and legal form</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, front-page and preamble</p>
<p>Profile Disclosure 2.7 – Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12</p>
<p>Profile Disclosure 2.8 – Scale of the</p>	<p>See “Avvocato Michela Cocchi - Studio</p>

reporting organization	<i>Legale Global Compact End of Year COP 2010 Communication On Progress</i> , “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 2.9 – Significant changes during the reporting period regarding size, structure, or ownership	<i>No significant change during the reporting period regarding size, structure, or ownership</i>
Profile Disclosure 2.10 – Awards received in the reporting period	<i>AAM Associação dos Advogados de Macau Mention for the participation of Michela Cocchi as Moderator in the Seminar “Corruption and the Rule of Law” Macau, 14-15th May 2010</i>
REPORT PARAMETERS	
Profile Disclosure 3.1 – Reporting period (e.g., fiscal/calendar year) for information provided	<i>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, front-page and “Message from the Founder and CEO”, pages 5-9, and, in particular, the Sections “Statement of Continued Support for the UNGC” and “Work in Progress”, pages 8-9</i>
Profile Disclosure 3.2 – Date of most recent previous report (if any)	<i>No previous report</i>
Profile Disclosure 3.3 – Reporting cycle (annual, biennial, etc.)	<i>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, front-page and “Message from the Founder and CEO”, pages 5-9, and, in particular, the</i>

	Sections “Statement of Continued Support for the UNGC” and “Work in Progress”, pages 8-9
Profile Disclosure 3.4 – Contact point for questions regarding the report or its contents	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, front-page and “Message from the Founder and CEO”, pages 5-9, and, in particular, the Sections “Statement of Continued Support for the UNGC” and “Work in Progress”, pages 8-9
Profile Disclosure 3.5 – Process for defining report content	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, front-page and “Message from the Founder and CEO”, pages 5-9, and, in particular, the Sections “Statement of Continued Support for the UNGC” and “Work in Progress”, pages 8-9
Profile Disclosure 3.6 – Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)	No boundary
Profile Disclosure 3.7 – State any specific limitations on the scope or boundary of the report	No limitations
Profile Disclosure 3.8 – Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC

between organizations	<i>Principles”, pages 11-12</i>
Profile Disclosure 3.9 – Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, “ <i>Our Impacts</i> ”, and, in particular, the Section “ <i>Commitments, Actions, and UNGC Principles</i> ”, pages 11-12
Profile Disclosure 3.10 – Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement	<i>No previous report</i>
Profile Disclosure 3.11 – Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report	<i>No previous report</i>
Profile Disclosure 3.12 – Table identifying the location of the Standard Disclosures in the report	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, Index, page 3
Profile Disclosure 3.13 – Policy and current practice with regard to seeking external assurance for the report	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, pages 1-19
GOVERNANCE, COMMITMENTS AND ENGAGEMENT	
Profile Disclosure 4.1 – Governance structure of the organization, including committees under the highest governance	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, “ <i>Our</i>

body responsible for specific tasks, such as setting strategy or organizational oversight	<i>Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12</i>
Profile Disclosure 4.2 – Indicate whether the Chair of the highest governance body is also an executive officer	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.3 – For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.4 – Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.5 – Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization’s performance (including social and environmental performance)	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.6 – Processes in	See “Avvocato Michela Cocchi - Studio

place for the highest governance body to ensure conflicts of interest are avoided	<i>Legale Global Compact End of Year COP 2010 Communication On Progress</i> , “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.7 – Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization’s strategy on economic, environmental, and social topics	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.8 – Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.9 – Procedures of the highest governance body for overseeing the organization’s identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12
Profile Disclosure 4.10 – Processes for evaluating the highest governance body’s own performance, particularly with respect to economic, environmental, and social performance	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Section “Commitments, Actions, and UNGC Principles”, pages 11-12

<p>Profile Disclosure 4.11 – Explanation of whether and how the precautionary approach or principle is addressed by the organization Actions Taken to Implement Principle 7</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Sections “Reflection on Our Sphere of Influence and Management System” and “Actions”, pages 12-19</p>
<p>Profile Disclosure 4.12 – Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Sections “Reflection on Our Sphere of Influence and Management System” and “Actions”, pages 12-19</p>
<p>Profile Disclosure 4.13 – Memberships in associations (such as industry associations) and/or national/international advocacy organizations</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, and, in particular, the Section “Partnership Projects: Timeline”, page 19</p>
<p>Profile Disclosure 4.14 – List of stakeholder groups engaged by the organization</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, “Our Impacts”, and, in particular, the Sections “Reflection on Our Sphere of Influence and Management System” and “Actions”, pages 12-19</p>
<p>Profile Disclosure 4.15 – Basis for identification and selection of stakeholders</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP</p>

with whom to engage	<i>2010 Communication On Progress”, “Our Impacts”, and, in particular, the Sections “Reflection on Our Sphere of Influence and Management System” and “Actions”, pages 12-19</i>
Profile Disclosure 4.16 – Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, “ <i>Our Impacts</i> ”, and, in particular, the Sections “ <i>Reflection on Our Sphere of Influence and Management System</i> ” and “ <i>Actions</i> ”, pages 12-19
Profile Disclosure 4.17 – Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, “ <i>Our Impacts</i> ”, and, in particular, the Sections “ <i>Reflection on Our Sphere of Influence and Management System</i> ” and “ <i>Actions</i> ”, pages 12-19
ECONOMIC	
Disclosure on Management Approach – Economic Provide a concise disclosure on the following Management Approach items: goals and performance; policy; additional contextual information. Actions Taken to Implement Principles 1, 4, 6 and 7. Disclosure on management approach	See “ <i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i> ”, both “ <i>Message from the Founder and CEO</i> ” and “ <i>Our Impacts</i> ”, pages 5-19

