



First Communication on Progress of Eurofinsa S.A. 2013/2014



UNITED NATIONS
GLOBAL COMPACT

GRUPO  **EUROFINSA**

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Letter of renewal of our commitment.

H.E. Ban Ki-moon
Secretary General
United Nations
New York, NY 10017
USA

Honourable Secretary-General,

It is my pleasure to submit to you at this time the Communication on Progress (COP) 2013-2014 setting out our efforts toward implementing the Ten Principles of the Global Compact to which we undertook a commitment in December 2013, the date on which we formally became signatories of the *Global Compact*.

In this regard, this First Communication on Progress to the Global Compact on the part of Eurofinsa, S.A. confirms our values concerning Corporate Social Responsibility and renews our commitment to the Ten Principles of the Global Compact regarding human rights, labour rights, the environment and combatting corruption as well as continuing to advance toward delving yet further into these principles and putting them into practice within our sphere of influence.

We therefore reiterate our commitment to integrating the principles of the Global Compact into our company's strategy, culture and everyday actions, as well as to becoming actively involved in cooperative projects which will contribute to the most wide-ranging United Nations Development Goals, particularly the United Nations Millennium Development Goals.

Sincerely,



Mauricio Toledano
President

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Preface.



Our commitment

The Eurofinsa Group has been taking part in the development of the countries where it does business with its experience in carrying out projects and its financing capacity for 37 years.

Our activity is focused mainly on carrying out infrastructure works in sectors having to do directly with people's welfare and quality of life, we therefore being committed to local development. In this regard, we have set the goal for ourselves of getting local labour actively involved to the utmost and generating income in the host country's own economy, particularly in the community for which the work is being done.

Similarly, in line with the most advanced international practices, we have planned to continue bolstering and shaping a common view and practice integrating the different sectors and groups whose opinions and interests are relevant to our activities.

Our guiding principles in this pursuit are those set out in our Code of Conduct, also mirroring the principles of the Global Compact.



Transparency

We are working daily toward consolidating and adopting corporate governance practices in harmony with the highest of international standards on this subject and with recommendations, particularly those having to do with transparency, which we believe to be those conducive to an adequate framework of confidence in which both Eurofinsa and its Groups of Interest as well as the society at large will feel comfortable.

Regardless of each individual's responsibility, position and physical location within the Eurofinsa organization, everyone's professional endeavours are carried out in consonance by high ethical guidelines of responsibility and integrity. We are fully aware of the supply chain being key to our commitments to effective, visible sustainability. Thus, we are committed to our suppliers, contractors and collaborators in general knowing and rendering full compliance with these principles and guidelines.

High-quality management entails progressing yet further with regard to transparency, the certification of best practices by means of Standard ISO 9001 therefore being the alternative already having been taken by several of the Group companies.



Social sustainability

In carrying out our activities, we are fully committed to doing our work, in all countries where we do business, by strictly respecting human rights and civil liberties, as well as human dignity and individual rights.

In particular, we are committed to the abolition of forced child labour and do not allow the illegal use of workers anywhere in our procurement chain.

One key aspect of our commitment to sustainability is occupational risk prevention, to which end we fully comply with the occupational safety and health regulations and also the occupational health promotion regulations. The OHSAS 18001 certification already awarded to several companies in the Group is a contribution to sustainable development on the part of our business model.



Environmental sustainability

The Group abides by strict compliance with the applicable legislation in its business activities, putting the means for assuring this compliance in place so that its projects will be carried out with utmost respect for the environment and minimizing whatever negative impacts were to be caused thereby. Along this same line, we are committed to efficiency, responsible use and safeguarding the natural environment.

In the countries where we do business, we actively work in keeping with the environmental sustainability-related practices and promoting the necessary training among our employees for safeguarding the environment as well as correcting the environmentally incorrect behaviours or those not committed to taking care of the environment.

It is within this framework that many of our companies have proceeded to attaining ISO 14001 certification for the purpose of taking yet one further step forward in the commitment to the principle of quality in environmental management.



About Eurofinsa Grup.

Founded in 1977, Eurofinsa is a group of companies specialized in rolling out and implementing turnkey projects and the international sale of equipment goods for Public Institutions.

