

General

Period covered by your Communication on Progress (COP)

From: June 2014 To: June 2015

Statement of continued support by the Chief Executive Officer (CEO)

Please provide a statement of your company's chief executive expressing continued support for the Global Compact and renewing your company's ongoing commitment to the Initiative and its principles (Please include name and title of the chief executive at the bottom of the statement).

To our stakeholders:

I am pleased to confirm that eFM reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this Annual Communication on Progress we report our actions and efforts over Social Responsibility and Sustainability.

eFM has recently re-viewed our Company Vision, Mission and Ethical Code, clearly defined by Italian law Decreto Legislativo 8 Giugno 2001, n. 231, ("Disciplina della responsabilità amministrativa delle persone giuridiche, delle società e delle associazioni anche prive di personalità giuridica") approved by eFM Board of Directors in June 2015 (Consiglio d'Amministrazione).

eFM has reinforced and embedded the 10 UNGC principles as per our innovative Mission "Sustain engaging places for a better life!" as further explained in this document.

eFM Ethical Code is also the document to which to refer for eFM COP 2015.

As part of eFM daily activities, eFM values and principles, internal and/or externally applying to employees, consultants, suppliers and third parties respecting the legitimate interests of all stakeholders. Any behavior is characterized by transparency, fairness, honesty, integrity and laws/regulations compliance.

In 2015 eFM has established a specific CSR & Sustainability BU in order to reinforce our work internally and externally across our stakeholders based on our believe "committed to results" which has been integrated into our new Mission "Sustain engaging places for a better life!"

By Sustain we mean we want to support stakeholders in the real estate cycle to fulfill their needs, ranging from protection, preservation to productivity to profit.

By Engaging we mean attractive and pleasant as well as available and useable places. Research shows that engaged people are happier, more productive, healthier. We design buildings and processes to connect people and things for the future use and maintenance.

By Place we mean the convergence of the real and virtual worlds. We design places with digital realism in mind. We design places focusing on the person well-being. Physical locations that can enhance the connection between business, people and objects. eFM has one goal in mind: For a Better Life!

As already reported in previous years eFM aims to have a solutions where different stakeholders such as users, owners, providers, authorities, and designers, are integrated to deliver their activity in less time, cost and risk and to benefit from the processes and standard services provided on the cloud. This is also an ongoing process within our internal teams as flexible workplace, space optimization, quality, cooperation, knowledge sharing, continual education and sustainability from continuing stem the importance of being an active member of the United Nations Global Compact".

Our Values:

Integrity

We accomplish our goals in an honest, fair and responsible manner, respecting ethical rules and principles required in compliance with professional rules.

Excellence

We are committed to continuous learning, sharing knowledge and ideas, working and co-operating within our teams, encouraging creativity and innovation thinking.

Equality

We are against all kinds of discrimination; we respect genders, racial, religious, political, language, age and intellectual differences. We believe each individual is unique.

Transparency

All our activities are managed in a transparent way as well as our communications and contracts, allowing our customers to make independent and conscious decisions.

Human Respect

We listen carefully and work on the improvement of relationship with each other and with our clients.

Values Sharing

The value of each individual is the guideline of our modus operandi: "self-management" we apply the techniques of listening and dialogue as tools for continuous improvement of our relationship with all stakeholders.

Responsible use of resources

We are conscious that our planet will shortly be at a very critical point in term of resources and we need to preserve it as much as we improving the sustainability awareness.

Sincerely Yours.

Daniele Di Fausto

CEO




Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
Principle 2: make sure that they are not complicit in human rights abuses

Assessment, Policy and Goals

Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments and company goals on Human Rights.

eFM's commitment to protecting human rights spans how we treat our employees, our expectations of our partners and how we make a sustainable impact in the communities where we live and work. The respect and protection of human rights are in the heart of our core values, especially :

- Labor rights
 - Freedom of expression and opinion
- eFM normally has an annual meeting in which eFM shares and openly discuss with all the employees the company values, mission and vision. However, as eFM is continuously looking forward to our Mission, in May 2015, the Board of Directors decided to held an extra company meeting to share and reinforce our believes: guarantee a better life to people in various social areas (employment, education, health, trade) through the creation of the first management platform for places that integrates all the stakeholders:
- >Self-management
 - >Completeness
 - >Purpose evolution

Our Company strategic internal communication tool it is an internal social network , as last year, called " Yammer".

