



Message from the Chief Executive Officer

Promon is a Brazilian company whose principal characteristics include the fact that it is entirely owned by its staff. Its vigorous and authentic organizational culture is the result of the experience garnered by generations of professionals in surmounting challenges during its 50-year history. Values such as integrity, trust, respect and equity are central to its corporate culture and character. Its history evidences an incessant pursuit of innovative ways to harmonize business goals with human needs, capital with labour, value creation for clients with effective contributions to social development, competitiveness with the professional and human fulfilment of its people.

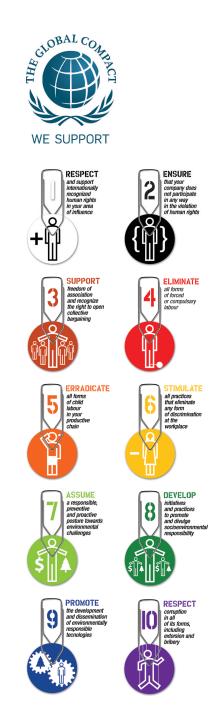
We therefore believe that in addressing issues related to human rights, industrial relations, environmental management and the fight against corruption organizations can and should go beyond the indispensable adoption of policies and practices aligned with the principles of corporate social responsibility, by including the requirements of sustainability among the fundamental elements that define their culture and inserting these requirements into their goals and strategies.

By continuing to support the Global Compact we publicly reaffirm our belief that companies are active agents in the process of development of society and environmental conservation, and that as such they have a role to play in the construction of a more prosperous and just society, both by example and by action.

WirFernando

Luiz Fernando Telles Rudge CEO







Commitment

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

System: Organisational Culture

Action Performance

Ethical Guidelines

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

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

System: Organisational

Action | Performance

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

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

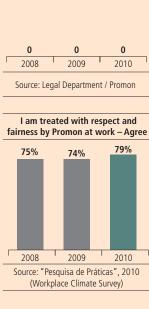
- profit sharing (semiannual) for all staff, whether or not they are shareholders
- dividends paid to shareholders, all of whom are Promon employees
- reinvestment in the business, which in turn is reflected in the share price and hence in employee wealth.

System: People

Action | Performance

Occupational Health & Safety Promon's occupational health, safety and environmental management (HSE) systems are certified against OHSAS 18001 and ISO 14001, and cover all projects and worksites. Actions to minimize hazards and risks, prevent accidents and comply with legal and regulatory requirements have a strong impact on the provision of a safe and healthy working environment while minimising occupational accidents and disease. Such HSE actions include:

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

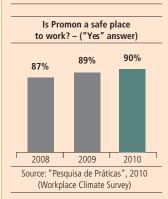




One of the winners of the quality award *Prêmio Nacional da Qualidade – 2007*



Source: Financial Management / Promon



alle **Promon**

Indicators

Number of complaints alleging

unfair trade pratices filed with or

by CADE, Brazil's antitrust regulator

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System: People

Action Performance **Occupational Health &** Safety

Office environment and worksite induction training – Information on Promon's Health, Safety

& Environment Policy, its HSE management system, workplace conditions and climate, risks inherent in the job, preventive measures, emergency telephone numbers, escape routes, and key work procedures and instructions is supplied to all office and worksite staff.

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

Specific HSE requirements for subcontractors – For all subcontracted services, HSE requirements are specified in the request for proposals and from then on for each scope of work, so that bidders and selected suppliers can budget and plan appropriately.

HSE kick-off meetings with subcontractors -

Meetings led by the head of HSE to explain Promon's HSE guidelines, corporate policy, procedures, objectives and targets for the activity in question.

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

Specific training – Provided as planned or whenever need is detected by awareness surveys or required by noncompliance, accidents or emergency situations.

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

Scheduled HSE inspections – Weekly HSE inspections are carried out at worksites using checklists to detect any vulnerabilities or hazards that need correcting, e.g. housekeeping/cleanliness, PPE use, CPE use, suitability of facilities.

Weekly HSE meeting - HSE teams meet with subcontractor site foremen to decide what needs to be done generally in the week ahead and agree on corrective action plans for any deviations or pending matters.

Action Performance

Programme

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

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

Pension fund – Introduced in 1976 and available to all staff. Loans – Personal loans from Promon are available to all staff. in amounts corresponding to up to 12 months' pay. The company finances purchases of company shares by employees.

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

Short vacation internship - School students aged 17-21 belonging to employees' families are admitted as interns during school vacations to develop behavioural skills, prepare for the selection process and familiarise themselves with the dynamics of a business environment.



2009

The CCPR Consortium, formed by Camargo Corrêa and Promon Engenharia, Brazil won the Protection Award in Occupational Safety 2010 edition of the journal Protection Initiative in two categories: Working at Height and Corrective Actions in Health and Safety.





Indicators

HSE training man-hours

vs. man-hours worked

3.3%

3.5%

2010

3 9%

2008

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System: People

Action Performance

Quality-of-Life Programme

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

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

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

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

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

Quick massage – Physical therapy in the workplace, focusing on body energy balance and muscle relaxation. **Fitness centre** – Promon has a fully equipped fitness centre occupying about 100 square metres in the penthouse of its office complex.

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

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

Running clubs – Help with training for runners, including personalised weekly training plans, Q&A, counselling, prizes, information, health tips, enrolment and supervision for main races in Brazil and abroad.

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

Action | Performance

Hiring &

Induction

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

Inclusion of Persons with Special Needs (PSN)

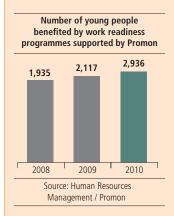
 "Attitude to Include Programme" aims to extend company's inclusion culture by hiring more PSN, providing support for them, and raising staff awareness.
 Adolescent Apprenticeships – Specific two-year programme to include and train 17-20-year-olds. Technical supervision by CIEE (Centro de Integração Empresa-Escola, an education nonprofit funded by business). Oversight by Promon's Human Relations and Communication Departments.

