

General

Period covered by your Communication on Progress (COP)

From: June 2018 To: June 2019

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:

In our COP eighth year, 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. Specifically in 2020 the Ten Principles have offered very useful guidelines to cope with the world crisis due to the Covid-19 pandemic and help us start support programs for ourselves and the Italian SMEs, backbone of our country. This is reflected in the 2020 Annual Communication on Progress, where we report our actions and efforts over Financial, Environmental and Social Responsibility and Ethics.

In 2019 eFM S.P.A. has concentrated on becoming international, therefore increasing attention to diversity, which meant focus on different countries, approaches, laws, ethical principles, keeping likewise management transparency and stakeholder involvement. Attention was devoted to learning different cultures and ensuring respect for diversity.

In 2019 eFM has reinforced as well our attention to privacy matters, adhering to GDPR (General Data Protection Regulation CE216/679) and to our Ethical Code application, 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.

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. Specifically, such solutions were enabled by our new workplace, characterized by an extraordinary attention to people, wellbeing, health, work-life balance. Specifically, we opened a new branch in Milan, geared around the concept of Open Office towards the City and all the Citizens: several events take place monthly to involve the stakeholders at large in social and civic matters to improve all people's lives.

As part of eFM daily activities, eFM values and principles, internal and/or externally applying 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 provides 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.

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 each individual 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

The value of each individual is 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 we improving the sustainability awareness.

Sincerely Yours.

Daniele Di Fausto,

CEO eFM


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.

First of all, during 2020 eFM has focused on ensuring health safety for its workers, Clients, suppliers and network to protect them from the pandemic Covid-19 virus. In addition to ensuring employees' health and safety, eFM enacted all strategies and policies to assure jobs for everybody in the company. Adhering to the principle that work is at the basis of human dignity, eFM laid the basis for stimulating and supporting Italian SMEs restart productive activities and rebuild the market .

2019 eFM has focused on making the Milan office the center of the city, designing it to keep people at the center of all our activities. Secondly, eFM has opened other branches in different countries, such as Boston, Munich, Istanbul, Santiago, exporting the same human rights principles. Also, implementing its Service Delivery Platform helped facilitate manual work and make it safer and less repetitive.

eFM's 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 normally has an annual meeting in which eFM shares and openly discuss with all the employees the company values, mission and vision. However, as eFM is continuously looking forward to our Mission, in May 2019, the Board of Directors decided to held an extra company meeting 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 , as last year, 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, smartworking, digital transformation, well being, wellness, 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 the year 2020, to fight against the economic downturn caused by the Covid-19 crisis and in compliance to the Prime Minister's directives, eFM has issued procedures to ensure safety of all employees both at home, at the office, at Clients' sites and while travelling. eFM has provided its employees with all the needed PPEs to ensure they could work safely in any environment. Besides, in order to fight the crisis ourselves, we all (including the Board members) decided, on a voluntary basis, to renounce to a percentage of our salary for the crisis months.

In addition, eFM promoted **Venture Thinking**, an ecosystem acceleration program for SMEs, based on the principle of collaborative economy. The program is based on the investment in "solidarity innovation" of large companies, which offer: a. a community of TOP managers and TOP Thinkers (national and international) who make available ideas, relationships, projects to overcome the crisis; b. training programs guaranteed by IESE (the world's number 1 Business School in Executive Education) which allow managers and companies access to high level skills and tools, otherwise difficult to afford. For more information visit www.venturethinking.it.

In 2019, in changing our offices 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's 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 2018-2019 so far are the following:

- 1) We have implemented a Welfare web portal for all employees and partners, where services to the person are available and can be utilized at little or no cost.
- 2) We have made available different professional services at no cost for personal well-being, such as physiotherapy, massotherapy, mindfulness sessions and the like.
- 3) Special summer camps and summer schools were developed and offered to all employees with children.
- 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.

- 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.

- Investigations, legal cases, rulings, fines and other relevant events related to Human Rights
- Periodic review of results by senior management
- External audits of Human Rights 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.

For example, we took the decision of cutting our salaries through a democratic survey and we measured our feelings prior to the decision and after some time to analyze our willingness and ability to deal with this decision overtime.