It is a common sharing virtual space where every employee has the opportunity to share its own ideas with the entire company without any filter to benefit the democratization of each decision /Idea.

Each employee can actively participate giving to the company his own contribution to develop the best ideas and solutions.

eFM has groups related to workplace, business intelligent, development Ideas, clients, marketing and so on. Employees can share files, documents, links and images and have access and control over the content shared anytime and anywhere. The benefits are manly: facilitating the user access to information, reducing communication costs and travel cost as well as human right respect of individual voice .

This gives also the opportunity to re-evaluate any possible risks pertaining to human rights in our sphere of influence.

Examples

- Reference to (statement of support for) the Universal Declaration of Human Rights or other international standards
- Written company policy on respecting Human Rights and preventing potential abuses (e.g. in code of conduct)
- Policy requiring business partners and suppliers to adhere to the principles on Human Rights?
- Assessment of Human Rights related risks and impact in industry sector and country(ies) of operation (see Risk Assessment Report at www.humanrightsbusiness.org)
- Specific goals in the area of Human Rights for the upcoming year

Implementation

Description of concrete actions to implement Human Rights policies, reduce Human Rights risks and respond to Human Rights violations.

eFM has developed a Human Rights Statement, in line with international best practice eFM supports and respects human rights as a core ethical value as described in our Ethical Code.

Through its high ethical conduct, eFM upholds that human rights protection is applied in every aspect of its business. Human rights and labor rights are closely related.

The description below reflects eFM's approach on the following areas of human rights: right to decent standard of living, right to education and training, right to family life (parenthood charter).

The two Global Compact principles on human rights are included:

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: ...and make sure that they are not complicit in human rights abuses.

eFM recognizes that human rights are an integral part of corporate citizenship and respects and supports the Universal Declaration of Human Rights and the 'Guiding Principles on Business and Human Rights: Implementing the United Nations Protect, Respect and Remedy Framework'.

eFM being an engineering company recognizes its responsibility to help ensure that the technologies it provides are used to respect, and not infringe, human rights.

As a company aiming to become global we embrace people to work with us whatever our nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible. eFM preventing or mitigating adverse human rights impacts that are directly related to our operations, services and business relationships.

eFM has also approved a statement outlining our position to protect and respect human rights through our operations and in our sphere of activity. This statement is aligned to the Guiding Principles as well as the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the Organization for Economic Co-operation and Development's (OECD) Guidelines for International Enterprises.

eFM concrete actions run in 2014-2015 so far are the following:

- 1) "Un Fiocco in Azienda" Project. The meaning was to grant an equal opportunity done for eFM pregnant women employees. It gave them the possibility to continue working while parking their car close to the office, so a special park has been created for them in front of the Rome office. (http://www.manageritalia.it/content/download/Associazione/associazioni/milano/Donne_Manage_Pari_Opportunita/UN_FIOCCO_IN_AZIENDA/2012_Presentazione_Un_Fiocco_in_Azienda.pdf)
- 2) "Company Family Friend" Project. eFM awarded a prize by the City of Assisi on Sunday during the Women Day on March 8th as the project reflected how eFM respects employees balance between private life & work life. eFM commitment to allow a right balance such as a flexible hour work'ace, family permission for whatever need, allowing employees children to stay in the office in case of need; sharing with all workers the choice of a new job location, flexibility for women /mothers and to any employee to work from home etc. There was ceremony in Assisi to which employees with their families participated.