The Eurofinsa Group has been working continuously in Africa, Latin America and Asia, where it is carrying out a great number of projects in the infrastructure, health, energy, water, education, defence and security, agroindustry, telecommunications and transport sectors.

For carrying out its activities, the Eurofinsa Group has a highly-qualified team assigned to both the headquarters office in Madrid and to its subsidiaries in Spain, the U.S., Brazil, Peru, Angola, China, Gabon, the Dominican Republic, Panama, France, Indonesia, Qatar, etc.

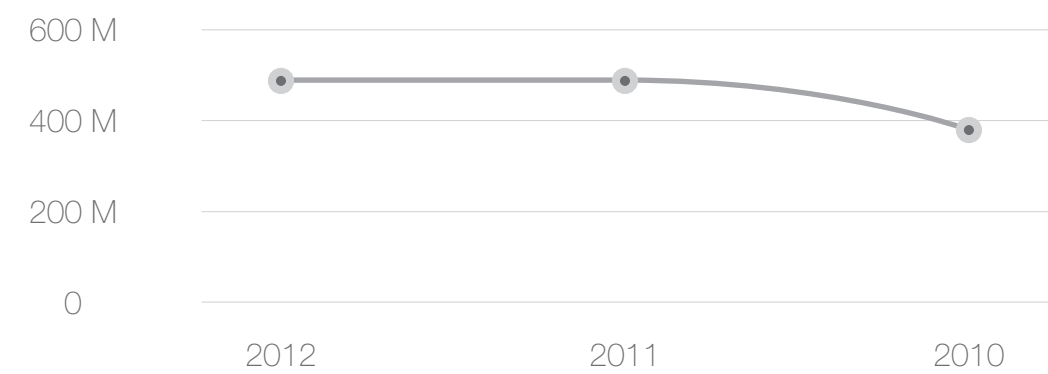
The Eurofinsa Group also has agents and representatives in different countries in Latin America, Africa and Asia.



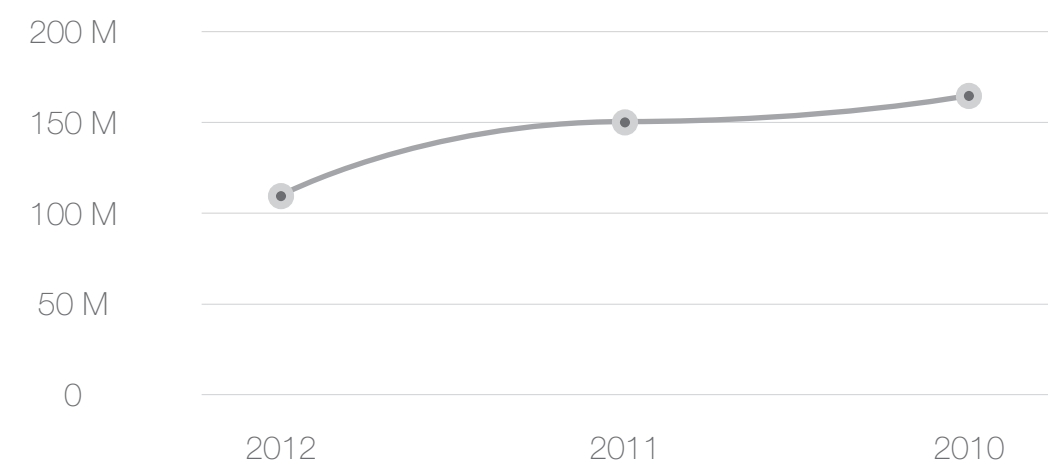
Eurofinsa in Numbers

	2012	2011	2010
Assets	492.575.317	485.452.807	372.671.482
Net Worth	113.110.587	146.015.593	161.737.926
Liabilities	379.464.730	339.437.214	210.933.556
Sales	485.018.644	341.350.317	393.971.164
EBITDA	35.781.996	6.435.353	67.783.119

