General

Period covered by your Communication on Progress (COP)

From: May 2020 To: May 2021

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 ninth year, I am very pleased to renew and confirm eFM support of the **Ten Principles** of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. In the last year as well the Ten Principles have offered very useful guidelines to cope with the world crisis due to the Covid-19 pandemic and helped us continue support programs for ourselves and the Italian SMEs, backbone of our country. This is reflected in the 2021 Annual Communication on Progress, where we report our actions and efforts over Financial, Environmental and Social Responsibility and Ethics.

In 2021 we **continued our support to Corporates and SMEs** helping them rethink the workplace needs and a safe return to the office during and after the pandemic crisis, embedding strategic SDGs concepts into the renewed and safer Hub-quarters, which we are promoting as best places to work, as opposed to head-quarters. We created the **New Present Circle** initiative, stimulating discussion and brainstorming sessions among Executive HR, RE and people in charge of Digital Transformation projects. For the whole period we kept promoting **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, offering: 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.

In 2021 eFM has implemented a new way **of measuring KPIs about SDGs** in order to plan and boost our renewed engagement to improve sustainability in our company. We kept concentrating on our international effort, thereby 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.

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.

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 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: we apply "self-management", the technique of listening and dialogue, as well as tools for continuously improving our relationship with all stakeholders.

Responsible use of resources - We are conscious that our planet will shortly be at a very critical point in terms of resources and we need to preserve it, as well as we improve the sustainability awareness.

Sincerely Yours.

Daniele Di Fausto, CEO eFM

eFM SPA
L'Amministratore Delegate
Ing. Daniele Diffeusto

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 and 2021 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.

During the pandemic year eFM enacted all possible initiatives to keep all together, to continue working, to feel safe, productive and part of the renewed eFM larger family. We created a special event "Engaging Spot", a common shared virtual space where every employee has the opportunity to share its own ideas with the entire company without any filter and build together in a democratic way our rules and procedures, in short, our company new rituals. eFM has teams related to workplace, smart-working, digital transformation, wellbeing, wellness, and so on. Employees can share discussions, files, documents, links and images and have access and control over the content shared anytime and anywhere. The benefits are mainly: 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.

We also devoted special attention to our emotions, studying the impact of our emotions during the day and during our activities on our productivity and wellbeing. We created a special tool, the "Emotional Calling" to keep track of our emotions and enact the best strategies to use them for the best.

During this past year eFM has continued integration with our branches in different countries, such as Boston, Munich, Istanbul, Santiago, enforcing and exporting the same human rights principles. Also, implementing its Service Delivery Platform helped reducing manual work, automating and making it safer.

eFM commitment to protecting human rights encompasses 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. During the pandemic period, we decided to hold additional company meetings to reiterate our presence (though remotely), our attention to everybody and reinforce our beliefs: 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, spurring principles such as Self-management, Completeness, Purpose evolution.

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 the year 2020 eFM promoted The **New Present Circle** initiative, discussion and brainstorming sessions among Executive HR, RE and people in charge of Digital Transformation projects. A safe, inter-company and cross-industry space, enabling informal mechanisms of exploration, comparison, validation of new initiatives on individual and collective qualities and organizational practices useful for responding to the current challenges of the new context.

In addition, eFM continued promoting *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 out Ethical Code.

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

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

The two Global Compact principles on human rights are included:

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

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

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

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

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

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

In 2020 and 2021 eFM continued implementing concrete actions previously taken, such as:

- 1) Enriched our 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 online professional services at no cost for personal well-being, such as promoting engagement through the Engage Academy, offering psychological help, mindfulness sessions and the like.
- 3) "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 promoting existing policies and procedures on human rights. The progress includes an undertaking to avoid causing or contributing to adverse human rights impacts and to address such impacts when they occur, and to seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, services and business relationships.

Examples

- Suggestion box, call center or grievance mechanism
- Awareness raising or training of employees on Human Rights
- Consultation with stakeholders and affected parties
- Allocation of responsibilities for the protection of Human Rights within your company
- Human resource policies and procedures supporting Human Rights

Measurement of outcomes

Description of how the company monitors and evaluates performance.

