

United Nations Global Compact
2018 Communication on Progress of Beni Stabili



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

November 2018

17 Sustainable Development Goals to change the world

At the sustainable development summit held in New York in September 2015, the 193 United Nations Member States officially ratified a new sustainable development program called “Transforming the world: the sustainable development program to be achieved by 2030”.

Launched in January 2016, this program contains 17 objectives broken down into 169 targets which aim to tackle extreme poverty, inequality, social exclusion and climate change and biodiversity erosion.

These new sustainability standards¹ apply to states as well organizations located in these states, as they carry most of the responsibility associated with these challenges.

Private sector companies have an important role to play in incorporating these objectives in their strategies. According to the study by KPMG “How to Report on Sustainable Development Goals” published in February 2018, only 4 out of 10 organizations worldwide include SDGs in their reporting. This figure goes up to 6 out of 10 in France, a third of which belong to the SBF 120 index².

However, SDGs represent real job opportunities (\$12,000 billion per year by 2030 according to Better Business, Better World³ and a \$5,000 to \$7,000 billion increase in investments according to UNEP-FI).

The UN illustrations below are used for clarity purposes throughout the report:



Source : <https://www.unglobalcompact.org/sdgs/17-global-goals>

¹ <https://www.novethic.fr/actualite/entreprise-responsable/isr-rse/aucun-pays-n-est-sur-la-bonne-voie-pour-atteindre-les-odd-d-ici-2030-146078.html>

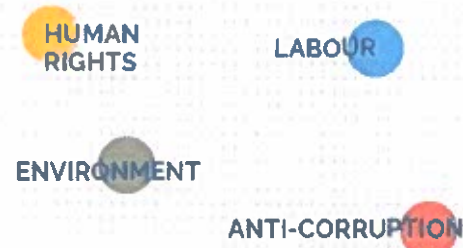
² <https://assets.kpmg.com/content/dam/kpmg/xx/pdf/2018/02/how-to-report-on-sdgs.pdf>

³ <http://www.globalcompact-france.org/actualites/objectifs-de-developpement-durable-comment-aller-plus-loin-dans-leur-integration-par-les-entreprises-103>

THE TEN PRINCIPLES

of the United Nations Global Compact

The illustration below shows the link between the 10 principles of the UN Global Compact and the 17 SDGs.



- 1 Support and respect the protection of internationally proclaimed human rights.
- 2 Not be complicit in human rights abuses.
- 3 Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 4 Support the elimination of all forms of forced and compulsory labour.
- 5 Support the effective abolition of child labour.
- 6 Support the elimination of discrimination in respect of employment and occupation.
- 7 Support a precautionary approach to environmental challenges.
- 8 Undertake initiatives to promote greater environmental responsibility.
- 9 Encourage the development and diffusion of environmentally friendly technologies.
- 10 Work against corruption in all its forms, including extortion and bribery.



Source : <http://www.fccco.com/en/sustainability/community/ten>

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Editorial by the CEO

Renewal of our commitment

Beni Stabili is a signatory of the United Nations Global Compact since 2016. This second Communication On Progress (COP) shows the achievements made by Beni Stabili within the framework of every 10 principles of the United Nations Global Compact.

Its CSR policy is linked with the strategy driven by Covivio (signatory since 2011) at the European scalewhile taking into account some Italian specificities. As Beni Stabili will be the subject of a merger-takeover transaction with Covivio by the end of 2018, this COP is intended to be read in conjunction with the 2017 Beni Stabili' and Covivio' Sustainability Reports, which provide further information on our global approach and performance.

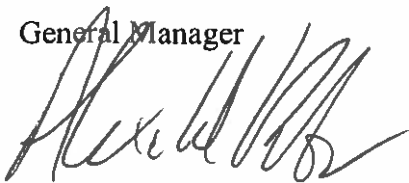
Since the writing of its first COP in 2017, Beni Stabili integrated the dynamics of the 17 Sustainable Development Goals (SDGs) of the United Nation 2030 Agenda for the Planet, adopted by global leaders at the United Nations Summit in September 2015. The following pages provide a summary of the practical actions Beni Stabili is taking to uphold each of the 10 principles of the Global Compact.