Assets



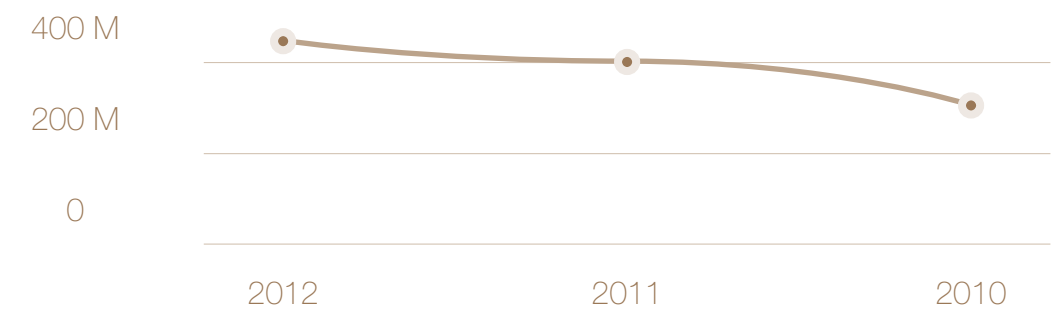
Net Worth



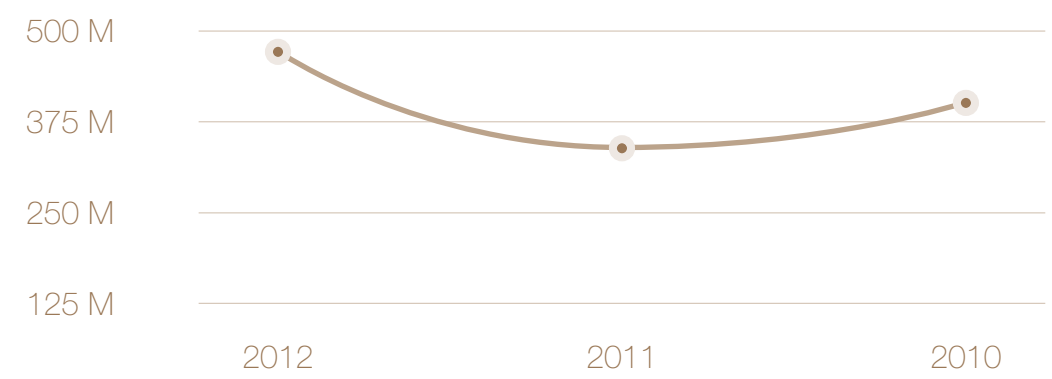


Eurofinsa in Numbers

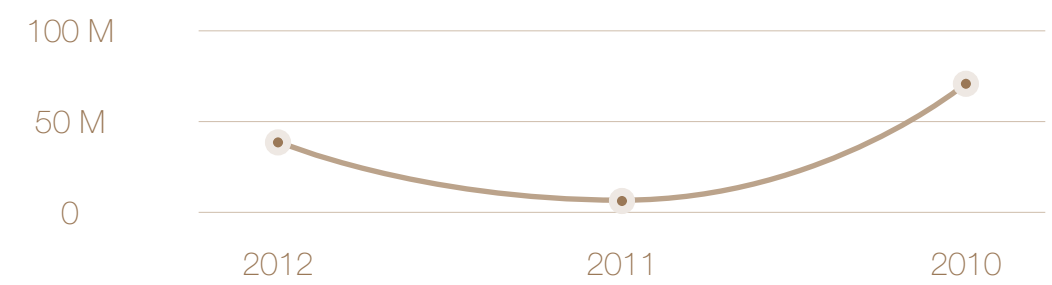
Liabilities



Sales



EBITDA





Government funding

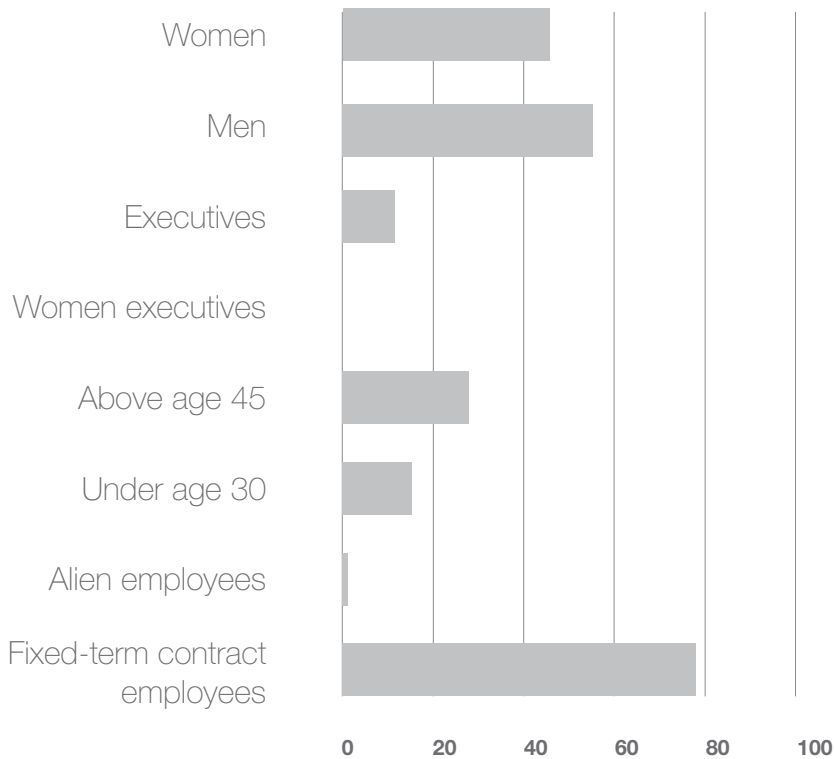
Eurofinsa does not receive any funding from any government.

Human Capital

Thanks to our team’s technical and professional quality, the Group enjoys an international reputation as a reliable partner in good standing in all the countries where it has done business thanks to its capacity to manage the projects under all types of conditions by furnishing the required experience.

The headquarters in Madrid is staffed by 240 employees, a total of 550 people being employed worldwide.

Eurofinsa Employee Profile (%)





Corporate Governance & CSR.



Within the framework of promoting the Group's Social Responsibility, the Eurofinsa management approved the creation of the **Corporate Social Responsibility** function as part of its corporate organization for the purpose of providing the management of its social responsibility commitments with precise, unified leadership and organization.

Similarly, for the purpose of getting the Company as a whole actively involved and of making social responsibility a core point across the board for its actions, **the CSR Committee** was set up, comprised of the President, the heads of the Human Resources, Technical Operations and Legal Affairs Departments and the representatives from the subsidiaries. The responsibilities and functions of those involved are well-defined:

- The strategy and decision-making shall fall to the Sole Director.
- The management and implementation of initiatives, their publicizing, the coordination with the CSR Committee and liaising with their Groups of Interest shall fall to the **Public Relations & CSR Department**.

