



UNITED NATIONS GLOBAL COMPACT
**COMMUNICATION
ON PROGRESS**

2013

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Vittorio Veneto, 20.06.2014

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 fifth annual Communication on Progress we provide an index to our performance with cross-references to the related GC principles in 2013.



Nicola Greco
CEO Permasteelisa S.p.A.

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THE PERMASTEELISA GROUP

Permasteelisa Group is a worldwide leading Contractor in **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.

Permasteelisa's history goes back to 1973 in Italy, Vittorio Veneto. During '80s and '90s the Group started an international expansion in the Australian, European, Asian and US markets.

Today, Permasteelisa is a global integrated Group present in four continents with a network of over 50 companies in more than 30 countries, generating a total turnover of around **1.4 billion euro a year**. The Group employs around 6,700 people worldwide in its Engineering & Design centres and in the 11 manufacturing plants equipped with the most modern and advanced technologies.

The mission of the Permasteelisa Group is to design and build innovative and avant-garde architectural works **alongside the world's greatest in contemporary architecture**, by using **advanced technologies** and **eco-sustainable 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.

Among Permasteelisa Group's projects are some world-renowned contemporary architectural works, such as the Sydney Opera House (the first building to make extensive use of the curtain walls), the revolutionary Guggenheim Museum in Bilbao, the extraordinary Walt Disney Concert Hall in Los Angeles and the Museum of Modern Art in New York.



For more information: www.permasteelisagroup.com



HUMAN RIGHTS

1.2.



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

COMMITMENT

Permasteelisa Group recognizes the rule of business community in supporting and respecting human rights, that is not to infringe human rights in the context of their own activities and their business relationships.

At this purpose Permasteelisa issued a Group Code of Ethics in line with the international standard of Corporate Social Responsibility, that clearly and transparently defines the values that Permasteelisa Group embraces in pursuing the Group's business goals, and the responsibilities Permasteelisa Group assumes within and outside the Subsidiaries.

The core principles of the Code inspire the management of its business are described, amongst which the following principles are cited:

“Employee care and development” - Code of Ethics par. 5.4

The Group values its human resources and strives to instil a climate of loyalty and mutual respect by providing suitable tools and opportunities for professional growth.

The Group cares about its employees' health and wellbeing, ensuring dignified working conditions and a safe and healthy workplace.

Relations between the Group and its employees must be based on the principles of civil coexistence and respect for personal rights and freedoms.

“Hygiene, safety” - Code of Ethics par. 5.10

Personal health and wellbeing, the safety of all work environments, and of our products are top priorities for the Permasteelisa Group and inform all of our interactions with employees, suppliers, customers, partners, subcontractors, and third parties involved in our business.

Permasteelisa works hard to ensure that its working environments, services and projects fully comply with all applicable laws. This commitment applies to all areas of work and every phase of a project: from engineering to procurement to final construction.

Permasteelisa S.p.A. clearly expresses and notifies the key principles and criteria underlying any decision taken at any level concerning health and safety in the workplace.

These principles and criteria may be so identified:

- a) risk avoidance;
- b) measuring risks that cannot be avoided;
- c) fighting risks at their source;
- d) adapting work to men, especially with regard to the creation of jobs and the choice of work tools and methods and production, in particular to alleviate monotonous and repetitive tasks and reduce the effects of such tasks on staff's health;
- e) keeping account of the degree of evolution of technique;
- f) replacing what is harmful with what is not harmful or less harmful;
- g) planning prevention, aiming at a coherent set that integrates the same technique, work organisation, work conditions, social relations and the influence of work environment factors;
- h) give priority to collective protection measures as opposed to individual protection measures;
- i) give workers adequate instructions.

These principles are used by the Group - and by those who, on its behalf, manage hygiene and safety in the workplace - to take the necessary measures to safeguard the health and safety of workers, including the prevention of professional, information and training risks as well as the setting up of an organisation and the necessary means.

The Group complies with these principles, especially when decisions or choices must be made and, afterwards, when these must be implemented.

Group activities must be nonetheless carried out in compliance with the laws, regulations and administrative rules concerning health and safety in the workplace in force in the Countries where the Group operates.

The Group understands that the environment is a precious asset and strictly observes all environmental legislation, while promoting the proper use of resources in the operation of its business.

The Group undertakes to continue to promote strong awareness of environmental issues with a view to optimising the eco-friendliness of its activities.

“Social accountability” - Code of Ethics par. 5.1

At the Group level, Permasteelisa is working toward implementation of SA8000 international standard (Social Accountability 8000) and, in accordance with its requirements, it ensures the fundamental rights of workers as mandated by law in the various countries where it operates, by agreements with third parties, and by the conventions of the International Labour Organization. Specifically, the social accountability standards of SA8000 address the following topics:

- Child labour
- Forced labour
- Health and safety
- Freedom of association and right to collective bargaining
- Discrimination
- Discipline
- Working hours
- Compensation

These requirements affect the company's processes and operations, and also involve clients, suppliers and subcontractors.

“Suppliers” - Code of Ethics par. 6.3

[...omissis....] All suppliers working with the Group must follow business practices that respect human rights, workers' rights and the environment.

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 & Safety Policy

Permasteelisa Group Companies are committed to improve the health and safety of the workers in compliance with the sector regulations of each Countries. At this scope a Group Quality Assurance and Sustainability Director has been nominated.

In the Permasteelisa Group web site www.permasteelisagroup.com/sustainability/health-and-safety is clearly defined the Health & Safety Policy, signed by the Permasteelisa Group CEO on February 2013, as follows:

“As per the Zero Tolerance - Safety Policy

We are committed to preventing accidents and injuries. No injury is acceptable to us. Injuries are not an inevitable part of doing business. We firmly believe that incidents and injuries are unnecessary and can be avoided.

From estimating, design and engineering, project management, manufacturing, to site/field installation, safety cannot be an afterthought.

We aim to set and maintain standards of health, safety and environmental performance across the Group which will ensure the health and safety of our employees at work and the health and safety of others who may be affected by our operational activities.

To enable us to do this we have set the following objectives:

Committed and active Leadership - *We will provide visible leadership, leading by example and considering the health, safety and environmental implications of all our strategic decisions.*

Compliance - *We will, as a minimum, comply with all relevant health, safety and environmental legislation and industry standards wherever the Group has a presence.*

Improvement - *We will ensure continual improvement.*

Consistency - *We will establish and maintain transparent and effective safety management systems and minimum operational standards for the good management of health, safety throughout the Group and engage all our employees.*

Accountability, responsibility and competence - *We will define and communicate everyone's health and safety responsibilities and required competencies clearly.*

Monitoring - *We will monitor our health, safety performance and review our system for managing performance regularly.*

Risk assessing and controlling - *We will ensure that risks to the health, safety of our employees and others who may be affected are properly assessed and controlled, including our contractors and suppliers.*

Education and training - *We will consult our employees and ensure that competent advice and suitable training and resources are made available to assist them in performing their duties to promote health and safety.”*

ACTIONS & OUTCOMES

In the following the details of some actions taken by Permasteelisa Group Subsidiaries.

PERMASTEELISA S.P.A.

At the purpose of guarantee the economic livelihood of its employees Permasteelisa S.p.A. set in place the following actions:

1. **Conventions & Benefit.**
2. **Health & Safety.**
3. **Training.**
4. **Privacy.**

1. Conventions & Benefit.

For the purpose of ensuring the well-being and a better quality of life of its employees Permasteelisa S.p.A. has entered into a policy that sets as an objective the possibility of having discounts and concessions on behalf of its employees.

Permasteelisa S.p.A. employees have also continued to use widely some conventions in 2013 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.

Permasteelisa S.p.A. has 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, whit the possibility to split the insurance rate in the monthly payslip.

- *Other conventions*

- Permasteelisa S.p.A. allowed the following benefits to their employees
- Canteen: Permasteelisa pays full cost of the noon meal for all its employees who carry at least 6 working hours per days. The canteen is located in the industrial area of Vittorio Veneto, where the company is settled.
- Petrol vouchers: assigned 5 Petrol vouchers to each employees as special benefit (1 voucher= 21l of petrol or 23l diesel)
- Health insurance: Permasteelisa S.p.A. took out an additional insurance policy in favor of the most disadvantaged employees (in relation of incomes and family responsibilities).

2. Health & Safety.

Permasteelisa Group set in place: actions in matter of Health and Safety, actions to improve the level of knowledge with specific training and actions to protect the economic livelihood of local communities with convention in favour of the employees.

Follow some example of actions taken:

Employees Health

The Company provides two health projects in order to sensitize the employees regarding the illnesses prevention.

- *“Prevenire è Vita” (Prevention is Life) and “Prevenire è vita vale doppio” (Prevention is life, double)*

Permasteelisa S.p.A. initiated the prevention project “Prevenire è Vita” 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.

The project “Prevenire è Vita”, initiated in 2008 finished as planned at the end of 2012 with the participation of about 80% of the employees. 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.

After the closing of this prevention project the Company, in 2013, started a new one named “Prevenire è vita vale doppio” (Prevention is life, double) in favour of the employees “Prevenire è vita vale doppio” (Prevention is life, double) that includes, besides anti-tumour Check-up, the cardiovascular screening.

The 68,6% of personnel joined this initiative. In 2013 the Company organized 4 days of visit for no. 159 attendees

- *Anti-influenza vaccination*

Permasteelisa S.p.A. offers the possibility of having a free anti-influenza vaccination to all its employees every year and during the course of 2013, 62 of 790 (7,85%) Permasteelisa S.p.A. employees joined the programme.

Safety at work

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.