Action | Performance

Internal Communication **Corporate portal** – Created in 2002 to enable staff to access all the necessary company information. **Our People** – Section of the portal where employees share personal experiences and amusing or significant true stories about their lives.



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



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System: People

Action Performance

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

Specific meetings – Open to all staff to encourage discussion and dissemination of ideas and knowledge. Meetings with HR – Meetings open to all staff to encourage dissemination of knowledge and discussion of ideas relating to human resources policy and practices. Use of videoconference rooms – The company's videoconference rooms enable groups to communicate in real time wherever they are located, facilitating collaboration and the sharing of information and work materials without any need to travel.

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

Blogs – Introduced on the intranet in 2007 to enhance communication and dissemination of content relating to matters of importance to the company. We currently have 16 blogs covering business, volunteering, sustainability and the affairs of the Secretarial Development Committee. **Roda Viva** – Periodical meetings coordinated by HR and attended by CEO and senior executives. Open to all staff but limited to 20 people per meeting to assure effective and intense dialogue on topics of interest to participants. **Chats with top management** – Periodical meetings coordinated by HR and attended by CEO and senior executives, involving groups of ten employees with highly varied profiles, from new hires to outstanding performers. Opportunity for informal open-ended discussion of relevant topics, as well as knowledge sharing and integration.

Action | Performance

Pay

Self-proposed salaries – Staff propose salary levels using a standard form with a justification for the parameters involved. After analysis and assessment by managers, including interaction with the individuals concerned, the results of the salary review are communicated to each professional.

Action | Performance

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

System: Society & Environment

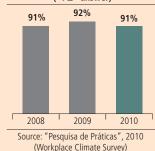
Action | Performance

Engagement in Social Initiatives

Professional Development

> Signatory of National Compact to Eradicate Slave Labour in Brazil – Promon is a signatory of the Compact, based on a report by the International Labour Organisation (ILO), undertaking not to acquire goods whose production chain involves slave labour. Member of Movimento Todos Pela Educação – The "All for Education Movement" is an alliance of civil society, business, social organisations, educators and public administrators in education to guarantee basic schooling of high quality for all by 2022, when Brazil celebrates its independence bicentennial.





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Promon

System: Society & Environment

Performance Action

Engagement in Social Initiatives

Member of Rede Nossa São Paulo: Outra

Cidade – "Our São Paulo: Another City" is a network comprising dozens of civil society organisations whose aim is to build a political, social and economic force through comprehensiveness, representativity, credibility, commitment and effectiveness that will engage society and successive governments with an agenda and a set of targets to offer a better quality of life to all inhabitants of the city.

Member of Instituto Ethos de Empresas e Responsabilidade Social – Since 2000 (Instituto Ethos is a nonprofit whose mission is to promote CSR). Member of Instituto Akatu pelo Consumo

Consciente – Since 2007 (Instituto Akatu is a nonprofit whose mission is to raise consumer consciousness of the value of sustainable goods and services).

Member of Brazilian Global Compact

Committee – The committee comprises 32 companies which voluntarily work with the Global Compact Network, provide guidance for signatories, and promote adoption of the Compact's Principles by the management of companies operating in Brazil.

Member of Fundação Nacional da Qualidade - FNQ, the National Quality Foundation, is a non-governmental organisation created in 1991 to research and disseminate the fundamentals of management excellence, help enhance the competitiveness of Brazilian business and improve the quality of life for all Brazilians. Member of GIFE - Group of Institutes, Foundations & Enterprises is the first South American association of grantmakers and other private-sector organisations that fund or operate CSR projects (social, cultural and environmental). GIFE assists its members in developing efficient and effective CSR activities by supplying accurate information, offering training through workshops, courses and conferences with Brazilian and foreign experts, providing a space for the sharing of ideas and experiences. and stimulating SR partnerships between private enterprise, government and organised civil society.

Action Performance

Social

Investment

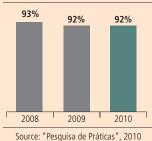
Instituto Razão Social – IRS is a nonprofit institution founded by Promon and other companies in 2001 to contribute to teaching-learning processes and school management in public education in Brazil, based on the understanding that business organisations can conduct projects in partnership to join forces and produce more effective results. Currently funded by Gerdau as well as Promon. **IRS initiatives supported by Promon**

Progestão Online - Distance learning: Promon has created an online version of Progestão, a continuing education course for public primary and secondary school managers. Social Mobilisation for Education Plan, Araucária, Paraná – With partners in business, civil society and government, Promon disseminates information about family participation in school to worksite employees in the city of Araucária. Paraná, which has a municipal plan for this purpose as part of a call from the federal ministry of education to encourage families and the community in general to volunteer for this kind of activity in order to improve the quality of education. The plan's core values are human rights, citizenship, ethics, solidarity, inclusion and tolerance.

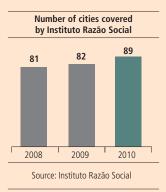


Recognized as one of the 20 model companies in corporate sustainability by Guia Exame de Sustentabilidade

Does the company adopt a socially responsible attitude toward the projects for which it is responsible? - ("Yes" answer)



(Workplace Climate Survey)



Number of educators directly and indirectly benefited from projects supported by Instituto Razão Social





Source: Instituto Razão Social



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System: Society & Environment

Performance Action

Social Investment

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

ACB initiatives supported by Promon

Project Pingo – Dissemination of knowledge and use of new and old media in educational activities for poor children to promote local talent, resources and services. Projeto Eu, Tu, Nós – "I, You, We" installs computer labs, sets up internet networks and produces community newspapers in poor neighbourhoods.

<u>Projeto Crê-Ser</u> – "Growing & Becoming" is a network linking schools with families and communities to protect children and defend their rights, while enabling them to experience high-quality education in such areas as reading and writing, visual and plastic arts, music, games and better study habits.

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

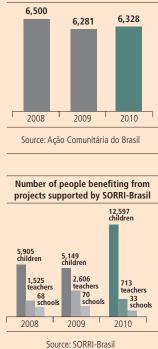
Sorri-Brasil – Promon supports Sorri-Brasil, a nonprofit that runs educational programs for people with special needs and works to raise social awareness of PSN issues.