In addition to the above, Eurofinsa has begun an analysis of the work done for and in conjunction with its Groups of Interest. To this end, the relevant groups were mapped as a first step in keeping with the following criteria:

- Assiduity of the relations.
- Importance for the proper implementation of the GC principles.
- Existence of prior relations.



The Groups of Interest identified are:

External

- Financial Community: National banking and Multilateral banking Sectors.
- Product suppliers and service providers: chain of supply.
- Civilian Society: foundations, NGOs with which currently collaborating.
- Media: National and international hardcopy and digital newspapers and magazines.
- Public authorities and administrations in which projects are being carried out.
- Local communities of the countries where projects are being carried out.

Internal

- Shareholders, partners, subsidiaries.
- Employees and executive management team.

Eurofinsa has commenced the process of putting to consideration how the Company and its Groups of Interest may be in a position to more precisely choose the significant material aspects for purpose of its commitment to the Global Compact.

As part of the aforementioned process, Eurofinsa is currently evaluating carrying out specific short-range and medium-range actions, as a next step, affording the possibility of obtaining the necessary information for moving forward toward progressively more solid relations with its Groups of Interest as part of the process of identifying their more relevant material aspects.



Social Action.



In addition to responsible, committed business management, Eurofinsa has also carried out a number of social action activities aimed precisely at helping certain less fortunate groups of the society, in this case, persons with disabilities.