In 2018, we strengthen the links with our stakeholders, to make our employees, customers and suppliers aware of the climate, environmental (carbon footprint, waste, biodiversity ...), human (health, equality, education ...) and economics (responsible industry and consumption ...).

It is therefore within the framework of a structured and coherent action, with both conviction and pride, that I renew Beni Stabili's commitment to respect the ten Principles of the Global Compact and to increase its influence in its sphere of activity influence.

Alexeï dal Pastro

General Manager




1.A. Human rights


Beni Stabili is a listed real estate company based in Italy. Although Italy presents little risk regarding the violation of human rights, the company nevertheless remains vigilant and committed to ensuring that human rights are respected across all its business activities.

Human Rights

Signatory companies are requested to:



Principle No.1: Support and respect the protection of internationally proclaimed human rights within their circle of influence and...



Principle No.2: ... Make sure that their own businesses are not complicit in human rights abuses.

SDGs covered in this section:



Principles Nos.1 and 2: support and respect the protection of internationally proclaimed human rights within their circle of influence and make sure that their own businesses are not complicit in human rights abuses.

Businesses should support and respect the protection of internationally proclaimed human rights.

Beni Stabili is committed to applying the laws, agreements and regulations in force in the countries where the company operates and respecting the principles of international reference texts, in particular:

- the Universal Declaration of Human Rights (UDHR) and its additional protocols
- the conventions of the International Labour Organization (ILO)
- the ten Principles of the Global Compact

Beni Stabili's internal rules and human resources policies govern 100% of Beni Stabili's activities and comply with the international conventions on human rights.

Every year since 2015, Beni Stabili' sustainable development report has been verified by an independent third party, which vouches for its commitments and declarations.

Beni Stabili fully supports and respects the protection of internationally proclaimed human rights.

The Code of Ethics and Conduct of Beni Stabili sets out the values that underpin the policies and procedures that guide Beni Stabili's supplier relationships and the expectations of both suppliers and employees. These include the commitment of the company to support, uphold and respect the rights and dignity of its employees and the people that it engages with. The company aims to embrace diversity within the workplace whilst taking any form of discrimination seriously to prevent any form of human rights abuse.

Beni Stabili is conscious of its responsibility to promote respect for human rights throughout the entirety of the business and engages with all of its employees through the roll out of its Code of Ethics and Conduct training programme. It is required that all employees follow the principles outlined in the Code in every circumstance regardless of the business, the individual's role and their stakeholders. In addition, Beni Stabili requires that contractors follow not just the applicable regulations but also the Code of Ethics and Conduct.

Beni Stabili's Code of Ethics is available on:

http://www.benistabili.it/static/upload/cod/codice-etico-settembre-2016_english.pdf



Businesses should make sure that they are not complicit in Human Rights abuses.

Beni Stabili ensures no complicity in human rights abuses. Although the company does not come into direct contact with regions that need significant legislation to protect human rights, the company still acknowledges its responsibility to address this throughout the whole supply chain. Directors and senior members of staff at Beni Stabili are required to ensure that the Code of Ethics and Conduct is implemented across the whole company, whilst all employees are required to monitor their own behaviour and keep colleagues accountable. Before commencing his position, each employee must sign a document that confirms he accepts and will abide by the Code of Ethics and Conduct. For any person within the company that does not comply with legislation, including human rights legislation, serious action is taken to discipline the individual or group appropriately.

1.B. Employment rights, working conditions, labour relations

Beni Stabili is attentive to working conditions and, since its creation, has made every effort to maintain good labour relations within the company.

The human resources practices and policies of the company comply with the fundamental International Labour Organization's (ILO) conventions. Indeed, Italy has ratified the eight fundamental ILO conventions on forced labour, freedom of association, the right to organise and bargain collectively, equal pay, abolition of forced labour, discrimination, the minimum age for employment and child labour. Italian Law supports each of these individual elements and, as a result, Beni Stabili's human resources management and labour relations fully comply.