Sorri-Brasil initiatives supported by Promon Contando História: Convivendo com as Crianças com Deficiência – "Storytelling and Living with Children with Disabilities" is a project designed to make teachers and children at São Paulo's public nursery schools aware of issues relating to children with disabilities via games and art. Roda de Conversa: o que eu quero ser quando crescer? Conversation Circle: What Do I Want To Be When I Grow Up? – Project designed to provide opportunities for reflection on the world of work today and the real possibilities of professional fulfilment for young people with special needs, via presentations to public secondary schools in São Paulo State.

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

Casa do Zezinho initiatives supported by Promon Programa Arte na Periferia – "Art on the Outskirts" provides art workshops and recreation at weekends for poor children as well as running income generation projects. Educação de Jovens para o Século XXI – "21st Century Education for Young People" provides courses in reading and writing, arithmetic, English, Spanish and computer skills for adolescents aged 14-18 to promote equality of opportunity and citizenship. Donation of 30 computers for modernisation of IT lab.

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





The Project "Art in the Periphery" of the Dewey House entity, supported by Promon since 2000 was cited as one of the top 30 social projects in the 2010 report A Global Compact for Development of the United Nations.

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System: Society & Environment

Performance JA initiatives supported by Promon

Social Investment

Action

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

educational programme designed to teach children and adolescents about budgeting, managing personal and family finance, and investing and spending wisely, as well as the pros and cons of credit.

Projeto Casulo – NGO that aims to foster the personal and social development of children, youngsters and families in two poor communities in the southern suburbs of São Paulo (Real Parque and Jardim Panorama).

Projeto Casulo initiative supported by Promon Casulo Community Library - Encourages children to read by democratising access to books in ways that promote diversity, fun and critical thinking.

Associação dos Meninos do Morumbi - NGO founded in 1996 to use music as an alternative to drugs and juvenile delinquency in a slum area of southern São Paulo (Morumbi). AMM initiative supported by Promon Environmental Education – Project designed to encourage children to address local socio-environmental issues through participatory practices and engagement.

Instituto Bola pra Frente – Social promotion for socially vulnerable children aged 6-17 in a northern neighbourhood of Rio de Janeiro (Guadalupe) through sport, education, art, culture and vocational training.

BPF initiative supported by Promon

Sport & Education Project – Contributing to all-round education for children and young adults through sport training and recreation.

Associação Ser Cidadão - Vocational education for 16-20-year-olds from poor communities. All courses have two modules. The basic module focuses on youth protagonism, comprising art education, music, reading, drama, environment and citizenship. The association also works with students' families.

ASC initiative supported by Promon

Coral Oficina - Choral singing workshops led by specialists to train and develop 15-20-year-olds in Santa Cruz, Rio de Janeiro. Donation of 35 computers for three IT labs and modernisation of administration.

Camp Vila Isabel – Vocational training for 14-18-yearolds by Círculo de Amigos do Menino Patrulheiro de Vila Isabel, founded in 1985 and operating out of the offices of the Brazilian Red Cross in Rio de Janeiro. Free courses in Portuguese, mathematics, English, work readiness, computer literacy, personal hygiene etc. Some 80 adolescents graduate from the clerical course each year.

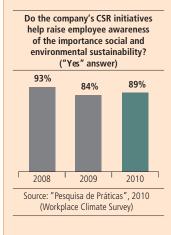
CVI initiative supported by Promon

Donation of 25 computers for IT lab and to computerise administration.

Asylo Espírita João Evangelista – Founded in 1927 to provide a home and educational activities for orphaned girls. **AEJE** initiative supported by Promon Donation of ten computers for IT lab.



Indicators





Promon Engineering entered the Benchmark Group of the Ethos of Corporate Social Responsibility (composed of companies which received the top prize based on the score of 2,167 firms that answered the questionnaire).

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System: Society & Environment

Action | Performance

Social Investment

CCA Lar Escola Recanto Cristão – Supplementary education for at-risk children and adolescents, plus meals, arts and crafts, sport, and computer skills. CCA LERC initiative supported by Promon Donation of 15 computers for modernisation of IT lab.

CCA Santa Teresa de Jesus – Founded in 1988 to improve the quality of life for children and adolescents through education, providing help with school work and courses in arts and crafts, music and computing, as well as recreation. **CCA STJ initiative supported by Promon** Donation of 12 computers for modernisation of IT lab.

Oxigênio Desenvolvimento de Polí ticas Públicas e

Sociais – Educational and social development programmes designed to contribute to conservation and sustainable use of biodiversity, dissemination of CSR practices and other activities that prioritise human rights and dignity.

Oxigênio initiative supported by Promon Donation of 45 notebooks, 21 desktops, LCD monitors, docking stations and Cisco IP phones, sent to Oxigênio's computer reconditioning unit, a partnership with Microsoft, for use in national digital inclusion programme.

Creche Santa Teresa de Jesus – Daycare centre for 1-3-yearolds, providing educational and recreational activities. CSTJ initiative supported by Promon Brinquedoteca – Creation of play space with toys and books for 120 children per year and staff training in importance of play to child development.

Centro Beneficente Nossa Senhora da Glória -

Education and quality-of-life assistance for children, adolescents and the elderly in Alemanha, a neighbourhood near the centre of São Luís, Maranhão. Children are given help with school work, literacy and religion, the elderly with self-esteem via recreational activities, friendship and prevention of old-age-related diseases.

CBNSG initiative supported by Promon Donation of utensils and office furniture.

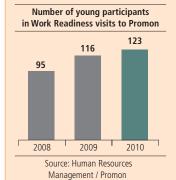
AMMJP Associação Missionária Menino – Help with school work, computing and recreation for poor children in São Luís, Maranhão. AMMJP initiative supported by Promon

Donation of utensils and office furniture.