Within the framework of the principles of the United Nations Convention on the Rights of the Child, such as the “right to life, survival and development”, as well as “the right of non-discrimination, our Company collaborates with two organizations contributing to achieving these goals:

- The **“También” Foundation** for social integration of persons with some type of physical, mental and/or sensory disability, by means of fostering adapted sports, leisure and free-time enjoyment activities.
- The Early Childhood Care Centre of the **AFANDEM Association**, part of the Amás Group, for personalized care of children from birth to 6 years of age who have either temporary or permanent special needs due to developmental defects or disorders.

Eurofinsa is also planning to take part in some of the United Nations’ more emblematic events as part of its upcoming actions, particularly in 2015, by means of becoming involved in the events from among planned with which our Company most closely identifies.



Eurofinsa also carries out social action initiatives at the international level, such as:

- Donation of school transport for those small children and youths studying at the Arequipa Centre for Studies and Integral Human Development (CEDHI) in Arequipa, Peru.
- Benefit event held for the Jicamarca “Corazón de Jesús” Parish School in Lima, Peru.
- Recognition by the National Council for the Integration of Persons with Disabilities (CONADIS) for its contribution toward the inclusion of persons with disabilities in the work force (www.conadisperu.gob.pe).

Eurofinsa provides support for those organizations of a sterling reputation which are able to ensure that the resources allocated will be well-administered. All of the donations are entered as such on the Company ledgers.



Eurofinsa and the Global Compact.

Eurofinsa S.A. joined the Global Compact and the Spanish Global Compact Network in December 2013.

This document is the First Communication on Progress which the Company is submitting after having joined and encompasses the activities carried out directly by Eurofinsa, S.A. with the september 2013 – august 2014 period.

The Communication on Progress will be made public by means of the Global Compact and Spanish Global Compact Network mechanisms proper. This COP will also be available on the Group's corporate website (www.eurofinsa.com) and distributed in both electronic and hardcopy format to its relevant Groups of Interest.



Human Rights.

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.

Eurofinsa S.A. joined the United Nations Global Compact in December 2013 as a result of its wish to seal and demonstrate its absolute, total commitment to fundamental human rights.

The Company's Code of Conduct encompasses the aforesaid spirit and this vision and values to which the Company adheres are known to the general public as well as to the employees and other Groups of Interest. Similarly, the Company's Executive Management issued Human Rights Commitment Declaration which was made known to all employees at an act held especially for this purpose in December 2013, the text of which is available to the public on the Company webpage (<http://www.eurofinsa.com/en-GB/publications.html>).

The Group employees have access to the mission, vision and values explicitly stated in the Executive Management Declaration of December 2013 and in the Code of Conduct and are party to the commitment they undertake on joining the Company.

Eurofinsa's contracts with its subcontractors, suppliers, service providers and collaborators include the commitment on the part of the collaborators of undertaking to abide by the Code of Conduct.

Similarly, a Response Committee is created by virtue of the Code of Conduct, this Committee's missions including those of seeing to the dissemination, knowledge of and compliance with the principles of conduct set out under said Code, including those regarding human rights.

Due to Eurofinsa's international ties, the Code of Conduct is also available on the Company webpage in the following languages: Spanish, English, French and Portuguese.

Goals and commitments for the 2014-2015 period.

Keeping up the effort currently under way for assuring the respect for human rights within its sphere of influence as a business. To this end, the Group undertakes the commitment of:

- Pinpointing the areas of current or potential risk regarding human rights within its scope of action.
- Providing in situ or virtual training and/or workshops for raising awareness among its employees and collaborations concerning the subject of human rights.



Human Rights.

Principle 2:

Businesses should make sure they are not complicit the infringement of Human Rights.

Despite the precautions which are constantly taken, mentioned at a further point herein, the risk of some supplier, service provider or subcontractor breaching their Human Rights-related commitment may arise in the operations at the more distant locations. Therefore, a more in-depth diagnosis is planned to be made of the at-risk areas this coming year.

The Procurement Department currently has the objective of periodically making an evaluation of our suppliers and service providers by way of 7 parameters (including CSR) for each order placed. Said Department will additionally avail of the collaboration of its foreign offices in the suppliers' countries of origin.