Employment rights	
Businesses are expected to :	
	Principle No.3: Respect freedom of association and the right to collective bargaining
	Principle No.4: Eliminate all forms of forced or compulsory labour
	Principle No.5: Support effective abolition of child labour
	Principle No.6: Eliminate discrimination in respect of employment and occupation

SDGs covered in this section:



Principle No.3: Respect Freedom of association and the right to collective bargaining

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Beni Stabili supports freedom of association and is open to its employees joining existing unions of their choices. Beni Stabili strives for equality across the whole business and takes its employees' views, rights and concerns seriously and with the upmost importance. 100% of the employees are

covered by a collective bargaining agreement (*Contratto Collettivo Nazionale dei Lavoratori – Settore dell'Edilizia* and *Contratto Collettivo Nazionale dei Lavoratori – Industria* (for managers)).



Principles No.4 and 5: Elimination of all forms of forced or compulsory labour; effective abolition of child labour

Beni Stabili applies ILO conventions

Beni Stabili applies all eight ILO conventions: freedom of association, respect of the right to collective bargaining, elimination of all forms of forced or compulsory labour, effective abolition of child labour and elimination of all forms of employment and occupational discrimination.

Considering Beni Stabili operates in Italy, the company is not exposed to the risk of forced or compulsory work or child labour. The company nonetheless has clear frameworks and procedures in place to ensure that it operates within the national legal framework.

Businesses should uphold the elimination of all forms of forced and compulsory labour & Businesses should uphold the effective abolition of child labour.

Beni Stabili does not support or practice any form of forced or compulsory labour. In addition, Beni Stabili ensures no complicity in human rights abuses. Although the company does not come into direct contact with regions that need significant legislation to protect human rights, the company still acknowledges its responsibility to address this throughout the whole supply chain through its Code of Ethics and Conduct.



Principle No.6: Elimination of discrimination in respect of employment and occupation

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Beni Stabili is committed to diversity and equality throughout the whole company and does not support or tolerate any form of discrimination. The Code of Ethics and Conduct outlines behaviours that the company will not tolerate and the appropriate penalties if the Code is not adhered to. It also includes practical suggestions to support employees who encounter behaviours that are not in line with the Code. Once a year, the Code of Ethics and Conduct is reviewed in a meeting which is open to all members of staff to attend.

A survey conducted as part of the Covivio's Ex-aequo program suggested that three-quarters of employees in the Covivio Group feel that the company is in line with, or even ahead of, good practice with regards to equal opportunities at the workplace. In particular, most employees think that men and women are treated equally in terms of training, and that women are treated fairly on internal promotions and remuneration. As part of our continuing efforts to ensure that discrimination does not happen to any of our employees and colleagues, Beni Stabili has produced a recruitment guide for human resources employees and managers and requires that a gender profile of applicants should be

drawn up as part of the shortlisting process for jobs. In 2017, it was decided to undertake an internal remuneration analysis which concluded that there is no gender pay gap issue within Beni Stabili between women and men with the same seniority and function.

To build on these results, the company continuously raises awareness of equal opportunities issues through events, conferences and workshops, and take part in a mentoring program across the Covivio Group for 22 women at executive level.

1. C. Environment

Beni Stabili has a comprehensive environmental policy, supported by long-term targets, which sets out its commitment to reduce the environmental footprint of its assets during development, renovation or management, as well as its own corporate offices. Beni Stabili acknowledges the impact it has on the environment and recognise the role it has to play in ensuring this impact does not affect the livelihoods of future generations.


Respect for the environment

7




Principle No.7: Organisations are expected to use caution when dealing with environmental issues.

8



Principle No.8: Organisations are expected to undertake initiatives to promote even more responsible environmental practices

9



Principle No.9: Organisations are expected to design and promote environmentally friendly technologies



SDGs covered in this section:



Principle No.7: Anticipate health and climate risks

Businesses should support a precautionary approach to environmental challenges.

The Control and Risks Committee governs the implementation of the Beni Stabili's risk management systems and ensures the effective and efficient running of all related controls throughout the business. The company's integrated risk management model (Internal Control System and Risk Management) is based on international enterprise risk management principles. Risks identified by our Corporate Business Model are run through the company's risk management system which assesses the requirements that the organisation needs to limit the consequences of any risk. The main aim of the company's risk management system is to ensure corporate strategic and operational objectives are met within the boundaries of laws and legislations.

