

Communication on Progress of Global Compact 2017/2018



Objective:

This report intends to evaluate the implementation of goals and principles of Global Compact in our structure.

Period covered by the Communication on Progress (COP)

From: August 2017

To: December 2018

General Consul:

Cynthia Almeida de Oliveira.

International Affairs and Global Compliance:

Álvaro Augusto Camilo Mariano

Team:

- ✓ Álvaro Augusto Camilo Mariano;
- ✓ Cynthia Almeida;
- ✓ Carlos Eduardo Rosa;
- ✓ Danne Evelin;
- ✓ Eléia Alvim Barbosa de Souza;
- ✓ Flávio Rodovalho;
- ✓ Ivan Henrique de Souza Filho;
- ✓ José Carlos Issy;
- ✓ Leonardo Issy.

Trainees:

- ✓ Letícia Postae;
- ✓ Marcella Domingues;
- ✓ Amanda Machado.

Paralegal aides:

- ✓ Midori Tanaka;

✓ Rita Lima Alves.

February 5th, 2019

United Nations

António Guterres
Secretary-General
777 United Nations Plaza 44th St
New York, NY 10017,
USA

Re: Communication on Progress of Global Compact 2017/2018

Dear Sir,

We are pleased to confirm once more that Rodovalho Advogados (“Rodovalho” or “Company”) keeps its support on the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption.

In this annual Communication on Progress, as we have done previous years, we describe our actions to integrate the Global Compact and its principles into our business strategy, culture and daily operations during the period above referred.

We also reaffirm we are committed to share this information also with our stakeholders using our primary channels of communication.

Yours sincerely,

Flávio Rodovalho
Chief Executive Officer (CEO)

Preface

Rodovalho Advogados is a law firm that acts in diverse areas, such as tax law, labor law, contracts law and corporate law. Headquartered in Goiás, an inland state of Brazil, the firm focuses in high specialized and in customized services, which are rendered according its customers' necessities.

The firm joined the UN Global Pact in 2010 and this is the report.

Human Rights Principles

Principle 1: Business 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

Rodovalho Advogados always focus on individuals, communities and environment. According to our point of view, there is clear evidence that our central measure is the respect for human rights while we recognize the moral imperative to operate with its principles. In this context, the respect for human rights also can be a tool to improve business performance and as example of our actions, we have the following actions:

- We have compliance with local and International Law, including Human rights principles;
- We ensure that our business operations are in compliance with these principles, which helps to avoid legal incidents in our global activities;
- We address all consumer concerns by increasing attention to business role while protecting human rights. As a general rule, establish and enforce a meaningful approach to human rights avoids any violation, as well as limit their impact on the company if it happens and in the meanwhile, protect the overall image of the office;
- We promote the rules of the Law by using the principles enunciated in the Universal Declaration of Human Rights which involves the creation of a stable,

rule-based society that is essential to the smooth functioning of business. Applying human rights principles thoroughly, consistently and impartially to a global office operation can contribute to develop the legal system. It is worth considering that contracts enforced fairly, bribery and with corruption are less prevalent when all business entities have equal access to legal process and equal protection under law. Besides, avoiding human rights violations helps to maintain positive community relations and contributes to further stable and productive business environment;

- As a mandatory rule to be followed by Rodovalho team, we wrote a company policy to respect Human Rights and prevent potential abuses;
- Our policy requires business partners and suppliers to adhere to Human Rights principles;
- We have specific goals in Human Rights area for the upcoming year, as: continue improving human well-being; increase development strategies to concern economic growth; human rights establish universally with legal guarantees to protect the freedom and equality of all individuals; human rights standards and obligations to put the government at the service of people to ensure that everyone benefits from growth and enjoys a life with dignity.

Implementation

As concrete actions to implement Human Rights policies, reduce Human Rights risks and respond to Human Rights violations we have:

- A department of complaint to serve clients when they may not meet their expectations. These clients are welcome to raise a concern about the department or a funded service provider through our complaints management process and our compliance service;
- We have awareness raising and training employees on Human Rights;
- We allocate responsibilities for the protection of Human Rights within our company;
- We have human resource policies and procedures supporting Human Rights.