GRAAC – Support Group for Children & Adolescents with Cancer, established the city of São Paulo to guarantee the right to a cure with quality of life according to the highest scientific standards. **Instituto Ronald McDonald** – Established in Rio de Janeiro to support children with cancer anywhere in Brazil through programmes that promote early diagnosis, referral and first-class treatment.

IRM initiative supported by Promon

Participation in McHappy Day Campaign (all revenue from sales of Big Macs on last Saturday in August, excluding some taxes, and promotional material produced by participating organisations donated to institutions fighting child cancer throughout Brazil). Promon's São Paulo and Rio de Janeiro offices purchased 500 and 200 vouchers respectively, with proceeds donated to GRACC and Instituto Ronald McDonald, and gave vouchers away to children assisted by partner institutions in both cities.





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System: Society & Environment

Action Performance

Voluntary Service Programme

Promon encourages employees to engage in volunteering and social responsibility activities. These are considered part of the company's responsibility to the nation and are structured and organised so as to assure maximum social returns on the resources used and the time spent by the employees concerned. The programme focuses on four areas: school homework, work readiness, managerial and infrastructure support for partner NGOs, and activities relating to social campaigns, communication and engagement.

Communication and engagement initiatives

<u>Volunteer Blog</u> – Virtual environment for employees, interns and service providers to exchange ideas, knowledge and experience, publicise opportunities and discuss lessons learned in connection with volunteering. To be upgraded in 2011.

<u>Volunteer Email</u> – Email accounts exclusively for Promon employees to deal with matters relating to voluntary service.

Promon Volunteering Week – First held in August 2010 to celebrate Brazil's National Volunteer Day (Aug. 28). Designed to recognise employees who volunteer while informing and motivating the rest. Activities held during the week at all Promon offices (Belo Horizonte, Campinas, Manaus, Rio de Janeiro and São Paulo) included exhibitions, presentations and workshops relating to voluntary service, as well as involvement of children cared for by partner NGOs.

Talks with senior executives – Volunteers have a chance to meet periodically with top management, including the CEO, in São Paulo and Rio de Janeiro. Meetings are coordinated by HR and open to all volunteers but limited to ten per meeting to enable a real dialogue on any topic related to the subject of volunteering.



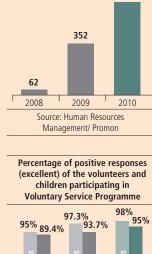
Ação Comunitária do Brasil – Nonprofit that since 1967 has run programmes in education, culture and citizenship to advance social inclusion for people in situations of social vulnerability. It currently focuses on capacity building and networking for community leaders, providing legal support for the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

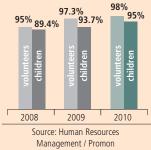
Activities

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

<u>Infrastructure Support</u> – Volunteers helped regularise municipal planning permission for ACB's office building by producing the floor plan, cross-section and elevation, facade elevation, plot plan, and roof plan for three rooms in the building.

<u>Management Support</u> – Workshop on strategic planning for 42 community leaders who partner with ACB. Presentation on what employers expect from young people for educators in ACB's work readiness programme.





Indicators

Number of volunteers in

Promon Group (Voluntary Service

Programme and social campaigns)

773

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System: Society & Environment

Action

Voluntary

Programme

Service

Performance Entity benefited

CCA Lar Escola Recanto Cristão – Supplementary education for at-risk children and adolescents, plus meals, arts and crafts, sport, and computer labs.

Activities Help with school work

<u>English</u> – Basic English classes given by volunteers with specific material and supervision by English for All, a Brazilian nonprofit.

 $\underline{Social \ campaigns}$ – Donation of clothes, shoes and toys for children during the year-end holiday season.

Entity benefited

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

Activities

Help with school work

<u>Mathematics</u> – Volunteers lead Q&A sessions on basic maths for children from low-income households basic maths with university teachers (Universidade Anhembi-Morumbi) providing classroom material and online pedagogic support.

English – Basic English classes given by volunteers with specific material and supervision by English for All, a Brazilian nonprofit.

Entity benefited

Círculo de Amigos do Menino Patrulheiro de

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

Activities

Help with school work

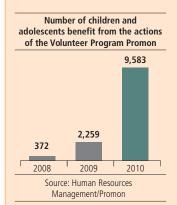
Introduction to the World of Business – Partnership with Associação Junior Achievement. Volunteers present concepts and basic principles of business management through games and other fun activities in five one-hour classes on one day each week. The idea is to help students develop awareness while acquiring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

Personal Economics – Course designed in partnership with Associação Junior Achievement to teach adolescents in ten one-hour classes on one day each week about budgeting, managing personal and family finance, and investing and spending wisely, as well as the pros and cons of credit. English – Basic English classes given by volunteers with specific material and supervision by English for All, a Brazilian nonprofit.

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

Entity benefited

Associação Ser Cidadão – Vocational education for 16-20-year-olds from poor communities. Formally set up four years ago, the association has a 20-year





Commitment:

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



System: Society & Environment

Action Performance

Voluntary Service Programme history grounded in the activities developed by Educação de Trabalho (Education for Work). All courses have two modules. The basic module focuses on youth protagonism, comprising art education, music, reading, drama, environment and citizenship. The association also works with students' families.

Activities

Help with school work

Personal Economics – Course designed in partnership with Associação Junior Achievement to teach adolescents in ten one-hour classes on one day each week about budgeting, managing personal and family finance, and investing and spending wisely, as well as the pros and cons of credit. English – Basic English classes given by volunteers with specific material and supervision by English for All, a Brazilian nonprofit.

<u>Work Readiness</u> – Adolescents and young adults aged 16-21 visit Promon's offices for presentations by volunteers, group dynamics, testimonials and technical visits to different departments, receiving information on employability, personal and professional development, and the Promon selection process, including mock interviews. Presentations by volunteers in 2010 covered information on the labour market and career prospects.

<u>Management support</u> – A group of volunteers are helping the management of ASC with strategic planning and related processes.

Social campaigns

Book donation – Volunteers collect books donated to start a library.

