



UNITED NATIONS GLOBAL COMPACT
COMMUNICATION
ON PROGRESS

2012

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Vittorio Veneto, 27.06.2013

STATEMENT

Being a good corporate citizen is an ambition enthusiastically embraced at all levels within our company. As a member of the Global Compact, we believe that our business policies incorporate the ten principles. Our board fully supports our actions in working towards sustainability goals – in particular those contained in the UN Global Compact – and endorses the future priorities and specific targets we set out in our report.

Through our support of the United Nations Global Compact, we also aim to move the agenda forward on performance related to human rights, labour rights, the environment and the fight against bribery and corruption. In our annual report, we have summarised the progress we have made against each of these principles and we will continue to follow them up in future reports. In this fourth annual Communication on Progress we provide an index to our performance with cross-references to the related GC principles.



Nicola Greco
CEO Permasteelisa S.p.A.

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Who We Are

Permasteelisa Group is a worldwide leading Contractor in the **engineering, project management, manufacturing and installation of architectural envelopes and interior systems.**

The Group brings its Know-How and expertise to all projects, in particular when dealing with **Special Features Buildings**, beginning with the design development phases all the way to the successful completion, achieving the customer's expectations.

Present in four continents, with a network of over 50 companies in more than 30 countries and 11 production plants, the Group generates a total turnover of around **1.4 billion euro** a year.

Business Units

Exteriors & Curtain Walls

Realizes architectural envelopes for signature landmark buildings throughout the world, applying constant innovation through advanced technologies.

Contract

Facilitates EPC projects in different construction sectors from Civil to Residential, maintaining high quality standards while meeting clients' demanding schedules.

Interiors

Benefits from the global size of the Permasteelisa Group in the interaction with international clients on a wide variety of projects, from unique custom showpieces to comprehensive commercial undertakings.

Our Brands



Mission & Philosophy

The Group's mission is to design and build innovative and avant-garde architectural projects in collaboration with the **famous names of contemporary architecture**, by applying **high technology solutions**.

The **quality** of our architectural envelopes and interiors is guaranteed by our rigorous quality control system. Besides, it's constantly improved through **R&D** in new **design** and **construction technologies** and through the use of **innovative materials**. The use of **environmentally friendly materials** and **eco-sustainable processes**,

and our commitment in energy saving, protect the environment and make the buildings themselves more comfortable and efficient.

The fundamental values underlying Permasteelisa's philosophy are the **services** offered both to the architect and to the client. As a result, all activities are oriented toward **full customer satisfaction** and quality of the products, achieved by means of continuous technological innovation.

Our History



1973

The Permasteelisa Group starts its activity.

1980s - 1990s

International expansion in the Australian, European, Asian and USA markets.

2000s

Consolidation of the leadership through the acquisition of the German Gartner and American Glassalum Holding Corporation companies.

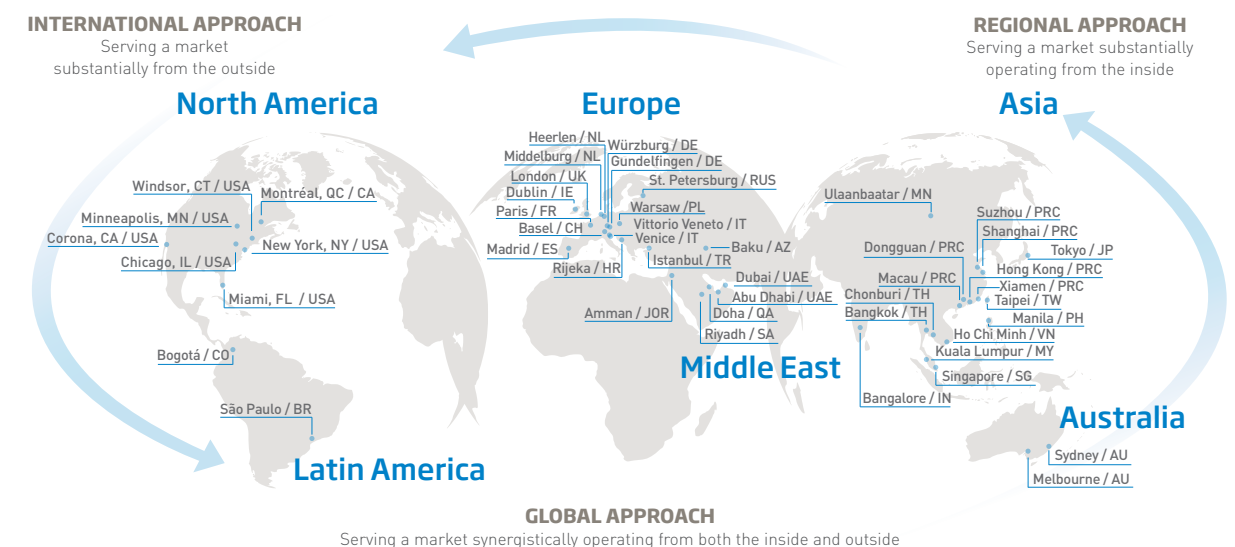
2007-2013

Strengthening our Global Approach starting business in new markets like Russia, Azerbaijan, Turkey, Mongolia and Brasil.

In 2011 Permasteelisa Group joined the Lixil Corporation.

Worldwide Presence: a Transnational Global Enterprise

The Permasteelisa Group philosophy is to operate as a Transnational Global Enterprise, capable of moving resources and organizations **quickly** and **flexibly** wherever the market developments may require, and using an **adequate mix of local, regional and overseas resources, tools and knowledge** to best fit the needs of any job developed within and by the Group.

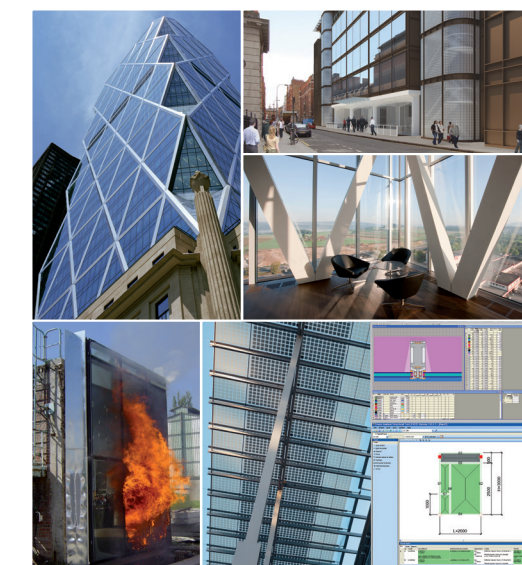


Innovation

Our leadership in the field is the result of constant **research for innovation** and improvement, making us the ideal partner for the most challenging and prestigious international architects.

The Group has entered into the next-generation photovoltaic panels sector through the participation in a cutting edge Research, Development and Industrialization project for the production of **non-silicium based solar panels**. The objective is to develop the so-called **"organic" photovoltaic cells** and to start-up an industrial production line of DSC panels (Dye-Sensitized Solar Cells).

This innovative technology utilises **light-sensitive organic pigments and nanotechnology** to generate electricity.



R&D. The Group has focused on environmentally sensitive themes and in its latest architectural projects has implemented new energy saving strategies. **Intelligent façades**, custom made for the largest world projects: **façades filtering light**, abating **acoustic pollution** and **saving heat from the sun** for winter heating or summer ventilation. Buildings capable of generating power through photovoltaic cells and resisting the strongest **seismic events** or **explosions**.

Main focus on:

- >> **Eco-Sustainable Architecture:** energy saving and renewable energy sources
- >> **Comfort** and **Acoustic** performances
- >> **Safety** and **Security**
- >> **Alternative** Systems and Materials
- >> Advanced **IT solutions** applied to engineering

HUMAN RIGHTS

1.2.



1 BUSINESS SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS

COMMITMENT

Permasteelisa has a Code of Ethics in which the core principles that inspire the management of its business are described, amongst which the following principles are cited:

“Focus on and enhancement of human resources” - par. 5.4

The Group recognises the centrality of human resources and the importance of establishing and maintaining relations with them based on reciprocal loyalty and respect, making adequate tools and professional growth opportunities available to its associates. The Group also promotes respect for the psycho-physical and cultural integrity of persons, ensuring work conditions that respect human dignity and safe and healthy work environments. Relationships between the Group's employees must be marked by principles of civil co-existence and must be conducted with reciprocal respect of the rights and liberty of the persons.