Measurement of outcomes

We never had any incident of Human Rights violation involving our office as a defendant. If it was the case, we would be delighted to review our policies and team after consulting our compliance department.

Nowadays, we operate as attorneys in legal cases related to Human Rights which involve once in a while violations. Thus, we have periodic review results inspected by our CEO and the compliance department to avoid these problems.

Labor Principles

Principle 3: Business 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 labor;

Principle 5: The effective abolition of child labor; and

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

Assessment, Policy and Goals

- We use as reference to Labor Principles the ILO Core Conventions and other international instruments;
- Rodovalho complies strictly with requirements and parameters required by Brazilian labor rules
- Our Corporate Governance includes respect to human rights as a formal criterion in our purchasing decisions and investments;
- We guide our operations in accordance with the Global Compact Principles and supporting the Millennium Development Goals;
- The office vision and strategy includes contribution with regard to sustainable development;
- We have formal mechanisms and systems for periodic evaluation of our members by our compliance department;
- We follow common practice of price competition to the market, comply with legislation and apply for the principles of corporate governance and Global Compact;
- We wrote a company policy to uphold the freedom of association and the elimination of forced labor, child labor and employment discrimination. We also have policies that clearly state employee rights and responsibilities and their compensation and benefits;
- Our policy requires business partners and suppliers to adhere to labor principles;
- Protect labor rights of employees and business partners employees leads to

increase productivity. That is a general consensus that workers treated with dignity and respect are more likely to be productive.

- To sum up, companies that avoid human rights and labor rights violations can also reduce employee turnover and achieve higher product quality.

Implementation

Rodovalho concrete actions to implement labor policies, reduce labor risks and respond to labor violations complies with Global Compact principles, as:

- Our office has a complaint task to serve clients and a compliance department to control all business turning;
- We are aware raising and training employees on labor rights and policies, including ensure health and safe conditions for all employees;
- We prevent discrimination of all kinds and ensure comparable pay for comparable work;
- We have allocation of responsibilities for the protection of labor rights within our company;
- We have human resource policies and procedures supporting the labor principles.

Measurement of outcomes

We never had any problem inside our office with Global Compact labor principles violation, involving our office as a defendant.

However, we have legal cases proving clients labor problems and we have always contribute to solve them by operating as their attorneys.

We also have a periodic review of results by our CEO and our compliance department to avoid these labor problems.

Environmental Principles

Principle 7: Business should support precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote great environmental responsibility; and

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

Assessment, Policy and Goals

- Rodovalho complies strictly with requirements and parameters required by Brazilian environmental rules;
- We also develop internal programs for environmental improvement, especially in terms of prevent not necessary printings; in addition, we have implemented practice of reusing printed paper, as well as its ultimate destination exclusively for recycling;
- We prioritize preventive policies and we have professionals especially dedicated for international affairs and environment policy;
- Rodovalho always participates of local councils to discuss environmental issues with the government and society and we have already implemented processes mapping and analysis to improve our environmental quality.
- Our company develops environmental education activities focused on the workforce, supplies and clients;
- Rodovalho performs internal actions to promote responsible consumption, disposal of solid waste and to reduce water and energy consumption;
- To contribute towards conservation of forests and combat illegal consume and predatory, as well as protect biodiversity, the timber supplies used in daily activities have certification of origin;
- In order to prevent and reduce environmental damage and optimize process, the company has invested in technological upgrading, targeting and to reduce the use of inputs and environmental certification of origin and reuse of waste, sustainable consumption of energy and water. Rodovalho has control about chain of custody in materials and solid waste releases results to internal

and external audiences.

