



UNITED NATIONS GLOBAL COMPACT
**COMMUNICATION
ON PROGRESS**

2014



**PERMASTEELISA
GROUP**

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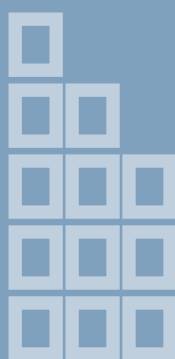
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Vittorio Veneto, 23.06.2015

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 the 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 our sixth annual Communication on Progress we provide an index to our performance with cross-references to the related Global Compact principles in 2014.


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

COMMITMENT

Permasteelisa Group recognizes the role 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 from 2007 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 Code has been updated on 3rd September 2014, and on April 23rd, 2015, Permasteelisa S.p.A. Board of Directors approved the new Code of Conduct for the Group, which fully replaces the previous Code of Ethics. The purpose of the new Code, drafted in joint participation with all LIXIL Group companies, is to trace a common line in order to operate according to shared principles of integrity, ethics in business activities, respect in the workplace, proper use of corporate assets and contribution to society (social responsibility).

The Code is intended to be used by anyone involved with the Group by virtue of any form of employment or collaboration relationship; therefore, it is the responsibility of all employees, managers and collaborators of the Group to comply with the principles and policies of the above-mentioned document in running the business and managing relationships, by promoting its disclosure and actual implementation. Permasteelisa Group business partners, including suppliers, service providers and distributors are also required to approve and share the rules described in the Code.

Considering that this COP is referring to the activities carried out during 2014, in the following only the actions taken by the Group with reference to the Code of Ethics will be listed.

The core principles of the Code of Ethics are described as follow:

"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.

"Health, safety and Environment" - 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. 5.12

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

Effective from October 1st 2014, a Corporate Quality assurance and sustainability Director has been nominated and he has the role to overview also the Safety management at Group Level.

In the following the details of some actions taken by Permasteelisa Group Subsidiaries in the subsequent matter:

1. **Conventions & Benefits**
2. **Health & Safety at work**
3. **Training projects**
4. **Privacy**
5. **Code of Ethics**

Please note that this list is a sample of activities improved in 2014 and it is not exhaustive.

PERMASTEELISA S.P.A.

For the purpose of supporting and respecting the protection of internationally proclaimed human rights and guaranteeing the economic livelihood of its employees, Permasteelisa S.p.A. set in place the following actions:

Conventions & Benefits

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 2014 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, with the possibility to split the insurance rate in the monthly payslip.

- Other conventions

- 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).
- Gym: special discounts for Permasteelisa S.p.A. personnel.
- Car rental: special discounts for Permasteelisa S.p.A. personnel with three leader car rental companies.
- Medical centre: special discounts for Permasteelisa S.p.A. personnel.

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 completion of the check-up program is scheduled to end at the end of 2016. The 68,6% of personnel joined this initiative. In 2013 the Company organized 4 days of visit for no. 159 attendees.

In 2014, around 29% of those who entered the program received the screening and from the beginning of the project, around 58% of those who entered the program received the screening.

Anti-influenza vaccination: Permasteelisa S.p.A. also offers the possibility of having a free anti-influenza vaccination to all its employees every year and during the course of 2014.

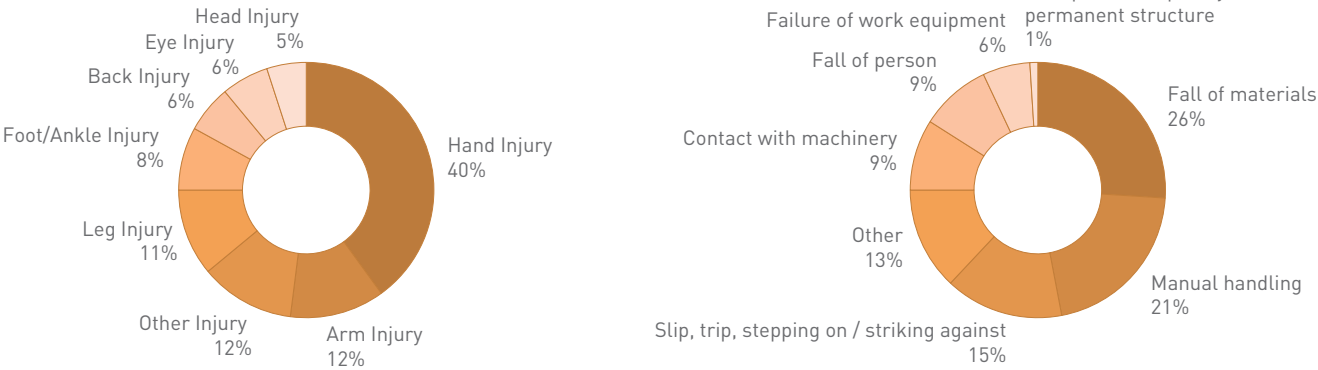
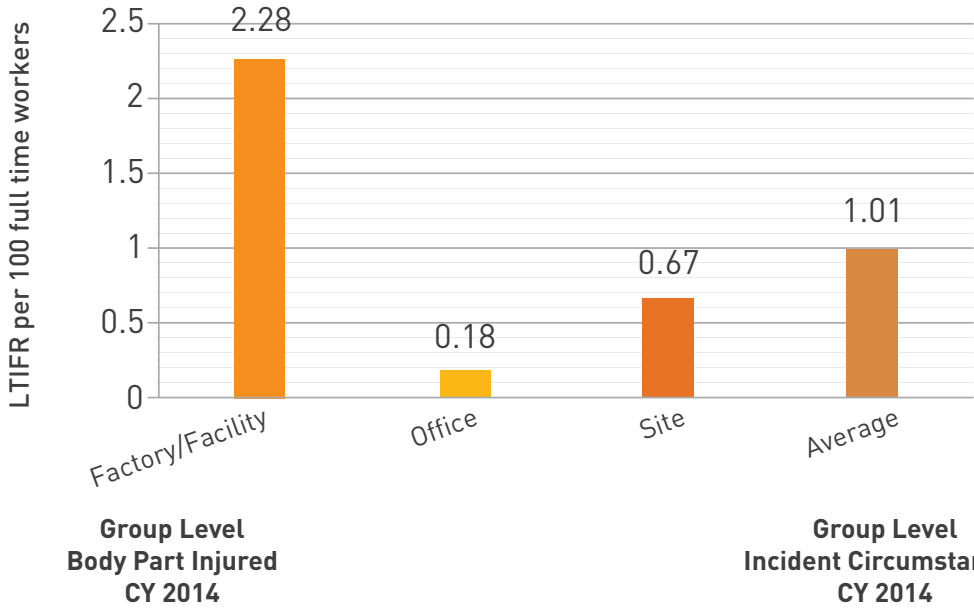
Health & Safety at work

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.

For the following report the data used for reporting includes the combination of Permasteelisa and Subcontractor hours and injuries. At this time, subcontractor injury and hours worked data is not separated from Permasteelisa. Injury Rate Calculation:

$$\left(\frac{\text{Number of Lost Time Injuries (LTI)}}{\text{Total Hours Worked}} \right) \times 200,000 = \text{Lost Time Injury Frequency Rate (LTIFR)}$$

A Lost Time Injury Frequency Rate (LTIFR) of 1.01 means that 1.01% of the population suffered a work injury that kept them away from work for at least one day.



Permasteelisa S.p.A.’s corporate management considers that occupational health and safety is an aspect of strategic 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 occupational health and safety 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 Company has decided to establish an office dedicated to occupational health and safety. In 2014 Permasteelisa S.p.A. started to implement a health and safety management and system according to the international standard BS OHSAS 18001:2007. The process ended in April 2015, with the issue of the certificate.