“Hygiene, safety” - par. 5.9

The health and well-being of persons, the safety of the construction sites, works and installations are priority objectives of the Permasteelisa Group and inspire all the actions with its employees, suppliers, customers, partners, subcontractors and third parties involved in the corporate businesses.

Permasteelisa has a great commitment to providing work environments, services and projects conforming to the requisites of the prevailing regulations. This commitment is adopted in every corporate business sector and each phase of project execution from engineering to procurement, up to the construction site activities”.

“Social responsibility” - par. 5.11

Permasteelisa has the implementation of the SA8000 (Social Accountability 8000) standard at Group level as an objective and, in compliance to the requisites of these regulations intends to ensure the fundamental rights of the workers in compliance with the prevailing laws in the countries in which the Group operates and the signed agreements with third parties based on the conventions of the International Labour Organization. Specifically, the social responsibility requisites of the standard deal with the following themes:

- Child workers
- Obligated work
- Health and safety
- Freedom of association and the right to collective contracts
- Discrimination
- Disciplinary procedures
- Working hours
- Remuneration.

These requisites have an impact on the corporate processes and business, also involving customers, suppliers and subcontractors.”

“Suppliers” - par. 6.3

(...omissis...); All the suppliers with which the Group operates must ensure modus operandi compatible with human and workers' rights, and protection of the environment.

ACTIONS

Permasteelisa S.p.A.’s corporate management considers that health and safety at work (HSW) is an aspect of fundamental importance within the correct operating and planning of the resources employed and respect of a human being in all its meaning. For that purpose the management has activated a health and safety at work management system as an integral part of its business, promoting strong awareness of safety at every level of the corporate hierarchy in a continuous perspective of prevention and improvement, Management System DPS 2.1.1. Permasteelisa requires its contact persons, customers and suppliers, other than its employees, to subscribe to and therefore respect its Code of Ethics. Specific clauses are provided for in the contracts.

HEALTH

•“Prevenire è Vita” (Prevention is Life)

Permasteelisa initiated a prevention project in November 2008 that provides for totally free anti-tumour Check-up for employees. A specialist visit is arranged with a staff of doctors who prescribe personalised individual diagnostics based on the age and sex of the employee. Such diagnostic visits will be repeated roughly every year and a half for each employee.

• Anti-influence vaccination

Permasteelisa offers the possibility of having a free anti-influence vaccination to all its employees every year.

• Safety

Permasteelisa Group Companies are committed to improving the health and safety of the workers in compliance with the sector regulations of each Countries.

In the following examples of actions and relative results obtained by some of the Group Companies.

Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l.

The Companies are committed to improving the health and safety of the workers in compliance with the sector regulations. The companies have decided to establish an office dedicated to work exclusively on safety in the work environment

Permasteelisa France S.a.s.

Improved analysis on the Safety Risk

Permasteelisa North America Corp.

Improved the activities to be OHSAS 18001 certified

Bleu Tech Montréal Inc.

Compliance to local law

Permasteelisa Japan K.K.

Monitoring of the safety risk

South China Factory (Permasteelisa HK)

Delivery of personal protective equipments

Permasteelisa (India) Pvt. Ltd.

Fire and first aid programme

Global Architectural Co. Ltd.

Improved the activities to be OHSAS 18001 and ISO 14001 certified

TRAINING

• Campus Project

Permasteelisa S.p.A.: Permasteelisa Campus was created for the recruitment of the so-called “entry level” resources, the entry procedure in the past created technical, financial and organizational problems. The project is directed at persons leaving Technical Institutes with a diploma and provides multi-disciplinary training for 5 weeks, with the Purpose of providing, in addition to the development of technical ability through 100 hours of training in the use of Autocad, an overall vision of the internal processes and therefore of the life cycle of a work order.

The project provides a structured curriculum of 8 modules for a total period of 184 hours, which permits young employees to have a general view of the process: from the preparation of an offer for capturing a work order, through the design and installation phases until delivery of the product to the customer.

A panoramic of the materials generally utilised is provided and of the problems that these can cause structurally. The curriculum also provides training the young employees from the technical viewpoint, with about 100 hours dedicated to use of Autocad, for the purpose of ensuring autonomy in the utilisation of the programme and reduce the design errors once the employees become operative.

Persons involved in the project vary from 10 to 20, according to internal requirements, and their entry depends on them passing a final test, composed of a series of multiple choice questions based on the programme carried out during the 5 weeks of the course.

• Permasteelisa Technical Academy

This is a project dedicated to the development of technical training programmes for employees of the Permasteelisa Group, which has the purpose of supporting their performance and continuous improvement facilitating the obtainment of technical information and development of personal expertise and knowledge, necessary for professional growth and the Group’s future performance.

Technical Academy is designed to centralize corporate awareness and formulate a standard methodology of training, for the purpose of supporting the sharing of knowledge and exchange of information within the Group.

• Training

Permasteelisa invests in the continuous training of its employees to favour their professional growth.

In the last two years the Permasteelisa Group, and specifically Permasteelisa S.p.A., has been involved in a process of structural and substantial change.

A fundamental element to favour the approach to the aforesaid change is a good leadership capacity of the managers to assist the associates to meet and overcome résistance to change. This is possible through effective communication, a real emotive and intellectual involvement of the associates and a remarkable team building capacity, such as to promote the spread of common objectives to which every individual of the team must adhere.

The contribution of the top management at all levels is therefore crucial to support and ensure change: their capacity to interpret new objectives and needs and assess the priority relevance of quality in the human resources management entrusted to them is determining. The leadership capacity that the managers must indicate thus becomes decisive, including in the perspective of those processes of integration of the diversities of which they are prominent figures.

In this perspective the training conducts a key role in contributing to the alignment, distribution and spread of the change, significantly contributing to the cohesion and spread of shared and common standards through organisational learning, and specifically through the diffusion of a common vision, alignment with respect to corporate objectives, making employees responsible and a leadership style aimed at the development of the expertise of associates and their empowerment.

• Safety training

Follows the list of some Permasteelisa Group Companies that have prepared specific safety training courses for the employees (Prevention and protection in the work place) in 2012:

- **Permasteelisa S.p.A.**
- **Permasteelisa Interiors S.p.A.**
- **Permasteelisa Impianti S.r.l.**
- **Permasteelisa France S.a.s.**
- **Permasteelisa España S.A.U.**
- **RI ISA d.o.o.**
- **Permasteelisa North America Corp.**
- **Bleu Tech Montréal Inc.**
- **Permasteelisa Gartner Middle East LLC**
- **Permasteelisa Gartner Saudi Arabia LLC**
- **Permasteelisa Gartner Qatar LLC**
- **South China Factory (Permasteelisa HK)**
- **Permasteelisa (India) Pvt. Ltd.**
- **J. Gartner & Co. (HK) Ltd.**
- **Permasteelisa Pacific Holdings Ltd.**
- **Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office**
- **Global Wall Malaysia Sdn. Bhd.**
- **Josef Gartner Curtain Wall (Shanghai) Co. Ltd.**

This list is a sample of the training activities improved in 2012 and it is not exhaustive.

CONVENTIONS

For the purpose of ensuring the well-being and a better quality of life of its employees Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l. have agreed some conventions in their interests, for example:

• **Crèche service**

Permasteelisa has contributed financially and from a design viewpoint to the completion of an inter-company crèche situated in proximity of the companies’ headquarters. The building was created in eco-compatible materials, with wooden fittings having enjoyable and coloured forms to ensure a healthy and relaxing atmosphere, and provides defined food programmes by arrangement with a dietician, other than a timetable capable of totally covering the work requirements of the parents. The corporate management has also decided to approve a further contribution of 50% of the monthly cost of the crèche fees on behalf of its employees using the structure.

• **Bank**

A framework agreement has been entered into with a bank that provides for various services on behalf of the Italian employees. Amongst these services, we mention a “virtual branch” in the company and a cash point service available 24 hours a day. The convention provides special conditions for all employees in the case where the latter open current accounts or apply for mortgages with this bank.