Eurofinsa's contracts with suppliers, service providers, contractors and their subcontractors and also with collaborators include a commitment on the part of the collaborators as to knowing and undertaking to abide by the Code of Conduct. Verification has been proceeded to be made of all contracts having to do with this aspect.

Goals and commitments for the 2014 -2015 period.

Preparation of a Supplier and Service Provider Map for the purpose of highlighting the information having a bearing on full compliance with the obligations within the scope of Human Rights protection. This information will enable the Executive Management to:

- Evaluate the degree to which critical: The map will include information on geographical areas and/or countries at risk, total percentage of suppliers, service providers and contractors critical to a certain degree, number of contracts entailing clauses setting out aspects including those related to ethical, social and environmental commitments.
- Set out policies with which compliance is to be rendered in terms of the information obtained with a view to the Group's CSR.



Labour Rights.

Principle 3:

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

Eurofinsa fully abides by the national legislation within the scope of the promotion of the principles of labour rights, reflecting the international labour laws in force. The Company philosophy is to deal with any problem or need by taking both the Management's and the workers' interests into account.

Goals and commitments for the 2014-2015 period.

- Promoting consultation and cooperation among the Company, its employees and their representatives in matters of mutual interest.
- Successfully establishing an employee and employee representative consultation policy set out in writing for dealing with subjects of importance.
- Setting up mechanisms for hearing out, evaluating and following up on employee positions, concerns, suggestions and criticisms.
- Facilitating the election of employee representatives in accordance with the national law.
- Furnishing the employee representatives with the adequate facilities for performing the tasks entailed.



Labour Rights.

Principle 4:

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

Forced labour is not a risk factor, given that the Company fully complies with all of the applicable legislation at both the national (Spain) and international levels with regard to the conditions for hiring its employees. All employees have an employment contract setting out the terms and conditions of the service to be provided, particularly and explicitly the voluntary nature of the employment.

Another measure carried out through the Human Resources Department further expanding upon the literal framework of Principle 4 is the regulation of conditions for the conciliation of family life and working life, such as shortened workdays, telecommuting and flexible working hours. In those aspects which go beyond strictly complying with that which is compulsory under the applicable legislation, these situations are not stipulated under regulations nor are they standardized, but have worked well in practice in those cases which have come to bear.

Goals and commitments for the 2014-2015 period.

As far as the Company operations and its dealings with other companies are concerned, to ensure that employees will have an employment contract setting out the terms and conditions of service, the voluntary nature of the employment and the freedom of abandoning the position, including the pertinent procedures. In this regard:

- Taking part in national and international programmes, including media campaigns aimed at heightening awareness concerning forced labour and the different modalities thereof.
- Studying mechanisms affording the possibility of conciliating family life and working life insofar as possible.



Labour Rights.

Principle 5:

Businesses should uphold the effective abolition of child labour.

Child labour does not comprise any risk either at Eurofinsa's headquarters offices or at its representative commercial offices. However, a certain degree of risk might be involved at the level of the subcontractors in countries where this principle is neither culturally controlled nor legally governed.

The Eurofinsa Group's Code of Conduct states that this type of practices will not be acceptable among the suppliers, service providers, contractors and, in general, collaborating companies. The Group's Code of Conduct explicitly states the Company's commitment of carrying out its activities strictly respecting human rights. The standards taken as a reference by this organization include the International Human Rights Charter and the basic ILO agreements on the subject of labour practices. And, in this regard, it does not under any circumstance allow any practices contrary to these principles, particularly with regard to the abolition of child labour.

The Code of Conduct by which the Company is governed made provision for a Response Committee, one of the missions of which is to see to the dissemination, knowledge and compliance with the principles of conduct set out under said Code, including those regarding Human Rights. In the event that any employee, regardless of the position held thereby within the company, learns of practices infringing this principle, said employee had the duty and avails of the mechanism for making the same known to the organization, in good faith, confidentially and without any fear of reprisal.

The Procurement Department currently has the objective of periodically making an evaluation of our suppliers / service providers by way of 7 parameters (including CSR) for each order places. Said Department will additionally avail of the collaboration of its foreign offices in the suppliers' countries of origin.