Training projects

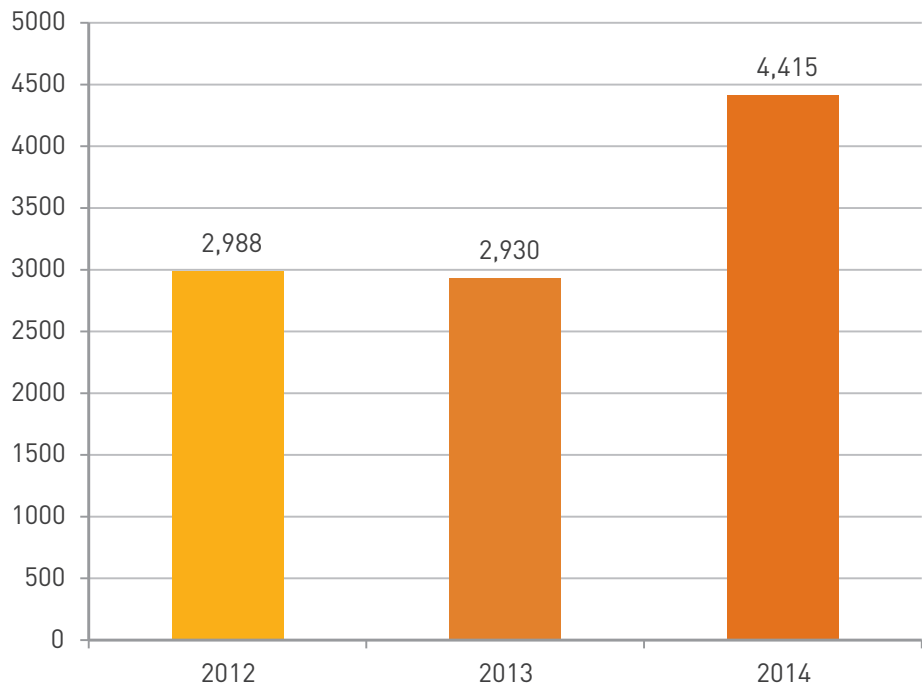
In 2014 Permasteelisa S.p.A. developed the following training projects:

- Safety Training:

Permasteelisa S.p.A. periodically organize training courses in relation to the matters of prevention, protection and safety at work. Specific courses were proposed to the employees, for example:

- First aid
- Fire prevention
- Utilisation of machinery (gantry cranes, fork lifts, etc.)
- Waste management
- Site safety
- Factory safety
- Safety at office
- Etc.

In 2014, 4,415 hours of training course have been issued



- *Permasteelisa Technical Academy*

PTAc is focused on keeping, developing and capitalizing a corporate awareness and to formulate a standard methodology of training, aimed to support the knowledge and information sharing within the Group. This project is dedicated to develop technical training programmes for Permasteelisa Group employees, with the purpose of supporting their performance and their continuous improvement, making available technical information to improve personal know-how, necessary for the professional growth of our resources and for the Group's future performances.

In 2014, 78 employees of Permasteelisa S.p.A. joined PTAc courses: 42 people attended the "Design&Material" course and 36 to the "Structural" one, for a total of 1,342 hours of training.

Specifically, D&M training aims to give both relatively new and experienced staff a technical overview of materials and main design aspects of curtain wall facades. On the other hand, the structural module, is focused on teaching basic structural and engineering theory and application understanding, related to wall systems.

Indeed, the purpose of structural engineering applied on curtain wall design is primarily to assure the structural adequacy and efficiency of a wall system design.

- *Training*

Permasteelisa invests in a continuous training for its employees supporting their professional growth. During the last two years Permasteelisa Group, and specifically Permasteelisa S.p.A., has been involved in a process of structural and substantial change.

Therefore, leadership has become a crucial characteristic for our managers, called to drive the culture of change supporting the Group to understand and accept this new deal.

Doing so requests effective communication skills to develop an emotional and intellectual involvement of the associates. Moreover, capacity of team building and a shared and common orientation towards results has become indispensable too.

For these reasons, the top management contribute is revealing itself essential to understand the importance of promoting and developing the human resources capital, leading them consistently and steadily towards a new perspective.

According to this scenario, Training assumes a key role contributing to spread the culture of change and common standards, through organisational learning and especially through a common view sharing.

Also, training support and promote a global cooperation, representing our corporate values and guidelines, spreading a real group culture, seeking to a continuous development of the human capital.

Summarizing, 14,190.5 hours of training were achieved in 2014. Here below the details:

General	19
H&S	4,415.5
IT	2,233.5
Languages	2,008.3
Managerial	1,152.75
Specific	898.5
Technical	2,594.5
Apprenticeship	868
Tot.	14,190.05

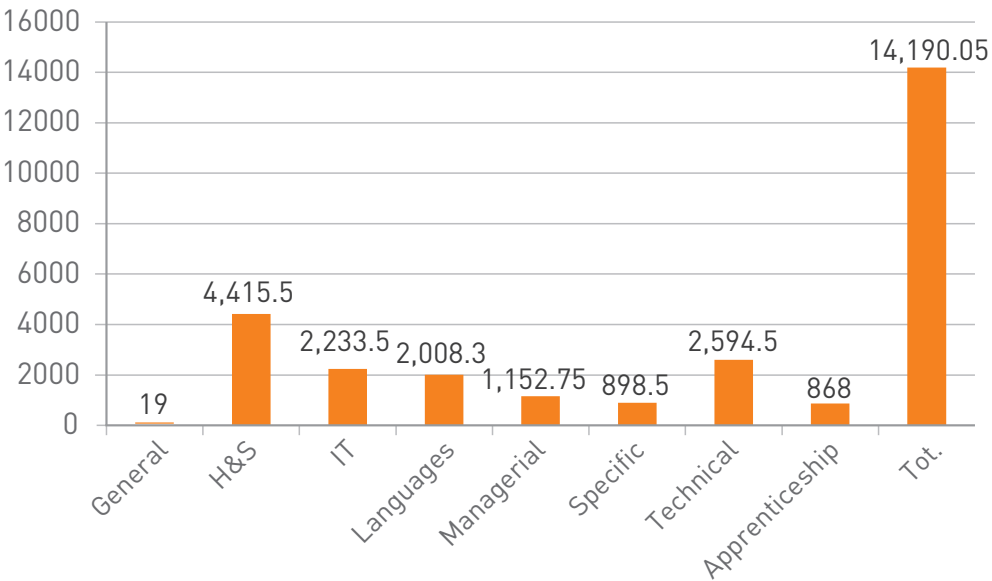


Fig. no. 1 - 2014 Training hours

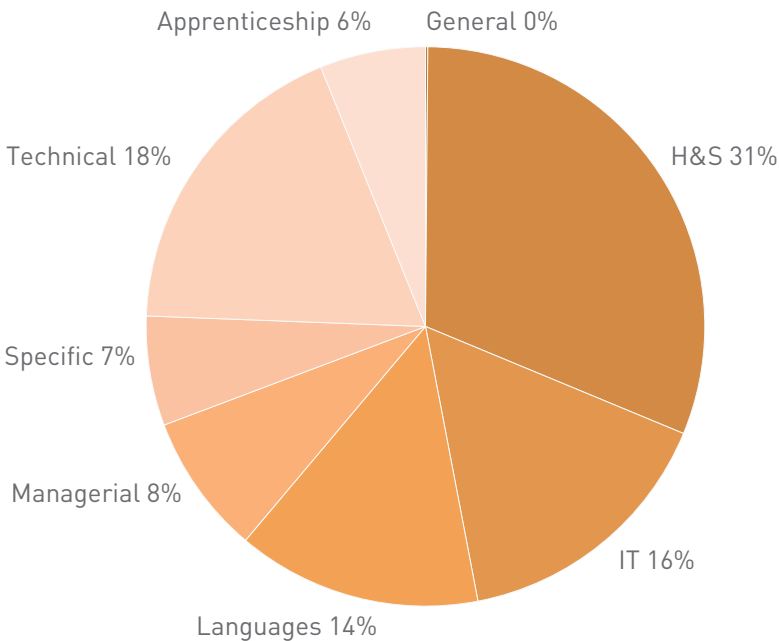


Fig. no. 2 - 2014 % of Training hours for type

Permasteelisa S.p.A., in June 2014, supported for the fourth year in a row the International Student Workshop and Competition “The Venice Towers”, a two-week full-time design studio experience open to graduate and undergraduate students.