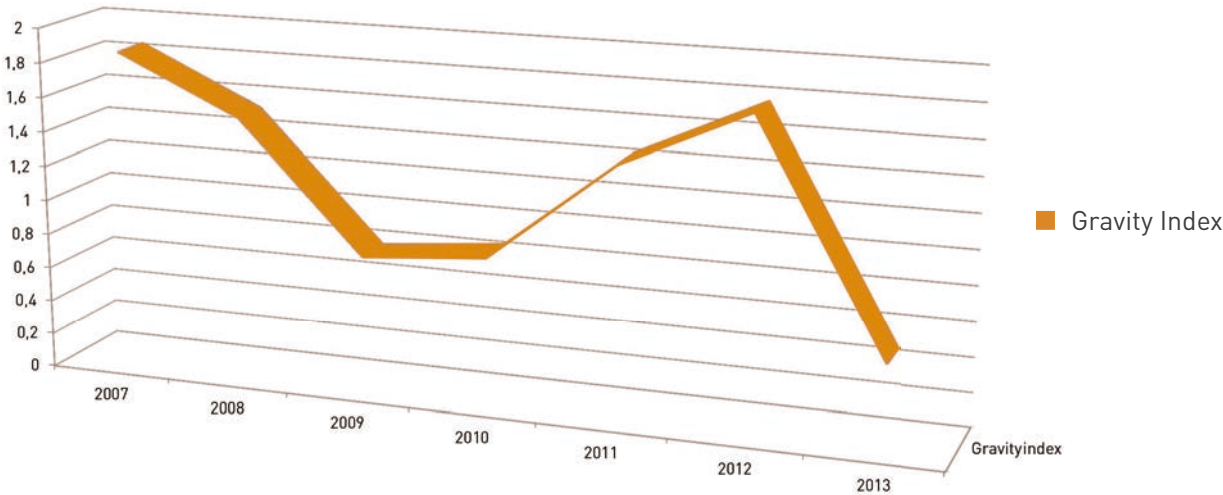
For that purpose the management has activated a health and safety at work management system as an integral part of its business, promoting strong awareness of safety at every level of the corporate hierarchy in a continuous perspective of prevention and improvement. Permasteelisa S.p.A is committed to 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.

The number of accidents further reduced during the course of 2013 compared to 2007. In fact in 2013, a total of 17 accidents were recorded, considering offices, factories and construction sites. The gravity index is an indicator that defines the dimension of the accident damage and is calculated as accident days for every thousand hours worked: Gravity index = accident days x 103 hours worked.

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

	2007	2008	2009	2010	2011	2012	2013
I _G	1.85	1.52	0.78	0.85	1.43	1.77	0.47

GRAVITY INDEX



3. Training.

In 2013 Permasteelisa S.p.A. developed the following training projects:

- *Safety Training*

Permasteelisa S.p.A periodically organize training courses in relation to the matters of prevention, protection and safety at work. In the bi-annual period 2008 - 2009 the training courses 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. In 2013, 2930 hours of training course have been issued.

- *Campus Project*

Permasteelisa Campus is a non-university Master created together with Biomedical University of Rome, Polytechnic University of Milan, IUAV University of Venice and University of Udine.

Two different educational paths have been carried out for the recruitment of the so-called “entry-level” resource: Project Management (PM) and Design (DS).

The project was directed to graduate students who had a specialistic or a bachelor degree in Architecture or Engineering.

For the PM Master have been selected 15 youths with a specialized degree and 14 with a three-years degree for the DS Master.

The aim of these training programs, which took place from May to September, was to provide a multi-disciplinary training, permitting to participants to have an overall vision of the internal processes and the life cycle of a work order.

The project provides a structured curriculum with the intent to introduce participants in Permasteelisa’s world. The main training subjects can be summaries as follows: preparation of an offer to award a work order, project management, design and installation phases until the delivery of the product to the customer. It’s also provided a panoramic of the materials normally used by the Company and related structural problems.

Following an initial classroom phase, of about 440 hours, participants of the two training courses have been selected for an internship of 3 months. The commitment and the results achieved by each of them during the internship period allowed them to be reconfirmed by the company.
Over 20 persons are in fact currently engaged in the following areas: project management, design, sales & tendering, project control, with a long term contract.

- *Permasteelisa Technical Academy*

In 2013, 25 employees of Permasteelisa Spa joined the “Structural” course (300 hours).
This is a project dedicated to the development of technical training programmes for employees of 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 information exchange within the Group.

- *Training*

Permasteelisa invests in a continuous training for its employees to help along their professional growth.
In the last two years Permasteelisa Group, and specifically Permasteelisa S.p.A., has been involved in a process of structural and substantial change.
A managers’ good leadership capacity is an essential element to facilitate the approach to the aforesaid change in order to assist the associates to overcome opposition to change. This is possible through effective communication, a real emotional and intellectual involvement of the associates and a remarkable team building capacity and sharing common objectives at which every member of the team must aim.
The top management’s contribution at all levels is therefore crucial to support and ensure change: their capacity to interpret new objectives and needs and evaluate the priority relevance of quality in the human resources management entrusted to them is determinant. In this way the leadership capacity that the managers must show becomes determinant, also in the outlook of those integration processes of the disparities of which they are prominent figures.
From this point of view the training has a key role contributing to the alignment, distribution and spreading of changing, significantly contributing to the cohesion and diffusion of common standards, through organisational learning and especially through the diffusion of a common view, the alignment following the corporate objectives, making the employees responsible and a leadership style aimed at the associates development and their empowerment.
Summarizing, 9488 hours of training were achieved in 2013, with the following attendance of employees at the courses organised:

Training courses	No. of employees
Languages	101
Specialist Training	54
Information Technology	72
Management	7
Technical Training	314
Safety	556
General (privacy, Legislative Decree 231/01, etc.)	349

The training projects provided by the company for its managers:
- Matrix Organization (Organizzazione a Matrice): training program created to provide people the capacity to work in a matrix company.