Goals and commitments for the 2014-2015 period.

- Urging suppliers, service providers, contractors and subcontractors, as well as collaborators and other commercial partners, to combat child labour and abide by the minimum age-related provisions of law set forth under the legislation national labour regulations, and with regard to all that for which provision is not made under the national legislation, to taking the international labour standards into consideration.
- Working on the implementation of suitable, verifiable age-ensuring mechanisms.
- Taking part in national and international programmes, including media campaigns, and coordinating the actions of the interested parties.
- Conducting in situ audits of those suppliers and service providers at the greatest risk of infringement with regard thereto.



Labour Rights.

Principle 6:

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

The Company abides by all pertinent local, national and international laws, basing itself in this regard on the recognition of the value of diversity in general and, in particular, of diversity of gender, linguistic, cultural and family-related diversity which may exist within the work force.

Eurofinsa sets out in its Code of Conduct that the decisions regarding selection and career promotion within the organization are based on equal opportunities, occupational merit and on circumstances and assessment of an objective, transparent nature, no discrimination whatsoever therefore being tolerable for any reason.

Notwithstanding the foregoing, the Company Management and the respective departments are fully aware of discrimination being a dynamic concept and of it being important to be alert to the entire broad spectrum of different types of discriminatory conduct and situations.

Within the framework of the actions for promoting effective equal opportunities among men and women in all aspects, including access to executive positions, Eurofinsa is committed to contributing to its employees' continued learning and training and to updating their knowledge and skills for the purpose of boosting their career development and maximizing the value of their work for the Company and its Groups of Interest.

The objective is for 100% of the employees to have the benefit of these educational and training opportunities.

In this regard, the Company makes language learning courses as well as courses for certification in Professional Project Management (PPM), FIDIC courses, etc. available to its employees by way of periodically offering open registration procedures.

Similarly, as part of its commitment to society and to the young people who are currently having the greatest problems entering the job market, Eurofinsa has signed working agreements with the following universities: Complutense University of Madrid, the Polytechnical University of Madrid and the Rey Juan Carlos I University. The objective of these internships is for the students and graduates to be able to gain work experience for further expanding upon their theory and practice-based knowledge acquired at college and improving their prospects of employment.

Lastly, Eurofinsa wants to make a commitment to the integration into the work force of groups at risk or in a situation of exclusion within the corporate social responsibility framework.



Labour Rights.

Goals and commitments for the 2014-2015 period.

- Providing employee training regarding non-discriminatory policies and practices, including heightening awareness concerning integration and disabilities. Reasonably adapting the physical environment for the purpose of guaranteeing the health and safety of employees, customers and other visitors with disabilities.
- Creating and implementing specific measures for fostering integration into the work force of groups at risk or in a situation of social exclusion.
- Setting out the procedures set into motion on detecting a situation of discrimination for the purpose of lodging complaints, dealing with claims, managing appeals and offering the employees with other possibilities to which they may take recourse.



Environment.

Principle 7:

Businesses should support a precautionary approach to environmental challenges.

The approach Eurofinsa takes and is committed to carrying out is being precautionary in safeguarding the environment as part of its actions. This principle has shown itself to be one of the most important and most advanced maxims in environmental management as opposed to mere recovery, which comes into play after the fact when a situation jeopardizing the environment has already occurred. Eurofinsa sees to the projects being carried out by the Group incorporating an environmental impact assessment regardless of whether or not an environmental assessment is required by law.

Goals and commitments for the 2014-2015 period.

- Making further headway concerning the identification of potential environmental risks in the process of carrying out its activities.
- Through the Group's headquarters, to promote the use of environmental management tools at the different levels of endeavour, such as environmental risk assessment, lifecycle assessment, environmental impact assessment, strategic environmental assessment. These tools will provide the information necessary for the organization to adopt the suitable measures on the basis of the principle of prevention.
- Promoting responsible use and acquisition.



Environment.

Principle 8:

Businesses should undertake initiatives to promote greater environmental responsibility.