The workshop was endorsed by **CTBUH** and supported also by **SOM, Pomeroy Studio** and **VOA Associates Incorporated** and this year it will be held at Palazzo Giustinian Lolin, the Venetian seat of Permasteelisa. “**The Venice Towers**” workshop addresses the problem of the redevelopment of a dismissed industrial area in the south of the residential zone of Marghera. The brief asks the students to design a cluster of mixed-use buildings, in order to recreate the complexity of an urban district, connected by a complex system of low-rise structures.

Students were asked to develop a real, feasible project that will therefore consist in a radical modification of the building surroundings, with prevision for the creation of new transport infrastructures, parks and other public amenities both on the mainland that on the lagoon taking into account the proximity with the ancient city of Venice.

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.

Code of Ethics

The code of Ethics has been distributed to all employees and signed. It is also distributed to clients at tender stage and attached to all contracts for suppliers and subcontractors.

PERMASTEELISA ESPAÑA S.A.U.

Conventions & Benefits

The Company provides meal vouchers for employees.

Health & Safety at work

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.

Training projects

- Training of employees is planned, as required by job
- Silicone treatment, excel and data base, electrical and mechanical, AutoCAD, CNC Programming Courses, Logistics Courses, Courses about stores, English and Italian Languages, Technical training on related light facades and materials involved in its preparation products.

Privacy

The Company operates in compliance with the privacy local law. 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.

Code of Ethics

The Code is distributed to all employees, clients and suppliers.

PERMASTEELISA FRANCE S.A.S.

Conventions & Benefits

The Company provides for employees.

- Canteen
- Petrol vouchers
- Health insurance
- Biennial medical examinations by the special authorities are in place in the Company.

Health & Safety at work

Permasteelisa France Sas worked with an external consultant to implement a Health & Safety Plan for the Company. A H&S referent initiated visits of all sites and started with monthly reports.

Permasteelisa France Sas commissioned a new referent safety in the Company and organized the meetings of training for Company site managers and project managers.

Code of Ethics

The code of Ethics has been distributed to all employees and signed. It is also distributed to clients at tender stage and attached to all contracts for suppliers and subcontractors.

PERMASTEELISA GARTNER MIDDLE EAST LLC

Conventions & Benefits

The Company provides economic livelihood as such as:

- Health insurance
- Fuel expenses reimbursement
- Pantry facilities with potable drinking water
- Utilities
- Accommodation for the expat employees.

Permasteelisa Gartner Middle East LLC (PGME) is providing adequate and comfortable working environment for all employees. For the white collars provides facilities as per international standards, while for workers (blue collars) in the factory provides ventilation, lighting, comfortable sharing accommodation, transportation and meals. PGME is providing local medical and life insurance to all the employees.

Health & Safety at work

PGME is compliant to the local UAE laws regards to the health and safety at the main office as well as at the production facilities.

Training projects

PGME has imparted 930 hours of HS training in 2014 throughout PGME organization. Moreover the Company has achieved the ISO 9001 certification in 2014 with relevant training during the accreditation process to all the heads of departments. The soft skills and technical training is continuous and ongoing.

Privacy

There is no privacy restrictions in the UAE, but as PGME, we maintain acceptable level of confidentiality by restricting access of information across the different departments and level of employees (also executing IT policies). The data related to client and suppliers is restricted to the procurement, sales dept., tender dept. and top management.

Code of Ethics

All employees have acknowledge the understanding of the Code of Ethics, while for clients and suppliers is an ongoing process.

The Code of Ethics is explained at the time of induction and the distribution has been announced with a formal memorandum to all the employees.
Moreover the Code of Ethics is available both in the Group Intranet Portal as well as in local HR system (accessible to all the white collars) while to all the workers an hard copy (booklet) has been distributed.

RI ISA D.O.O.

Conventions & Benefits

The Company is paying additional individual retirement funds for all employees. The Company has organized a series of free medical specialist exams for all employees.

Health & Safety at work

RI ISA D.O.O. engaged an external Health & Safety and Fire protection specialist to review the H&S and Fire procedures and inspect working environment. The advisor produced a report and a document for the future reference.

Training projects

The Company organized courses in Health and Safety, Fire protection and safe working environment for all employees, each 4 hours duration. One employee has attended the training in the first aid assistance in the working environment.

Privacy

The Company has nominated a person in charge of the privacy of personal data.

Code of Ethics

RI ISA D.O.O. distributed the Code of Ethics to all employees.

PERMASTEELISA GARTNER QATAR LLC

Conventions & Benefits

Permasteelisa Gartner Qatar LLC (PGQ) provide local Health insurance, accommodation, transportation as well as drinking water to all the employees as per applicable local labour law.

Health & Safety at work

PGQ activities in 2013 and 2014 were mainly based on NDIA/HIA Project where the team achieved a significant safety milestone: 17 million man hours without a lost time injury (at May 31st, 2015). This significant achievement reflects the staff's commitment to PGQ's safety culture and their daily dedication to the safety of everyone on the project and reiterates our firm commitment to safety.

PGQ HSE success is based on the PGQ Model:

1. Communication through Safety Induction, Safety Training, Tool Box Talks, STARRT and Safety Alerts
2. Responsibilities by identifying the roles and responsibilities of the Supervisor and his workers
3. Accountability to keep the Supervisor and workers accountable once the responsibilities have been identified, through Tool Box Talks, STARRT, Retraining, Action Notices and Inspections.

Statistics :

- 747 Inspections were done
- 471 HSE Observations have been reported
- 115 Incidents have been reported
- 17 Near Misses have been reported
- 13,746 People received Safety Induction
- (f) 203 Action Notices were issued
- 84 Tool Box Talks were delivered.

Training projects

The Company did training of different kind for several employees ranging from: Specialized training for Health & Safety Management System, Document Control Management, Revit Architectural 2014, Green Building Concepts and Applications (LEED), Advanced Project Management, Cost Control Engineering and language etc.

Privacy

PGQ holds and process a variety of personal data of customers, business partners, employees and other individuals and complies with privacy laws that are in effect in the country that we operate, as well as the Group's data privacy policy and all other relevant guidelines and procedures. PGQ ensures that third parties that process personal data on our behalf adhere to applicable laws and regulations, our policies and relevant minimum standards including those set out in our Group Code of Ethics.

Code of Ethics

The Company is taking the signed acknowledgment for them to confirm that they understand the Corporate Code of Ethics. PGQ expects that the business partners, including suppliers, service providers and distributors, to uphold ethical rules equivalent to the Group Code.

PERMASTEELISA GARTNER SAUDI ARABIA LLC

Conventions & Benefits

By law the Company is also granting: health insurance, house allowance and transportation allowance to each native employee.

Health & Safety at work

Permasteelisa Saudi Arabia strictly applies Permasteelisa Group policies and procedures including HSE and HR. All the employees are trained to follow and apply that, especially the safety procedures at site. Specific tools boxes are held on regular basis at each site project to maintain the safety and health awareness at work. Company is mainly focused on installation activities and is practicing training while executing the works. However, especially for HSE, dedicated courses and tools boxes are given. In the year 2014 the Company has spent around 1,600 hours in safety training.

Privacy

Sensitive data of employees, clients and suppliers are subject to restricted circulation within the Company and between the delegate employees.

Code of Ethics

The Code of Ethics is distributed to the main stake holders of the Company:

- Employees 100%
- Clients 100%
- Suppliers - around 50% (many local suppliers are speaking, reading, writing only Arab).

JOSEF GARTNER GMBH, GARTNER SWITZERLAND AG

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

Conventions & Benefits

The following instruments are in place as benefit to employees:

- Canteen (subsidized by Company)
- Contributions to Social System according to German law (Health, Social, Unemployment).

Health & Safety at work

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.

