

General

Period covered by your Communication on Progress (COP)

From: June 2017

To: June 2018

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

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

To our stakeholders:

I am very pleased to confirm eFM support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption for the sixth year.

Below we report our actions and efforts over Financial, Environmental and Social Responsibility and Ethics in our 2018 Annual Communication on Progress.

Given our changed configuration (becoming S.P.A.) eFM has devoted in 2018 increased attention and focus on ethical principles, on management transparency and stakeholder involvement, allowing us for continuous improvement.

We kept applying to our whole organization our Ethical Code, according to the Italian Law Decreto Legislativo 8 Giugno 2001, n. 231, through extensive internal training and meetings, as well as external communication with our stakeholders through our website and newsletters.

At the same time we have reinforced our attention to privacy matters, adhering to GDPR (General Data Protection Regulation, CE 2016/679).

eFM has reinforced and embedded the 10 UNGC principles as per our innovative Mission "Sustain engaging places for a better life!" as further explained in this document. Specifically, we have integrated increased attention and focus on the "human side of the company, by bringing on board colleagues specialized on Change Management, Psychology, Philosophy and Sociology.

We enriched our Mission and Value Proposition with solutions supporting our people's personal and professional growth. We have extended these solutions to our Clients as well, allowing for an extraordinary attention to people, wellbeing, health, work- life balance.

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

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

Our Values:

Integrity

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

Excellence

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

Equality

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

Transparency

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

Human Respect

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

Values Sharing

Everybody's values are the guideline of our modus operandi: "self-management" we apply the techniques of listening and dialogue as tools for continuous improvement of our relationship with all stakeholders.

Responsible use of resources

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

Sincerely Yours,

Daniele Di Fausto

CEO

eFM SpA
L'Amministratore Delegato
(Ing. Daniele Di Fausto)



Examples (Please click on the links below for examples of statements)

Human Rights Principles

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

Assessment, Policy and Goals

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

Following our Rome headquarter change, in 2018 we have changed our office in Milan designing it to keep people at the center of all our activities. It is now in the center of town, ready to host all citizens, relatives and friends. Likewise, eFM has opened other branches in different places outside Italy, "exporting" the same Human Rights principles, keeping each person at the center of our activities.

eFM keeps designing its Service Delivery Platform to facilitate manual work and make it safer and less repetitive. In adopting machine-learning technology, eFM makes sure that any low-level work is substituted by machines, as to free people to concentrate on better and more rewarding tasks.

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

- Labor rights
- Freedom of expression and opinion

eFM keeps holding several meetings throughout the year to share and openly discuss with all the employees the company values, mission and vision.

eFM also uses virtual meetings and social networking platforms to share and reinforce our believes: guarantee a better life to people in various social areas (employment, education, health, trade) through the creation of the first management platform for places that integrates all the stakeholders:

>Self-management

>Completeness

>Purpose evolution

Our Company strategic internal communication tool it is an internal social network called "Yammer". We have added to Yammer all the 365 Office suite, in order to ease communication, team work and share information.

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

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

eFM has groups related to workplace, business intelligent, development ideas, clients, marketing and so on.

Employees can share files, documents, links and images and have access and control over the content shared anytime and anywhere. The benefits are manly: facilitating the user access to information, reducing communication costs and travel cost as well as human right respect of individual voice. This gives also the opportunity to re-evaluate any possible risks pertaining to human rights in our sphere of influence.

Examples

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

Implementation

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

In opening our new branches and changing our Headquarters we adhered to the objective of maximizing our work-life balance. We created a workspace where we could work together, while enjoying the company of our beloved children and parents, as well as extended family members.