Formattato: Italiano (Italia)

Examples

- Suggestion box, call center or grievance mechanism
- Awareness raising or training of employees on Human Rights
- Consultation with stakeholders and affected parties
- Allocation of responsibilities for the protection of Human Rights within your company
- Human resource policies and procedures supporting Human Rights

Measurement of outcomes

Description of how the company monitors and evaluates performance.

Human rights challenges and opportunities are different at different stages of the eFM value chain.

For example, in R&D, these may include aspects of accessibility and privacy.

Interfacing with manufacturing, including our supply chain, the main human rights issues are labor rights, and health and safety.

In sales and marketing, issues such as anti-corruption are the most likely human rights issues to be addressed.

eFM also in 2014 continued to ensure compliance with basic human rights within our organization and with whom the company interacts such as partners or /and supply chain as per our Ethical Code.

We continued to progress in the area of Human Rights hiring people with different backgrounds and cultures. To support that we organized a professional English course for our employees to facilitate international sharing, integration and open to any culture.

We believe that each individual is a single and unique so that we can enrich our company, build a multicultural environment and let the company grow worldwide.

Our Vision is to become a global company in few years and our business markets LATAM, UAE are going on including different cultures and different ways of working.

The effective monitoring and evaluation mechanisms of human rights integration are continuing as :

- Regular stakeholder consultations in the area of human rights
- Internal awareness-raising and training on human rights for management and employees
- Claims reports, communication channels and other procedures for reporting concerns or seeking advice
- Inclusion of minimum human rights standards in contracts with suppliers and other relevant business partners
- System to monitor the effectiveness of human rights policies and implementation, including in the supply chain
- Leadership review of monitoring and improvement results
- Process to deal with incidents

Examples

- Specific progress made in the area of Human Rights in the past reporting period
- Information about how your company deals with incidents of Human Rights violations
- Investigations, legal cases, rulings, fines and other relevant events related to Human Rights
- Periodic review of results by senior management
- External audits of Human Rights performance

Labour Principles

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

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

(For more information on the principles, [click here](#))

Assessment, Policy and Goals

Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities).

Description of written policies, public commitments and company goals on labour rights..

The Vision to become a global player encourage a global culture and multinational tasks,

eFM do not use forced, compulsory or child labor. eFM supports freedom of association and, where applicable, recognizes the right to collective bargaining.

eFM is a company that encourages and respects individuals: value recognized from our network.

eFM Labor Conditions Requirements based on international standards such as UN human rights declarations, International Labor Organization (ILO) conventions, International ethical standards and international labor laws. The eFM Labor Conditions Requirements apply to all of our offices (Milan, Rome, LATINAM and UAE and include:

- Prevention of child labor
- Non-discrimination
- Disciplinary practices
- Working hours
- Freedom of association
- Compensation
- Freely chosen employment
- Human Treatment
- Working time respecting the balance between life and work encouraging work from home or from everywhere the employee can work
- Compensation

eFM has a fundamental responsibility to provide decent working conditions and treat our people fairly.

Occupational health and Occupational safety

Examples

- Reference to ILO Core Conventions or other international instruments
- Written company policies to uphold the freedom of association and collective bargaining and the elimination of forced labour, child labour and employment discrimination
- Written policies that clearly state employee rights and responsibilities and their compensation and benefits
- Policy requiring business partners and suppliers to adhere to the Labour principles
- Assessment of labour-related risks in the industry sector and country(ies) of operations
- Specific goals in the area of Labour Rights for the upcoming year

Implementation

Description of concrete actions taken by your company to implement labor policies, reduce labor risks and respond to labor violations.

Compliance to labor law is a must and Human Resources People ensure that every employee is able to work in compliance with local labor laws. eFM ensures that the laws are strictly followed by every employee and we take necessary disciplinary action against who does not respect the laws

- Whenever we have a new employee the laws are distributed and explained to new employees.
- Any complain received by managers are processed by HR and dealt in real time. HR, if required, takes appropriate measures.
- The labor laws are effective and communicated to managers during their anticorruption training to ensure fair dealings among employees
- Current and new employees sign the Code.