<p>can be used to describe systems set up to tackle issues addressed by GC principles as well as any major changes to management systems or structures to improve performance and further implement GC principles</p>	
<p>For all:</p> <p>EC1 – Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments</p> <p>No Specific COP Requirement</p> <p>EC2 – Financial implications and other risks and opportunities for the organization’s activities due to climate change</p> <p>Actions Taken to Implement Principle 7</p> <p>EC3 – Coverage of the organization’s defined benefit plan obligations</p> <p>EC4 – Significant financial assistance received from government</p> <p>No Specific COP Requirement</p> <p>EC5 – Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation</p> <p>Outcomes from Implementing Principle 1</p> <p>EC6 – Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation</p> <p>No Specific COP Requirement</p> <p>EC7 – Procedures for local hiring and proportion of senior management hired</p>	<p>See “<i>Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress</i>”, both “<i>Message from the Founder and CEO</i>” and “<i>Our Impacts</i>”, pages 5-19</p>

<p>from the local community at significant locations of operation</p> <p>Actions Taken and Outcomes from Implementing Principle 6</p> <p>EC8 – Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement</p> <p>EC9 – Understanding and describing significant indirect economic impacts, including the extent of impacts</p> <p>No Specific COP Requirement</p>	
<p>ENVIRONMENTAL</p>	
<p>Disclosure on Management Approach – Environmental</p> <p>Provide a concise disclosure on the following Management Approach items: goals and performance; policy; organizational responsibility; training and awareness; monitoring and follow-up; additional contextual information. Actions Taken to Implement Principles 7, 8 and 9. Disclosure of management approach can be used to describe systems set up to tackle environmental issues addressed by GC principles as well as any major changes to management systems or structures to improve performance and further implement GC principles</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19</p>
<p>For all EN1 – 30,</p> <p>Actions Taken and Outcomes from</p>	<p>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP</p>

Implementing Principles 7, 8 and 9	<i>2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19</i>
LABOR PRACTICES AND DECENT WORK	
<p>Disclosure on Management Approach – Labor Practices and Decent Work</p> <p>Provide a concise disclosure on the following Management Approach items: goals and performance; policy; organizational responsibility; training and awareness; monitoring and follow-up; additional contextual information. Actions Taken to Implement Principles 1, 3 and 6. Disclosure of management approach can be used to describe systems set up to tackle labor issues addressed by GC principles as well as any major changes to management systems or structures to improve performance and further implement GC principles</p>	<i>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19</i>
<p>For all LA1 – 14,</p> <p>Outcomes from Implementing Principles 1 and 6</p>	<i>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19</i>
HUMAN RIGHTS	
<p>Disclosure on Management Approach – Human Rights</p> <p>Provide a concise disclosure on the</p>	<i>See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both</i>

<p>following Management Approach items: goals and performance; policy; organizational responsibility; training and awareness; monitoring and follow-up; additional contextual information. Actions Taken to Implement Principles 1, 2, 3, 4, 5 and 6. Disclosure of management approach can be used to describe systems set up to tackle human rights issues addressed by GC principles as well as any major changes to management systems or structures to improve performance and further implement GC principles</p>	<p><i>“Message from the Founder and CEO” and “Our Impacts”, pages 5-19</i></p>
<p>For all HR1 – 9, Actions Taken and Outcomes from Implementing Principles 1 and 2</p>	<p>See <i>“Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19</i></p>
<p>SOCIETY</p>	
<p>Disclosure on Management Approach - Society Provide a concise disclosure on the following Management Approach items: goals and performance; policy; organizational responsibility; training and awareness; monitoring and follow-up; additional contextual information. Actions Taken to Implement Principle 10. Disclosure of management approach can be used to describe systems set up to tackle anti-corruption addressed by GC principles as well as any major changes to</p>	<p>See <i>“Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19</i></p>

management systems or structures to improve performance and further implement GC principles	
For all SO1 – 8	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19
PRODUCT RESPONSIBILITY	
<p>Disclosure on Management Approach – Product Responsibility</p> <p>Provide a concise disclosure on the following Management Approach items: goals and performance; policy; organizational responsibility; training and awareness; monitoring and follow-up; additional contextual information.</p> <p>Actions Taken to Implement Principles 1 and 8. Disclosure of management approach can be used to describe systems set up to tackle issues addressed by GC principles as well as any major changes to management systems or structures to improve performance and further implement GC principles</p>	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19
For all PR1 – 9	See “Avvocato Michela Cocchi - Studio Legale Global Compact End of Year COP 2010 Communication On Progress”, both “Message from the Founder and CEO” and “Our Impacts”, pages 5-19