

**COMMUNICATION ON PROGRESS (COP)
BASIC TEMPLATE**

Period covered by your Communication on Progress (COP)

From:

To:

1. STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER (OWNER OR PRESIDENT IN THE CASE OF SMALL BUSINESSES)

Rome, 12 June 2019

To our stakeholders:

I am pleased to confirm that Translated Srl reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Marco Trombetti

CEO



Translated S.r.l.
Via Indonesia n.23
00144 Roma (RM)
P.IVA 07173521001

2. DESCRIPTION OF ACTIONS

Human Rights

Translated supports and respects the protection of international human rights within the sphere of our influence, and ensures that we are not complicit in human rights abuses.

Translated is a socially accountable company. We will conform to all requirements of SA 8000. In addition, we will comply with our company policies, national and international law, and respect any international instruments and their interpretation on Social Accountability, including, but not limited to, ILO Conventions 29, 87, 98, 100, 105, 111, 135, 138, 155, 159, 177, 182, ILO Recommendations 146, 164, the Universal Declaration of Human Rights, The U.N. Convention of the Rights of the Child, and the U.N. Convention to Eliminate All Forms of Discrimination Against Women.

We will strive to continually improve the ways in which we promote, communicate and manage Social Accountability with our employees, our customers, our suppliers and the community at large.

We will ensure that this policy is reviewed periodically, communicated and is accessible to all staff, including directors, executives, management, supervisors, and staff, whether directly employed, contracted or otherwise representing the company and is publicly available, upon request. Translated will continue to encourage all suppliers and contractors to comply with the same standards. workers are provided safe, suitable and sanitary work facilities.

Translated provides a safe and healthy working environment at all sites and facilities, and takes adequate steps to prevent accidents and injury to health by minimizing the causes of hazards in the working environment.

Translated ensures that no children or workers are exposed in situations inside or outside the workplace that are hazardous, unsafe, or unhealthy.

Translated has appointed the Corporate Manager – Environmental, Safety, Security, a senior member of management, as its representative responsible for the health and safety of all personnel and accountable for the implementation of all SA 8000 health and safety standards.

Labour

Child Labour: Translated complies with local minimum age laws and requirements, and does not employ child labour.

Minimum wages: Translated compensates our workers with wages and benefits that meet or exceed the legally required minimum. Translated does not dock or withhold pay for disciplinary or punitive reasons.

Translated does not require employees to work more than the maximum hours of daily labour set by local laws. Translated complies with overtime pay requirements. Translated limits overtime to avoid exceeding 12 hours per week.

Forced Labour: Translated ensures that forced labour is not used in the production of Translated's products and ensures that the overall terms of employment are voluntary. No personnel are required to lodge "deposits" or identity papers upon commencing employment with Translated

Harsh or Inhumane Treatment: Translated prohibits physical abuse, harassment, mental or physical coercion and verbal abuse or the threat of any of the foregoing.

Freedom of Association: Translated respects the rights of workers to organize in labour unions in accordance with local laws and established practice.

Environment

Translated Srl is committed to being a leader in environmental sustainability, both in the way we carry out our operations and in the products and services we offer.

Environmental sustainability at Translated means conducting our business in a manner that acknowledges, measures and takes responsibility for our direct and indirect impact on the environment. This means that we will conserve energy, dispose of waste responsibly, and reduce

pollutants and other byproducts our activities may generate. By conducting our business in this manner, we align our long-term success with the Earth's ecological well-being, and create enduring benefits for our shareholders, customers, employees and the communities in which we live and work.

In addition to our general corporate policy statement above, which has officially been in place since May 2013, we would like to highlight specific ways in which our company and employees embrace the importance of the environment around us and the world that in which we cohabitate at our PI campus locations in Rome, Italy - <https://picampus.it/>.

We operate our offices and conduct our activities taking into consideration the efficient use of energy and materials:

- Low consumption lights
- Low consumption appliances, such as printers, dishwashers, monitors, etc.
- Low usage of paper (99% of paper used in office is related to tender submissions)
- Printers print front to back

We reduce and where possible eliminate waste:

- No or low usage of plastic policy in kitchens
- Cloth hand-dryers in bathrooms
- Donating and/or reusing electronic equipment when possible
- Differentiated recycling program

We minimize the environmental risks to our employees and the communities in which we operate:

- Smoke-free buildings and designated smoking areas
- 4% employee salary increase for quitting smoking
- 4% employee salary increase for bicycling to work.

Anti-Corruption

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.

Translated declares and guarantees as well that until now no offer, gift or payment of any kind, which constitutes an illegal or corrupt practice, has ever been or will be made to anyone by Translated, either directly or indirectly as an inducement or reward for the award or execution of any project.

Our goals are to continue to act as we did until and to provide education for all levels of employees up to management and clients about corruption and how to avoid it.

3. MEASUREMENT OF OUTCOMES

We are very proud to declare that, thanks to our policies in support of the Ten Principles of the United Nations Global Compact, in our agency there is no discrimination on race, colour, age, gender, sexual orientation, ethnicity, religion, disability, union membership or political affiliation whatsoever;

that we all recycle materials like plastic, papers, glass, etc. and do not print any document unless absolutely necessary; and

that our offices are a very healthy and safe environment where employees can practice sports, receive massages and swim.