Entity benefited

Creche Vovó Carmen – Daycare centre in Rio de Janeiro providing educational and recreational activities for 105 children aged 2-6, as well as psychological support and social counselling for their families.

Activities

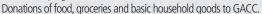
<u>Infrastructure support</u> – Diagnosis, analysis and preparation of technical options for conversion of a space into a play room with toys and books.

Entity benefited

GACC Amazonas – In 2002 the local chapter of Support Group for Children & Adolescents with Cancer set up a centre for 25 children in treatment at the Amazonas State Oncology Centre. The centre offers educational activities, recreation, and psychological and pedagogical counselling. In addition, GACC Amazonas distributes food, basic household goods and clothing, among other items, to 225 registered children.

Activities

Social campaigns

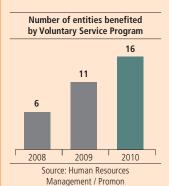


Entity benefited

Fundação Toque – Nonprofit providing specialised educational support to children and adults with intellectual and multiple disabilities, and clinical, cultural, vocational and sports-related support to persons with hearing, sight and other physical disabilities.

Activities

<u>Infrastructure Support</u> – Volunteers produced architectural, plumbing and electrical designs for a new wing for the foundation's building.





Promon Voluntary Service Programme ranked among top 11 CSR initiatives in 2010 by Brazilian Association of Sales & Direct Marketing Managers (Prêmio Top Social ADVB).

Commitment:

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

System: Partners & Suppliers

Action Performance

CSR Clause in Supplier Contract

Assessments

for Supplier

Qualification

& Monitoring

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

Action | Performance

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

Action | Performance

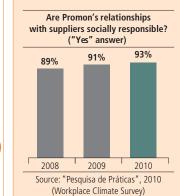
Initiative to Share Values & Principles

Promon Integra 2009 – Biennial event bringing together key suppliers to share ethical principles and deploy joint initiatives relating to labour law commitments that contribute to the development of Promon's supplier network. The next such event is scheduled for 2011.

Action Performance

Technical Pr Inspection er to Verify Best Practice in Social & Environmental Responsibility

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



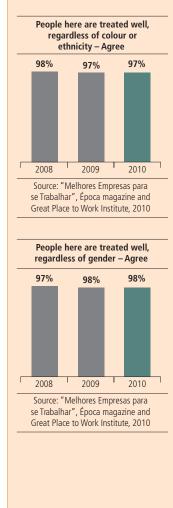
NEW

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

Commitment

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

System: People			
Action Hiring & Induction Action Professional Development	 Performance Promon does not permit discrimination on grounds of age, gender, colour, race, creed or sexual preference in recruitment and selection. Inclusion of Persons with Special Needs (PSN) – "Attitude to Include Programme" aims to extend company's inclusion culture by hiring more PSN, providing support for them, and raising staff awareness. Adolescent Apprenticeships – Specific two-year programme to include and train 17-20-year-olds. Technical supervision by CIEE (Centro de Integração Empresa-Escola, an education nonprofit funded by business). Oversight by Promon's Human Relations and Communication Departments. Performance Promon does not permit discrimination on grounds of age, gender, colour, race, creed or sexual preference in its training processes. 		
System: Soci	ety & Environment		
Action IBASE CSR Report	Performance Statistical survey of workforce by gender, age (over 45), hierarchical level and ethnicity for publication in CSR report according to standard developed by IBASE (Instituto Brasileiro de Análises Sociais e Econômicas), a nonprofit founded in 1981 to build democracy by fighting inequalities and stimulating citizens' participation through research, surveys, advocacy and solidarity campaigning.		
System: Part	ners & Suppliers		
Action CSR Clause in Supplier Contract	Performance Inclusion of CSR requirements based on Social Accountability Standard SA8000 in supplier selection and assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of SA8000 compliance.		
Action Assessments for Supplier Qualification & Monitoring	Performance Supplier selection and performance assessment based on documents that prove the legality of their activities in the marketplace.		
Action Technical Inspection to Verify Best Practice in Social & Environmental Responsibility	Performance Promon staff visit suppliers for inspection of social and environmental practices.		
Action Initiative to Share Values & Principles	Performance Promon Integra 2009 – Biennial event bringing together key suppliers to share ethical principles and deploy joint initiatives relating to labour law commitments that contribute to the development of Promon's supplier network. The next such event is scheduled for 2011.		
Action Engagement in Social Initiatives	Performance Signatory of National Compact to Eradicate Slave Labour in Brazil – Promon is a signatory of the Compact, based on a report by the International Labour Organisation (ILO), undertaking not to acquire goods whose production chain involves slave labour.		



Indicators



APPromon

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

Commitment

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

System: Organisation

Action | Performance

Ownership Structure Promon's employees are its sole shareholders. Equity ownership is open to all staff without exception on a voluntary basis. This

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

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

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

System: People

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

System: Partners & Suppliers

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

network. The next such event is scheduled for 2011.

Pra & I



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

Commitment

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

System: Society & Environment



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

System: Partners & Suppliers

Performance Action **CSR Clause** All contracts signed by suppliers of goods and services in Supplier include a clause repudiating and prohibiting the use of any form of forced labour or child labour throughout the Contract supply chain. Action Performance Supplier selection based on documents that prove the **Documents** legality of their activities in the marketplace. Required Action Performance Inclusion of CSR requirements based on Social Inclusion Accountability Standard SA8000 in supplier selection and in supplier assessment procedures. Staff in HR, Legal, Procurement, selection and Administration and HSE trained as internal auditors of assessment policies SA8000 compliance. of specific criteria assuring the elimination of all forms

Action Performance

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

Performance Action

Initiative to Promon Integra 2009 – Biennial event bringing together key suppliers to share ethical principles and deploy joint initiatives relating to labour law commitments that contribute to the development of Promon's supplier

Performance

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

	0		0		0	
	2008	Т	2009	-	2010	7
Source: Ethos indicators for Social Responsibility, 2010						
Number of violations of ban on child labour imputed to Promon by Ministry of Labour inspectors						
				ur in:	spectors	
				ur in:	spectors	
				ur in:	spectors	
				ur in:	spectors	
				ur in:	spectors	

2009

Source: Human Resources

Management / Promon

2010

2008



Share Values & Principles network. The next such event is scheduled for 2011. Action **Technical** Inspection to **Verify Best** Practice in Social & Environmental Responsibility

of forced or compulsorv labour

Assessments

for Supplier

Qualification

& Monitoring

AIPPromon

Indicators

Number of reported violations relating to use of forced

labour in production chain

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

Commitment

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

System: People

Action Performance

Hiring & Induction

Adolescent Apprenticeships – Specific two-year programme to include and train 17-20-year-olds. Technical supervision by CIEE (Centro de Integração Empresa-Escola, an education nonprofit funded by business). Oversight by Promon's Human Relations and Communication Departments.