As a real estate developer and owner, Beni Stabili ensures that risks related to applicable legal environmental requirements are fully assessed and mitigated across all assets. For example, in 2017 a decree from the Italian Ministry for the Environment sets minimum environmental criteria for new construction, renovation and maintenance projects for public buildings, including on energy audits, energy supply systems and minimum energy performance standards. APE (Attestato di Prestazione Energetica), the Italian equivalent of EPCs, is also required whenever a property is built, sold or rented, and it is unlawful for landlords to let space below a minimum APE standard. Beni Stabili is therefore taking the necessary steps to meet these requirements which is enabling the company to build a comprehensive understanding of the key risks to assets with the aim to develop and implement strategies to minimise risk, protect asset value and ensure environmental damage is limited.

To date 89% of the company's buildings have APE ratings and plans are in place to increase the level of these ratings. Significant investment into the company's portfolio over the coming years will increase APE ratings with the aim to meet a minimum of APE rating B on all new builds. To reduce the risk of obsolescence resulting from higher environmental standards and investor expectations which increasingly favour more sustainable buildings, Beni Stabili also requires minimum LEED "Gold" (or equivalent), BRaVe AA and EPC A certificates on all new office developments, and a minimum of LEED "Silver" (or equivalent), BRaVe A ratings and EPC B ratings on all refurbishments.

Beni Stabili recognises its responsibility and role in mitigating against environmental risks and managing the risks it, as a company, influences. Beni Stabili is committed to taking action on climate change by embedding sustainability strategies throughout the whole business as it strives to become a sustainable business. Beni Stabili's sustainability strategy identifies the most critical risks that it faces and how responses to these risks need to be prioritised and integrated into the business model. Energy, carbon, water and waste have been identified as the main environmental risks and a robust data management system is in place to monitor the utilities consumption of managed assets.

A bold set of targets for 2020 underpin our commitment to protecting and conserving the environment. Energy consumption is to be reduced by 15%, and Beni Stabili aims to carry out pilot tests to introduce systems to monitor the consumption of energy across all assets by 2020. In addition, Beni Stabili has set asset-specific targets. For example, at Milano Montebello the company

aims to use less than 200kWh/m² of electricity per year, and to cut overall waste production by 15%. Furthermore, Beni Stabili now purchases renewable electricity for all 31 of its managed assets. As a result of these and other energy reduction initiatives introduced across our portfolio, the business saw emissions associated with electricity consumption fall from 11,492 tonnes CO₂e in 2015 to 841 in 2017.



Principle No.8: Businesses should undertake initiatives to promote greater environmental responsibility

Businesses should undertake initiatives to promote greater environmental responsibility.

Building green assets

Since 2016, all developments and renovations have systematically undergone an environmental certification process (BREEAM, LEED and ITACA). Beni Stabili set itself the target of 50% of its offices to be green by the end of 2020. This figure stood at 54% at the end of 2017 and a new target at 2022 was set.

Beni Stabili has also set itself a target of reducing carbon emissions by 50% between 2015 and the end of 2020 in the directly-managed portfolio. It is making changes to its renovation policy, investment policy and transport policy, and increasing the use of green electricity.

Promoting Biodiversity

Beni Stabili strives to protect and promote biodiversity in its various projects. Biodiversity erosion is a major concern in the real estate sector; the 5 main causes are: overexploitation of natural resources, destruction and disruption of species' natural habitats, pollution, introduction and proliferation of invasive non-native species and climate change.

In 2017, 28 multi-let offices buildings of the Beni Stabili portfolio were analysed as part of the Group's mapping exercise aiming to calculate its impact on biodiversity.



Principle No.9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

Businesses should encourage the development and diffusion of environmentally friendly technologies.

Beni Stabili actively encourages the development and application of environmentally friendly technologies whilst undertaking initiatives to promote greater environmental responsibility. The company aims to position itself as a leader within its sector, differentiating itself from its peers through a commitment to investing in technology and innovative designs that improve environmental and social outcomes.