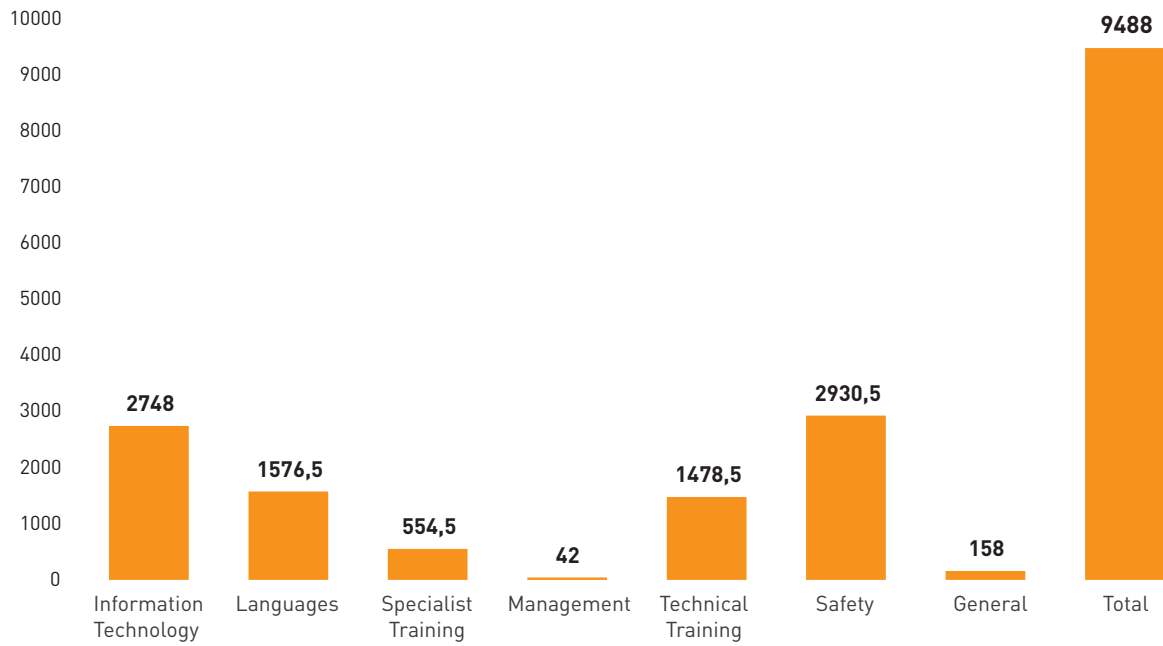


Fig. no. 1 - 2013 Training hours

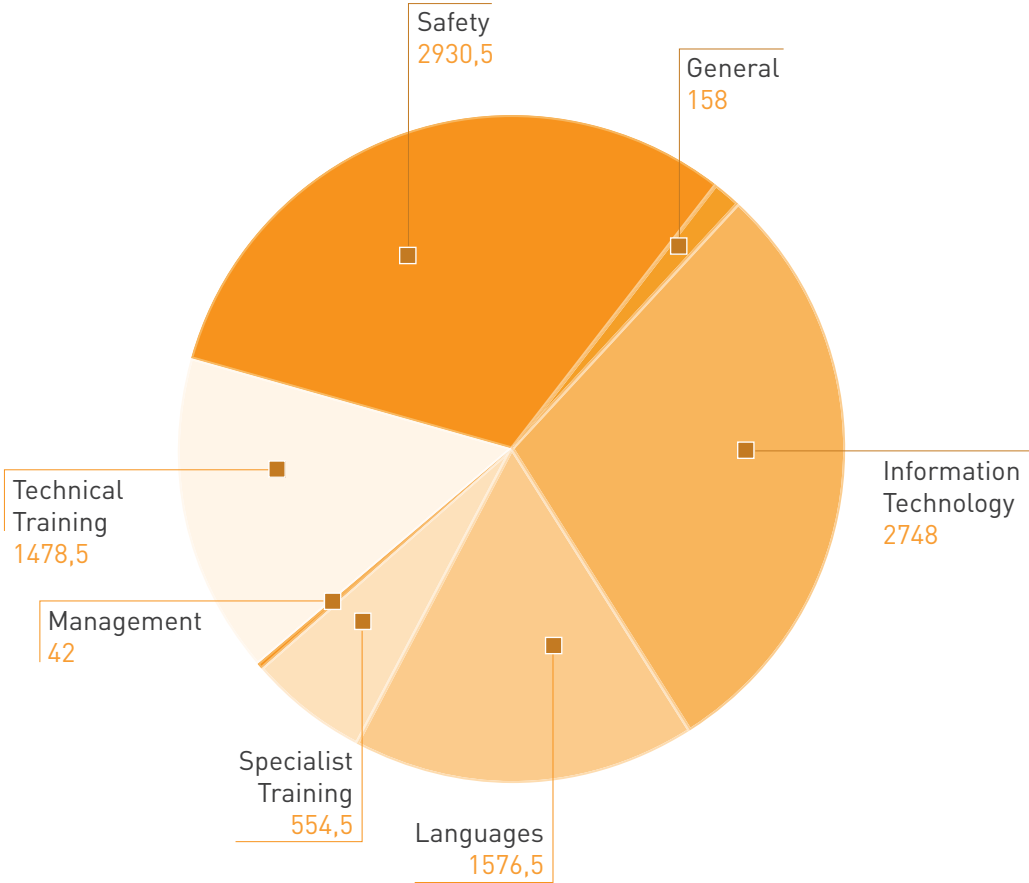


Fig. no. 2 - 2013 Training hours for type

4. Privacy.

Permasteelisa S.p.A. protects the personal data of its employees. 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.

PERMASTEELISA ESPAÑA S.A.U.

The Company has implemented the control of personal information treatment according to Spanish Law. Permasteelisa España S.A.U. has a specific document and protocol to inform the personnel.

Permasteelisa España S.A.U. has established a safety protocol to be respected when personnel have to enter the factory and site installations. Production and Safety Department has implemented a particular and compulsory protocol to enter the factory and the site installations, so the access to the installations is admitted in respecting the safety rules and wearing the specific equipment. In this way the Company periodically make safe and healthy trainings to all workers.

PERMASTEELISA FRANCE S.A.S.

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

As planned, in 2013 a Health & Safety plan has been implemented and further developed in the company, with the support of an external Safety Risks consultant. The internal H&S Manual was explained and commented with all Project Managers. A Training of people was on-going in 2013.

PERMASTEELISA GARTNER MIDDLE EAST LLC

All employees in the production factory and sites were provided with adequate and new safety equipment. It is mandatory for all workers to undergo a safety training before being assigned to their respective jobs. The total safety training hours for 2013 were 1325.

RI ISA D.O.O.

RI ISA D.O.O. engaged an external expert to examine Health & Safety quality of the office working environment (lighting, environment conditions, safety measures). Company organized trainings through the year 2013. RI ISA organized a detailed medical examination for all employees.

PERMASTEELISA GARTNER QATAR LLC

All employees are provided with adequate safety equipment. Every worker has 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 Health and Safety theme to improve employees experience.

In 2013 the Company provided the training to employees in matter of Health & Safety, as follows:

- Safety induction: 11548 hours
- Working at height: 10448 hours
- Safety task analysis risk reduction: 270 hours
- Fire watch/Prevention: 547 hours
- Heat stress – 3598 hours
- Look out tag out (Electrical safety): 776 hours
- Power tools on-site training: 219 hours
- Ladder focus training on site: 1665 hours

PERMASTEELISA GARTNER SAUDI ARABIA LLC

Permasteelisa Gartner Saudi Arabia strictly adhere to Permasteelisa Group policies and procedures in matter of HSE and HR. The application of those policies and procedures is applied, where possible, also to the subcontractors. All the employees are trained to follow and apply, especially at site, safety procedures. Specific tools boxes are held on regular basis to maintain the safety awareness. In 2013 the company has spent more than 1000 man hours in safety training.

JOSEF GARTNER GMBH, GARTNER SWITZERLAND AG AND 000 JOSEF GARTNER (RUSSIA)

Internationally human rights have been proclaimed in 1948, this regulations have been integrated in the German / Swiss / Russian Constitution. The companies Gartner Switzerland AG, 000 Josef Gartner and Josef Gartner GmbH follow these national constitutions and the derived national laws therefrom.

There is an organization for health and safety in function for all employees. This includes also authorized and qualified persons.

Risk analysis' and work instructions are available for all significant works.

In 2013 employees have been trained by external experts in the facilities of the governments safety organization. 15 employees have been trained for a total duration of 45 days. The trainings have been meet different themes such as usage of different kind of cranes, usage of fork-lifts, ladders, scaffoldings, special courses regarding safety of electrical equipment.

Additional all employees have been instructed regarding general accident prevention regulations (related to their scope of work) and usage of personal protection equipment (if applicable).

SCHELDEBOUW B.V.

Health & Safety audits are carried out in all areas where the Company operates. In addition, a project started in 2013 to improve the level of safety in the factories by removing old equipment and updating all task sheets for operators. Health & Safety training is carried out every year by Scheldebouw, both for individual factory tasks and also for management of installation sites. In addition reports are prepared by the company doctor on sickness levels and possible causes in order to take preventive action.

PERMASTEELISA NORTH AMERICA CORP.

Health & Safety - Permasteelisa North America Corp. is registered to and complies with the international occupational health and safety standard OHSAS 18001. Permasteelisa North America Corp annually hosts independent third party auditors which perform comprehensive audits related to occupational Health and Safety for ongoing OHSAS 18001 certification.

Health & Safety training is ongoing at Permasteelisa North America Corp, including courses on first aid, and CPR, safe operation of machines, tools, equipment, and many other topics. All construction and manufacturing operatives receive weekly safety instruction.

The total 2013 hours spent by construction, manufacturing and office on safety activities was 13026 hours.

All of Permasteelisa North America Corp construction projects and manufacturing facilities employ local labor from the surrounding communities.

BLEU TECH MONTRÉAL INC.

Bleu Tech Montréal Inc. complied with local laws and regulations as well as implementing company Health & Safety Program (identify risks, implement correctives measures, insure safety measures).

In-house training: In 2013 the Company provided a two days first aid training for two people for the night shift (night shift of ten people). Sound measures were taken in the factory to determine risks and solutions to prevent potential future earing problems. Training has been given to few new employees about how to operate safely overhead crane, scissor lift and pallet stacker (8 hours per course).

PERMASTEELISA PACIFIC HOLDINGS LTD.

The Company actively carries out the following activities to support and ensure safe and healthy work environment, among many others:

- Monthly Safety Inspection
- Daily Tool Box meeting
- Work Activity Risk Assessment
- Safe Work Procedure and Work Method Statement
- Training Courses
 - 8 hours training on Building Construction Regulation for Site Supervisor
 - 48 hours training on Workplace Skill Qualification on Lorry Crane Operations
 - 31.5 hours training on Construction Productivity Management Certification
 - 8 hours training on Working at Height.

PERMASTEELISA PHILIPPINES INC.

Health & Safety is a priority in the work environment, both at site and office.

- Site: Permasteelisa Philippines Inc. provides Regular Safety Tool box talks to all employees. For new workers, Permasteelisa Philippines Inc. ensures they have undergone thorough orientation on Health & Safety prior to deployment

- Office: Permasteelisa Philippines Inc. actively participates on Fire Safety and Earthquake drills. Permasteelisa Philippines Inc. organizes one annual team building meeting.

GLOBAL ARCHITECTURAL CO. LTD.

The Health & Safety plan is reviewed and updated as necessary every year. Global Architectural Co. Ltd. does not knowingly source from suppliers who contravene internationally proclaimed human rights.

GLOBAL WALL MALAYSIA SDN. BHD.

The Company has carried out and continue to carry the following activities to support and ensure safe and healthy work environment:

- Monthly Safety Inspection
- Daily Tool Box meeting
- Work Activity Risk Assessment
- Safe Work Procedure and Work Method Statement.

PERMASTEELISA (INDIA) PVT. LTD.

Permasteelisa (India) Pvt. Ltd. office improved safety measure for fire and first aid: the Company continuously conducts safety training courses for all on-site construction workers, and subcontractors workers as well. The Company also instituted training for first aid and fire safety in Bangalore office.

PERMASTEELISA JAPAN K.K.

The Company operates in accordance with Labour Standard Law and Company Hand book, which specify Health and Safety rules and guidelines. The Company provides annual health check-up to all employees. On site, daily safety meeting is carried out involving all workers. Permasteelisa Japan K.K. also organizes monthly safety meeting and one annual safety general meeting involving all subcontractors.

PERMASTEELISA PTY LTD.

The Company operates predominantly within the Australian marketplace and have statutory obligations that protect internationally proclaimed human rights. The Company does not knowingly source from suppliers that would contravene internationally proclaimed human rights.

PERMASTEELISA MONGOLIA LLC

Health & Safety is a priority in the work environment. Daily tool box talks are legislated for all employees on Site and in the Factory.

PERMASTEELISA HONG KONG LTD.

In line with the Corporate directive the Company has employed a senior Health & Safety manager and, with the agreement of the Sustainability Manager, the Company has reviewed the overall organisation, improved it and has put in place a safety roll out plan. Training was commenced in Sept. 13. This training was for all site employees and took the form of safety personnel visiting (monthly) each site and carrying out the training in house. There was also one external trainer who was brought to explain OHSAS 18001. A safety committee was formed and they meet once a month to discuss incidents and how to prevent these in the future.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

Safety is the first. Safety policy and slogans are posted in factory board and workshop. EHS knowledge has been delivered to all new hires at the orientation stage.