Further/specific activities:

- The Group Code of Ethics has been introduced
- The Companies constantly monitoring their proper application through the "Berufsgenossenschaft"
- The Companies have an appointed respective manager in charge ("Fachkraft für Arbeitssicherheit").

Training projects

There are ongoing induction and training courses.

Privacy

All personal data are protected under the guidelines of the German "Datenschutzgesetz" and the European regulation (EDSSG). An Officer for Data Protection is appointed and all employees are informed about duties and rights.

Code of Ethics

The Code is distributed to all employees and suppliers. Clients are made aware of this when submitting the tender. 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 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."*

SCHELDEBOUW B.V.

Conventions & Benefits

- Canteen in Middelburg
- Games room in Heerlen
- Private health insurance.

Health & Safety at work

The Company is BS OSHAS 18001 certificated.

The Company developed the following activities:

- Regular health & safety training, briefings & audits/monitoring.
- Amendments to safety stop devices on production lines
- New assessments of each factory workstation together with new work equipment use descriptions.

All Site management had updated safety training:

- Specific factory equipment training
- Monthly toolbox talks
- First aid training updates
- Emergency response training.

Privacy

The Company protects all confidential information.

Code of Ethics

The Code of Ethics has been issued to all employees, clients & suppliers.

PERMASTEELISA NORTH AMERICA CORP.

Conventions & Benefits

Permasteelisa North America (PNA) provides Health Insurance options to all employees from Medical, Disability, Life, Travel, and Workers Compensation. PNA 401k plan is managed collectively internally by PNA Benefits committee and our 3rd party vendor Fiduciary Investment Advisors.

Health & Safety at work

PNA each year communicates the Equal Employment Opportunity Commission law and posts this is all PNA locations on employee bulletin boards. This reaffirms PNAs commitment to equal opportunity in the workplace. Each new employee is introduced and provided training on EEOC, Harassment and Safety. All Managers, Supervisors and Employees were trained on "Workplace Harassment". Employee complaint procedures are outline in the training as well as within our Associate Handbook. Each and every complaint brought to the attention of Human Resources is thoroughly investigated and responded to. For Safety specifically all managers and Supervisors have a Safety objective in their performance appraisal, safety awareness is introduced through the new hire orientation process for all employees. All factory and site personnel go through a introductory safety orientation. All employees who are in safety sensitive positions are provided with the proper training and personal protective equipment.

The Company is BS OSHA 18001 certified.

Training projects

There were many forms of training provided to employees in 2014, not limited to, safety, factory, PTAC, lunch and learns, E-Learning courses, outside training programs, vendor sponsored training, home grown training on business principles specific to what we do. The approximate number of hours of training conducted in 2014 are approximately 224.

Courses/categories (Jan 2014 - Dec 2014): 122 total courses / 11 different categories (eLearning, Factory Training Program, QA/AC, Project Management, PTAc, PMF, Safety, Seminar, Technical, Vendor, Human Resources).

Privacy

All personal and medical data regarding employees is protected and in locked file cabinets in Human Resources. Client and Supplier information is contained and safe guarded within each respective function Estimating, Legal, Safety, Procurement etc.

Code of Ethics

Code of Ethics was distributed to all employees via our e-learning system as well as for new hires during the orientation process. 100% has been provided to employees. Not aware of any information provided to clients and suppliers.

BLEU TECH MONTRÉAL INC.

Conventions & Benefits

Group health insurance is provided.

The Company encourages local businesses by buying local as much as possible.

Health & Safety at work

Bleu Tech Montréal Inc. is committed to provide and maintain a safe and healthy environment. First Aid courses are provided to all employees who express the desire to become a First Aider, people are trained

to handle specific equipment to perform their tasks. Periodic maintenance programs for equipment are in place.

Training projects

Bleu Tech Montréal Inc. provided First Aid courses (16 hours), fork lift truck trainings or refresh (8 hours or 4 hours), overhead crane trainings (4 hours), stacker and pallet truck trainings (4 hours), fork lift truck training for trainer (2 days), language courses (French or English, hours pending level), facility inspection trainings (4 hours), etc.

Privacy

Personal data of employees and data of clients and suppliers are kept confidential. Only few authorized people in HR dept. (employees), accounting (clients and suppliers) and purchasing departments (suppliers) have access to the necessary data. Health information regarding employees are managed and kept confidential by the group insurance Company, only overall information are available in term of employee group.

Code of Ethics

Code of Ethics are presently distributed to all employees. The distribution of the Code of Ethics to clients and suppliers will be done starting May 2015.

PERMASTEELISA PACIFIC HOLDINGS LTD.

Conventions & Benefits

The Company provides adaequet insurances to the employees such as:

- Life insurance
- Accident insurance
- Enhance Hospital & Surgical insurance
- Critical Illness insurance
- Specialist Care insurance.

Health & Safety at work

The Company is ISO 18001 certified and actively carry 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 projects

Training courses organized by the Company:

- 16 hours of Singapore Goods & Services Tax briefing seminar
- 16 hours of Singapore Accounting Standards seminar
- 16 hours of Quantity Surveying and Claims seminar
- 384 hours of ISO 9001:2015 awareness training
- 16 hours of Legal Aspects of Workplace Safety training
- 24 hours of Construction Productivity Management training
- 128 hours of Work At Height & Safety course training
- 16 hours of Singapore BizSafe standards training.

Privacy

Personal data of employees, client and suppliers are accessible by authorized personal only. The Company is also in compliant with the local Singapore Personal Data Protection Act.

Code of Ethics

The 100% of our employees, relevant and related clients and suppliers are communicated the Company's Code of Ethics.

Training in the form of monthly Code of Ethics principles communication and sharing is carried out every month to all employees.

GLOBAL ARCHITECTURAL CO. LTD.

Conventions & Benefits

- Canteen provision (free lunch)
- Uniform
- Transportation
- Gasoline allowance for managerial level
- Life and Health insurance
- Birth day gift and lunch
- Travelling and sport days (outing)
- New Year party day.

Health & Safety at work

The Company has the Welfare Committee established by the request of Labour Department in order to oversee the employee's welfare included working condition, hazardous and danger work, hiring condition in line with Thai Labour Law, etc.

The Company provided the Occupational Health, Safety and Environment policy in line with Thai law and regulation by setting up the Safety Committee to fully take care of such matter.

The Company is BS OSHAS 18001 certificated.

Training projects

Training courses organized by the Company

- 1,880 hours: Related Occupational Health, Safety and Environment as per legal compliance
- 1,696 hours: English language
- 544 hours: Orientation and introduction program
- 5,300 hours: Others; technical training, labour, import & export, financial, etc.

Privacy

The Company protect the personal data, especially the employee's personal data, their information have been kept in the HR system and only authorized persons can access.

Code of Ethics

The Code is distributed to all employees, clients and suppliers.

PERMASTEELISA (INDIA) PVT. LTD.

Conventions & Benefits

- Canteen
- Health insurance
- Medical Reimbursement.

Health & Safety at work

Permasteelisa (India) Pvt. Ltd. applies the standard healthy and Hygienic conditions as per the standard requirements.

Training projects

Training has been given to the employees as below:

- Technical training: approximately 4,000 Hours
- Languages: 400 Hours.

Privacy

The Company protects the personal data.

Code of Ethics

The Code has been distribute to all the employees (100%).

PERMASTEELISA JAPAN K.K.

Conventions & Benefits

The Company provides basic social insurances including health insurance, annual health check-up, flu vaccination etc.

Health & Safety at work

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. We also organize monthly safety meeting and one annual safety general meeting involving all subcontractors.

Training projects

The Company supports employees participating in external trainings such as related to site activities, special courses for site management. The hours depend on the each courses.

Privacy

The Company protects the personal data.

Code of Ethics

The Code is distributed to the 100% employees. For clients and suppliers are under process.

PERMASTEELISA MONGOLIA LLC

Conventions & Benefits

- All operational employees are drawn from the Local community in Ulaan Baatar
- A full canteen facility is/was available in our Factory
- All workers are covered by individual Medical Insurance policies paid for by PML.