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

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

The description below reflects eFM approach on the following areas of human rights: right to decent standard of living, right to education and training, right to family life (parenthood charter). The two Global Compact principles on human rights are included:

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

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

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

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

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

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

eFM concrete actions taken in 2017-2018 so far are the following:

- 1) We organized two focused meetings on the theme of "Diversity management" Our vision is to work to bring about lasting cultural change, to the benefit of eFM staff, customers and other stakeholders. By doing this we will contribute to eliminating unconscious bias and disruptive behavior at work, and help ourselves and our clients confront their most difficult challenges with the utmost confidence.
- 2) "Pink Parking" Project. The meaning was to assign specific and private parking spaces to pregnant colleagues, freeing spaces previously occupied by Management.
- 3) "Un Fiocco in Azienda" Project. The meaning was to grant equal opportunities for eFM pregnant women employees, by putting in place actions to avoid discriminating them while on maternity leave, keeping them connected to the firm and providing for tools to enable remote work. All our colleagues participating to the project will be invited by the Pope to a private meeting in September 2017
<https://www.manageritalia.it/it/focus/progetti-manageritalia/produttivit-e-benessere/un-fiocco-in-azienda>
- 4) "Global Accessibility" Partnership. eFM is partnering with the Global Accessibility Company in order to develop a tool to assess accessibility of spaces to people with disabilities and special needs and facilitate removal of physical barriers to buildings and working spaces.

eFM supports and respects human rights as a core ethical value.

eFM has an ongoing process of existing policies and procedures. The progress includes an undertaking to avoid causing or contributing to adverse human rights impacts and to address such impacts when they occur, and to seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, services and business relationships.

Examples

- Suggestion box, call center or grievance mechanism
- Awareness raising or training of employees on Human Rights
- Consultation with stakeholders and affected parties

- Allocation of responsibilities for the protection of Human Rights within your company
- Human resource policies and procedures supporting Human Rights

Measurement of outcomes

Description of how the company monitors and evaluates performance.

eFM has established different and new mechanisms to measure compliance to its values by its employees and its stakeholders. Periodic questionnaires are administered to our Community to measure such compliance and take actions to improve it, if necessary.

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

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

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

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

In 2018 eFM continued to ensure compliance with basic human rights within our organization and with whom the company interacts such as partners or /and supply chain as per our Ethical Code.

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

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

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

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

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

Labour Principles

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

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

Principle 5: the effective abolition of child labour; and

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

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

Assessment, Policy and Goals

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

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

Examples

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

Our eFM Vision to become a global player encourages a global culture and multinational tasks. We use our platform to achieve these tasks throughout the world. Our platform enables application of non-discriminatory practices, openness to every culture, accessibility from any country.

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

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

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

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

eFM has a fundamental responsibility to provide safe and sound working conditions and treat our people to improve health and wellbeing.

Implementation

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

Our new headquarters was designed to specifically ensure people wellbeing, which goes beyond simple compliance. Compliance to labor law is a must and Human Resources People ensure that every employee works in compliance with local labor laws.

eFM ensures that the laws are strictly followed by every employee and we take necessary disciplinary action against who does not respect the laws.

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

ELEMENTARY NEEDS

In our new HQ we have added a canteen, providing healthy food and we have made available a room where people can bring their own food in case of specific dietary needs.

Last year we added to our office two water tanks specifically designed to purify water and we distributed glass bottles to all employees. In addition, our smart water fountains can calculate everybody's water consumption to keep everybody's healthy.

We plan to fill our Milan office as well with specific plants releasing oxygen and absorbing toxic substances. Greenery has a very positive impact on wellbeing and happiness.

We have elected to reserve our best space in the office to our colleagues working in the Contact Center. Since they have to stay sit at their workstations most of the day, they can enjoy the best lit room, with best acoustic conditions, and with plenty of plants releasing oxygen.

To further develop wellbeing we are offering courses on mindfulness and yoga to our employees.

We allow our people to work from any place they want, either from home, our office, or co-working places in town.

HEALTH & SAFETY

ISO 18001:2007 Health and safety are core business activities in eFM. We have received the certification in 2017 and we keep investing in continuous improvement in health and safety.

In 2018 our employees and our management kept being trained on the D. Lgs 81/08 (Health and Safety certification) TRAINING

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

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

Quite often the training sessions are announced and encouraged by our management on Yammer, so that they are always accessible to every employee.