JOSEF GARTNER & CO. (HK) LTD.

The Company strictly follows all labour laws in Hong Kong and the Permasteelisa Group's Safety Policy. Josef Gartner & Co. (HK) Ltd. has built up a comprehensive Quality & Safety Department in Hong Kong monitoring the construction activities. The Company organizes training sessions with Safety Video to all new employees and new workers on sites.

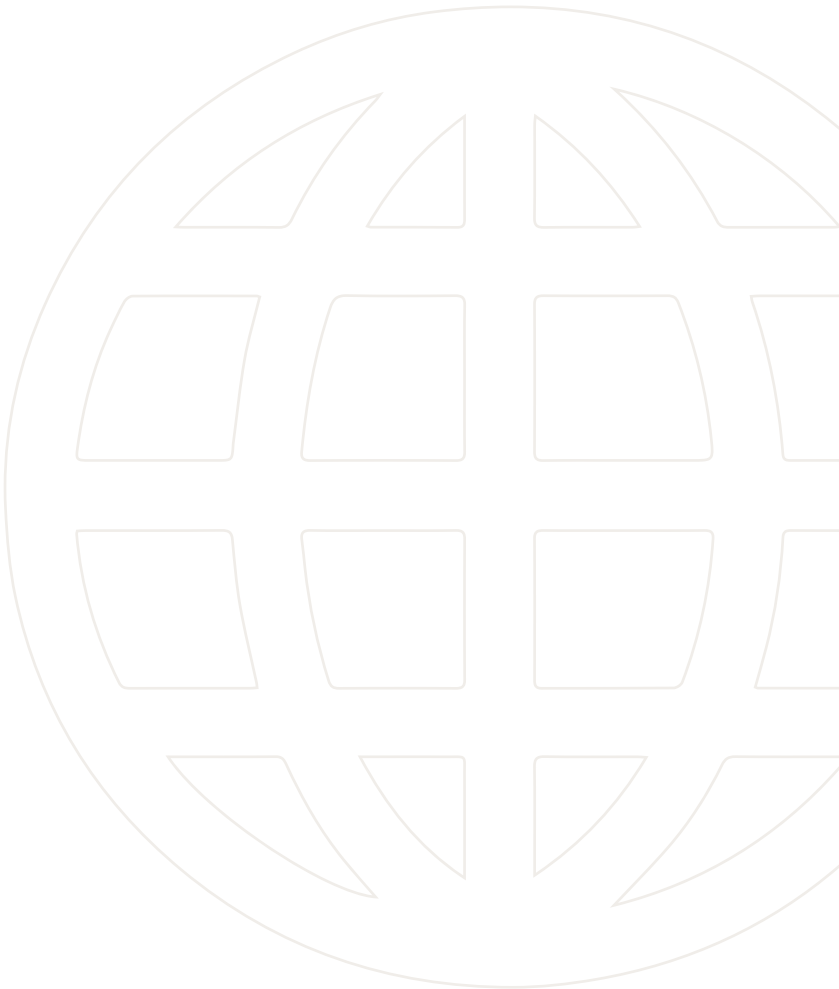
JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

Safety trainings were conducted both on site and in factory as "pre-job" training. Each job site and factory has dedicated "Safety Officer" to do the daily safety check. In 2013, we conducted " 277 Hours" of safety training on site and "93 hours" of safety training in factory and one fire drills. Safety equipment (harness, helmet, shoes etc.) are provided by the Company to employees in workshops and on job sites and are mandatory to wear. Annual health and safety audit is done by the Group Sustainable Director. Problems found during audit will have a detailed follow up plan.

Summarizing 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 2013:

- Permasteelisa S.p.A.
- Permasteelisa España S.A.U.
- Permasteelisa France S.a.s.
- Permasteelisa Gartner Middle East LLC
- RIISA d.o.o.
- Permasteelisa Gartner Qatar LLC
- Permasteelisa Gartner Saudi Arabia LLC
- Josef Gartner GmbH
- Gartner Switzerland AG
- OOO Josef Gartner (Russia)
- Scheldebouw B.V.
- Permasteelisa North America Corp.
- Bleu Tech Montréal Inc.
- Permasteelisa Pacific Holdings Ltd.
- Permasteelisa Philippines Inc.
- Global Wall Malaysia Sdn. Bhd.
- Permasteelisa (India) Pvt.
- Permasteelisa Japan K.K.
- Permasteelisa PTY Ltd.
- Permasteelisa Mongolia LLC
- Permasteelisa Hong Kong Ltd.
- South China Factory (Permasteelisa Hong Kong Ltd.)
- Josef Gartner & Co. (HK) Ltd.
- Josef Gartner Curtain Wall (Shanghai) Co. Ltd.

This list is a sample of the training activities improved in 2013 and it is not exhaustive.



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 & OUTCOMES

Code of Ethics

Everyone who collaborates with Permasteelisa has to respect the ethical principles in which the Group believes. Permasteelisa S.p.A. 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.

Permasteelisa S.p.A., as Parent Company, 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.

The Code of Ethics has been made available to everyone via publication on its website, www.permasteelisagroup.com, which can be easily downloaded. The pdf file of Code of Ethic is downloadable front the Group intranet, available to all Permasteelisa Group employees.

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. The Code is available in the following languages: Italian, English, Spanish, French and German.

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.

Follow some actions set in place by the Permasteelisa Group Companies.

Training on the Code of Ethics

Training sessions with regards to Legislative Decree 231/01 for employees of Permasteelisa S.p.A. are regularly held in order to inform and educate them also on the principles of the Code of Ethics, in Italy and the other Group Subsidiaries.

For example, during 2009 training was held at all subsidiaries in the Asia area.

Delivery and acceptance activities for the Code of Ethics

PERMASTEELISA S.P.A.

The moment that they are hired, employees receive a copy of the Code, and are required to examine it and thereby accept its contents. The 99% of the Permasteelisa S.p.A. employees signed the code in acceptance. The Code is also attached as annex to all contracts (customers and suppliers). Purchase and Sales Department also inform the suppliers and costumers about the Code sending them a copy.

PERMASTEELISA ESPAÑA S.A.U.

The Company attaches as annex the Code of Ethics to all contracts (employees, customers and suppliers). Permasteelisa España personnel has been informed about Ethics' code of the Group. Purchase Department informs all suppliers about the Code of Ethics.

PERMASTEELISA FRANCE S.A.S.

The Code of Ethics is distributed to all employees and accepted by personnel representatives. It is part of General Purchase conditions applicable to purchasing contracts and signed as attachment to subcontracts by all subcontractors.

PERMASTEELISA GARTNER MIDDLE EAST LLC

The Group Code of Ethics is adhered to by all employees across all hierarchical levels in the organization. The Code of Ethic document is provided and explained to all new employees during the induction process. An acknowledgement of the same from the employee is placed on the personal record maintained by the HR Department.

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. Also periodically, the Company issues a memorandum to all employees to remind/enhance specific items.

PERMASTEELISA GARTNER SAUDI ARABIA LLC

The Code of Ethics is distributed to all new employees of the company. At the joining of the employee, the Company is distributing a Vademecum for employees which contain some basic statements regarding personal conduct and discipline, in addition to the Code of Ethics. Employees are informed about the Ethic to conduct the business towards the stakeholders.

JOSEF GARTNER GMBH, 000 JOSEF GARTNER AND JOSEF GARTNER SWITZERLAND AG.

The Code of Ethics has been uploaded on the web presence of Josef Gartner GmbH in German and English language. Access to the CoE is available to all employees, clients and suppliers of Josef Gartner GmbH, 000 Josef Gartner and Josef Gartner Switzerland AG.

At first, the CoE was introduced to and acknowledged by the management in special workshops. Then, the members of the management spread the CoE in all departments and introduced it to the personnel in all subsidiaries and branches of Josef Gartner GmbH.

The standard form contracts for supply of work, material, glass and other services contain the following clause: "Principal Contractor (=Josef Gartner GmbH or its subsidiary or branch) shall comply with the ethics code of the Permasteelisa Group available under www.permasteelisagroup.com/sustainability/code-of-ethics."

SCHELDEBOUW B.V.

The Code of Ethics - translated into Dutch, was distributed to all staff & also all suppliers & subcontractors. This resulted in a number of queries from both staff & suppliers which were dealt with by the management & HR departments.

PERMASTEELISA NORTH AMERICA CORP.

The Code of Ethics is applied both inside and outside the company and aims to ensure the efficiency and reliability of the Group. The Code of Ethics is made available to non-Permasteelisa North America employees, such as clients and suppliers, at www.permasteelisagroup.com. For Permasteelisa North America employees, a hard copy of the Code of Ethics is provided on their first day of employment. Each new hire signs a document starting they have read and accepted all parts of the Code of Ethics and accept the principles, and respect them in the business. While there was no formal training regarding the Code of Ethics for employees in 2013, the training of such topic is being constantly evaluated. Training will be provided to employees when necessary and appropriate in the future.

BLEU TECH MONTRÉAL INC.

Permasteelisa Code of Ethics is distributed to all employees. The HR department distribute and briefly explain at the hiring time the Permasteelisa Code of Ethics.

PERMASTEELISA PACIFIC HOLDINGS LTD.

To ensure and increase the awareness of the Company's Code of Ethics and expectation of compliance, the Company set up the following policies:

- All new and existing employees are to undertake the Code of Ethics as a pre-requisite of their employment.
- Communicated to all employees the issue of the Code of Ethics and the channels to raise any ethical concerns.