Health & Safety at work

Health and Safety is a priority in the work environment, Daily tool box talks are legislated for all employees on Site and in the Factory. Note: Our employees are primarily Mongolians.

Training projects

On the job training has been effectively provided in both the factory and site. Many of the operatives had never worked in curtain wall before - note we have successfully assembled and installed over 15,000 m sq of cladding with these teams.

Privacy

The Company protects the personal data.

PERMASTEELISA HONG KONG LTD.

Conventions & Benefits

The following employee related programs have been provided for employees:

- Health Insurance
- Dental Care
- Annual Medical check up
- Life, Accident, Death & Disability, and Long Term Disability insurances
- Business travel insurance to provide assistance for employee during their travel oversea
- Influenza Vaccination Program to enhance the employee health awareness
- Community supporting activities:
 - Walk for Sight & Moon Walk (ORBIS) - to raise fund for ORBIS sight saving work in China
 - Skip Lunch Day (The Community Chest HK) - to raise fund for street sleeper, residents in cage homes and cubicles
 - Green Day (The Community Chest HK) – to promote Green Live such as greener form of transport, reduce food waste, support food waste recycling, save energy and water, support resources recycling and redistributing programmes, support waste reduction, separation & recovery
- Festive food or discount provide for employees to enjoy during Chinese New Year & Mid-Autumn Festive.

Health & Safety at work

Permasteelisa has employed a safety and health manager and a term of supporting safety professionals in each active region to promote and assure the safety and health of all employees irrespective of their different ethnicity and nationality. In addition to safety and health, all staff members enjoy the same right and benefits corresponding to their posts.
The Company is BS OHSAS 18001 certified.

Training projects

In 2014, we have provided intensive training in different areas and aspects of our business in order to improve the employees hard and soft skills.

Health and Safety training:
About no. 290 workers and staff have received a three hours safety training. For site workers, there is a more routine safety talk on various safety subjects on a weekly basis. We have also delivered a full day safety management training to about no. 30 projects and safety staff.

Management, quality and technical training have been provided to our employees as well as education sponsorship:

- PMF (Permasteelisa Moving Forward)
- Train the Trainer
- T1 – Heat Soaked Treatment Inspection
- IMS (Integrated Management System) for Senior Management
- Enhance audit skills set trainings
- Team building for the whole Companies in HK to enhance employee belonging and team spirit
- Factory Visit to enhance employees awareness on the factory production process
- External sponsorship program for employees who taking bachelor or master degree to subside partially of the tuition fee for the subject related to job.

Privacy

Compulsory with Hong Kong Personal Privacy Regulation to collect only employment related information from employee. Only HR can access to employee’s personal information and HRIS system.

Code of Ethics

New Code of Ethics Guideline has been communicated with all employees and all employees have accepted and will respect the Code of Ethics. Code of Ethics training will provide to all new joined employees during the first day of employment to ensure they understand the Code of Ethics clearly.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

Conventions & Benefits

- Canteen
- Health insurance of employee.

Health & Safety at work

The Company set in place the following activities:

- Done environment testing: 1)noise testing 2)waste water testing 3)exhaust gas testing
- Occupation health testing: 1)noise testing inside factory 2) dusting test inside factory
- Re-allocated wastage timber, steel, paper, aluminium etc. to improve working environment.

The Company is BS OHSAS 18001 certified.

Training projects

The Company sets in place the following training activities

- New employee safety training
- Leadership safety training
- Incident investigation and share.

Privacy

The Company protects the personal data.

Code of Ethics

The Company distributes the Code of Ethics to employees, suppliers and client.

JOSEF GARTNER & CO. (HK) LTD.

Conventions & Benefits

The following employee related programs have been provided for employees:

- Health Insurance
- Dental Care
- Annual Medical check up
- Life, Accident, Death & Disability, and Long Term Disability insurances
- Business travel insurance to provide assistance for employee during their travel oversea
- Influenza Vaccination Program to enhance the employee health awareness
- Community supporting activities:
 - Walk for Sight & Moon Walk (ORBIS) - to raise fund for ORBIS sight saving work in China
 - Skip Lunch Day (The Community Chest HK) - to raise fund for street sleeper, residents in cage homes and cubicles
 - Green Day (The Community Chest HK) – to promote Green Live such as greener form of transport, reduce food waste, support food waste recycling, save energy and water, support resources recycling and redistributing programmes, support waste reduction, separation & recovery
- Festive food or discount provide for employees to enjoy during Chinese New Year & Mid-Autumn Festive.

Health & Safety at work

Josef Gartner has employed a safety and health manager and a term of supporting safety professionals in each active region to promote and assure the safety and health of all employees irrespective of their different

ethnicity and nationality. In addition to safety and health, all staff members enjoy the same right and benefits corresponding to their posts.
The Company is BS OHSAS 18001 certified.

Training projects

In 2014, the Company provided intensive training in different areas and aspects of our business in order to improve the employees hard and soft skills.
Health and Safety training:
About no. 290 workers and staff have received a three hours safety training. For site workers, there is a more routine safety talk on various safety subjects on a weekly basis. We have also delivered a full day safety management training to about no. 30 projects and safety staff.
Management, quality and technical training have been provided to our employees as well as education sponsorship:

- PMF (Permasteelisa Moving Forward)
- Train the Trainer
- T1 – Heat Soaked Treatment Inspection
- IMS (Integrated Management System) for Senior Management
- Enhance audit skills set training
- Team building for the whole Companies in HK to enhance employee belonging and team spirit
- Factory Visit to enhance employees awareness on the factory production process
- External sponsorship program for employees who taking bachelor or master degree to subside partially of the tuition fee for the subject related to job.

Privacy

Compulsory with Hong Kong Personal Privacy Regulation to collect only employment related information from employee. Only HR can access to employee’s personal information and HRIS system.

Code of Ethics

The Code of Ethics has been communicated with all employees and all employees have accepted and will respect the Code rules. Code of Ethics training will provide to all new joined employees during the first day of employment to ensure they understand the Code of Ethics clearly.

GARTNER CONTRACTING CO. LIMITED

Conventions & Benefits

The Company provides to employees moment to enjoy together as example days out for staff and families, annual day at Disneyland.

Health & Safety at work

The Company is BS OHSAS 18001 certificated.

Training projects

All employees have health insurance, annual body check, equal opportunities, equal pay.
The Company organized the following training courses:

- Technical - design and engineering, materials
- Safety - equipment, procedures and practices
- Management
- HR
- Leadership.

Privacy

The Company protects the personal data in line with the Code of Ethics.

Code of Ethics

The Company distributes the Code of Ethics to all the employees and suppliers.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

Conventions & Benefits

At the purpose of guarantee the economic livelihood of its employees, the Company set in place the following actions.

- Canteen: The factory pays full cost of the working meal for all its employees who carry at least 8 working hours per day. The canteen is located inside the factory
- Petrol allowance: some particular level of employees can have the petrol allowance related with the business. If they drive their own car for Company business, they can claim petrol allowance from Company
- Health insurance: The Company took out an additional health and life insurance policy to all employees.

Health & Safety at work

The Company 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.

The Company fully follows Permasteelisa Group Code of Ethics in line with the international standard of Corporate Social Responsibility.

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”; “Hygiene, safety”; “social accountability”; “Suppliers”; Safety.

Safety equipment (harness, helmet, shoes etc.) are provided by the Company to employees in workshops and on job sites and are mandatory to wear. Every worker has to undergo safety training before being assigned to his work. The Company provides annual health check-up to all employees.

The Company provides PPE to relevant employees, e.g. Helmet, safety vest, safety chain, safety shoes, etc. Since May, 2009 the Company is BS OSHAS 18001 certificated, accredited by Hong Kong Quality Assurance Agency.

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 2014, the following training courses were conducted:

- 2hrs/p on “Zero Tolerance Safety Policy”
- 2hrs/p on “Curtain wall installation Safety Training”
- 2hrs/p on “Working at Height Training”
- 2hrs/p on “Scaffold Safety Training”
- 50hrs/worker on “3-level Safety Training”.