• **Vehicle "third party liability" insurance**

A convention has been established with an insurance company for the employees with special tariffs.

• **Other conventions**

Permasteelisa has entered into a policy that sets as an objective the possibility of having discounts and concessions on behalf of its employees.

BENEFIT

Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l. allowed the following benefits to their employees
Canteen: Permasteelisa pays full cost of the noon meal for all its employees. The canteen is located in the industrial area of Vittorio Veneto, where the company is settled
Petrol vouchers
Health insurance

Permasteelisa North America Corp. allowed the benefits described later to their employees.

PRIVACY

Permasteelisa protects the personal data of its employees.

OUTCOMES

The commitments that Permasteelisa set were achieved by implementing the projects described in the section alongside and obtaining in 2012 the results listed below.
The list is non-exhaustive of all the actions implemented by the Permasteelisa Group Subsidiaries.

HEALTH

•“Prevenire è Vita” (Prevention is Life)

The project, initiated in 2008, has seen participation by about 80% of the employees of Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l. The project has been extended to the employees hired after 2008.

In 2011 the Company organized five days of first and second level checks. At the end of the year the 45% of the attendees ended the project (I and II visits).

In 2012 the Company organized five days checks and the project ended on the 31th December 2012 as planned. The screening has led to the early diagnosis of malignant tumours 2, 11 suspected malignancies and 43 benign neoplasms. Such early diagnosis allowed the people to receive timely treatments.

Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l. planned to start in 2013 a new prevention project in favor of the employees “Prevenire è vita vale doppio” (Prevention is life, double) that will include, besides anti-tumour Check-up, the cardiovascular screening

Anti-influence vaccination

Follow the number of employees that joined the programme during the course of 2012:

Permasteelisa S.p.A.: 45 of 535 employees (8.4%).

Permasteelisa Interiors S.r.l. 15 of 201 employees (7.5%)

Permasteelisa Impianti S.r.l.: anyone joined the programme (0%)

• **Safety**

A Group Quality assurance and Sustainability Director has been nominated.

Permasteelisa S.p.A.

The number of accidents further reduced during the course of 2012 compared to 2007.

In fact, a total of 23 accidents were recorded, considering offices, factories and construction sites, 17 of which at the work place and 6 “during travel”, that is to say occurring during commuting between home and the work place.

The seriousness index is an indicator that defines the dimension of the accident damage and is calculated as accident days for every thousand hours worked:

$I_g = \text{total accident days} \times 1.000 / \text{hours worked}$.

The table below shows the trend of the seriousness index over recent years.

	2007	2008	2009	2010	2011	2012
I_g	1.85	1.52	0.78	0.85	1.43	1.77

Permasteelisa Interiors S.r.l.

The number of accidents further reduced during the course of 2012 compared to 2010, in fact, a total of 2 accidents were recorded, considering offices, factories and construction sites.

	2010	2011	2012
I_g	3.66	2.21	1.20

Permasteelisa Impianti S.r.l.
The Company recorded only 1 accident in 2012, for a total of 3 working days. No accidents recorded in 2010 and 2011

Permasteelisa France S.a.s.
The Company during 2012, awarded to external advisors the audit activities of H&S in their premises and sites. Following the audit report Permasteelisa France S.a.s. implemented their own internal H&S Manual. The auditing activity has been extended until the end of 2013

Permasteelisa North America Corp.
The Company in order to improve upon health and safety efforts, obtained an international certification for occupational health and safety management system and processes for manufacturing activities. The OHSAS 18001 has been on June 2012 by an independent 3rd party, the British Standards Institute (BSI). All construction and manufacturing employees receive safety training and instruction on a weekly basis

Bleu Tech Montréal Inc.
The Company complied with local laws and regulations as well as implementing company Health and Safety Program (identified risks, implement correctives measures, insure safety measures are follow at all times)

Permasteelisa Japan K.K.
The Company hold safety and health meeting every month inviting staff and subcontractors. Also annual safety and health committee is held once per year in April to educate and enlighten the staff to the safety and to yearly report the accidents/incidents

South China Factory (Permasteelisa HK)
The Company provides employees with the following safety and health protection measures: hearing and eye protection (earplugs and goggles), masks, gloves, labour insurance shoes and helmets

Permasteelisa (India) Pvt. Ltd.
The Company office safety measure initiated for fire and first aid

Global Architectural Co. Ltd.
The Company acquired ISO 14001 and OHSAS 18001 in 2012 which covers and protect the Health, Safety and Environment of the employees and local communities.

TRAINING

• Campus Project

To date a total of 54 persons have had the possibility of participating in the Campus Project, 48 of which in the design areas. Due to the global financial crisis, during 2012 the Campus Project was for the moment suspended awaiting a world economic recovery.

• Permasteelisa Technical Academy

Permasteelisa S.p.A. held training sessions in a hall for a total of 3,690 hours during 2011. The total number of employees who used the Technical Academy project during the year was 132. Teaching in a hall was accompanied by organised visits to the production factories of some of the main suppliers for the purpose of assimilating the peculiarities and the implication of some materials in the design phases. In 2012, 48 employees of Permasteelisa S.p.A. joined the “Design & Material” course (1400 hours) and 24 employees joined the “Structural” course (328 hours), for a total of 1768 hours.

About 860 persons were achieved in the other Group companies distributed in the European, Asian and U.S. areas.

• Training

13.545,5 hours of training were achieved in 2012, with the following attendance of employees at the courses organised:

Training courses	No. of employees
Languages	4515
Specialist training	533,5
Information Technology	890
Management	389
Technical training	3881
Safety	2988
General (privacy, Legislative Decree 231/01, etc.	349

The training projects provided by the company for its managers:

Eat my Dust	a training project created for the development of managerial expertise to make winning team;
Performance Appraisal	training program created to explain the “Performance Appraisal” process and the evaluation methods;

continued during the course of 2012, concentrating on the dynamics of managerial alignment, favouring the consistency of the decisional processes at local level and the dialogue and knowledge among the various Business Units.

The development of the managers’ leadership capacities continued with the purpose of assisting the associates to face problems of various types.

• Safety training

In the bi-annual period 2008 - 2009 the training courses in relation to the matters of prevention, protection and safety at work involved 848 Permasteelisa employees in Italy. Training courses continued during the course of 2010 in a manner aimed more at the individual work categories. Specific courses were proposed to the office staff on.

- first aid
 - environmental management system
 - environmental Consolidated Act
 - etc.
- With regard to the production employees, the training courses were developed on themes strictly connected to the activities of an industrial factory, for example:
- first aid
 - fire prevention
 - utilisation of machinery (gantry cranes, fork lifts, etc.)
 - waste management
 - etc.
- In 2012, continuing 2011 experiences, general safety courses were organized for white collars and specific courses for blue collars (use of forklift and bridge crane courses, first aid and fire) for a total of 2988 hours.

Permasteelisa France S.a.s.
The internal H&S Manual was explained and commented with all Project Managers. A Training of Site Managers is on-going in 2013

Permasteelisa España S.A.U.
Permasteelisa España S.A.U. complies with the current legislation of labour and with health and safety requirements, reaching 500 hours of training in 2012