PERMASTEELISA PHILIPPINES INC.

Code of Ethics is distributed and signed. Company Handbook has been issued outlining obligations of the Company to Employees and vice-versa. Company policies are communicated to new hires upon joining; updates/changes in policies are cascaded to everyone. Any violation of such is subject to investigation and disciplinary action.

GLOBAL ARCHITECTURAL CO. LTD.

Code of Ethics is distributed to every employee and third parties. The code of ethics booklet in both English and Thai has been issued to all staff and written confirmation of compliance obtained.

GLOBAL WALL MALAYSIA SDN. BHD.

To ensure and increase the awareness of the Company's Code of Ethics and expectation of compliance:

- All new and existing employees are to undertake the Code of Ethics as a pre-requisite of their employment.
- Communicated to all employees the issue of the Code of Ethics and the channels to raise any ethical concerns.

PERMASTEELISA (INDIA) PVT. LTD.

All employees received the Code of Ethics and the Communication on Progress - UN Global Compact, along with Employee Handbook, and are required to sign an acknowledgement letter that they have received it. The Company is planning to start information seminars this year on these issues to stress their importance to our staff and our subcontractors and suppliers. The Code of Ethics and the UN Global Compact are posted prominently in all our offices in India.

PERMASTEELISA JAPAN K.K.

The Code of Ethics is distributed and signed.

PERMASTEELISA PTY LTD.

Code of Ethics is distributed and signed. Company Handbook has been issued outlining obligations of the Company to employees and vice-versa. Should the Company has any concern from our supply chain the Company would investigate and act accordingly.

PERMASTEELISA MONGOLIA LLC

Code of Ethics distributed and signed by all employees. This has also been distributed to all suppliers. The Company Handbook has been issued outlining obligations of the Company to employees and vice-versa. Training is ongoing.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

Code of Ethics distributed and signed. Company Handbook has been issued outlining obligations of the Company to employees and vice-versa.

JOSEF GARTNER & CO. (HK) LTD.

The Code of Ethics is handed over to all new employees confirmed by signature. In 2013 there was no violation of the Code principles. Josef Gartner & Co. (HK) Ltd also made aware Clients and Suppliers about the Code of Ethics.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

Code of Ethics was distributed to employees at the time of publishing. For new employees the Code of Ethics is given together with the Employee Handbook at the time of joining. The training was given in the first week after employee joins the company.

Reporting

Permasteelisa has set up an e-mail address (organismodivigilanza@permasteelisagroup.com) 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 Organismo di Vigilanza, which has the responsibility to inform the Board of Directors and the Board of Auditors in case Code of Ethics violations. All reports are handled in compliance with privacy regulations, safeguarding the rights of anonymity of the person reporting.

Also during 2013, as well as for the 2008-2012 periods, the Organismo di Vigilanza of Permasteelisa S.p.A. did not receive any information indicating that abuse occurred in relation to human rights.



LABOUR

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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 & OUTCOMES

Where admitted by the local law, the Permasteelisa Group Companies recognizes the right to collective bargaining and allows the periodical meetings. Follow some examples:

PERMASTEELISA S.P.A.

Currently part of Permasteelisa S.p.A. 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.

The overall percentage of Permasteelisa employees in Italy belonging to unions in 2013 was 21%. Specifically, in 2013, 9 union meetings were held at Permasteelisa S.p.A. out of a possible maximum of 10.

PERMASTEELISA ESPAÑA S.A.U.

Unions, elections and meetings: Personnel of Permasteelisa España has 4 representatives joined the two main Spanish trade unions, which are CC.OO. and U.G.T. The Company supplies the room for periodical meetings and accepts as computable the spent time.

PERMASTEELISA FRANCE S.A.S.

Meeting with employees representatives: There is a monthly meeting with personnel representatives according to French Law.

RI ISA D.O.O.

All employees are covered under the Croatian national contract for the building industry. The company management has introduced to employees their right to be organized in a trade union. This is permanently on display on the company message board.

JOSEF GARTNER GMBH

For the Josef Gartner GmbH, all collective agreements are negotiated with a works council which is elected by the employees every four years. Trade unions are not represented in the company. The German Works Council Act is used as a guideline for any collective bargaining negotiations. The Company currently has several agreements in place, for example concerning wages and salary increases, management by objectives, working hours, health management such as rehabilitation and so on. Meetings between the HR department and the works council take place weekly or on demand in special cases.

SCHELDEBOUW B.V.

Personnel are free to join with trade unions, but participation is small, as the workers have an elected works council that meetings with the general manager at least 4 times per year to discuss issues important to the workers.

PERMASTEELISA NORTH AMERICA CORP.

In 2013, the number of employees covered by collective bargaining agreements was 952. Permasteelisa North America in no way impedes employees covered under collective bargaining agreements from negotiating such agreements. Permasteelisa North America is signatory to CBAs with the Ironworkers and Glaziers. Both of these agreements are at the national level, and the company does not typically enter into local agreements, except for Ironworkers in NYC and Carpenters in NJ.

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.

Site work employees: In 2013 there were 24 site union employees (9 employees Alberta, 9 employees Ontario and 6 employees Winnipeg from the following union local: 721, 728, 765 and 1819).

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

Meetings: South China Factory has established labour union according to relevant law.

GLOBAL ARCHITECTURAL CO. LTD.

Welfare Committee: There is a Welfare Committee representing Permasteelisa employees that meet once a month.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

Although there is no union inside the Company, the Company contributes to the union organization in the region that the company registers. Employees have right to contact the regional union organization for collective bargaining.

PERMASTEELISA PTY LTD.

The industrial landscape in Australia operates under Federal Government guidelines. The Company is obligated to work within these guidelines as is the employee and their respective collective bargaining strategies.

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

Permasteelisa Group, 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. Permasteelisa Group aims to abide by the SA8000, and such requirements are extended to corporate activities, clients, suppliers and sub-contractors. The SA8000 addresses the topic of child labor. This was made public to stakeholders. Principle 5 specifically calls for the effective abolition of child labor.

ACTIONS & OUTCOMES

Permasteelisa Group disapproves of the use of any form of coercion against staff, as well as the use of concealed labour. At this scope Permasteelisa set in place policies and internal rules to impede it. 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. The Companies also are required to 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.



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 & OUTCOMES

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.

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 & OUTCOMES

Permasteelisa Group formalized internal hiring and personnel management procedures/policies 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. Follow some example:

PERMASTEELISA S.P.A.

Permasteelisa S.p.A. 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 ESPAÑA S.A.U.

Some of workers are hiring temporary workers in factory. Spanish Law established same rights between temporary and payroll workers. They work jointly in same installations, and same conditions and equipment of safety.

PERMASTEELISA FRANCE S.A.S.

Permasteelisa France is applying the French law, which punishes the discrimination in respect of employment and occupation.

PERMASTEELISA GARTNER MIDDLE EAST LLC

The Company has a diverse workforce comprising of employees of various nationalities from Europe, Asia and Africa. The Company follows a structured interview process whilst selecting the employees. The initial interviews are conducted by the Department/Line Managers and the final interview is conducted by HR. Candidates are selected solely on the basis of their merits by matching the requirements described on the Job Description to the skills/competencies of the individual.

PERMASTEELISA GARTNER QATAR LLC

It is stated in the Code of Ethics 5.11 SOCIAL ACCOUNTABILITY, that at the Group level, Permasteelisa is working toward implementation of SA8000 (Social accountability 8000). In accordance with that standard, it ensures the fundamental rights of workers as mandated by law in the various countries where it operates, by agreements with third parties, and by the conventions of the International Labor Organization. Specifically, the social accountability standards of SA8000 address the following topics: Child labor, Forced labor, Health and safety, Freedom of association and right to collective bargaining, Discrimination, Discipline, Working hours, Compensation. These requirements affect the Company's processes and operations, and also involve clients, suppliers and subcontractors.

PERMASTEELISA GARTNER SAUDI ARABIA LLC

Permasteelisa Gartner Saudi Arabia is strictly following Permasteelisa Group procedures for hiring its staff. Hiring of employees is done on principle of skills and experience required by the position to be covered without any kind of discrimination.

RI ISA D.O.O.
In accordance with Croatian Labour law, it is written in Articles of association of the company RI ISA any discriminatory act or behaviour is forbidden.

JOSEF GARTNER GMBH
There is a detailed recruiting process in place which enables everybody to apply for vacancies. This process is based on the so-called “Allgemeines Gleichbehandlungsgesetz” (AGG), the General Equal Treatment Act (GETA). Its aim is to prevent and to eliminate discrimination with regard to race/ethnic background and sex as well as religion/belief, age, disability and sexual orientation. The selection of candidates is based on the skills of the individual in relation to the job, i.e. academic background, professional experience and specific knowledge with regard to the job offer.

SCHELDEBOUW B.V.
Hiring of staff is coordinated by the HR department. New employees are selected on their suitability for the post and not subject to any discrimination.

PERMASTEELISA NORTH AMERICA CORP.
Permasteelisa North America has procedures relating to the hiring of staff. All Managers and those involved in the hiring process are made aware of these hiring procedures. Permasteelisa North America’s focus is to select candidates on the skills of the individual in relation to the job sought. It is the company’s policy to “provide equal employment and promotion opportunity to all employees and job applicants, recruitment, benefits, compensation, training, performance evaluations, promotions, transfers, disciplinary actions, demotions, terminations, etc. and company sponsored social and recreational activities will be reviewed periodically to ensure non-discriminatory treatment.”