Implementation

Our concrete actions to implement environmental policies, reduce environmental risks and respond to environmental incidents are:

- Initiatives and programmers to reduce waste materials, as recycling, and consumption of resources, as energy, water, electricity and paper;
- We are constantly aware raising and training employees on environmental protection;
- We frequently have activities to improve the energy efficiency of products, services and processes; recently, part of our computers and other electronic equipment has been exchanged for more efficient ones;
- Development and diffusion of environmentally friendly technologies;
- We have a compliance department to manage our environmental system seeking to identify, monitor and control the company's environmental performance;
- Rodovalho has allocation of responsibilities for environmental protection within our company;
- Recently we have implemented new policy for printing in order to avoid unnecessary prints and, if imperative, use recycle paper and printing in the both sides in draft mode, except if extremely inescapable.

Measurement of outcomes

The office monitors and evaluates performance of employees constantly and we never had any problem involving environment principles violation regarding Rodovalho as a defendant.

Furthermore, we follow the environmental laws in all kinds and we take for granted our contribution to the world regarding Global Compact principles. However, we have some legal cases involving daily problems with environment violation by companies and citizens and by this, we can solve the untoward behavior by working on the case to find a better solution and review with these violators a change of

actions.

We also have a periodic review of results by our CEO and our compliance department to avoid these environmental problems.

Anti-Corruption Principles

Principle 10: Business should work against corruption in all its forms, including extortion and bribery.

Assessment, Policy and Goals

- Rodovalho wrote a company policy of zero-tolerance for corruption, bribery and extortion to avoid these current problems;
- We support the UN Convention Against Corruption and many other international instruments;
- The company has a protocol to guide staff in situations where they are confronted with extortion or bribery;
- Rodovalho has a policy requiring business partners and suppliers to adhere to the anti-corruption principles;
- In the relationship with authorities and tax officials of public authorities at all levels, the company made public commitments to combat corruption and bribery and maintains posture recognized by internal and external audiences about the prohibition of direct or indirect encouragement of government agents;
- Rodovalho fully complies with the Brazilian Law n. 12.846, of August 1st 2013, which has implemented international rules about anti-corruption policy.

Implementation

As concrete actions to implement anti-corruption policies, reduce anti-corruption risks and respond to incidents we have:

- Rodovalho has updated its anti-corruption protocol in compliance with the recent amendments to Brazilian Law no. 12.846 of 2013 and also with the regional Antibribery Law of State of Goiás (its headquarter state), as well as other regulatory rules;
- The company has provided recurrent training to its whole team regarding the federal and regional Anti-Corruption rules by means of courses, meetings and other similar events;

- We have also participated in many round tables promoted by Brazilian Bar Association (“OAB”) and other industrial, commercial and professional associations in order to discuss the particularities of Brazilian and regional anti-bribery rules;
- A department of complaint to serve clients when we may not meet their expectations and we also have a compliance team to welcome these clients about their concerns;
- We also have awareness raising and training employees about company's policies regarding anti-corruption and extortion by e-mail, internet, internal communication and others;
- We allocate responsibilities for anti-corruption within the company;
- Rodovalho has always participated in industry initiative and collective actions on anti-corruption.

Measurement of outcomes

We never had any incident of Corruption involving our office as a defendant, but if it was the case, we would be delighted to review our policies and our team behavior. Nowadays, we operate in legal cases related to Anti-Corruption and we have periodic review results inspected by our CEO and our compliance department to avoid Corruption problems.

Comments:

- As shown by the report, Rodovalho Advogados has several actions aligned with the objectives and principles of Global Compact, sometimes only missing the formalization of the process to include policies already adopted and evaluation mechanism that allows the development of goals;
- In addition, the number of information has allowed us to observe that despite failures of communication found, the company can promote its principles and code of conduct to both the internal and external public and is well evaluated by its employees, clients, competitors, government, class political and local community.

Opportunities to explore:

Through the dissemination of the Global Compact to establish themselves as local and regional business class to implement the Millennium Goals and expand their business opportunities.

Target for the next application:

- Implementation of the process mentioned in the report;
- Expand disclosure forms of actions and policies undertaken by the company with the public.