Eurofinsa considers it to be a duty and a commitment to foster environmentally-responsible conduct and attitudes within its sphere of influence. Within this framework, the following aspects have been addressed at the Eurofinsa Group headquarters:

- Regarding energy-savings, the light bulbs at its headquarters have been replaced with LEDs.
- Regarding recycling, the heightened awareness of its employees concerning the current protocols for recycling paper and toner is being promoted.

Goals and commitments for the 2014-2015 period.

- This is a matter of innovating in initiatives involving a social and environmental commitment on the part of the Company.
- Creating an environmental management plan including: environmental objectives and goals, policies and procedures for achieving these goals, definite responsibilities, employee training activities, documentation and a system for keeping an ongoing account of any change and progress made.
- Environment-related training for employees.
- The Group headquarters energy efficiency study.



Environment.

Principle 9:

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

At Eurofinsa, we are committed to investing in cutting-edge technologies for reducing the environmental impact of our activity.

Goals and commitments for the 2014-2015 period.

— Studying ways of taking part and/or investing in technology-based projects promoting R&D on the subject of environmental sustainability.



Anti-Corruption.

Principle 10:

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

Our organization has a Code of Conduct in place explicitly stating that Eurofinsa Group employees must abide, under all circumstances, by an ethical conduct and avoid activities of a nature such that they might put the Group's material interests or social prestige in question; nor shall they collaborate with third parties in activities which might be against the law or which might be prejudicial to the trust which third parties having in the organization.

All of the Group's employees and companies pertaining to the Group must know and understand the laws and regulations related to their occupational activity and, in the event of doubt, must request whatever advisory they may require.

Specifically with regard to combatting corruption, it is set forth that all individuals pertaining to the Group are under the obligation of rejecting such behaviour in all forms thereof and have the duty of acting in line with the national and international provisions of law on this subject, including those such as the Spanish Penal Code, the U.S. Foreign Corrupt Practices Act and the OECD guidelines for multinational companies.

The Group undertakes to make the means available in order for those pertaining to our organization to know and understand the Company's in-house rules and the provisions of law most relevant to their scope of responsibility.

The following procedure is specifically set out in the Code of Conduct:

- In the event of doubt, they must always consult their superior in the organization or the Company's established channels for the purpose of fully complying with the Code of Conduct.
- Free gifts or presents must always been given and received in full compliance with the stated Company rules applicable in accordance with the Code of Conduct.
- Guideline amounts are set for the courtesies to third parties and those which may be given to the Group employees.
- All free gifts in addition to those above must be appropriately accounted for by the Company.
- Cash payments out of the ordinary, those made by bearer checks or in currencies other than those previously covenanted, those not mentioned in the contracts or those made into uncustomary accounts or to made individuals, companies, organizations or accounts open in tax havens shall be prevented in accordance with the applicable Spanish legislation.



— Every effort shall be made to prevent money laundering, and the principle of due diligence shall be applied for preventing collaborating with third parties who might serve as cover for terrorist or criminal activities.

One hundred percent of all employees, customers, suppliers and service providers know the Company's Code of Conduct and the corruption and bribery-combatting policies.

The organization similarly has a mechanism in place which is detailed in the Code of Conduct for managing incidents involving combatting corruption. Thus, a **Response Committee** is created by virtue thereof, the missions of which include that of ensuring the dissemination, knowledge and full compliance with the principles of conduct set out in said Code. This Committee avails of the collaboration of the Eurofinsa Group's functional areas specialized in the different matters included under the Code of Conduct.

In order to make irregular conduct concerning the subjects dealt with in the Code known to the organization confidentially without any fear of reprisals, Eurofinsa personnel may send their messages to the Response Committee either by e-mail to codigodeconducta@eurofinsa.com or by regular post addressed to: Paseo de la Castellana, 91 C.P. 28046 in Madrid.

Goals and commitments for the 2014-2015 period.

— Maintaining continuing training programmes for its employees on the Code of Conduct and the Global Compact Principles, as an indispensable tool for supporting them in developing integral conduct in the workplace environment.

— Determining in greater detail the use and functions of the Response Committee for the use of this channel for consultation regarding professional practice as well as for reporting possible infringements or breaches of the Code of Conduct.



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