HEALTH & SAFETY
ISO 18001:2007 Health and safety are core business activities in eFM. WE are aiming to audit it by end of 2015 in order to continuous improvements in health and safety.

In 2014 our employees have been trained on the D. lgs 81/08 and our management on the

TRAINING

We have an induction program for all our new employees regardless of grade covers the following key areas:

- Health and safety training and procedures
- The quality program and their policies
- HR issues – including discrimination, corruption and data security
- Customer service, sales, service delivery, insurance, etc

Quite often the trainings are announced and encouraged by our management on Yammer , these are accessible to every employee.

We encourage the training on the job giving possibility to everybody to join a new team we learn on the job

Formattato: inglese (Regno Unito)

Examples

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training for employees on labour rights and policies
- Describe how the health and safety of all employees is ensured
- Describe how your company prevents discrimination of all kinds and ensures comparable pay for comparable work
- Consultation with employees and other stakeholders
- Allocation of responsibilities for the protection of labour rights within your organization
- Human Resource policies and procedures supporting the Labour principles
- Participation in international framework agreements and other agreements with labour unions

Measurement of outcomes

Description of how the company monitors and evaluates performance.

Employees' right to free association and collective bargaining are recognized and respected. There is a clear and transparent process for receiving employee suggestions, requests and complaints. Effective communication with employees is promoted, so that issues arising from business decisions are addressed appropriately and promptly. eFM helps to monitor the labor conditions of a client's suppliers and the responsibility performance as compared to the company's own Code of Conduct. The results were used as the basis for making further improvements in supplier behavior

Examples

- Demographics of management and employees by diversity factors (e.g. gender, ethnicity, age, etc.)
- Describe how your company deals with incidents of violations of Labour principles
- Investigations, legal cases, rulings, fines and other relevant events related to Labour
- Periodic review of results by senior management
- Specific progress made in the area of Labour during the last reporting period
- External audits (e.g. SA 8000)

Environmental Principles

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
 Principle 8: undertake initiatives to promote greater environmental responsibility; and
 Principle 9: encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection

eFM supports approach to Environmental and Sustainability challenges .

eFM has increased sustainability programs and initiatives to promote greater environmental responsibility around the globe.

We also increased the awareness internally and externally with a specific campaign supporting different initiatives. Some concrete actions here as follows

Integrating sustainability p7, 8 & 9 principles in our strategies and operations, means understanding and managing our own impact in the environment, while also working with stakeholders to respond to the environmental challenges facing the world

From previous years eFM continues :

- promoting sustainable workplace policies and implementing environmental responsible initiatives, while encouraging stakeholders to do the same and committing to make a positive impact on the environment and addressing local environmental challenges
- investing in responsible energy use; educating and supporting our people in making sustainable decisions;
- working on environmental protection projects; and cooperating with clients, leadership groups and other businesses to address environmental impacts. In addition, eFM uses solutions "Green" to allow employees to reach the company by train, car sharing and carpooling.

eFM is associated at Green Building Council, a non profit organization dedicated to sustainable building design and construction.

In 2013, till 2014, eFM implemented strategies within the company to save energy, to reduce waste, and to move further steps towards sustainability (i.e. space optimization, waste differentiation, paper recycling, cca's, paper reduction towards digitalized documents, etc)

eFM concrete actions:

- 1) the "Earth Hour Worldwide Event" in March 2015 engaging also our stakeholders, clients and suppliers to switch off lights globally. A great campaign: in our offices around the globe (Europe: Rome, Milan, Brazil and UEA) switched off the lights during the local time 8:30 pm - 9:30 pm.)
- We are working towards promoting eco technologies. We are working on reducing carbon emissions and waste
- 2) Sustainability Awareness campaign globally within eFM and with messages on our social networks (FB, Twitter, Website, Yammer etc.)
- 3) Yamaha Kiss Mugello (KISS = *Keep It Shiny and Sustainable*). Briefly:

eFM supported Yamaha Motor Racing which is playing environmental role model in the MotoGP paddock. Together with FIM (Fédération Internationale de Motocyclisme) and L'Autodromo del Mugello, eFM has been one of the partner of Yamaha Motor Racing encouraging the public to get involved in their environmentally and socially sustainable initiatives to keep the hills of Mugello (close to Florence) beautiful for many years to come. The project covered:

- Environmental Sustainability

As a part of the KISS Mugello project, there were nearly 20.000 "kiss" distributed by 'Cooperativa Sociale l'Orologio di Scarperia' to manage the waste in the hills of the Mugello Circuit. The kit included three sacks for waste and a card having info about KISS Mugello and a fun contest. Within the circuit there was ten distribution points of the kits where any questions about KISS Mugello could be asked.

Last year the same amount of kits was distributed and resulted in 20,9 tons of waste recovered.

But it's not just the fans that kept Mugello green, the paddock also played its part. Recycling at the Italian track was never been easier, fifteen "ecological islands" were put in place for the collection of the waste, including 150 liters bins for plastic and 200 liters bins for paper. Furthermore, Yamaha Motor Racing's partner Dyson and Mugello Circuit set up "Airblade" hand-dryers in all restrooms within the paddock to not only save paper but also 52.200g of CO2 (calculations based on 2 paper towels per dry and 20.000 visitors in the MotoGP paddock at Mugello over the race weekend)

- Social & Economic Sustainability /CSR

eFM also supported the Yamaha, Mugello Circuit and VR46 which developed a social initiative to raise funds to create a game room in the Meyer Hospital in Florence for young children.

To support this social sustainable action, fans sold out the 700 t-shirts that carrying the text "Yellow + Blue = Green", which symbolized how the Movistar Yamaha MotoGP riders and team have gone through a sustainable journey to be more in harmony with nature. The money earned was given to the Meyer Hospital and allowing the buyer to take part in the KISS Mugello contest.

To join the Kiss Mugello Contest fans were asked to take a 'sustainable selfie' of them wearing the 'Yellow + Blue - Green' T-shirt with their friends and post it on the KISS Mugello Facebook page (www.facebook.com/kissmugello) with the hashtag #KISSMugello

Ensuring maximized efficiency in the company's own operations to minimize its environmental impact

4) New working and sustainable environment for our people at two new offices: eFM made the decision to select new locations for both sites, Rome and Milan.

First step, a same target for two teams: understanding the working needs of our employees, in Rome and Milan, within the office such as how much time they spend in meeting rooms, in break areas, at their desk, if they work more in the office or at home, what do they feel is missing or need to be changed etc.

eFM started with a sustainable approach analysis: the relevant info have been taken, on daily, interviewing people using a simple table apps developed by eFM in order to avoid the use of the paper, recording the daily answers, working environment and future need to let them "feeling home at the office" (social sustainability).

We are planning "sustainability locations" and in our target there is: once moved, eFM will run sustainability campaign to all our employees, reinforcing the message to reducing energy use, resources and so reducing CO₂ emission, better space where to connect and to share.

Actions to ensure the optimal results for eFM's environmental policy include training employees on the environmental policies, periodic internal audits, management review meetings, environmental programs such as reducing hazardous and nonhazardous waste. By end of 2015 we will re-certificate our integrated system such as ISO 18001 and 14001.

Future eFM sustainability goals:

1. Strongly Integrate and communicate our environmental policy across the company due to our new offices;
 2. Reduce our impact on climate change;
 3. Comply with environmental legislation and regulation where we operate;
 4. Strive for continuous improvement in our environmental protection;
 5. Continuing implementing and still improving the "printing consolidation project" for the third consecutive year.
 6. Engaging stakeholders, partners and supply chain to green actions like "green building".
- Since 2012 eFM has been qualified as Enel Green Power (EGP) Top Affiliate for the high quality of services (renewable energies and energy efficiency) provided to its customers.

eFM in partnership with EGP offers a full range for energy services, from design to implementation of photovoltaic, solar and wind plants; consultancy on energy efficiency and innovative services for all energy saving needs.