<p>RI ISA d.o.o. Company organized trainings through the year 2012 in order to improve working process, with at least 2 hours per quarter</p> <p>Permasteelisa North America Corp. All construction and manufacturing employees receive safety training and instruction on a weekly per a total of 12,641 hours in 2012</p> <p>Bleu Tech Montréal Inc. In-house training: all new and current employees with a new assignment follow a training related to Health and Safety policies, as well as the technical aspects of their new tasks or assignments. External training: 1% of the budget is assigned to external training (courses, seminars, etc.) for all the employees wishing to improve their technical knowledge</p> <p>Permasteelisa Gartner Middle East LLC Basic Health and Safety trainings have been organized for the employees - total 1600 hours</p> <p>Permasteelisa Gartner Saudi Arabia LLC In the year 2012 the company has spent around 2000 working hours in safety induction to the site personnel. Regular tool box are given on weekly basis to create a safety and environmental culture. Some of our HSE employees have been awarded by the main Contractors for their performances at site. Zero accidents policy</p> <p>Permasteelisa Gartner Qatar LLC All employees are provided with adequate safety equipment. Every worker have to undergo a safety training before being assigned to his work. Every morning the work starts with a 10 minute reminder about safety on the daily task. Every week there is a new HS theme to improve employees experience. Total training hours 5860 hours in 2012</p> <p>South China Factory (Permasteelisa HK) On 2012, South China Factory (Permasteelisa HK) organized 30 hours security training for 400 people, mainly the production operators (total 12,000 hours)</p> <p>Permasteelisa (India) Pvt. Ltd. The Company organized approximately 10 hours security training for each employees</p> <p>J. Gartner & Co. (HK) Ltd. Josef Gartner & Co. (HK) Ltd organized for the site employees a full day training course plus a half day site induction course</p> <p>Permasteelisa Pacific Holdings Ltd. The Company adhered strictly to the local regulations</p> <p>Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office In 2012, the newly hired Vietnamese received safety training and orientation</p> <p>Global Wall Malaysia Sdn. Bhd. The Company adhered strictly to the local regulations</p> <p>Josef Gartner Curtain Wall (Shanghai) Co. Ltd. The Company organized safety trainings considering the different position and different type of work of the personnel. The average of training hour for each employee is around 23 hours in 2012.</p>	<h2>CONVENTIONS</h2> <p>Permasteelisa’s Italian employees have also continued to use widely some conventions in 2012 that were activated by the company in previous years. For example, almost all the available seats of the convention with the inter-company crèche service was again utilised, as was the “virtual branch” of the bank arranged that ensures the weekly presence of at least one banking consultant available (previous appointment) for the employees during normal working hours. In addition to the existing conventions such as body shops, vehicle workshops, tyre repairer, car hire and travel agencies, car insurance, credit cards for employees and their family.</p> <h2>BENEFIT</h2> <p>Permasteelisa Italian Companies give all employees who carry at least 6 working hours per days the canteen benefit Petrol vouchers: Permasteelisa S.p.A., Permasteelisa Interiors and Permasteelisa Impianti assigned 5 Petrol vouchers to each employees as special benefit (1 voucher= 21l of petrol or 23l diesel) Health insurance:</p> <p>Permasteelisa S.p.A., Permasteelisa Interiors and Permasteelisa Impianti The companies took out an additional insurance policy in favor of the most disadvantaged employees (in relation of incomes and family responsibilities). Permasteelisa S.p.A.: 203 of 535 employees (38%) Permasteelisa Interiors S.r.l. 78 of 201 employees (39%) Permasteelisa Impianti S.r.l. 19 of 37 employees (51%)</p> <p>Permasteelisa North America Corp. The Company in order to protect their economic livelihood of employees injured at work, provides comprehensive workers compensation insurance coverage to cover all related medical expenses and lost wages due to doctor prescribed days away from work. Additionally, PNA will accommodate injured workers with limited work capacity due to their work injury with a modified “light duty” job (at full pay) in order to transition them to full recovery and return to normal work.</p> <h2>PRIVACY</h2> <p>Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l. The processing of the employees’ personal data takes place in observance of the Italian legislation on Privacy. Access is reserved only to the staff involved in the function concerned. Paper documents with the sensitive data are conserved in protected areas, locked cupboards or offices. Data conserved on electronic supports are protected by an authentication password. Data saved in server files is subjected to a planned backup, thus avoiding the risk of its loss. The employees were also trained in connection with the Privacy regulations and in this context were acquainted with the methods with which to conduct the processing.</p>
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2 BUSINESS SHOULD MAKE SURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES

COMMITMENT

Permasteelisa Group rejects any behaviour that could lead to complicity in the commission of crimes of human rights abuses. The principles by which Permasteelisa is inspired are set out in the aforementioned Code of Ethics.

ACTIONS CODE OF ETHICS

So that everyone who collaborates with Permasteelisa respects the ethical principles in which the Group believes, the company has promoted the dissemination of its Code of Ethics to all employees, as well as customers and suppliers, asking them to sign it, and thereby approve. The Code of Ethics has been distributed to all Group companies in order for it to be noted and accepted by everyone who collaborates with Permasteelisa. Training courses were organized in Italy and in Group companies in order to share with and raise awareness amongst employees of the importance of the Code as a basis of conduct on which Permasteelisa intends to build its business.

REPORTING

Permasteelisa has set up an e-mail address (organismodivigilanza@permasteelisa.it) for the reporting of any violations of the Code of Ethics, and therefore also for reporting hypothetical and potential human rights abuses. Reports are received by Permasteelisa S.p.A.'s Supervisory Board, which has the responsibility to inform Management and the Board of auditors in case of violations are reported. All reports are handled in compliance with privacy regulations, safeguarding the rights of anonymity of the person reporting.

OUTCOMES CODE OF ETHICS

The Code of Ethics has been made available to everyone via publication on its website, www.permasteelisagroup.com, which can be easily downloaded. Permasteelisa also promoted its spread internally, divulging it across all Group companies and the same time asking all General Managers to share it also with the customers and suppliers of various companies. During 2010, the Code of Ethics was revised and approved by the Board of Directors of the Parent Permasteelisa S.p.A. on November 26, 2010. A translation into multiple languages of the Code of Ethics was also provided for as well as the previous Italian and English versions, so that its message could become even more widespread.

Follow some actions

Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l.

Delivery and acceptance activities for the Code of Ethics

The moment that they are hired, employees of the Group receive a copy of the Code, and are required to examine it and thereby accept its contents. The 99.5% of the Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l. employees signed the code in acceptance

Training on the Code of Ethics

Training sessions with regards to Legislative Decree 231/01 for employees of Permasteelisa in order to inform and educate them also on the principles of the Code of Ethics are regularly held, in Italy and at foreign branches. For example, during 2009 training was held at all subsidiaries in the Asia area.

In 2010 about 90% of managers and executives in Permasteelisa's Italian companies had attended training.

In 2011 continued the training to the employees with lessons by a teacher and a subsequent test of valuation.

In 2012, 185 Permasteelisa S.p.A. employees and 31 Permasteelisa Interiors Employees were trained.

Permasteelisa France S.a.s.

The Code of Ethics has been distributed by Permasteelisa France S.a.s. to employees and commented with employee's representatives. It is attached to all new subcontracts and named in the General Purchase conditions

Permasteelisa España S.A.U.

The Company attached as annex the Code of Ethics to all contracts (employees, customers and suppliers)

Permasteelisa North America Corp.

The Code of Ethics is distributed by Permasteelisa North America Corp. to all existing and new hires. Existing employees were asked to review and sign an acknowledgement form and new hires the same. New hire are provided with the Code of Ethics on the first day of employment

Bleu Tech Montréal Inc.

Permasteelisa Code of Ethics is distributed to all employees

Permasteelisa Gartner Middle East LLC

Code of Ethics is handed over to each employee by HR department upon joining the Company. Code of Ethics is distributed to all clients and suppliers. Recorded and monitored by the Account Department

Permasteelisa Gartner Saudi Arabia LLC

The Code of Ethics is distributed to all new employees of the company with the instruction to comply with the ethical principles

Permasteelisa Gartner Qatar LLC

The Code of Ethics is adhered to by all employees across all levels in the organization The Code of Ethics is provided to all new employees at the time of joining the Company and an acknowledgement is placed on the personal record with the HR department

Permasteelisa Japan K.K.

All new employee received the Code of Ethics

South China Factory (Permasteelisa HK)

The Company distributes the Code of Ethics for all new and in-service personnel

Permasteelisa (India) Pvt. Ltd.

Code of ethics is distributed to all employees Permasteelisa (India) Pvt. Ltd.. organized training courses for employees and supplier

J. Gartner & Co. (HK) Ltd.

The Permasteelisa Group's Code of Ethics is provided to and signed by Josef Gartner & Co. (HK) Ltd employees. Josef Gartner & Co. (HK) Ltd also made aware Clients and Suppliers about the Code of Ethics

Permasteelisa Pacific Holdings Ltd.

The code of ethics is distributed to all employees and third parties and well received by all parties

Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office

Code of Ethics is distributed to employees. The Company collected the employees signature in acceptance of the CoE contents and principles

Global Wall Malaysia Sdn. Bhd.