Rome, 12 June 2019

RE: Code of Conduct

To Whom It May Concern:

I, Isabelle Andrieu, a legal representative of Translated Srl, declare that we support the UN Global Compact principles; that we monitor our own sustainability performance; and that no deviations from the UN Global Compact are valid for Translated and its suppliers who take part in the delivery of translation services.

Sincerely,

Isabelle Andrieu
Co-founder & President


Translated S.r.l.
Via Indonesia n. 23
00144 Roma (RM)
P.IVA 07173521001

Rome, 12 June 2019

Dear Stakeholders,

We are pleased to confirm that Translated Srl supports the Universal Declaration of Human Rights including all 30 articles contained therein.

With this communication, we reconfirm our intent to advance those principles within our sphere of influence in the global freelance translator industry. We are committed to including the international human rights principles as part of our strategy, culture and day-to-day operations of our company.

Sincerely yours,  Translated S.r.l.

Via Indonesia n.23
00144 Roma (RM)
P.IVA 07173521001

Isabelle Andrieu
Co-founder & President

Rome, 12 June 2019

SOCIAL ACCOUNTABILITY POLICY

General Statement

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Forced Labour

Translated ensures that forced labour is not used in the production of Translated's products and ensures that the overall terms of employment are voluntary. No personnel are required to lodge "deposits" or identity papers upon commencing employment with Translated.

Child Labour

Translated complies with local minimum age laws and requirements, and does not employ child labour.

Health and Safety

Translated provides a safe and healthy working environment at all sites and facilities, and takes adequate steps to prevent accidents and injury to health by minimizing the causes of hazards in the working environment. Translated ensures that no children or workers are exposed in situations inside or outside the workplace that are hazardous, unsafe, or unhealthy. Translated has appointed the Corporate Manager – Environmental, Safety, Security, a senior member of management, as its representative responsible for the health and safety of all personnel and accountable for the implementation of all SA 8000 health and safety standards.

Minimum Wages

Translated compensates our workers with wages and benefits that meet or exceed the legally required minimum. Translated does not dock or withhold pay for disciplinary or punitive reasons.

Working Hours

Translated does not require employees to work more than the maximum hours of daily labour set by local laws. Translated complies with overtime pay requirements. Translated limits overtime to avoid exceeding 12 hours per week.

Discrimination

Translated prohibits discrimination based on race, colour, age, gender, sexual orientation, ethnicity, religion, disability, union membership, or political affiliation.


Harsh or Inhumane Treatment

Translated prohibits physical abuse, harassment, mental or physical coercion and verbal abuse or the threat of any of the foregoing.

Freedom of Association

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Isabelle Andrieu
Co-founder & President

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Rome, 12 June 2019

DIVERSITY POLICY STATEMENT

The purpose of this policy is to provide diversity and equality to all in employment, irrespective of their gender, race, ethnic origin, disability, age, nationality, national origin, sexual orientation, religion or belief, marital status and social class. We oppose all forms of unlawful and unfair discrimination.

All employees, whether part time, full time or temporary, will be treated fairly and equally.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilized to maximize the efficiency of the organization.

Our commitment:

Every employee is entitled to a working environment which promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.

The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.

Breaches of our diversity and equality policy will be regarded as misconduct and could lead to disciplinary proceedings.

This policy is fully supported by senior management and has been agreed with employee representatives.

The policy is monitored and reviewed annually. T

Sincerely yours,



Isabelle Andrieu
Co-founder & President
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Rome, 12 June 2019

ENVIRONMENTAL SUSTAINABILITY POLICY STATEMENT

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In addition to our general corporate policy statement above, which has *officially* been in place since May 2013, I would like to highlight specific ways in which our company and employees embrace the importance of the environment around us and the world that in which we cohabitate at our PI campus locations in Rome, Italy - <http://www.pi-campus.it/>.

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Isabelle Andrieu
Co-founder & President


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Via Indonesia n. 23
00144 Roma (RM)
P.IVA 07173521001

Rome, 12 June 2019

ANTI-CORRUPTION DECLARATION

General Statement

TRANSLATED declares that it is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.

TRANSLATED declares and guarantees as well that until now no offer, gift or payment of any kind, which constitutes an illegal or corrupt practice, has ever been or will be made to anyone by TRANSLATED, either directly or indirectly as an inducement or reward for the award or execution of any project.

Sincerely yours,


Translated S.r.l.
Via Indonesia n. 23
00144 Roma (RM)
P.IVA 07173521001

Isabelle Andrieu
Co-founder & President

Rome, 12 June 2019

To Whom It May Concern:

I, Isabelle Andrieu, Co-founder and President of Translated Srl, declare that we are currently not on the removed or suspended vendor list of the UN or other such lists of other UN agencies, nor are we associated with, any company or individual appearing on the 1267/1989 list of the UN Security Council..

Sincerely,


Translated S.r.l.
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Isabelle Andrieu
Co-founder & President