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.

eFM also in 2019 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 NORTH AMERICA, GERMANY, 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 man agent 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

Starting in 2019 eFM adopted a radical Smart Working policy to implement sustainability policies and help employees reach better work-life balance. This approach, based on trust between eFM and its employees, is in line with the new organization teal model adopted by eFM, where the positions within the teams are temporary and voluntary/elective. The approach aims at encouraging self-entrepreneurship, collective and shared choices, managerial growth for all.

In 2020, during the lockdown period, eFM decided to implement a series of policies and "rituals" to increase wellness, decrease social distance, increase employee involvement and improve their emotional state.

In 2019 eFM S.P.A. has concentrated on becoming international, therefore increasing attention to diversity, which meant focus on different countries, approaches, laws, ethical principles, keeping likewise management transparency and stakeholder involvement. Attention was devoted to learning different cultures and ensuring respect for diversity.

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 , Boston, Munich, Istanbul, Santiago, 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.

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.

Starting in 2019 eFM adopted a radical Smart Working policy, extended to all employees with maximum freedom of time (up to 4 days a week, against the average of 1 day per week for the vast majority of companies). The procedure is easy: it is enough to the team coordinator know, without any other prescription.

In 2020, during the lockdown period, eFM implemented a series of policies and "rituals" to increase wellness, decrease social distance. Every morning at the beginning of the working day and every night at the end we meet virtually to make sure we all well, organize our day and celebrate accomplishments. These meetings make people feel safe and cared for, increase employee involvement and improve their emotional state.

During the lockdown eFM has organized on-line activities for children who were not attending schools to partake in their education and relieve their parents.

In 2019 our new Milan office was created to be the center of the city, designing it to keep people at the center of all our activities. Our office mingles with the city, without boundaries. Our new Milan office 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.

We have filled our office 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 are aiming to audit it by end of 2019 in order to continuous improvements in health and safety.

In 2019 our employees have been trained on the D. Lgs 81/08 and our management on the

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 trainings are announced and encouraged by our management on Yammer, these are 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.

During the 2020 lockdown eFM has administered several questionnaire and survey to understand and measure the level of distress brought about by the pandemic and find ways to diminish it. Our emotional survey taken every day showed that at the beginning of the pandemic most people felt alone, afraid, sad, while after eFM caring activities the overwhelming feeling were happiness and gratitude.

Over the course of the year 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)

Environmental Principles

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

The Smart Working policy implemented by eFM much prior to the lockdown showed benefits in terms of decrease in CO₂ emissions.

Our new offices have 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:

- promoting sustainable workplace policies and implementing 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.
- investing in responsible energy use; educating and supporting our people in making sustainable decisions;
- working on environmental protection projects; and cooperating 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

Smart Working implemented 4/5 days/week prior to lockdown and 5/5 during lockdown produced much cleaner air and reduce the number of emissions. Technology tools and supports were distributed to all employees to ensure everybody could work safely from home. eFM kept ensuring maximized efficiency in the company's own operations to minimize its environmental impact.

Our new HQ is 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's environmental policy include training employees on the environmental policies, periodic internal audits, management review meetings, environmental programs such as reducing hazardous and nonhazardous waste. By end of 2019 we will re-certificate our integrated system such as 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.

Real Estate Platform (myeFM). Our real estate management platform enables constant monitoring of the performance of service contracts and their significant improvement (e.g. execution time of a repair of the heating system; intervention time for window breakage; etc). These actions have an important effect above all on improving the quality of the working environment (air, cleaning, etc.) and the energy performance of buildings (up to 3%). These "environmental" effects are monitored and reported to the customer who, in addition to the economic benefits of saving, can also demonstrate the effects of its action on the environment. SMART WORKING. In 2019 - 2020 eFM adopted a radical Smart Working policy, opening it up to the entire corporate population, and extending it up to 4 days a week. If it is calculated that the savings per person of an average smart worker (1 day a week) is 135 kg of Co2 per year, we can estimate by default that for the 250 people of eFM the contribution in reducing CO2 emissions was about: 50,000 kg of CO2 less for 2019.

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 (eg. 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 behaviour 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 2019 our EMS 14001 certification will be verified and updated.

We send alerts and reminders 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 in 2013, we also implemented 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 2019 we kept implementing training sessions opened to all employees about our company's 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