BLEU TECH MONTRÉAL INC.
There is a policy against discrimination and harassment based on religion, race, gender, sexual orientation, handicap or any individual trait. The Company hired on the basis of knowledge and experience with no restrictions to race, gender, etc.

PERMASTEELISA PACIFIC HOLDINGS LTD.
The Company has procedures relating the hiring staff, focused to select candidates on the skills of the individual in relation to the job sought.

PERMASTEELISA PHILIPPINES INC.
All decisions with respect to recruitment and promotions are made solely on the basis of qualifications and experience, viewed in relation to the requirements of the position.

GLOBAL ARCHITECTURAL CO. LTD.
There are HR policies dictate on hire personnel based only on skills. The Company does not discriminate in terms of nationality, race or religion. Employees are selected solely upon experience and ability to perform the tasks defined within the job description. The recruitment procedure is in accordance with that defined within the ISO 9001 accreditation.

GLOBAL WALL MALAYSIA SDN. BHD.
There are HR policies dictate on hire personnel based only on skills.

PERMASTEELISA (INDIA) PVT. LTD.
Permasteelisa (India) has very strict policies for discrimination as regards hiring and ongoing business practices, and hiring is targeted at job skills and experience.

PERMASTEELISA JAPAN K.K.
The Company does not discriminate in terms of nationality, sex, race or religion. The hiring procedure is specified in the company hand book which is in accordance with Labour Standard Act. Employees are selected upon experience and skills.

PERMASTEELISA PTY LTD.
The Company we does not discriminate in terms of nationality, race or religion. Employees are selected based solely upon experience and ability to perform the tasks envisaged.

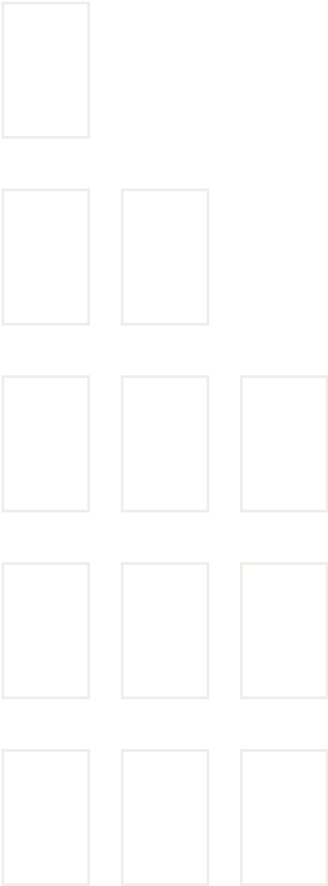
PERMASTEELISA MONGOLIA LLC
The Company does not discriminate in terms of nationality or religion. Employees are selected based solely upon experience and ability to perform the tasks envisaged. Note: The Company currently employs eight (08) different nationalities.

PERMASTEELISA HONG KONG LTD.
HR has vigorous procedures for hiring staff. In the office there are many nationalities. Staff are selected on ability and cost.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)
South China Factory (Permasteelisa Hong Kong Ltd.) shall not discriminate against any worker based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices.

JOSEF GARTNER & CO. (HK) LTD.
The Company has internal policy rules in hiring personnel. The approach to hiring is strictly based on skills and education only and independent from gender, place of birth, nationality and religion. The salary structure is strictly based on performance and contribution to the company’s success independently from gender, place of birth, nationality and religion.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.
The Company has procedures relating the hiring staff. Candidates are interviewed by HR and direct supervisor / department managers. Candidates selections are based on the experience and skills in relation to the job sought.



ENVIRONMENT

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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 & OUTCOMES

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. The Company is 14001 certified and adopted Organization and Management Control Handbooks.

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 230,650kWh equivalent to a saving of 57,7 TOE, while in 2013 have been produced 209,670 equivalent to a saving of 52,4 TOE.

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. updated in 2012 the 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 adopted HSE Manual and management system and an environmental plan is developed for all jobs.

PERMASTEELISA GARTNER MIDDLE EAST LLC

The Company has an environmental assessment report in 2013 and Health and Safety policy statement. Permasteelisa Gartner Middle East's environmental report for 2013 is prepared to recognize the necessity of environmental activities within the factory and of the prospect of the sustainable society which is oriented environmental conservation in future while the principal aim of the Health and Safety Management System is to eliminate accidents and ensure the safe completion of the fabrication, assembly and installation works. Relevant documents will be forwarded separately.

RI ISA D.O.O.

RI ISA engaged an external expert to examine Health & Safety quality of the office working environment (lighting, environment conditions, safety measures).

JOSEF GARTNER GMBH

Josef Gartner GmbH has integrated an environmental management system in 2012 into the management system based on ISO 9001. The environment management system has been certified according to ISO 14001 in 2013 by an independent and registered body in the course of the yearly audits. Risk assessment and policy for hygiene, safety and environment are in place. These are not only part of the certified environment management system but also required by legislation.

PERMASTEELISA GARTNER QATAR LLC

The Company made an environmental risk assessment and has a ES&H Management Policy which states commitment to establish ourselves as one of the recognized leaders in occupational health, safety, and protection of the environment for both, design and work locations, and ultimately achieving the goal of preventing all accidents and injuries.

PERMASTEELISA GARTNER SAUDI ARABIA LLC

HSE policies are mainly applied at site during the execution of the works. At the beginning of each project the Company submits to its Clients and Main Contractors specific risk assessment for the project including HSE practices. The Company has its 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. The Company prior the start of each site activity prepare a risk assessment plan that is further implemented and followed during the site activities. At the beginning of each project Permasteelisa Gartner Saudi Arabia submit to its Clients and Main Contractors specific risk assessment for the project including HSE practices. HSE policies are mainly applied at site during the execution of the works.

SCHELDEBOUW B.V.

An environmental assessment was carried out in 2013 as part of the recertification of Scheldebouw's ISO certification. All aspects of environmental compliance were included & assessed.

PERMASTEELISA NORTH AMERICA CORP.

The Company Environmental Health & Safety program. PNA is registered to and complies with the ISO 14001 environmental management system. PNA conducted a thorough environmental risk assessment of its Windsor manufacturing facility which included all environmental aspects and impacts associated with the manufacture of unitized curtain wall systems for commercial construction. Permasteelisa North America is committed to responsible environmental management by implementing sound environmental policies and practices and by providing a framework for setting and reviewing environmental objectives and targets. Top management endorses employee participation in the company environmental, health and safety programs through active participation, communications, employee training and continuous improvement programs. Permasteelisa North America is commitment to the environment, health and safety programs extends to clients, employees, the community, State and regions Permasteelisa North America does business in.

BLEU TECH MONTRÉAL INC.

certified BOMA BEST (industrial building).

PERMASTEELISA PACIFIC HOLDINGS LTD.

ISO 14001 and ISO 18001.

PERMASTEELISA PHILIPPINES INC.

The Company is not a high risk contributor to environmental challenges; however when a challenge presents, the Company undertakes an environmental risk assessment and seeks a sustainable solution. Policies on hygiene, safety, and environment are communicated to all employees.

GLOBAL ARCHITECTURAL CO. LTD.

The Company undertakes an Environmental Risk Assessment in accordance with ISO 14001 and OHSAS 18001 accreditation.

PERMASTEELISA (INDIA) PVT. LTD.

Permasteelisa India have a policy for Health and Safety of all employees. An environmental risk assessment is planned for 2014.

PERMASTEELISA JAPAN K.K.

No environmental risk assessment has been carried out by Pisa Japan. The company is not high risk contributor to environmental challenge however when a risk is foreseen we will undertake suitable approach.

PERMASTEELISA PTY LTD.

The Company is not a high risk contributor to environmental challenges; however when a challenge presents The Company undertakes an environmental risk assessment and seek a sustainable solution.

PERMASTEELISA MONGOLIA LLC

The Company is not a high risk contributor to environmental challenges; however when a challenge presents the Company undertakes an environmental risk assessment and seeks a sustainable solution.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

South China Factory (Permasteelisa Hong Kong Ltd.) has established the Environmental Management System (EMS) to govern the environmental aspect in order to reduce the environmental impact of pollution & resource/energy consumption: made an Environmental risk assessment. Policy for hygiene, safety and the environment: Build a zero safety accident culture and a zero environmental impact culture.

JOSEF GARTNER & CO. (HK) LTD.

The Safety Policy and the Project related Safety Method Statements are covering environmental challenges.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

The Company has Hygiene, safety and the environment policy for job sites and factory respectively. For example, in factory chemical products are stored separately. MSDS of chemical products are demanded at the time of procurement. According to MSDS recommendation, measures are taken such as gloves for workers who work with cleaning spirit for product cleaning. Waste of sealant is collected and stored separately and periodically collected by specialized scrap treatment company who we have annual agreement with.

8 BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

COMMITMENT

Permasteelisa supports initiatives for the promotion of greater energy savings.

ACTIONS & OUTCOMES

The Permasteelisa Group subsidiaries take in place activities to promote a greater environmental responsibility, like for example the improving environmental and recycle rules.

Follows details of few initiatives per Company:

PERMASTEELISA S.p.A.

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.