System: Society & Environment

Action | Performance

Engagement in Social Initiatives

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

Member of Movimento Todos Pela Educação – The "All for Education Movement" is an alliance of civil society, business, social organisations, educators and public administrators in education to guarantee basic schooling of high quality for all by 2022. It has five major aims: all children aged 4-17 to attend school; all children to be fully literate by the age of 8; all children to attain a level of learning appropriate for their grade; all children to complete secondary schooling by the age of 19; wellmanaged and rising investment in education. **Funding member of Fundação Abring pelos**

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

Action | Performance

Voluntary Service Programme

Sixteen-to-21-year-olds from Ação Comunitária do Brasil, Associação Ser Cidadão and Camp Vila Isabel receive advice on work readiness through presentations, group dynamics and testimonials in guided visits to Promon's São Paulo and Rio de Janeiro offices. 2,936

08 ¹ 2009 ¹ 20 Source: Human Resources Management / Promon

2010

2008





Number of young people

benefited by work readiness

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

Commitment

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

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

Indicators Ministry of Labour penalties for use of forced labour 0 0 0 2008 2009 2010 Source: Human Resources Management / Promon Nanagement / Promon



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

Commitment

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



Performance Action Promon's employees are its sole shareholders. Equity

Ownership Structure

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

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

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

System: People

Action Performance Hiring & HR conducts the selection and accession process entirely in line with Promon's commitment to eliminate discrimination Induction in the organisation. Candidates participate in all stages of the selection process regardless of job description or hierarchical level. Inclusion of Persons with Special Needs (PSN) - The company's "Attitude to Include" Programme is designed to extend its inclusion culture by hiring PSN, providing assistance and raising staff awareness. Action Performance The same benefits, including pay, medical care and Pay retirement plans, are available to all professionals regardless of hierarchical level, function, gender, ethnicity, religion and age. Performance Action Professional Promotion strictly by merit, with no discrimination based on **Development**, hierarchical level, function, gender, ethnicity, religion or age. The performance assessment system is the same for all staff **Education &** regardless of hierarchical level, function, gender, ethnicity, Training religion or age. Professional development programmes are offered to all staff regardless of hierarchical level, function, gender, ethnicity, religion and age.

Action Performance

Separation

Employees participate in all stages of the separation process regardless of job description or hierarchical level. HR assists employees with the production and dissemination of their CVs. Following separation, ex-employees may opt to continue paying for the pension plan provided they bear the full cost of the premium.



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

Commitment

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

System: Partners & Suppliers

Action Performance All contracts signed by suppliers of goods and services **CSR Clause** include a clause repudiating and prohibiting all forms of in Supplier discrimination in respect of employment and occupation. Contract Action Performance Supplier selection is based on documents that prove the Required Documents legality of their activities in the marketplace. Performance Action Inclusion Inclusion of CSR requirements based on Social in Supplier Accountability Standard SA8000 in supplier selection and **Selection &** assessment procedures. Staff in HR, Legal, Procurement, Administration and HSE trained as internal auditors of Assessment SA8000 compliance. **Policies of Specific** Criteria **Assuring the Elimination of** Discrimination in **Employment** & Occupation Action Performance Assessments Supplier selection and performance assessment are based on documents that prove the legality of their activities in for Supplier **Oualification** the marketplace. & Monitoring

Action | Performance

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

Action | Performance

Initiative to Share Values & Principles

Technical

Inspection to Verify Best Practice in Social & Environmental Responsibility

Promon Integra 2009 – Biennial event bringing together key suppliers to share ethical principles and deploy joint initiatives relating to labour law commitments that contribute to the development of Promon's supplier

network. The next such event is scheduled for 2011.

Businesses should support a precautionary approach to environmental challenges.

Commitment

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

System: Society & Environment

Performance Action

HSE Management System

Promon is certified against ISO 14001, the most widely recognised international standard for environmental management. The key component of its HSE Management System is the identification and preventive treatment of potential causes of damage to the environment, society or property, setting goals and targets for enhanced environmental performance. All projects and worksites comply fully with ISO 14001.

In 2009 and 2010 the HSE Management System used by Promon and the consortia in which it participates was recognised by independent bodies as a benchmark for best management practice, receiving awards such as the Petrobras Contractor HSEQ Prize for the diesel hydrotreater unit (DHTU) at the Revap refinery and the Banas Sustainable Development Prize for the retarded coking unit at the Repar refinery. JEV

Action Performance

Environmental Management Discipline

Action Environmental Responsibility Working Groups in Engineering **Projects**

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

Promon includes environmental management among the

Performance

Working groups comprising professionals from various technical areas of engineering, whose remit is to procure, implement and disseminate available technologies that minimise the environmental impact of the company's projects. The groups include engineers allocated to projects in accordance with the work themes addressed.

Action Performance

Multidisciplinary group whose main remit is to strengthen and disseminate the company's social and environmental activities.

Performance Action

Socio-Environmental Awareness Raising

Society &

Group

Environment

Programmes to conserve or substitute non-renewable resources and minimise the amount of renewable resources used, both in management of the organisation's facilities and in the supply of products and services to clients and at

worksites. Recycling of paper, plastic cups and fluorescent bulbs, use of recycled paper, collection and proper disposal of batteries used in offices, office furniture made of certified wood and reduction of electricity and water consumption are some of the preventive measures taken to address environmental challenges.