Training projects

And other Safety Training organized by project teams.

Privacy

The Company protects the personal data of its employees.

The processing of the employees’ personal data takes place in observance of the China 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.

Code of Ethics

The Company rejects any behaviour that could lead to complicity in the commission of crimes of human rights abuses. The principles by which the Group is inspired are set out in the aforementioned Code of Ethics. The Company distributed the Code of Ethics to 100% the employees and suppliers.

JOSEF GARTNER CURTAIN WALL (SUZHOU) CO., LTD.

Conventions & Benefits

The Company has a canteen to provide lunch to each employee and dinner to employees work overtime. The Company also provide health check to every employee annually. Health insurance are provided to all employees.

Health & Safety at work

The Company recognize the importance of guaranteeing working conditions that respect human dignity and a safe and healthy working environment. Safety, environment check are done periodically. Potential dangers are identified and precautions are done. Safety factor is considered in machine selection to provide max safety to operators. Safe operation conduct training is provided to specific job post. Safety appliance are provided to workers according to their work nature.

The Company is BS OHSAS 18001 certified.

Training projects

The Company organises regular training to employees.

- Pre-job training is provided to every new employee, which covers Company policy, ethics code, safety. (3hr/ppl)
- Quality, safety, health training to workers (2hr/ppl)
- Specific safety training, such as Fire distinguisher training 2hr; 1st aid training (external course) 3 hrs for selected personnel; 3hr/ppl job safety training for new employee
- Specialist training on job post, such as 16hrs external courses for each electrician; 40hrs external courses for forklift operator.

Privacy

The Company protects the personal data. Personal data are only accessible by authorised HR. Contracts with Suppliers are considered as confidential documents.

Code of Ethics

The Company distributed the Code of Ethics to 100% the employees and 100% major suppliers.

JOSEF GARTNER & CO. (HK) LTD. TAIWAN BRANCH

Conventions & Benefits

- Medical insurance
- Labour insurance
- National health insurance
- Retirement funds.

Health & Safety at work

The Company set in place the following rules:

- Follow local EPA requirements for the office furniture/layout
- Regular fire drills test
- Maintain air-conditioner system.

Training projects

Training have been organized by the Company, as follows:

- Site Safety training
- Site QA/QC training
- English language training.

Privacy

The Company protects the personal data.

Code of Ethics

The Company distributes the Code of Ethics to employees, suppliers and client.

2 BUSINESS SHOULD MAKE SURE THAT THEY ARE NOT
COMPLICIT IN HUMAN RIGHTS ABUSES COMMITMENT
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 was 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 September 3rd, 2014. 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 was 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.

On the 23rd of April, 2015, Permasteelisa S.p.A. Board of Directors approved the new Code of Conduct for the Group, which fully replaces the previous Code of Ethics. The purpose of the new Code, drafted in joint participation with all LIXIL Group companies, is to trace a common line in order to operate according to shared principles of integrity, ethics in business activities, respect in the workplace, proper use of corporate assets and contribution to society (social responsibility).

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 2014, as well as for the 2008-2014 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

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 and all employment contracts are covered by the local collective bargaining.

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. The new Code of Conduct also established the same principle.

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. The new Code of Conduct also established the same principle.

ACTIONS

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

OUTCOMES

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

6

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

Permasteelisa is also working to ensure equal opportunity hiring, and to act with impartiality towards its employees. This principle finds its inception in its Code of Ethics paragraph 5.3, "**Fairness and equal opportunity**". The new Code of Conduct also established the same principle.

ACTIONS & OUTCOMES

Permasteelisa Group Companies 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.

The Company formalized internal hiring procedure. The job recruitment is done on the base of the required job profile.

PERMASTEELISA FRANCE S.A.S.

Permasteelisa France is applying the French law, which punishes the discrimination in respect of employment and occupation. The Company selects candidates on the skills of the individual in relation to the job sought.

PERMASTEELISA GARTNER MIDDLE EAST LLC

The Company has formal procedures for recruitment and selection of employees, moreover PGME has an employee's handbook (under revision) as point of reference for compliance to the rules and policies of PGME organization. PGME conducts fair interviews and assessment of the candidates with respect to the job specification and description. The candidate is interviewed by the respective department head for assessing the technical skills and by HR for the overall evaluation.

PERMASTEELISA GARTNER QATAR LLC

The Company provides a work environment that is free from discrimination of any form in compliance with local culture and applicable laws.

PGQ currently hires staff of different background, sex, religion among more than 12 different nationalities: Filipinos, Indian, Italian, Japanese, Lebanese, Palestinian, Polish, Romanian, South African Sri Lankan, French, British and Australian.

The selection of applicants for employment will be based strictly on their knowledge, work experience, skill, attitude, flexibility and commitment.

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. Hiring of employees is done on the principle of skills and experience required for the post job to be covered without any kind of discrimination.

RI ISA D.O.O.

This principle is explicitly included in the Code of Ethics. Also included explicitly in the Company statute. The discrimination on any grounds is strictly forbidden and a person in charge of the protection against discrimination is appointed. Personal and discriminative questions are strictly forbidden during job interviews.

JOSEF GARTNER GMBH

The Company is against discrimination of any sort towards our employees and has procedure relating the hiring staff based on the skills of the individual in relation to the job sought.

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.

PNA and anyone in a hiring capacity upholds the Equal Employment Opportunity Commission law. All recruitment activity is centralized to Human Resources who works in conjunction with all management staff. Our hiring processes are very well defined and outlined which are further complaint with Affirmative Action law and ISO 9001 standards. PNA as an employer who looks at a multitude of factors when hiring, skills, experience, background on education, specialized training, etc. PNA also makes efforts to attract and hire women, minorities, and other protected classes.

BLEU TECH MONTRÉAL INC.

Bleu Tech Montreal Inc doesn't discriminate against race, color, sex and religion. This is part of the hiring policy. Employees are hired based on their skills.

PERMASTEELISA PACIFIC HOLDINGS LTD.

The Company is against discrimination in respect to employment and occupation. The Company practices fair employment practices and support the Singapore national fair employment practices. The Company is compliant and support the Code of Ethics. The Company's practice of fair employment practices and standards adopted of the Singapore national fair employment practices focus selection of individual in relation to competencies match to the job.

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 Company focuses to the skills and qualification with no concern on gender or age.

PERMASTEELISA (INDIA) PVT. LTD.

Permasteelisa (India) Pvt. Ltd. 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 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.

PERMASTEELISA HONG KONG LTD.

The Company acts in compliance to Hong Kong Government Regulation on the discrimination policy. During 2014, there are more than 20 new joiners are from different nationalities and races. The hiring decision is based on the candidate skill sets and culture fit to the Company and team. The hiring decision is based on the candidate skill sets and culture fit to the Company and team.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

South China Factory (Permasteelisa HK) 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.

Compliance with Hong Kong Government Regulation on the discrimination policy. During 2014, there are more than 20 new joiners are from different nationalities and races. The hiring decision is based on the candidate skill sets and culture fit to the Company and team. The salary structure is strictly based on performance and contribution to the Company's success independently from gender, place of birth, nationality and religion. The hiring decision is based on the candidate skill sets and culture fit to the Company and team.

GARTNER CONTRACTING CO. LIMITED

The Company guarantees equal opportunities to each candidates. Skills and experience and personality traits.

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. 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 (SUZHOU) CO. LTD.

The Company is also working to ensure equal opportunity hiring, and to act with impartiality towards its employees. This principle finds its inception in the Code of Ethics "Fairness and equal opportunity". The Company has the procedures relating the hiring staff. Candidates are pre-selected by HR based on their job experience and education. Those past pre-selection are interviewed by their direct superior. Candidates selection are made mainly on skills in relation to the job sought.

ENVIRONMENT

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 5.10 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 has environment management system certified according to UNI EN ISO 14001 international standard.

The Company also adopted Organization and Management Control Manual with specific rules in matter of environmental management.