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

Examples

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

Measurement of outcomes

Description of how the company monitors and evaluates performance.

eFM has established different and new mechanisms to measure compliance to labour principles analyzing its employees and its stakeholders' perception. Periodic questionnaires are administered to our Community to measure such compliance and take actions to improve it, if necessary.

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

Examples

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

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

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

Examples

- Assess the environmental footprint and impact of your company
- Written company policy on environmental issues, including prevention and management of environmental risks
- Policy requiring business partners and suppliers to adhere to the environmental principles
- Describe specific goals in the area of the environment for the upcoming year

Our new HQ has powered our approach to eFM support to Environmental and Sustainability challenges.

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

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

Integrating sustainability p. 7, 8 & 9 principles in our strategies and operations, means understanding and managing our own impact in the environment, while also working with stakeholders to respond to the environmental challenges facing the world.

From previous years eFM continues to:

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

Implementation

Description of concrete actions to implement environmental policies, reduce environmental risks and respond to environmental incidents

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

Both our new HQs are a sound example of a new working and sustainable environment for our people. On the basis of our understanding of the working needs of our employees, analyzing time spent in meeting rooms, in break areas, at desks, at home, and our readiness to change, we have designed a very sustainable office. eFM adopted a sustainable analysis through people interviews and focus groups, simple apps developed by eFM in order to avoid paper, recording daily answers, and detecting future need to let people "feeling home". The result is a very "sustainable location" with reduced energy use, resources and reduced CO₂ emission, better space where to connect and to share.

In our sustainable office we have adopted a Clean Desk Policy, eliminating personal shelves and cabinets to avoid paper stacking, as well as dust, reducing printing paper and thus saving trees. We have eliminated waste baskets and concentrated waste areas in order to recycle materials appropriately.

Our sensors are used to detect energy consumption, as well as air quality, in order to save planet energy and improve our people health.

Actions to ensure the optimal results for eFM environmental policy include training employees on the environmental policies, periodic internal audits, management review meetings, environmental programs such as reducing hazardous and nonhazardous waste. In 2018 we will update our certification on the integrated systems ISO 18001 and 14001.

Future eFM sustainability goals:

1. Strongly Integrate and communicate our environmental policy across the company due to our new offices;
2. Reduce our impact on climate change;
3. Comply with environmental legislation and regulation where we operate;
4. Strive for continuous improvement in our environmental protection;
5. Continuing implementing and still improving the "printing consolidation project" for the third consecutive year.
6. Engaging stakeholders, partners and supply chain to green actions like "green building".

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

Example

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

Measurement of outcomes

Description of how the company monitors and evaluates environmental performance

- Employees have been invited to participate to environmental awareness campaign and get constant reminders to reducing waste and managing resources more effectively (e.g. Water use)
- For energy reduction campaigns eFM invites its employees to participate to any kind of events on the matter, as well as adopting sustainable behavior in treating waste appropriately, minding energy saving, reducing paper printing.
- A better waste management activity on recycled paper in line with the company's commitment to rise consciousness about environmental issues.
- In July 2017 our EMS 14001 certification were verified and updated.

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

Examples

- Information about how your company deals with incidents
- Investigations, legal cases, rulings, fines and other relevant events related to environmental principles

- Specific progress made in the area of the environmental protection during the last reporting period
- Periodic review of results by senior management
- External audits of environmental performance

Anti-Corruption Principles

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

Assessment, Policy and Goals

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

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

Examples

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

Implementation

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

Our target constantly remains

- Analyze our clients for corruption-related risks.
- Formulate an anti-bribery/corruption policy; our new Ethical Code issued in June 2015 is being recently revised and updated.

As already specified, in 2018 we kept having training sessions opened to all employees about our company policies regarding anti-corruption and extortion (e.g. mailings, internet, internal, communication, etc.). In addition, this training is mandatory for each new employee.

Examples

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

Measurement of outcomes

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

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

We keep providing updated training sessions for all our employees on the matter, monitoring their understanding and implementation of such policies.

Examples

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