The code of ethics is distributed to all employees and third parties and well received by all parties

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

The Company distributed to employees the Code of Ethics and provided to organize training as planned. The Code is distributed also to Clients and Suppliers

Global Architectural Co. Ltd.

Code of Ethics is distributed to every employee and third parties. The Company organized orientation and briefing courses to improve awareness to every employees.

REPORTING

Also during 2012, as well as for the 2008-2011 periods, the Supervisory Board did not receive any information indicating that abuse occurred in relation to human rights.

LABOUR

3. 4. 5. 6.



3. BUSINESSES SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING

COMMITMENT

Permasteelisa recognizes the right to collective bargaining, which supports the freedom of association of workers.

ACTIONS

Currently part of Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and Permasteelisa Impianti S.r.l.'s employees are members of two national unions. Permasteelisa promotes freedom of association guaranteeing the various activities included therein, such as, for example, the freedom for employees to appoint their own union staff and representatives and the freedom of meeting during working hours.

Permasteelisa France S.a.s.

Meeting with employees representatives

Permasteelisa España S.A.U.

Unions, elections and meetings

Permasteelisa North America Corp.

Union collective bargaining agreements

Bleu Tech Montréal Inc.

Site work employees

South China Factory (Permasteelisa HK)

Meetings

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

Unions and meetings

Global Architectural Co. Ltd.

Welfare Committee.

OUTCOMES

The overall percentage of Permasteelisa employees in Italy belonging to unions in 2012 was 21% for Permasteelisa S.p.A., 12% for Permasteelisa Interiors S.r.l. and 8% for Permasteelisa Impianti S.r.l.

Follow the number of employees belonging to unions were:

Permasteelisa S.p.A.	113
Permasteelisa Interiors S.r.l.	24
Permasteelisa Impianti S.r.l.	3

Specifically, in 2012, 9 union meetings were held at Permasteelisa S.p.A., 6 were held at Permasteelisa Interiors S.r.l. and 1 at Permasteelisa Impianti S.r.l., out of a possible maximum of 10

Permasteelisa France S.a.s.

In compliance with the French law for companies having less than 50 employees, monthly meetings with representatives of Personnel are organize and formalized in official reports

Permasteelisa España S.A.U.

In Permasteelisa España S.A.U. are present the two main trade unions of the Country.

A workers' committee (4 employees) is elected democratically. In 2012 the company has held 10 meetings with the works council

Permasteelisa North America Corp.

The Company uses union field labours and is signatory to several union collective bargaining agreements, and

agrees for a particular project to adhere to the Main Contractor’s or Owner’s collective bargaining agreements

Bleu Tech Montréal Inc.
The site work is done with union employees

South China Factory (Permasteelisa HK)
2012 there were two union meetings

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.
Actually there are in Josef Gartner Curtain Wall (Shanghai) Co., Ltd. 305 employees belonging to unions, and in 2012 there were 2 Union meetings

Global Architectural Co. Ltd.
The Welfare Committee is composed by 15 people, in compliance with Thai Labour Law. In 2012, were held 12 meetings.

4 BUSINESSES SHOULD UPHOLD THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR COMMITMENT

Permasteelisa, as stated in the Code of Ethics under the principle of “**Focus on and development of human resources**”, recognizes the importance of respect for the psycho-physical and cultural integrity of people, guaranteeing working conditions that respect human dignity and a safe and healthy working environment. Permasteelisa also recognizes its own “social responsibility” in ensuring the basic rights of workers on the job.

ACTIONS

Permasteelisa Group disapproves of the use of any form of coercion against staff, as well as the use of concealed labour. Follows some actions:

Permasteelisa S.p.A., Permasteelisa Interiors and **Permasteelisa Impianti S.r.l.**
Policies and internal rules, agreement with subcontractors

Permasteelisa France S.a.s.
Suppliers affidavit

Permasteelisa España S.A.U.
Code of Ethics distribution

Permasteelisa North America Corp.
Promotion of compliance

Bleu Tech Montréal Inc.
Business interruption

The following companies have adopted Policies and internal rules against compulsory and forced labour: Permasteelisa Gartner Saudi Arabia LLC, South China Factory (Permasteelisa HK), Permasteelisa (India) Pvt. Ltd., J. Gartner & Co. (HK) Ltd., Permasteelisa Pacific Holdings Ltd., Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office, Global Wall Malaysia Sdn. Bhd., Josef Gartner Curtain Wall (Shanghai) Co. Ltd. and Global Architectural Co. Ltd.

OUTCOMES

Each Group company is obliged not to use forced labour, and to respect the working hours required by national legislation in the countries in which its individual subsidiaries operate. Permasteelisa recognizes the right to overtime pay where required by law. As for the Group’s Italian companies, employment contracts are governed by the sector’s National Collective Labour Agreement. Permasteelisa also does not use any type of coercion or remote control over workers (i.e. internal video surveillance in offices or factories).

Permasteelisa S.p.A., Permasteelisa Interiors S.r.l. and **Permasteelisa Impianti S.r.l.**
Italian laws don’t allows any concealed labour and Permasteelisa Italian Companies fully adhere to such instructions. The Companies also ask to subcontractors (ex. Installation companies), before starting any kind of activities or business, evidences of tax, salaries, insurance and social security positions for their employees

Permasteelisa France S.a.s.
The Company has mandatory affidavit from all subcontractors, regularly updated that they comply with the Labour Law

Permasteelisa España S.A.U.
The Company complies with existing labour legislation

Permasteelisa Gartner Saudi Arabia LLC
The Company, as the Group, is against all forms of forced and compulsory labour and it is promoting such principle to third parties. The main activity has consisted in controlling that the suppliers were complying with the labour law, hiring people with regular contracts. Particular attention has been given in controlling the

employment of legal emigrant

Permasteelisa North America Corp.

The Company complies with all Equal Employment Opportunity and Affirmative Action laws and promotes this in all business locations and third party relationships

Bleu Tech Montréal Inc.

The Company is against all forms of forced and compulsory labour. If a vendor doesn't comply with Human Rights all business will be terminated with them

South China Factory (Permasteelisa HK)

Staff overtime has its own overtime application form. The Company Employee Handbook defines the work timing: five days of eight-hour day

Permasteelisa (India) Pvt. Ltd.

The Company is against all forms of forced and compulsory labour and strongly promotes the same

J. Gartner & Co. (HK) Ltd.

The Company is strongly against to all forms of forced and compulsory labour and do not tolerate to deal with any third party which is not upholding the same principles

Permasteelisa Pacific Holdings Ltd.

The Company uphold this principle

Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office

Confirmed that business practices are non-compulsory

Global Wall Malaysia Sdn. Bhd.

The Company uphold this principle

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

The Company confirms that it is against all forms of forced and compulsory labour. The Company also promotes such principle to third parties

Global Architectural Co. Ltd.

The Company is against all forms of forced and compulsory labour.

5 BUSINESSES SHOULD UPHOLD THE EFFECTIVE ABOLITION OF CHILD LABOUR

COMMITMENT

In compliance with the laws of the country in which it operates and with international law, Permasteelisa respects and promotes the abolition of child labour.

In the section “**Social Responsibility**” in its Code of Ethics, Permasteelisa is the guarantor for the protection of basic workers' rights with respect to child labour.

ACTIONS

In adopting the Code of Ethics, Permasteelisa Group companies undertake to respect the principle of abolition of child labour for children of non-working age.

OUTCOMES

Permasteelisa Group does not hire children of non-working age.

6 BUSINESS SHOULD UPHOLD THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION

COMMITMENT

Permasteelisa is also working to ensure equal opportunity hiring, and to act with impartiality towards its employees. This principle finds its inception in its Code of Ethics paragraph 5.3, “**Fairness and equal opportunity**”.

ACTIONS

Permasteelisa formalized internal hiring and personnel management procedures to mitigate the risk of discrimination based on age, race and ethnic origin, nationality, the political opinions, religious beliefs, gender or health status of its employment candidates

OUTCOMES

Follow some example:

Permasteelisa S.p.A.

The Company formalized internal hiring and personnel management procedures to mitigate the risk of discrimination based on age, race and ethnic origin, nationality, the political opinions, religious beliefs, gender or health status of its employment candidates.