At the purpose of energy saving, the Company adopted an energy management including washrooms presence sensors and ambient light sensors in the 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, in 2013 have been produced 209,670 equivalent to a saving of 52,4 TOE, while 2014 have been produced 199,450kwh equivalent to a saving of 49,86 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 ESPAÑA SAU

The Company has a system for environmental risk assessment and also an environmental policy.

PERMASTEELISA FRANCE S.A.S.

The Company does an environmental risk assessment for all projects (Project Environment Plan) prepared by a dedicated person in the Company. Permasteelisa France doesn't have any factory, but only offices in Paris. The Company has an internal policy for Health and Safety. Environment is handled project by project.

PERMASTEELISA GARTNER MIDDLE EAST LLC

PGME send on monthly basis an on line report to the Corporate Health and Safety Officer who is preparing the Environmental Risk Assessment at Group Level on annual basis.

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. Re-Certification took place in February 2015.

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 Customs Department in the State of Qatar has very strict regulations and require prior approval from the Environmental Protection Committee (EPC) before to import any hazardous materials. PGQ endure that these regulations are followed during import and storage of material.

Use and removal of hazardous materials at site is regulated and monitored by the site management team and included in project method statements and risk assessment to be approved before to commence any activity. The importance of hygiene, safety and the environment are included into our Code of Ethics and Code of Ethics and applied to all our activities at office and in particular at site.

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. Permasteelisa Saudi Arabia strictly apply the HSE Group policies and procedures and where possible asking to its suppliers and subcontractors to adhere with. HSE policies are mainly applied at site during the execution of the works.

SCHELDEBOUW B.V.

The Company made an environmental risk assessment by external auditor in 2015 and adopted an updated environmental policy for 2015.

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. To be compliant with ISO 14001, 2004 Standard we have an Environmental policy statement which is available to the public. To be complaint with the ISO 18001 2008 Standard we have a safety policy statement.

BLEU TECH MONTRÉAL INC.

Certified BOMA BEST (industrial building). The small amount of toxic products that BTM uses are stored, used and disposed of in a manner that is not toxic to the environment. The other products that are used are recycled. The Company has proper equipment to protect employees such as eye and ear protection, safety boots, gloves, eye wash stations, washrooms, hand disinfecting stations, etc..

PERMASTEELISA PACIFIC HOLDINGS LTD.

ISO 14001 and BS OHSAS 18001 certified.

GLOBAL ARCHITECTURAL CO. LTD.

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

PERMASTEELISA JAPAN K.K.

The Company follows the labour safety and hygiene code of Japan.

PERMASTEELISA MONGOLIA LLC

Policy for Health and Safety is set out in Company working documents - particularly in respect of risk assessments and Method statements. Environmental challenges await Mongolia, to date we are in the early stages of this being developed as a strategy.

PERMASTEELISA HONG KONG LTD.

The Company has employed an Environmental Protection Manager and conducted all necessary Environmental impact assessments and is certified to ISO 14001.

JOSEF GARTNER & CO. (HK) LTD.

The Company has employed a Environmental Protection Manager and conducted all necessary Environmental impact assessments and is certified to ISO 14001.

GARTNER CONTRACTING CO. LIMITED

The Company has an environmental manager.

JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD.

The Company 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 cantered on the proper use of resources, as set the Code of Ethics under "Hygiene, safety and the environment". Environmental Aspects Register are set in place with Control Plans developed both for factory and project sites. The Company has Hygiene, Safety and Environment policy for job sites and factory respectively. Environmental Aspects Register in place with Control Plans developed both for factory and project sites. The Company follows the group Zero Tolerance Safety Policy and committed to preventing accidents and injuries. No injury is acceptable to Josef Gartner Curtain Wall (Shanghai) Co. Ltd. The Company has Hygiene, Safety and 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.

JOSEF GARTNER CURTAIN WALL (SUZHOU) CO. LTD.

Environmental risk assessment was done in 2014 as part of the Company IMS system. Every month our HSE officer does environment inspection and provide action plan to relevant department demanding improvement. The Company has Hygiene, Safety and Environment policy in place.

- 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
- Waste water is treated in compliance with local government environment regulation
- Noise assessment was done and precautions are taken.

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 recycled.

Permasteelisa S.p.A. also uses a 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. adopted a digital system to manage all requests for authorization permits, vacations, travel, Company cars etc., with a relevant paper and toner saving.

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 the following table are summarized the relevant waste information including to the Permasteelisa S.p.A. data the Permasteelisa Interiors S.r.l.

	2009	2010	2011	2012	2013	2014
Other packaging waste (kg)	143,760	133,360	138,340	132,470	156,990	153,170
Cardboard and paper packaging waste (kg)	64,990	70,220	106,920	100,040	66,550	78,200
Iron and Steel (kg)	263,810	528,340	402,370	300,190	144,430	153,444
Glass (kg)	136,390	90,630	79,160	64,810	167,380	117,700
Wood packaging waste (kg)	206,230	149,910	258,350	318,280	261,890	312,260
Aluminium waste	367,160	474,890	447,260	538,560	520,370	331,600
Plastic packaging waste	27,770	25,800	29,190	17,200	21,710	22,600

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.

PERMASTEELISA ESPAÑA S.A.U.

The Company complies with laws of special waste treatments. In particular Permasteelisa España recycled material during 2014, as follows: waste, wood, glass, plastic, recycle paper, cardboard, aluminium profiles, aluminium chips and steel strips. Selective waste collection is performed through authorized managers, utilities (electricity, oil) are monitored and actions are taken to minimize them are controlled discharges and emissions of pollutants into the atmosphere.

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

Considering the complexity of the UAE area and the environmental conditions the air conditioning needs to be operational out of necessity during the working hours. We try to conserve electricity and water by switching off the lights after the office hours.

RI ISA D.O.O.

The Company collects waste paper and hand it to an external Company for the recycling. Collects printer toners and cartridges for the safe recycling and disposes of old electronics in a safe manner.

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 analyses all energy users regularly and to identify significant potential to safe energie and the environment.

The roof’s 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 analyzed and leak-checked. In regard to environmental responsibility we have the focus also to our suppliers and partners. A separate waste collections system is part of the environmental management system.

PERMASTEELISA GARTNER QATAR LLC

PGQ strives to preserve the global environment. Accordingly, PGQ works to reduce the environmental strain caused by our business activities, promote energy saving. PGQ has waste separation system at site and separation of paper from other materials at office.

PERMASTEELISA GARTNER SAUDI ARABIA LLC

Permasteelisa Saudi Arabia is following precautions to save the environment. Some measures are as follow:

- Separate waste collection of exhausted stationery
- Separate collection of packaging at site
- Responsible use of electricity and water.

SCHELDEBOUW B.V.

Separate waste collection is set in place:

- Recycle of aluminium
- Reduction of energy use by changing lights & reducing temperatures
- Minimise transport by maximizing stuffing of containers.

PERMASTEELISA NORTH AMERICA CORP.

The Company set in place Wood, Aluminium, Cardboard, Paper, recycling programs, and then greater communication in the facility on paper consumption.

BLEU TECH MONTRÉAL INC.

The Company separates waste coming mainly from metal (aluminium and steel), glass, paper and wood for recycling. We use electricity coming from renewable sources (Hydro).

PERMASTEELISA PACIFIC HOLDINGS LTD.

The Company:

- Encourages recycling
- Controls waste disposal in accordance to regulation
- Controls water pollution in accordance to regulation
- Reduces wastage of materials
- Monthly communication to employees promoting environmental responsibility.

GLOBAL ARCHITECTURAL CO. LTD.

Safety section has created campaigns and promotion to build awareness for environment among the factory by giving small gifts and certificates. Water and waste included electricity saving have been alerted by both Safety and HR department.

PERMASTEELISA JAPAN K.K.

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 MONGOLIA LLC

Waste prevention and recycling is carried out on both site and factory.

PERMASTEELISA HONG KONG LTD.

The Company has employed an Environmental Protection Manager and conducted all necessary Environmental impact assessments and waste management; our Company is certified to ISO14001 and some projects have implemented the LEED and Beam Plus systems.