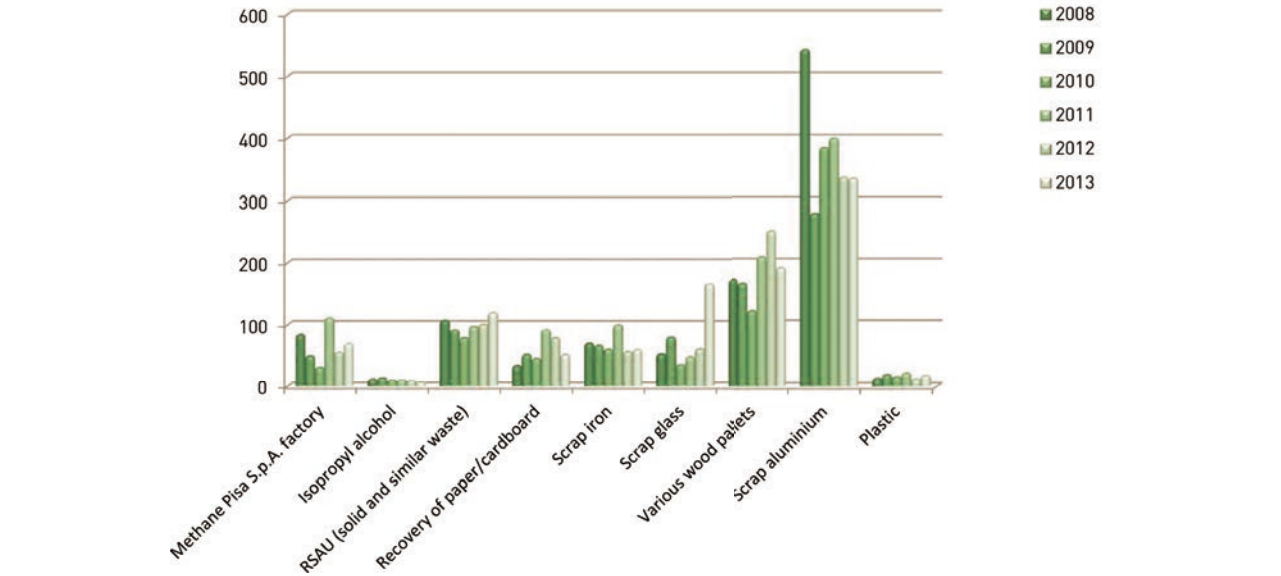
Permasteelisa S.p.A. is equipped with a cogeneration plant for simultaneous and joint production of electricity and heat.

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 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	2013
Methane Pisa S.p.A. factory (m³)	83,675	49,470	30,530	110,355	55,155	68,825
Isopropyl alcohol (lt)	11,200	13,507	9,455	10,403	8,458	6,229
RSAU (solid and similar waste) (kg)	106,240	91,220	78,950	97,040	100,430	118,990
Recovery of paper/cardboard (kg)	33,350	51,500	44,940	91,330	78,770	51,310
Scrap iron (kg)	69,630	66,170	60,220	99,110	56,240	59,340
Scrap glass (kg)	52,400	79,700	34,850	47,650	61,010	165,120
Various wood pallets (kg)	171,390	165,190	120,960	207,980	249,390	190,800
Scrap aluminium	542,200	278,020	384,040	399,580	336,660	335,330
Plastic	11,459	17,750	14,080	20,530	10,680	16,230



Packaging.

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.

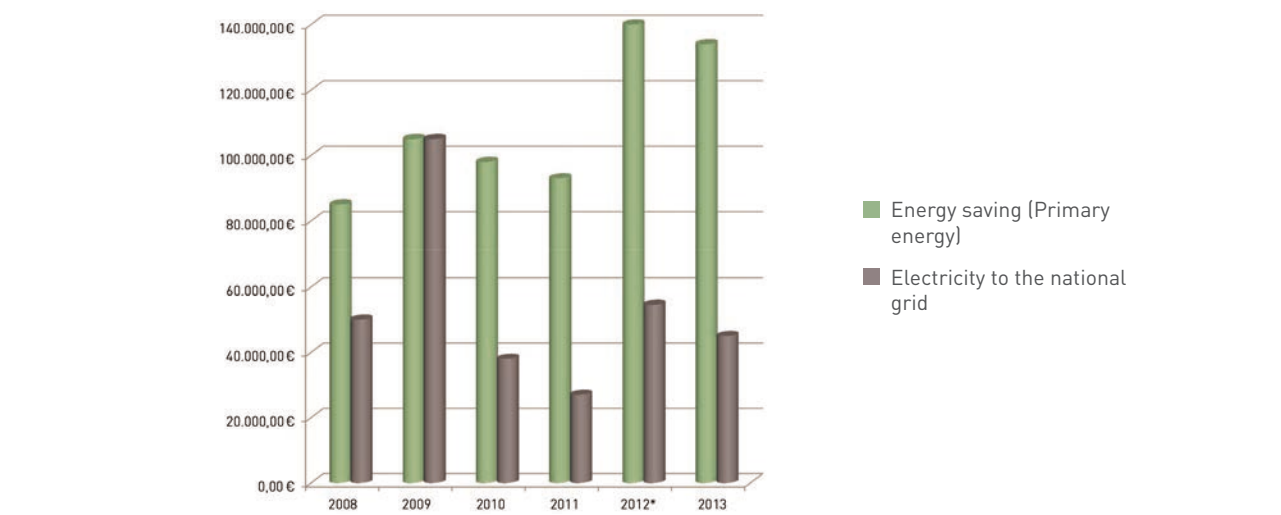
In 2011 470 tons of timber was saved.

In 2012, 316 tons of timber was saved in Permasteelisa S.p.A. and 671 tons in all Permasteelisa Group.

In 2013, 270 tons was saved in Permasteelisa S.p.A. and 684 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 €
2013	191TOE/134,000€	45,000€



*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 ESPAÑA S.A.U.

The company complies with laws of special waste treatments. In particular Permasteelisa España recycled material during 2013, as follows: waste, wood, glass, plastic, recycle paper, cardboard, aluminium profiles, aluminium chips and steel strips.

PERMASTEELISA FRANCE S.A.S.

The Company has for all sites a dedicated special plan for environment and has a separate waste collection system.

PERMASTEELISA GARTNER MIDDLE EAST LLC

Established separate waste collection and disposal systems. Waste wood, scrap steel and aluminium are separated and sending to recycling contractors.

RI ISA D.O.O.

The Company collects waste paper and hand it to an external company for the recycling.

JOSEF GARTNER GMBH

Josef Gartner GmbH has additional integrated an energy management system in 2013 into the management system based on ISO 9001. The energy management system has been certified according to ISO 50001 in 2014 by an independent and registered body in the course of the yearly audits.

Main focus of this system is to analyse all energy users regularly and to identify significant potential to safe energy and the environment. The roof of the facilities of Josef Gartner GmbH are covered by photovoltaic panels to produce electricity out of solar energy.

The supply and piping system for compressed air has been analysed and leak-checked.

In regard to environmental responsibility THE Company has the focus also to suppliers and partners.

A separate waste collections system is part of the environmental management system described under principle no. 7.

PERMASTEELISA GARTNER QATAR LLC

Separate waste collection is done by the Company; separate skip is used for wood, steel and carton.

PERMASTEELISA GARTNER SAUDI ARABIA LLC

Permasteelisa Garter Saudi Arabia is following precaution to save the environment, like: separate waste collection in the offices - paper - toner cartridges - other waste materials; or at site keeping a separate collection of packaging materials. More over it is constantly given information to the employees about the correct use of lighting and air conditioning in the offices.

The use of electricity for lighting and cooling is controlled by remote controls like thermostats and timers.

SCHELDEBOUW B.V.

Targets are set in the environmental assessment to control the most important items, segregation of waste & recycling safe storage of hazardous materials reduction in energy usage - in addition an inspection & report was made to reduce energy consumption.

PERMASTEELISA NORTH AMERICA CORP.

All wood wastes, and metal wastes are recycled and diverted from landfills.

- Diverted 704 Tons of waste from landfill.

- Windsor facility recycles 59% of its solid wastes.

Damaged, defective glass waste persists in being the largest single source of PNA waste generation. We are searching for solutions for recycle, reuse.

BLEU TECH MONTRÉAL INC.

The Company recycles paper, metal. The Company reduced electrical consumption by changing the factory lighting system.

The Company has done building modifications to reduce loss of energy at a small scale. Equipment maintenance is done on a regular basis to keep them running in the best working order.

PERMASTEELISA PACIFIC HOLDINGS LTD.

The Company:

- Encourage Recycling

- Control waste disposal in accordance to regulation

- Control water pollution in accordance to regulation

- Reduce wastage of materials

PERMASTEELISA PHILIPPINES INC.

The Company observes proper waste disposal, especially at site. In the office, observes recycling of used papers, and also implement electricity saving measures (e.i. turning off AC units from 6pm).

GLOBAL ARCHITECTURAL CO. LTD.

Separation of waste produced by the factory takes place and is controlled via ISO 14001 and OHSAS 18001 procedures.

GLOBAL WALL MALAYSIA SDN. BHD.

Promotes recycling via email, memo. Promotes awareness of pollution and the need to protect the environment by distributing related articles from magazines and newspaper and websites. Office old newspapers are kept and send to recycle Centre.

PERMASTEELISA (INDIA) PVT. LTD.

Waste separation, recycling, reuse are all implemented in offices.

PERMASTEELISA JAPAN K.K.

Waste is collected separately and disposed as per UAE regulations. Both in office and job sites, The Company has separate waste collection system and do recycle the recyclable material as much as possible. 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.

PERMASTEELISA PTY LTD.

The Group Companies have R&D facilities that are seeking the use of materials and technologies that will reduce the carbon footprint of the buildings that the Group builds, the efforts are driven by the possibilities that the technologies can offer and the commercial premium that this approach can have in the market place where Developers and Tenants are more attuned with the responsibilities that they also carry with the developments they propose.

PERMASTEELISA MONGOLIA LLC

Factory - waste is collated and sold as scrap to local merchants for recycling.

Waste separation on site is undertaken - but in Permasteelisa Mongolia LLC case is extremely limited.