- 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 **new mechanisms to measure compliance to its values** by its employees and its stakeholders, combining **objective data analysis** with **voluntary information**, gathered through surveys.

Examples of 2020 data analysis output are the following:

- the overall female population increased from 39% in 2014 to 41% in 2020;
- in the same years 2014-2020 recruiting was equally split around 50% between males and females;
- turnover in the same years is much lower for women (43%) than for men (57%).

Periodic questionnaires are administered to our Community to measure such compliance and take actions to improve it, if necessary. For example, as a consequence of the pandemic adverse effects, in 2020 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.

To avoid employees' loneliness and burnout, as well as ensure higher engagement levels, eFM promoted the **Emotional Calling** tool to monitor people's wellbeing and engagement levels. On the basis of the outcome of our emotions we decide which actions to take to improve our emotional status and resolve our respective problems.

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 service providers, 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 2020 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.

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

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

During the 2020-2021 pandemic period eFM **deepened and kept improving our Smart Working policy**. In 2019 we had already 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.

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.

eFM also kept concentrating 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, San Diego, 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, which turned to be very appropriate during the pandemic period.

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.

At the beginning of 2021 eFM started developing a new value proposition aimed at **promoting and guaranteeing decent work especially for a subset of our Clients**, namely Service Providers. In Italy 500.000 people work in the cleaning industry, representing the category with lower salaries, excluding catering services. For instance, activities classified as "services for buildings and gardens", typically performed by women, are paid on average 40% less than activities classified as "specialized construction services". Maintenance and cleaning services workers have a higher incident rate, around 5% higher than other service workers.

During the 2020-2021 pandemic period eFM **deepened and kept improving our Smart Working policy**, previously already adopted to implement sustainability policies and help employees reach better work-life balance. The freedom to work 4 days

a week remotely, against the average of 1 day per week for the vast majority of companies, was extended to 5 days because of the lockdown period. Through remote connections, eFM implemented a series of policies and "rituals" to increase wellness, keep us together and 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 are all well, organize our day and celebrate accomplishments. These meetings make people feel safe and cared for, increase employee involvement and engagement and improve their emotional state.

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

Already 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.

HEALTH & SAFETY

During the pandemic period eFM enacted all the necessary measures to keep our working spaces clean and free of infection. Sanification took place constantly at our offices, as well as maintenance and cleaning of places, pipes, plumbing and so on, regulated access procedures and training for keeping safe homes as well.

TRAINING

We have an induction program for all our new employees, regardless of employment levels, covering the following key areas:

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

Examples

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

Measurement of outcomes

Description of how the company monitors and evaluates performance.

eFM has established **new mechanisms to measure compliance to its values** by its employees and its stakeholders, combining objective data analysis with voluntary information, gathered through surveys.

Examples of 2020 data analysis are the following:

- in the years 2017-2020 52% females were promoted to a supervisory role, as compared to 48% males
- from zero females in leadership roles to 32% in managerial roles in the team driven new organization
- the overall female population increased from 39% in 2014 to 41% in 2020;
- in the same years 2014-2020 recruiting was equally split around 50% between males and females;
- turnover in the same years is much lower for women (43%) than for men (57%).

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 prompt.

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.

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

eFM has established **new mechanisms to measure compliance to its values** by its employees and its stakeholders, combining objective data analysis with voluntary information, gathered through surveys.

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 on premise) is 135 kg of Co2 per year, we estimated that the contribution for the 250 people of eFM in reducing CO2 emissions was about:

50,000 kg of CO2 less. In 2020 – 2021 we extended our smart working policy to 5 days / week , thus reducing CO2 emissions by another 12.500 kg of CO2.

eFM continues devoting attention and effort to continuously improving the environment and holds the UNI EN ISO 14001:2015 certification: "Environmental management systems". Some of our initiatives on environment are:

- Employees are 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.

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 moreinformation 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 fairy. 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