Beni Stabili's Product Innovation Team focuses on incorporating sustainability into the design, development and operation of its assets. There is a specific focus on product labelling, energy, water, waste, tenants, enhancement of the public realm, community well-being and procurement. Research underpins much of the company's approach and the team have collaborated successfully with external partners including the Polytechnic University of Milan to produce a database of sustainable construction materials (which can be found on our website), and more recently to explore innovations in the public sphere and create an Innovation Hub where start-up enterprises can work together to explore business ideas.

Beni Stabili's Symbiosis project in Milan demonstrates its holistic focus on innovation to enable sustainability, community, wellbeing and smart-working. This 125,000 m² business district encompasses 15 buildings including offices and retail outlets that aim to demonstrate the latest technologies within a popular historical area of Milan. The vision for the area is focused on connections, with free Wi-Fi at all times and pedestrian paths fitted with LED lighting. The buildings' management systems will reduce energy use by switching off air conditioning and lighting when it is not needed. LED lighting will be suspended from the ceilings with daylight sensors, and photovoltaic panels on rooftops will generate renewable electricity for 50% of the development. The remaining power will come from certified renewable sources provided through the grid.

The project incorporates a 13,000 m² common area complete with a main stage, fountains and outdoor work spaces. Initiatives with tenants such as Fastweb, where both parties will work together to support the health and wellbeing of employees, demonstrate the commitment of Beni Stabili to mutual cooperation on sustainability issues to meet the needs of surrounding communities.

In 2017, we began a partnership with Milan Municipality to develop a green e-mobility driverless transport system to connect Symbiosis with the Milan public transportation network. The project compliments earlier efforts by Beni Stabili to promote the use of electric vehicles in Milan in response to growing health risks and concerns revolving around increased pollution levels. Since 2013 Beni Stabili has installed electric vehicle charging stations that are free for tenants. By the end of 2017, ten assets were equipped with the stations, among which are our two head office buildings in Milan and Rome.

The process of greening our standing assets continues at pace. Across our standing portfolio we seek to reduce our footprint by employing environmentally friendly technologies and encouraging more responsible practices. For example, in 2017 we started the renovation of Montebello 18 asset in Milan in conjunction with Intesa Sanpaolo. Beni Stabili agreed a green lease with Intesa Sanpaolo that will commit both parties to investing in measures that will increase the sustainability performance of the building. The project involves a full fit-out of the building, including new windows, new electrical and mechanical systems, and a thermal power plant with a high efficiency air to air heat pump system. The renovation will aim for LEED Core and Shell 'Gold' certification.

In total, Beni Stabili submitted seven properties for certification against the BRaVe sustainability standard in 2017, and carried out tests piloting the BREEAM In-Use Volume Sampling methodology for 22 buildings. The aim of this scheme is to drive down energy costs, improve the resilience of our

assets and to continue to support environmental technologies and innovation. Indeed, 54% of assets were classified as 'green' at end of 2017, and this increased to 67% by the middle of 2018. The Beni Stabili's long-term plan is to increase the coverage of buildings with green certificates (LEED, BREEAM or equivalent rating systems) to 80% by 2022, and embed green certificates within future developments.

The company also continues to target energy efficiency improvements through the installation of LED lighting, systems to monitor heating consumption and internal improvements to thermal power plants. Energy data is collected on a quarterly basis from the managed assets to accurately measure and report on our usage and impact. Through this the company has been able to establish baselines and long-term targets for the reduction of energy, carbon, water and waste consumption. In 2017 Beni Stabili's Sustainability Committee gave the go ahead of the pilot use of smart metering of electricity and water at the new Via Schievano 7 development which is under construction. The pilot will examine the compatibility of smart metering technology with our existing energy management systems. Lessons learned on the project will be used to inform the way smart meters are used over the next few years in other developments.

Other innovative pilot features launched at Via Schievano 7 include the use of building information modelling (BIM) applied throughout the construction project, from design to management. Beni Stabili also submitted the development for certification under the worldwide BiodiverCity label which assesses and rates the performance of construction projects that take biodiversity into account. Beni Stabili is the first Italian company to submit a development for certification under this scheme.