PERMASTEELISA HONG KONG LTD.

Paper is collected and re cycled, lights are always switched off by the last person leaving the office and the AC is switched on and off automatically.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

Based on the environmental management system, there is a mechanism to control the wastes including solid waste, chemical waste, waste water, waste air & noise. Once the waste is sorted in the factory, the government-approved-waste collector will collect it regularly. In addition, the employees are compulsory to attend the environmental training while they go to the factory on board. Furthermore, the environmental audit will be regularly conducted to monitor the compliance to environmental control.

JOSEF GARTNER & CO. (HK) LTD.

Waste is collected separately. More and more of Josef Gartner & Co. (HK) Ltd projects are either LEED certified or BEAM certified with the view to create sustainable buildings and sustainable building management. Hong Kong has still a long way to go to catch up with the Energy Standards in Central Europe.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

The Company undertakes initiatives to promote greater environmental responsibility. The major material aluminium are recyclable. The Company separates waste by materials. Steel, aluminium and paper are sold to the companies that are specialized in recycle material treatment. The Company collects timber packages and makes use of them for re-packaging. For sealant waste the Company has annual agreement with specialized certified company who can handle the waste properly according to the local regulation.

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 & OUTCOMES

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

1. Organic photovoltaic cells

In partnership with ERG Renew (ERG Group), Permasteelisa 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.

2. Sustainable design

Furthermore, the Permasteelisa Group continued 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 GARTNER MIDDLE EAST LLC

Permasteelisa Gartner Middle East, being part of Permasteelisa Group, is promoting technologies in the facade industry environmentally friendly such as: closed cavity façade, façades filtering light, abating acoustic pollution, minimizing consumption of energy and saving heat from the sun for winter heating or summer ventilation.

RI ISA D.O.O.

The Company developed Timber CW, a facade system using frames completely made of wood, which is more environmentally friendly than the aluminium.

JOSEF GARTNER GMBH

Energy saving aspects are one of the basics of product and needs to be considered in each tender or/and awarded project.

Step by step we substitute conventional illuminates by modern systems with less electrical energy consumption in facilities. the conventional office buildings have been partly refurbished in terms of energetic aspects such as heat-insulation, heating/cooling system and illumination.

SCHELDEBOUW B.V.

The R&D department - of which a part is based in Scheldebouw - is carrying out research for the Group that includes more energy efficient performance of facades & potential for energy generation.

PERMASTEELISA NORTH AMERICA CORP.

By improving air handling equipment, lighting equipment:

- The Windsor facility saved 618,000 KWH / Year equivalent to providing 65 homes with electricity for 12 months
- Improvements in energy efficiency have saved the Windsor Facility and est. \$87,722 per year
- Reduction in energy use has decreased the Windsor facility carbon footprint
- Reduced 436 Tons/ year of CO equivalent to 348,882 gallons of oil consumed

PERMASTEELISA (INDIA) PVT. LTD.

The Company is actively promoting energy saving solutions to clients.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO.

The group invests in R&D projects to develop new technology that is eco-friendly. In design, the Company does thermal analysis to assist designing a more energy saving system. Thermal break system is normally used in aluminium frame and insulated glass with high performance coating is used to achieve lower U value. The Company is also promoting the closed cavity system (new double skin energy saving façade system) to customers.



ANTI-CORRUPTION

10.



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

COMMITMENT

Permasteelisa Group 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.

"Relations with the Group's stakeholders must be based on the principles of honesty, fairness, integrity, transparency and mutual respect. Honesty and transparency are the basic standards for all of the Group's activities and are indispensable to operating the business."

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 "**Government and public institutions**".

All interactions between the Group and public institutions are handled by authorized personnel based on the principles of legality, integrity, transparency, cooperation and non-interference, within the scope of each party's roles and in accordance with the law.

Personnel must refrain from interfering in the decisions of civil servants: It is forbidden to give money or other forms of payment, directly or through intermediaries, to public officials, civil servants and their close relatives in order to influence them in the performance of their duties. Gifts, favours, benefits or conduct lacking in transparency with respect to government representatives, public officials and civil servants in general are not allowed.

In any case, it is forbidden to give gifts, favours or benefits to civil servants or State-controlled companies or their relatives, unless the goods or services concerned are of reasonable price and it is traditional custom to do so.

Permasteelisa allows to give gifts to civil servants or employees of Public Institutions this in those Countries where it is traditional custom to do so, provided that the gifts are of an appropriate nature and are reasonably priced, still in accordance with local legal regulations and cannot, in any case, bias – or appear as an attempt at biasing – the recipient in the performance of his duties.

Fraudulent conduct (omissions, false declarations, etc.) for the purpose of obtaining subsidies, grants or government loans is expressly forbidden. Financial resources obtained legitimately from government agencies and Public Institutions cannot be used for purposes other than those declared in the application.

Any request or offer of favours from public officials that fall outside what is authorised in this Code of Ethics must be reported to the Compliance Committee.

And in paragraph 6.5 "**Donations**"

Subject to approval from the CEO, Group companies may comply with requests for donations from non-profit entities and associations.

The code also stated the rules to follow in case of Code violation, paragraph 8 "**Violation of the code**"

The Code of Ethics is an integral part of the contractual conditions required of employees and all others who work for the Permasteelisa Group pursuant to applicable legal regulations.

Failure to respect the provisions laid down in the Code also constitutes violation of a worker's obligation to perform his or her job with proper diligence, as required by the national collective employment contract in use. Disciplinary sanctions will be imposed in accordance with the applicable employment regulations.

For free-lance workers and consultants, compliance with the provisions and standards of the Code is an indispensable condition for entering into contracts of any kind with Group companies. Any violation of Code of Ethics rules by third parties (e.g. suppliers, collaborators, consultants, etc.) may cause, depending of the seriousness, just cause for contracts revocation or termination with all the related legal consequences, including the payment of damages.

ACTIONS & OUTCOMES

The principles of honesty and fairness enshrined in the Code of Ethics constitute a commitment by the company to refrain from illegal conduct. The Companies of the Group follows the Code of Ethics principles and adopted internal policy and procedures against bribery and extortion.

In the following are listed some examples:

PERMASTEELISA S.P.A.

Permasteelisa S.p.A. approved the 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 those Model is overseen by the Organismo di Vigilanza through audit tests.

In the framework of Law 231/01 (which established administrative liability of the bodies), Permasteelisa managers and staff are trained to be the main guarantors of corruption forms absence, 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.

JOSEF GARTNER GMBH, 000 JOSEF GARTNER AND JOSEF GARTNER SWITZERLAND AG

The Permasteelisa Code of Ethics as well as the Permasteelisa Letter of commitment to the UN Global Impact, both applicable in Josef Gartner GmbH, 000 Josef Gartner and Josef Gartner Switzerland AG, establish effective policies against corruption. Further, internal policies and directives govern the four-eyes-principle, signature rules and the exclusive competence of the centralized procurement departure for procurement procedures.

SCHELDEBOUW B.V.

No bribery or corruption is permitted by Scheldebouw management or employees. This is outlined in the policy for Code of Ethics. The systems in place for approval of orders & payments are designed to prevent corruption.

PERMASTEELISA NORTH AMERICA CORP.

Permasteelisa North America follows three documents that give rules against corruption. The first is Permasteelisa North America's "Conflict of Interest" policy. The company defines a conflict of interest as "any situation in which an associate uses his or her contacts or position in the Company to advance his or her private business or financial interest, whether or not at the Company's expense." The policy continues to give employees examples of situations that could be considered a conflict of interest and prohibits such behavior. The second document is the Code of Ethics. The Code of Ethics states, "All dealings between the Group and third parties must be conducted ethically and legally and without resorting to unlawful means. Corruption, illegal favoritism, collusion, and attempts to receive personal advantages for oneself or for others are prohibited." The third is the UN Global Compact, which states "Businesses should work against corruption in all its forms, including extortion and bribery."

BLEU TECH MONTRÉAL INC.

The Company follows the Permasteelisa Code of Ethics.

The Company also follows any published news items that put suppliers in a bad situation regarding their credibility deleting business with these parties.

GLOBAL ARCHITECTURAL CO. LTD.

The policy is defined within the company Handbook which is made available to all employees on commencement of their contract together with the Code of Ethics for signing.

PERMASTEELISA PTY LTD.

The policy on such matters is contained within the Group's Code of Ethics and as stipulated by the Federal and State Government legislation that the Company operates under.

PERMASTEELISA MONGOLIA LLC

The policy on such matters is contained within the company Handbook, given to all employees on commencement of their contract together with the Code of Ethics for signing. In summary: there is zero tolerance for any form corruption.

PERMASTEELISA (INDIA) PVT. LTD.

The Code of Ethics is distributed to all employees and suppliers, and they are specifically informed of the Group position on corruption, requirement for transparency, and the consequences of not following those guidelines.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

South China Factory handbook has covered the disciplinary action to be taken for any corruption, for code of ethics, it is the commencement of employee abiding company policy.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

The company follows internal rules/policies against the corruption in all its forms, as follows:

1. The group's Code of Ethics provides guidance on how to conduct business in a fair, ethical and legal manner. Employees are required to sign the Code of Ethics.
2. In company standard procurement contract, we have the "anti-corruption Initiative term" stating "Seller shall strictly comply with the national laws, regulations and relevant policies on market entrance, bid and tender, construction and installation, market activities and regulations. Both Buyer and Seller shall commit to a "ZERO-TOLERANCE Policy" towards bribery and corruption."
3. Group conducts internal audit annually to monitor compliance with company process and policy and to detect potential misconduct.
4. Whistleblowing is in place as an anonymous reporting mechanism against corruption.





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