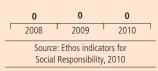
Environmentally secure disposal of electronic waste from offices, such as monitors, mice, keyboards and notebooks, via a company selected on the basis of compliance with environmental licensing legislation and waste disposal operator certification requirements.

Training and awareness-raising campaigns organised by Promon at its offices and worksites include:

Periodic Training Plan, with procedures and actions for the entire workforce to minimise scope-of-work environmental impact, such as selective waste collection, wood reuse, water conservation, leak NEV prevention etc.

Indicators	
lumber of reported violations relating to use of forced labour in production chain	

Numb





The CCPR Consortium, formed by Camargo Corrêa Promon and Engineering, won the National Award for Management Banas 2010 in the categories: Quality and Sustainable Development - Environment, an initiative of the Journal Banas.



Businesses should support a precautionary approach to environmental challenges.

Commitment

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

System: Society & Environment

Action

Socio-

Raising

Environmental

Environmental

Sustainability

Aspects &

Impacts

Meter

Awareness

Performance Environment Week, held to coincide with World Environment Day (June 5); publicised on the company's intranet, with activities including presentations, recycling workshops for employees, and tips on ways to reduce water and power consumption, plus how environmental footprint is calculated (using a tool that measures the natural resources used to generate electricity based on the material and energy requirements of a given population). JEV Action Performance Structured process for environmental aspect and impact studies and procedures in project implementation and operation are used to identify and deploy intelligent

Action Performance

construction and operation.

Promon is developing a sustainability meter to measure the environmental and social impacts of its business activities. The environmental component of the system has been tested on some projects. The social component is still under development. NEV

solutions with superior environmental performance in plant

Performance Action

Brazil GHG Protocol Programme

Participation in the Brazilian programme to implement the Greenhouse Gas Protocol, a partnership between the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBSCD), adapted to the Brazilian context to produce a carbon emission inventory.

Action Performance

Employee **Sustainability** Training

Employees in various departments receive financial assistance and/or leave for graduate studies or short courses on sustainability-related topics.





Businesses should undertake initiatives to promote greater environmental responsibility.

Commitment

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

System: Society & Environment

Action Performance **Materials** Recycling

Recycling of paper, fluorescent bulbs and plastic cups, use of recycled paper, collection and proper disposal of batteries used in Promon's offices. Recycling of electronic equipment from offices, such as monitors, mice, keyboards and notebooks, by a specialised company that retrieves components and metals for reuse.

Performance Action

Reduction of Resource Consumption

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

In 2010, all engineering design processes were modified to include electronic verification prior to document issuance, as well as electronic verification of supplier documents, instead of printing out copies for verification, significantly reducing consumption of paper and printer ink, generating less waste and using less power.

Worksite waste, residue and effluent are properly collected, stored and disposed of in accordance with guidelines and specific procedures for each project. Engineering develops design solutions to reduce consumption of raw materials in plant construction and operation. Worksite design includes programmes to mitigate environmental impacts by reducing air pollution and water consumption, as well as promoting reuse of materials, substituting plastic for wood pallets and recycling the plastic instead of disposing of it in construction landfills.



Action Performance

Socio-Environmental Awareness Raising

Inclusion of

Responsibility **Practices in**

Engineering

Designs

HSE toolbox talks lasting at most 15 minutes daily are held at every worksite for Promon, consortium and contractor personnel. All new employees take an induction course that includes specific lectures on environmental management. Alongside awareness-raising events, including lectures and worksite campaigns, the annual calendar of internal events includes, for example, a Water Conservation Campaign held in March at all worksites to coincide with World Water Day, with actions to encourage employees to reduce water consumption and reuse water; Tree Day, with worksite campaigns to raise awareness of the importance of conserving vegetation and planting trees on worksites or local parks; and other campaigns in accordance with a specific agenda.

Performance Action

Encouragement of and technical support for the inclusion of environmental best practices in engineering designs, with assistance for technical, economic and environmental feasibility studies. The following were proposed in 2010:

- alternative ways for alumina, steel and thermal power plants to recycle industrial waste;
- inclusion of sustainable or green building materials, such as translucent roofing, louvre blinds, thermal ceilings, rainwater use, solar water heaters and solar panels on utility poles.







Businesses should undertake initiatives to promote greater environmental responsibility.

Commitment

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

System: Society & Environment

Action Performance **Employee**

Mobility Actions

Provision of chartered transport between offices, metro stations and car parks to reduce demand for parking spaces and traffic congestion in the vicinity of Promon's offices. Encouragement of employee carpooling. VEV

Action Performance

Environment Development of Environment & HSE Management module for distance training of interns and new employees. The & HSE module deals with the history of the topic at Promon with Management Module engineering design and worksite applications. **Trajectories** Programme

Action Performance

Social &

Group

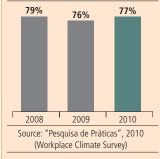
Environmental

Responsibility

Coordination

Periodic meetings of senior executives and line managers to plan and follow-up actions relating to Promon's social and environmental responsibility.

I am satisfied with the way the company handles environmental issues in services and at worksites for which it is responsible – Agree



NEW

OSMS 🔤

BCV The Consortium, formed by Camargo Corrêa, MEP and Promon Engineering, won the Prize Petrobras / Engineering Quality, Safety, Environment and Health in Industrial Construction Category.



AlpPromon

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

Commitment

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

System: Society & Environment

Action Performance Electronic In 2010, all er

Document Verification

In 2010, all engineering design processes were modified to include electronic verification prior to document issuance, as well as electronic verification of supplier documents, instead of printing out copies for verification, significantly reducing consumption of paper and printer ink, generating less waste and using less power.