1.D. Fighting corruption

Beni Stabili takes fighting corruption and the supporting governance structures and policies surrounding it seriously. Eliminating the risk of fraud and corruption remains a priority even though no wrongdoing has been recorded at Beni Stabili since its creation.

Integrity, loyalty and respect for others and compliance with regulations are the behaviors Beni Stabili promotes and expects among all staff, but also from stakeholders and more specifically from its suppliers through the Responsible Purchasing Charter.

FIGHTING CORRUPTION



Principle No.10: Businesses are expected to fight all forms of corruption including extortion and bribery.

SDG covered in this section:



Businesses should work against corruption in all its forms, including extortion and bribery.



Principle No.10: Preventing the risks of fraud and corruption

Beni Stabili works against corruption in all its forms and addresses issues including, but not limited to, bribery and corruption in all its forms, including extortion of funds and bribes across the whole organisation and supply chain. Beni Stabili is committed to respect all national and international legislations regarding money laundering.

A Code of Ethics leverage of responsibility

Since 2003 Beni Stabili has adopted an Organisation, Management and Control Model (pursuant to Italian Legislative Decree no. 231/2001) that provides for rules, measures and preventive and disciplinary procedures deemed appropriate to reduce the risk of offences being committed within the company, thus exempting the company from administrative liability. This is underpinned by the Code of Ethics and Conduct. The adoption of the Model and the Code of Ethics and Conduct is one of the main prerequisites for the effective functioning of the internal audit and risk management system. Compliance with the Model and its effective implementation are guaranteed by a collegial body, specifically established pursuant to the relevant legislation, with independent powers of initiative and control, called the Supervisory Body. Among its functions, the Supervisory Body has the task of ensuring the adequacy of the Model and its constant

implementation, monitoring the effective application of the rules contained therein and ensuring its effective implementation. In this way, Beni Stabili ensures that all operations are monitored and assessed for risks of corruption.

In 2017 the Beni Stabili's Code of Ethics and Conduct was updated alongside Covivo and circulated to all employees. Within the Code it is stated that it is strictly forbidden to propose and pay for, as well as receive and accept bribes. It is also strictly forbidden for any Beni Stabili employee to benefit from and/or offer advantages from and/or to any third party with the aim of taking advantage or influencing businesses. In 2017, Beni Stabili received no corruption-related sanctions, and no confirmed incidents against any employee were made.

When establishing a new partnership with an external company, Beni Stabili has a strict procedure which requires to verify the moral reputation and integrity of the potential partner, and gather and audit all available evidence. In addition, within the Code of Ethics and Conduct Beni Stabili has included practical suggestions to give further guidance to our employees about bribery and corruption.

The implementation of The Code is closely monitored and evaluated by the Ethics Officer and Internal Control Committee. Any risks of conflicts of interest or potential instances of bribery and corruption from a third party can be reported to the Ethics Officer for investigation and follow up by actions.

Regular trainings are conducted on anti-corruption policies and procedures to ensure all employees are aware of the Code and its requirements. For example, in 2017, all employees, including consultants, managers, senior executives and members of the Board of Statutory Auditors, undertook a mandatory training on anti-corruption policies and procedures, including the Organisation, Management and Control Model and the Code of Ethics and Conduct. The training programme was targeted according to the needs of each group: from general contents for employees and consultants to more detailed risk-based learning for managers and executives. The contents covered not only the Code of Ethics and Conduct, but also the policies and procedures in place required to embed correct behaviours supported by practical examples and scenarios.

Useful links

2017 Beni Stabili Sustainable Development Report

http://www.benistabili.it/static/upload/ben/beni-stabili-report-2017_-25-06-18-_pagine-doppie.pdf

2017 Beni Stabili Financial Report

<http://www.benistabili.it/static/upload/ben/beni-stabili-siiq---consolidated-half-year-financial-report-as-at-30-06-18.pdf>

Beni Stabili's COPs are available on the Global Compact website

<https://www.unglobalcompact.org/what-is-gc/participants/101671-Beni-Stabili-S-p-A-SiiQ>



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