The Company has separate waste collection system in place. We are developing energy saving procedures. In SCF division has been 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.

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 of environmental control.

JOSEF GARTNER & CO. (HK) LTD.

The Company has employed an Environmental Protection Manager and conducted all necessary Environmental impact assessments and waste management; the Company is certified to ISO14001 and some projects have implemented the LEED and Beam Plus systems.

The Company has separate waste collection system in place. The Company is developing and energy saving procedures.

SOUTH CHINA FACTORY (PERMASTEELISA HONG KONG LTD.)

Separated waste collection system for paper, steel, silicon, alum, timber.

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 recycled 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. Follows below system and policies.

- Separate waste collection system
- Recycling of silicon bottles
- Anti-spill precautions for chemical material storage
- Noise pollution control plan
- Energy usage monitoring
- Waste pollution control plan.

JOSEF GARTNER CURTAIN WALL (SUZHOU) CO. LTD.

All wastes either in office or in plant are sorted by material types. Recyclable materials such as steel, aluminium, glass and paper are collected by government certified waste collective companies. The Company collects timber packages and make use of them for re-packaging. For sealant waste we have annual agreement with specialized certified Company who can handle the waste properly according to the local regulation. One side used paper is sorted out for recycle use. The Company request employees to print on double face whenever possible. The Company also encourage employees to use electronic documents instead of printing out.

JOSEF GARTNER & CO. (HK) LTD. TAIWAN BRANCH

Recycle materials, recycle used paper, sewer sewage system.

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

As reported in Permasteelisa Group web site:

Sustainability of buildings extends beyond environmental challenges but also structural and safety issues. For a building to be sustainable it must not only be energy efficient and have minimal environmental impact but provide both safety and security for building occupants.

In this respect, research is being carried out in the fields of:

- Blast enhancement
- Impact protection
- Seismic performance
- Intrusion & forced entry
- Fire resistance
- Ballistic projectile resistance.

Research has focused on providing technology that can be extended and applied to various project standards and specifications, not simply one-off ad-hoc products. This technology includes patented system design not only tested & certified through actual field trials but also enabling benchmarking and validation of unique proprietary developed advanced software tools.

Research is also carried out to develop structural systems that optimize the use of façade materials and systems. Material life cycle research enables ease of replacement of individual components as they near the end of the design life without the need to replace the overall façade. Structural optimization techniques and software reduce unnecessary material wastage. Permasteelisa has led the industry in the development of free and fluid form structures with the successful completion of numerous prestigious projects. The unique form and complexity of such structures has led to the development of proprietary surface rationalization and optimization software as well as research into the unique properties and limitations of cold formed materials such as glazing, metals and composites. Further research is being carried out investigating the use and application of alternative industry technologies through the use of polymers and composites and the use of adhesives and bonding technologies.

The Group has focused on environmental sustainability themes and in its architectural projects implements new energy saving strategies. **Intelligent façades**, custom made for the largest world projects: **façades filtering light, abating acoustic pollution** and **saving heat from the sun** for winter heating or summer ventilation. Buildings capable of generating power through **photovoltaic** cells and resisting the strongest **seismic events or explosions**. Research and development within the Permasteelisa Group has primarily focused on sustainable design of buildings and the development of façade components and systems to achieve this.

Main focus areas of sustainable building design include:

- *Protection*

One of the main goals of any sustainable building is to provide not only protection against the elements but also safety and security to its occupants. With this in mind, structural and safety research is being undertaken in the areas of blast enhancement against the threat of explosive attack, fire protection and seismic design. Despite the severe structural demands that such loadings have on façades, the outcomes of this research have led to the development of systems and technologies that allow architects the possibility to maintain design flexibility and aesthetics, maximise transparency whilst maintaining enhanced levels of protection for occupants.

- *Energy Saving & Comfort*

The increasing architectural trend of maximising glazed surfaces area presents a technological challenge with regards to energy consumption and building sustainability. To address this challenge, **building physics research and development** has focused on areas such as the development of **accurate software tools** capable of assessing building energy usage, the development of **climatically responsive advanced façade** systems, **façade integration of renewable energy systems** as well as studies into the **improvement of internal thermal and acoustic comfort conditions**.

-*Efficient Design & Materials*

Design & Materials Research has focused on the development of proprietary **surface rationalisation and optimisation software** in conjunction with research into the possibilities and limits of **cold forming of glazing, metals and composites**. Cold bending refers to the bending of a flat surface to form the required curved free form surface. By understanding the extent to which a material can be formed the surface may be optimised in order to minimise the number of unique panel types as well as reduce the number of pre-curved panels.

Efficient design goals are focused on **developing new systems using advanced composites and polymer materials** with both **low embodied energy and a high degree of thermal efficiency and recycle ability**. These systems are **lightweight**, have **high thermal efficiency** and provide a **new architectural aesthetic**. Research into the application of innovative materials is carried out in accordance with the highest quality and occupant comfort standards.

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.

In **SCHELDEBOUW B.V.**, the R&D department is carrying out research for the Group that includes more energy efficient performance of facades & potential for energy generation.

New products developed by R&D i.e:

- CCF being actively sold
- Low energy lights being fitted
- Energy saving technology being reviewed to automatically control consumption.

Permasteelisa Group at Safeguarding Australia 2015

May 2015 - Permasteelisa Group participated at **Safeguarding Australia 2015**, the 12th national security annual summit held on 13th and 14th May 2015 in Canberra.

The conference takes a look at the present day threats to society in general and covers a broad base of topics including cyber security, the socio-ethnic nature of terrorism, extremism and discussions about protection in general. Marc Zobec, deputy Technical Manager of Permasteelisa Group, was invited to give a lecture to the Blast Design and Modelling Workshop with the presentation "*Blast Enhancement of Glass Facades: Engineering Solutions for a Design Paradox*", focused on physical protection in terms of actual systems and methods of enhancing building security. The presentation outlined research, development, design solutions and case studies of engineering test methods, tools and techniques to successfully overcome today's design challenges allowing architects to maintain freedom of expression whilst providing adequate security to occupants.

It is a real though unfortunate fact that terrorist attacks are an ever present threat with the primary goal of causing maximum outrage and fear in society and disrupting everyday life. In order to achieve this, "soft" targets such as commercial and recreational buildings are primary targets with the main form of delivery being blast attacks. Current architectural trends though favor the maximization of natural daylight and views and with the advent of solar and thermal control glass coatings, fully glazed buildings are becoming increasingly more desirable. In the event of blast attacks, the primary cause of injuries are due to glass fragmentation and over pressure. Therefore the initial logical approach would be to limit the size of glazing, therefore not only limiting the architectural form and expression of the building but also the way occupants interact within the building itself.

Such constraints create a design paradox. Permasteelisa Group has developed technical solutions able to provide protection to buildings through the curtain wall, and these achievements were explained to the audience of the summit.

ANTI-CORRUPTION

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.

PERMASTEELISA GARTNER QATAR

Our Code of Ethics provide guidelines for this rules. The Company normally investigates any suspicious dealing with particular focus on the dealing between employees and clients and subcontractors.

JOSEF GARTNER GMBH 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 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.

The Code of Ethics describes that bribery or corruption, in any form is strictly prohibited & not acceptable. It is also unacceptable to receive gifts of any nature from suppliers or subcontractors, the Company also receive similar procedures from the bulk of our clients.

PERMASTEELISA NORTH AMERICA CORP.

The Code of Ethics is PNA policy: "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 are prohibited". Other rules against the bribery are set in place in Associate Handbook, pg. 10 (Conflict of Interest section).

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 HONG KONG LTD, JOSEF GARTNER & CO HK LTD, JOSEF GARTNER CURTAIN WALL (SHANGHAI) CO. LTD., JOSEF GARTNER CURTAIN WALL (SUZHOU) CO. LTD.

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

- 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.
- In the Companies standard procurement contract, there are 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 a “ZERO-TOLERANCE Policy” towards bribery and corruption.*”
- The staff handbook has covered the disciplinary action to be taken for any corruption.



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