These corporate procedures are applied to all candidates and employees without regard to race, age or gender.

Permasteelisa select candidates focusing on the skills of the individual in relation to the job sought.

Staff management follows rules established by Staff Regulations and in internal procedures, also without regard to race, age or gender

Permasteelisa North America Corp.

The Company has specific procedures and processes to comply with all Employment Labor Laws. The Company complies with all forms of Equal Employment Opportunity and Affirmative Action, whereby employment decisions maintain the highest degree of selection and fairness while satisfying the organizations internal skill and experience requirements

Bleu Tech Montréal Inc.

There is a policy against discrimination and harassment based on religion, race, gender, sexual orientation, handicap or any individual trait

Permasteelisa Gartner Middle East LLC

Hiring of staff is done by HR department as per proper recruitment procedures. No discrimination whatsoever is existing.

The best candidate is selected regardless race, religion, gender etc.

Permasteelisa (India) Pvt. Ltd.

The Company adopted procedures for hiring staff.

The applicants are selected in consideration of their skills as required for the projects

J. Gartner & Co. (HK) Ltd.

The Company has internal policy rules in hiring personnel

Permasteelisa Pacific Holdings Ltd. and Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office

There are HR policies dictate on hire personnel based only on skills

Global Wall Malaysia Sdn. Bhd.

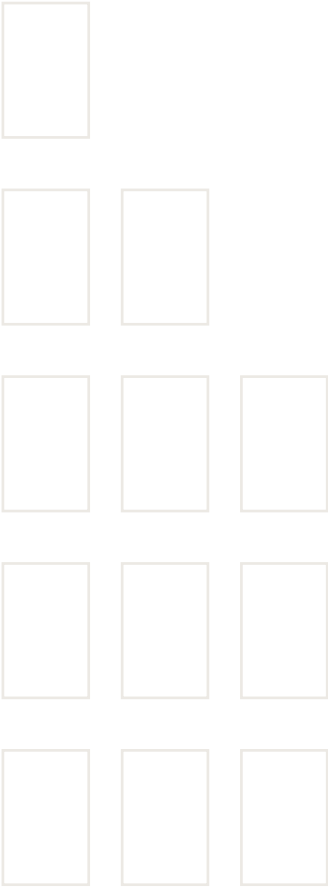
There are HR policies dictate on hire personnel based only on skills

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

There are specific internal policy to hire staff

Global Architectural Co. Ltd.

There are HR policies dictate on hire personnel based only on skills.





7 BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES

COMMITMENT

The Group recognizes the environment as a primary asset that must be safeguarded, and undertakes to comply with current regulations regarding environmental protection and conservation, promoting a running of its business centered on the proper use of resources, as set by paragraph 5.9 in the Code of Ethics under “**Hygiene, safety and the environment**”.

ACTIONS

Permasteelisa Group is committed to reducing consumption of energy and material, especially as regards sources of energy.

Follow the description of some actions improved:

Permasteelisa S.p.A.

In order to promote protection of the environment at the forefront, Permasteelisa has installed a photovoltaic/solar energy system at its Italian production site. The purpose of this is to use and transform energy from the sun (a source of non-polluting and inexhaustible energy) as “clean” energy to use for different purposes at its production site

Permasteelisa S.p.A. and Permasteelisa Interiors S.r.l.

The Companies adopted Organization and Management Control Handbooks

Permasteelisa France S.a.s.

The Company adopted HSE Manual and management system

Permasteelisa North America Corp.

The Company Environmental Health & Safety program

Permasteelisa Gartner Middle East LLC

Company Policy Statements on Environment and Health & Safety and environmental risk assessment

Permasteelisa Gartner Saudi Arabia LLC

Risk assessment, policy and procedures

Permasteelisa Gartner Qatar LLC

HSE plan

South China Factory (Permasteelisa HK)

Environmental risk assessment

Permasteelisa (India) Pvt. Ltd.

Recycle

Permasteelisa Pacific Holdings Ltd.

ISO 14000

Global Wall Malaysia Sdn. Bhd.

Improved environmental policy

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

Improved environmental policy

Global Architectural Co. Ltd.

Improved environmental policy

OUTCOMES

Permasteelisa S.p.A.

Lighting management at the company’s headquarters is centralized in order to avoid waste, and moreover the lights Management of lighting is centralised in the headquarters to avoid waste of electricity, in addition washrooms have presence sensors. Steps were taken in 2010 for the inclusion of ambient light sensors in open-space offices in order to regulate the output of electric lighting according to the level of sunlight detectable within offices, with the dual purpose of limiting energy consumption and simultaneously improve the working conditions of employees by ensuring that the workplace is always properly illuminated. The photovoltaic system, tested in December 2009, went operational in 2010 with a production on an annual basis of 206,500 kWh, equivalent to a saving of 51.6 TOE, tonnes of petroleum equivalent. In 2011 have been produced 237,600 kWh equivalent to a saving of 59.4 TOE, tonnes of petroleum equivalent.

In 2012 have been produced 667.808kWh
Construction of the plant was carried out according to certain standard power generation prerogatives making use of renewable energy sources, specifically:

- electricity production without the emission of pollutants, carbon dioxide and monoxide, etc.
- conservation of fossil fuels
- no noise pollution
- compensation for energy through incentives included in the national Energy Bill
- protection of the territory in terms of environmental impact.

Permasteelisa S.p.A. and Permasteelisa Interiors S.r.l.

The Companies updated their respective Organization and Management Control Handbooks, with specific rules aimed of prevent environmental crimes (Decree 231/01 Italian Laws)

Permasteelisa France S.a.s.

The Company has a HSE Manual and one internal employee is appointed for environmental issues

Permasteelisa North America Corp.

The Company Windsor Facility, has an environmental Health & Safety program in place and certified by BSI for OHSAS 18001. Permasteelisa North America Corp. Windsor office and factory joint safety committee reviewed and approved by CT dept. of Labour. Storm water pollution plan program registered with State of CT DEEP

Permasteelisa Gartner Middle East LLC

Company Policy Statements on Environment and Health & Safety are existing.
Environmental risk assessment is conducted as per UAE regulations. Health and Safety Manual is also existing

Permasteelisa Gartner Saudi Arabia LLC

The company prior the start of each site activity prepare a risk assessment plan that is further implemented and followed during the site activities. The company has it is own HSE policy that is part of the company procedure. A dedicated organization for the application of the HSE procedures is set up and constantly surveys the site activities addressing the personnel in behaving accordingly

Permasteelisa Gartner Qatar LLC

The Company follows strictly an approved HSE plan which includes policy for Hygiene, safety and environment

South China Factory (Permasteelisa HK)

The Company made an Environmental risk assessment. Policy for hygiene, safety and the environment: Build a zero safety accident culture and a zero environmental impact culture

Permasteelisa (India) Pvt. Ltd.

The Company has policy for Safety, hygiene and proper environments. The Company carries out risk assessment (i.e. practices recycling of refuse, and maintains a fairly hygienic environment.)

Permasteelisa Pacific Holdings Ltd.

The Company is ISO 14000 accredited

Global Wall Malaysia Sdn. Bhd.

The Company although not accredited ISO 14000, follows the same practice

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

The Company adopted a general company policy for the Hygiene, Safety and Environment

Global Architectural Co. Ltd.

GAT adopted a system covering Occupational Environment Health and Safety (OEHS) which included Environmental Risk Assessment.

BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

COMMITMENT

Permasteelisa supports initiatives for the promotion of greater energy savings.

ACTIONS

Permasteelisa is committed to reducing the waste and refuse generated during the production process chain. Coordination within the chain's production phases allows for rational management of waste. All scraps are reused through the internal production cycle, or via payment to appropriate external service providers. This methodology has been adopted at all Permasteelisa Group sites.

Permasteelisa S.p.A. also use software that optimizes the use of production materials and therefore reduces waste within production lines. In parallel, we have developed a quality system that aims to reduce non-compliances which, in fact, would produce more waste.