Example

- Awareness raising or training of employees on environmental protection
- Initiatives and programmes to reduce waste materials (e.g. recycling) and consumption of resources (energy, fossil fuels, water, electricity, paper, packaging, etc.)
- Activities aimed at improving the energy efficiency of products, services and processes
- Development and diffusion of environmentally friendly technologies
- Raise awareness among suppliers by asking them for environmental data on their products
- Environmental management system with objectives and procedures for evaluating progress, minimizing negative impacts and transferring good practices
- Allocation of responsibilities for environmental protection within your company

Measurement of outcomes

Description of how the company monitors and evaluates environmental performance

- Employees have been invited to participate to environmental awareness campaign and get continuously reminders to reducing waste and managing resources more effectively (eg. Water use).
- For energy reduction campaign eFM invited its employees to participate, also in their homes to be present at the EH 2015.
- A better waste management activity of recycle paper in line with the company's commitment to rise consciousness about environmental issues.
- In 2015 our EMS 14001 certification will be verified.

We send alerts and reminders through Yammer on our internal social network.

Examples

- Information about how your company deals with incidents
- Investigations, legal cases, rulings, fines and other relevant events related to environmental principles
- Specific progress made in the area of the environmental protection during the last reporting period
- Periodic review of results by senior management
- External audits of environmental performance

Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery (For more information on the principles, [click here](#)).

Assessment, Policy and Goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

eFM is committed to uphold the highest standards of ethical business conduct in all our activities wherever it operates –
 Demonstrating business integrity and tackling corruption is increasingly essential to meet strict ethical requirements from our customers, and to protect our reputation –
 eFM is strongly committed to the fight against bribery and corruption. This is consistent with our values, and our commitment to integrity, and lawful and ethical behavior.
 eFM does not tolerate corruption in any shape or form and has undertaken strict measures to ensure the compliance of all employees with these standards.
 eFM is committed to ensure all business dealings are conducted fairly. eFM has a zero tolerance policy to all forms of bribery and corruption.
 In 2013, we also implemented processes to let transparent the commercial activity.

Examples

- Assessment of risk of corruption and bribery in the company's industry and country(ies) of operation
- Written company policy of zero-tolerance for corruption, bribery and extortion
- Reference to (or statement of support for) the UN Convention Against Corruption and other international instruments
- Protocol to guide staff in situations where they are confronted with extortion or bribery
- Policy requiring business partners and suppliers to adhere to the anti-corruption principles
- Specific goals in the area of anti-corruption for the upcoming year

Implementation

Description of concrete actions to implement anti-corruption policies, reduce anti-corruption risks and respond to incidents.

Our target continuously remain :

- Analyze our clients for corruption-related risks. In the process.
- Formulate an anti-bribery/corruption policy > new Ethical Code in June 2015

As already wrote ,In 2013 we implemented a training opened to all employees about company's policies regarding anti-corruption and extortion (e.g. mailings, internet, internal communication, etc.). In addition, this training is mandatory for each new employee.

Examples

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training of employees about company's policies regarding anti-corruption and extortion (e.g. mailings, internet, internal communication, etc.)
- Allocation of responsibilities for anti-corruption within your company
- Participation in industry initiative or other collective action on anti-corruption

Measurement of outcomes

Description of how the company monitors and evaluates anti-corruption performance.

The Audit Committee, composed of managers and senior managers, is responsible for the development, implementation and monitoring of anti corruption activities

Examples

- Information about how your company deals with incidents of corruption
- Internal audits to ensure consistency with anti-corruption commitment, including periodic review by senior management
- Investigations, legal cases, rulings, fines and other relevant events related to corruption and bribery
- Specific progress made in the area of anti-corruption during the last reporting period
- External audits of anti-corruption programmes