Action | Performance

Procedure to Struct Identify & Treat studie Environmental opera Aspects & soluti Impacts const

Structured process for environmental aspect and impact studies and procedures in project implementation and operation are used to identify and deploy intelligent solutions with superior environmental performance in plant construction and operation. Solutions deriving from these studies include:

Buildings: Use of translucent roofing, large window frames (natural lighting and ventilation), fibreglass venetian blinds (side ventilation and lighting), heat-insulated metal roof tiles, natural roof ventilation (lantern roof), louvres (interior insulation control), independent self-supporting structural elements not requiring mortar or outer coating, and mineral fibre ceilings (thermal and acoustic insulation).

Electricity: Use of dry-type transformers in substations – no toxic gas emissions, no fire hazard, no fire propagation, smaller footprint, less drainage required (less material, excavation and waste), less risk of leaks.

Water reuse: Rainwater tank designed to enable worksite water reuse and for garden irrigation, plumbing, toilet flushing, boot washing etc., for up 40% potable water saving.

NEW

Action | Performance

Operational Waste Control



enhance waste recycling and avoid landfill disposal, such as: **Rubble** – Concrete waste from pile driving is sent to concrete recycling plants rather than construction landfills. **Scrap metal** – Used to make simple tools, worksite utensils, litter baskets, ashtrays etc. instead of being thrown away. **Hazardous waste** – Co-processing preferred whenever possible to disposal via licensed landfill, thus mitigating environmental impact.

Worksite waste management plans include solutions to

Action | Performance

New Energy Brazilia

Projects

Brazilian sugar & ethanol producer – Promon designed a plant to produce ethanol from sugarcane and generate electricity for consumption and sale of surplus power to the grid. The design called for the use of proven technologies such as diffuser extraction, treatment of juice using a clarifier with low retention time, heat regeneration, juice evaporation to generate process steam and reduce steam consumption, batch fermentation, yeast recovery by centrifugation, and distillation by direct heating with steam generation.



Indicators

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



The CCPR Consortium, formed by Camargo Corrêa Promon and Engineering, won the first prize of "Project of the Year 2010" for developing the project "Construction and Installation Portfolio REPAR of Coke" in recognition of his expertise in project management.



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

Commitment

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



NEV

Action Performance Open meetings held from time to time, where employees Engineering make presentations on engineering-related issues including Meetings environmentally sustainable solutions, such as use of biofuels, solar water heating, photovoltaic solar power and sustainable building practices.

System: Training

Action Performance

New Talent Programme

At the start of 2010, Promon's interns were invited under the New Talent Programme to develop projects involving innovation, creativity and process improvements at Promon Engenharia. Prize-winning environmental and sustainabilityrelated initiatives included projects for worksite waste disposal, sustainable office behaviour, technical and economic analysis of solar power use in offices, implementation of collective transport, and carpooling.



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

Commitment

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



System: Organisation

Performance Action Guidelines for business conduct and accountability to

Guidelines & Practices shareholders. Guidelines for auditing.

Guidelines

Performance Action Ethical

Corpo & Alma ("Body & Soul") was published in 2009 to share the company's history and culture. Distributed to all staff and service providers, as well as major clients. suppliers and partners, the book sets out to translate at least partly the motivations for engagement and the results of the dedication of all those who have contributed to the company's development.

The chapter "Our Conduct" describes Promon's ethical worldview, which prioritises mutual respect, protection of the environment, transparency and excellence in all activities and relations with stakeholders. This chapter of the book seeks to present the positions developed by Promon during its entire history.

System: People

Guidelines &

Practices

Action Performance

Conduct in respect of hiring, timekeeping, worktime accounts, holidays, pay and benefits, employee mobility, use of the healthcare plan, compliance with safety standards, occupational health and environmental protection.

- Guidelines on access control, shipping, reimbursement, security, handling of internal and external documents and pouches, use of telephones, vehicles, and buying, selling, donating, transfer and safekeeping of property.
- Policies for use of hardware and software, internet use, email and telephony.
- Conduct in handling information relating to business management, clients and other stakeholders.
- Secrecy, transparency in relationships, commitment to technical solutions, and integrity in complying with all contractual and legal requirements.
- Clarity and objectivity in meeting technical and commercial requirements.
- Guidelines on relationships with internal and external stakeholders, visual identity, and publicity material.

System: Society & Environment

Action Performance

Engagement in Social Initiatives

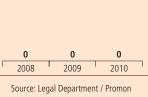
Signature of Business Compact For Integrity & Against Corruption in Brazil – The anti-corruption compact (2006) comprises a set of guidelines and procedures governing relations between government and business organisations or other types of signatory. Latin American Conference on Corporate **Responsibility in Promoting Integrity and Combating Corruption** – Promon participated in discussions on topics such as cooperation among companies and institutions to inhibit corruption at the international level.

Action Performance

Guidelines & Practices Commitment to environmental and social improvements and transparency in informing the public about social and environmental impacts.

Indicators

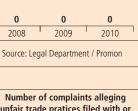
Complaints filed with or by ANVISA (public health surveillance), IPEM (weights and measures), IDEC (consumer defence), INMETRO (weights and measures), PROCON (consumer defence), other government bodies or NGOs for irregularities in Promon's processes, services and products



unfair trade pratices filed with or by CADE, Brazil's antitrust regulator

	0	0	0		
Г	2008	2009	2010		
Source: Legal Department / Promon					

APPromon



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

Commitment

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

System: Clients

Action Performance Guidelines & Ethics, secrec Practices commercial r

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

System: Partners & Suppliers

Action Performance

Guidelines & Eth Practices Gui

Ethical principles in supplier relations. Guidelines on managing contracts with partners.

Action | Performance

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

Action | Performance

Sharing of Values & Principles

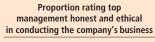
Assessments

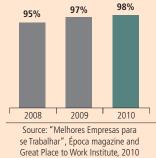
for Supplier Qualification

& Monitoring

Promon Integra 2009 – Biennial event bringing together key suppliers to share ethical principles and deploy joint initiatives relating to labour law commitments that contribute to the development of Promon's supplier network. The next such event is scheduled for 2011.









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