Permasteelisa S.p.A. is equipped with a cogeneration plant for simultaneous and joint production of electricity and heat.
This combined use may increase the efficiency of the use of fossil fuels by more than 80%, which corresponds to lower costs and lower emissions of pollutants and greenhouse gas emissions, compared to separate production of electricity and heat.
A cogeneration system with thermal and electrical processes of production requires 35% less fuel than the configuration of separate production of electricity and heat.

Permasteelisa S.p.A. is investigating a series of initiatives aimed at the digitization of all requests for authorization permits, vacations, travel, company cars etc., which currently occurs using paper formats. In addition to speeding up and securitizing procedures, the goal of this is to reduce the use of paper and toner.

Permasteelisa France S.a.s., Permasteelisa España S.A.U., RI ISA d.o.o., Permasteelisa North America Corp., Bleu Tech Montréal Inc., Permasteelisa Gartner Middle East LLC, Permasteelisa Gartner Saudi Arabia LLC, Permasteelisa Japan K.K., South China Factory (Permasteelisa HK), Permasteelisa (India) Pvt. Ltd., J. Gartner & Co. (HK) Ltd., Permasteelisa Pacific Holdings Ltd., Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office, Global Wall Malaysia Sdn. Bhd., Josef Gartner Curtain Wall (Shanghai) Co. Ltd. and Global Architectural Co. Ltd. improved environmental and recycle rules.

OUTCOMES

Permasteelisa S.p.A.’s commitment to reducing waste and refuse during production is reflected in the following table, where, except for very limited cases, the good performance of Permasteelisa S.p.A.’s policy in recent years can be seen.

	2008	2009	2010	2011	2012
Methane Pisa S.p.A. factory (m³)	83,675	49,470	30,530	110,355	55,155
Isopropyl alcohol (lt)	11,200	13,507	9,455	10,403	8,458
RSAU (solid and similar waste) (kg)	106,240	91,220	78,950	97,040	100,430
Recovery of paper/cardboard (kg)	33,350	51,500	44,940	91,330	78,770
Scrap iron (kg)	69,630	66,170	60,220	99,110	56,240
Scrap glass (kg)	52,400	79,700	34,850	47,650	61,010
Various wood pallets (kg)	171,390	165,190	120,960	207,980	249,390
Scrap aluminium	542,200	278,020	384,040	399,580	336,660
Plastic	11,459	17,750	14,080	20,530	10,680

The innovative packaging of cells (the basic unit of a continuous façade) produced using metal pallets, contributes significantly to the waste reduction policy practiced by Permasteelisa. The metal pallets, in fact, can be reused for much longer than wooden ones, and do not produce waste materials. In 2008, only in Italy, about 0.3 m³ of timber was saved per parcel with a total of 750 tons of wood saved; savings in 2009 were about 800 tons. In 2010 450 tons of timber was saved, due to a lower production of panels. Added to these direct cost savings were the indirect costs savings on disposal. In 2011 470 tons of timber was saved. In 2012, 316 tons of timber was saved in Permasteelisa S.p.A. and 671 tons in all Permasteelisa Group.

The use of the cogeneration plant continues to be a source of considerable energy savings. The following table shows results obtained in recent years

Year	Energy savings (primary energy) TOE/	Electricity to the national grid
2008	144TEP / 85,000 €	50,000 €
2009	132TEP / 105,000 €	105,000 €
2010	128TEP / 98,000 €	38,000 €
2011	138 TEP/ 93,000 €	27,000 €
2012*	200TEP/140.000 €	54.530 €

*The 2012 was a cold year and system worked more that the previous years to heat the Factory

In 2012 Permasteelisa continued to pay particular attention to the environment by maximizing the use of recycled, environmentally friendly, FSC-certified and PET-derived materials for the printing of all institutional communication materials and advertising, such as the financial statements, the Code of Ethics, brochures, promotional bags, etc., and for various materials distributed to employees

Permasteelisa France S.a.s.
has for all sites a dedicated special plan for environment

Permasteelisa España S.A.U.
Waste collection system (waste separation, recycling of all recyclable materials in accordance with current legislation through an external company authorized) use of low energy lighting, low emissivity glass for energy savings

RIISA d.o.o.
improved separate waste collection systems

Permasteelisa North America Corp.
Windsor Facility has established material recycling programs for scrap metals, white office paper, cardboard and recycling of Universal waste (electronics, light bulbs, batteries, computer hardware). The facility also has a storm water run-off environmental management program to ensure non-pollution of ground water permitted through Connecticut Department of Energy and Environmental Protection as required by Federal Environmental Protection Agency Regulations. The Facility is also registered as a “Small Quantity Generator” for disposal of hazardous waste and materials

Bleu Tech Montréal Inc.
Energy efficient lighting (replacement of existing fixtures in the factory), all recyclable waste (paper, metal, etc.) hazardous waste is handled by specialized companies

Permasteelisa Gartner Middle East LLC
Recycling of wood, metals and paper is implemented

Permasteelisa Gartner Saudi Arabia LLC
The company is practicing the recycling of waste materials (paper, packaging). Moreover it is constantly given information to the employee about the correct use of lighting and air conditioning in the offices

Permasteelisa Japan K.K.
Waste is collected separately and disposed as per UAE regulations. Permasteelisa Japan K.K introduced separate waste collection, recycles of used paper etc., took out some ceiling lights in the offices. On site, recyclable materials are collected for recycle

South China Factory (Permasteelisa HK)
sets goal for reducing waste of resource every year, such as: decreasing usage of water, electricity and oil; control the balance of material and sort out the rubbish etc.

Permasteelisa (India) Pvt. Ltd.
supports recycling and separate waste collection, and is conservatives with the use of electricity

J. Gartner & Co. (HK) Ltd.
Waste is collected separately

Permasteelisa Pacific Holdings Ltd.
The company committee for projects and office promotes such policies activities

Permasteelisa Pacific Holdings Ltd., Vietnam Representative Office
promotes recycling and energy conservation in the office and on the job site

Global Wall Malaysia Sdn. Bhd.
The company committee for projects and office promotes such policies activities

Josef Gartner Curtain Wall (Shanghai) Co., Ltd.
The Company gives to all employees general environmental rules

Global Architectural Co. Ltd.
One of GAT OEHS objectives is waste management to segregate waste collection.

9 BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

COMMITMENT

Permasteelisa recognizes the importance of research and development regarding the environment. For this reason Permasteelisa has funded projects to encourage energy saving.

ACTIONS

Permasteelisa S.p.A. is active in the development of new, eco-friendly technologies.

OUTCOMES

Permasteelisa S.p.A.

• Organic photovoltaic cells

In partnership with ERG Renew (ERG Group), Permasteelisa S.p.A. initiated a project in 2008 for production of semi-transparent solar panels that, thanks to the combined action of an organic dye and nano particles of titanium dioxide, convert light - diffused or direct - into electricity.
In 2009 a consortium was formed to develop the project and the testing phase began.
Project partners are the Tor Vergata University of Rome, the Ferrara University and the Turin University, which will focus on research.
After the design phase and a pilot line was completed at the beginning of 2012.
The research is focuses on the optimization of the semi-transparent solar panels and their application on a project.

• Sustainable design

Furthermore, the Permasteelisa Group continued in 2012 to promote the development of sustainable design of buildings, intelligent façades for the largest projects in the world that, in addition to meeting the demands of increasingly futuristic architects, are able to filter light, reduce sound pollution, and recuperate solar heat to provide air conditioning in summer and heating in winter, etc.

The areas of interest in the sustainable design of buildings primarily involve:

- **protection and safety** within the buildings, including against explosives, fires and earthquakes
- **energy savings and comfort**
- **design and new materials**, composites or polymers with low embodied energy, high thermal efficiency and the ability to be recycled.

Permasteelisa North America Corp.

Reduction of Carbon Footprint at the Permasteelisa North America Corp., Windsor Facility.
According to figures supplied by Northeast Utilities, two energy savings projects initiated by the Windsor Team are not only saving electricity usage and cost but are also reducing our Carbon Footprint through the reduction of Green House Gasses which are a by-product of generating electricity.

Replacement of 600 (400 watt High Pressure Sodium)Light fixtures with 200 watt, electronic ballast T-5 fluorescent fixtures, motion detectors and replacement of 100 watt incandescent night lights with 42 watt compact florescent and replacement of two direct electric drive motor air compressors (total of 160 horsepower) with variable-drive 25 horsepower primary and back-up has resulted in the following reduction or avoidance of 7,597.171 pounds of Carbon Dioxide Air Emissions, avoidance of 2,202 pounds of Nitrogen Oxide Air Emissions and the avoidance of 4,099 pounds of Sulfur Oxide Air Emissions.

Northeast Utilities also states that the reduction of required electricity at the Windsor facility saves 99,148 gallons of Fossil fuel or 3,550,080 pounds of coal from being burned over the life of the project.
These projects saved enough electricity consumption to provide 842 residential homes with electricity.



ANTI-CORRUPTION

10.



10 BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY

COMMITMENT

Permasteelisa establishes, in its Code of Ethics, the principle of impressing upon stakeholders relationships that are honest, fair, and have integrity, transparency and mutual respect. Honesty and transparency are fundamental principles in all Group activities and are essential elements in business management, as in the twelfth Ethical principle of **“Honesty and fairness”**, paragraph 5.2. Regarding relationships with the Public Administration, in its Code of Ethics Permasteelisa states that all relationships between the Group and public institutions are arranged by associates entrusted for this purpose, and are based on the principles of lawfulness, fairness, transparency, cooperation and non-interference, with respect to their mutual roles. The Group does not exchange money or other means of payment with public officials to influence activities they perform as their official duties, neither directly nor through intermediaries. Gifts, favours or conduct towards government representatives, public officials and public employees that are not transparent are not allowed, as stated in the Code of Ethics paragraph 6.4 **“Public administration and public institutions”**.

ACTIONS

The principles of honesty and fairness enshrined in the Code of Ethics constitute a commitment by the company to refrain from illegal conduct.

For example, Permasteelisa S.p.A. and Permasteelisa Interiors S.r.l. have approved respective Organizational Management and Control Models pursuant to Legislative Decree 231/01 in order to promote business activity in accordance with national laws and legislation. The application of these Models is overseen by the Supervisory Board of both companies through audit tests. In the framework of Law 231/01 (which established administrative liability of the bodies), Permasteelisa managers are trained to be the main guarantors of absence of forms of corruption, and in their ability to prevent these forms.

Permasteelisa has established the principle of separation of duties. Payments are all recorded in its computer system and must be authorized by someone other than the people who managed the billing process, and provided with specific proxies.

Permasteelisa France S.a.s., Permasteelisa España S.A.U., Permasteelisa North America Corp., Bleu Tech Montréal Inc., Permasteelisa Gartner Middle East LLC, Permasteelisa Gartner Saudi Arabia LLC, Permasteelisa Gartner Qatar LLC, Permasteelisa Japan K.K., South China Factory (Permasteelisa HK), Permasteelisa (India) Pvt. Ltd., J. Gartner & Co. (HK) Ltd., Permasteelisa Pacific Holdings Ltd., Global Wall Malaysia Sdn. Bhd., Josef Gartner Curtain Wall (Shanghai) Co. Ltd. and Global Architectural Co. Ltd. also adopted policy and procedures against bribery and extortion.

OUTCOMES

Follow some example of the activities improved by the Group

Permasteelisa S.p.A. and Permasteelisa Interiors S.r.l.

The Companies adopted an Organization and Management Control Models that provide, amongst other elements, a set of rules and controls to prevent the risk of corruption offences. The adoption of these models by Permasteelisa S.p.A. and Permasteelisa Interiors S.r.l. employees and managers was encouraged and assisted by various training courses, and then verified using specific audit tests

Permasteelisa France S.a.s.

has an internal manual for procurement activities, describing the rules of tenders for materials and outsourcing. A double signature is mandatory for all contracts and P.O.

Permasteelisa España S.A.U.

is against all forms of corruption and will denounce to the competent authorities any suspected act done by company personnel and any external collaborator

The Company’s Code of Ethics describes Permasteelisa North America Corp. requires compliance in performing work in the most ethical and professional manner.

“Our guiding principal throughout the Group is to respect the laws and regulations of the countries in which we operate, and to treat honestly, reliability, impartiality, loyalty, integrity and good faith as essential keys to our success we urges all employees and everyone who contributes to our business to embrace and enforce the principles expressed in the COE”

Bleu Tech Montréal Inc.

Company policy is very strict and will not be accepted bribery and extortion actions

Permasteelisa Gartner Middle East LLC

The Company is provide with it Handbook (Vademecum for employees) handed over to each new employee upon joining the company. (Especially the Personal Conduct & Discipline, Disciplinary Procedures, Business Code of Conduct)

Permasteelisa Gartner Saudi Arabia LLC

The Company adhere to and apply the Code of Ethics of Permasteelisa Group. The book is distributed to any new employee of the company and instructed to comply with the ethic principles. It is aim of the management to create a culture of transparency and honesty in doing business

Permasteelisa Gartner Qatar LLC

Rule against corruption is included in the Code of Ethics. Every employee, subcontractor and supplier have to acknowledge the Code of Ethics

Permasteelisa Japan K.K.

The rules against bribery are specified in the employment rules Article 4 -Business Discipline

South China Factory (Permasteelisa HK)

The Company in accordance with the Group’s Code of Ethics for all office staff training to explain and illustrate the seriousness of engaging in corrupt behaviour

Permasteelisa (India) Pvt. Ltd.

The Code of Ethics clearly defines Permasteelisa Group’s stand against corruption. Bribery is discouraged and forms grounds for dismissal if discovered and policy were improved

Josef Gartner & Co. (HK) Ltd.

The Company adopted rules against all form of bribery

Permasteelisa Pacific Holdings Ltd.

The Company improved specific procedure against bribery and extortion

Global Wall Malaysia Sdn. Bhd.

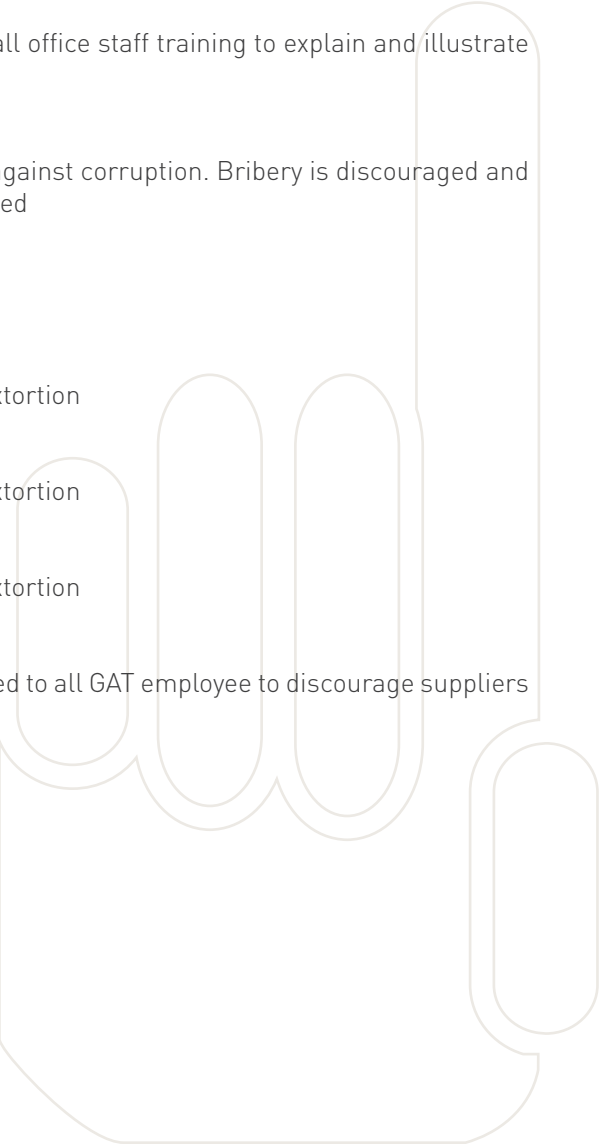
The Company improved specific procedure against bribery and extortion

Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

The Company improved specific procedure against bribery and extortion

Global Architectural Co. Ltd.

The Company adopted specific policy against bribery and requested to all GAT employee to discourage suppliers from offering personal benefits.





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