

International Anti-corruption Model



salini
COSTRUTTORI

April 18th, 2013



Dear colleagues:

Salini Group conducts its business firmly believing that to build is to create, to enhance an idea, develop the expertise and techniques to bring it into existence. To build is to generate knowledge, organization, driving force. It is the creation of value that lasts in time and is perpetuated. Salini Costruttori thrives on its passion for the noble 'craft' of construction: a passion handed down by its founder and reinforced by the international outreach it has acquired over time.

Founded in 1936, it boasts more than 70 years of experience in the construction of roads, motorways, railways, dams, hydro-electric plants, tunnels, aqueducts and civil and industrial constructions throughout the world. The history of the group is charted by the projects it has carried out and in the continuous impetus to satisfy the most varied and complicated requirements and markets in the development of its core business.

The core values of the company, its operational methods and all the organizational and governance instruments have been developed as a continuation of the original spirit and with the firm commitment to play a leading role in the future, contributing to development, growth and wellbeing. During this period, our employees all over the world have hard worked to build the most important asset of our activity – integrity.

Salini Costruttori's operating philosophy is environmentally friendly; it focuses on people and on the principles of sustainable development, social responsibility and "good citizenship". In this context, corruption is a threat to our activity and our employees, and it is contrary to our culture. It is very important to us to have clear business policies against corruption and to take measures to be always compliant with these policies.

The present Model summarizes the commitment of Salini Group to the respect of principles introduced by the anti-corruption laws and by the relevant international Best Practices (L. Decree 231/2001, UK Bribery Act 2010 and Foreign Corrupt Practices Act), in order to safeguard integrity and compliance with anti-corruption laws of the different countries in which it operates.

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Each employee, manager and director is responsible to behave in compliance with this Model, the other policies of Salini Group and the laws and regulations of the countries in which it operates

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1. SCOPE

Salini Costruttori S.p.A. Board of Directors has adopted the present Anti-corruption Model in order to promote the compliance with the ethic standards and the respect of the national and international rules for the prevention of corruption in all its direct and indirect forms as well as, integrity, transparency and correctness in performing the work activities.

The Model has been approved by reasoned resolution of the Board of Directors of Salini S.p.A. and, contextually, the persons in charge of the implementation of the Model have been identified. Likewise, the other companies of Salini Group must approve the adoption of the present Model.

Moreover, Salini, as far as possible, will aim to ensure the adoption and the respect of the standards set by the Model, by the company or other entities (joint venture, consortia etc.) where the company has a significant participation.

With regard to Agents or third parties in general that may represent Salini Group in front of others, they have the contractual agreement, from the date of adoption of this Model, to respect the principles of behavior defined by the present.

1.1 Objectives and contents

Salini and its subsidiaries (collectively defined as "Salini" or "Group"), in accordance with the defined code of ethics, are committed to conducting their activities, in all countries where they operate, in respect of ethic principles and in compliance with applicable laws.

It is crucial to Salini, because it leads a growing number of business activities abroad, to acquire an instrument defining principles and policies to be adopted in conducting business operations, in order that these can be carried out in compliance with the main international standards ("FCPA" Foreign Corrupt Practices Act and "UKBA" UK Bribery Act) and according to what defined by the Management.

In this sense, the present Anti-corruption Model is adopted with the aim of providing a systematic reference framework of the anti-corruption prescriptive procedures and policies, that Salini pursues for preventing behaviors of **active and passive corruption**, in particular, related to offers or requests of money, benefits, and / or other utilities, or payments executed or received by anyone acting in the name of or on behalf of any of the Group companies in relation to business activities, ensuring compliance with anti-corruption laws. The Model aims, among others,

at functioning as a guideline in addressing the corruption risks that may arise during the business activities.

It should also be noted that, if the provisions prescribed by a local law of one of the countries where the Group operates were more restrictive than this Model, the Company is committed to operate in compliance with the local law.

However, it should be noted that no Model is able to regulate all potential situations that may arise in practice. Employees are stimulated to ask their managers or the persons in charge of the respect of the anti-corruption provisions (detailed below) for any information about facts and specific circumstances that may affect these issues.

Moreover, in order to facilitate the discussion of these arguments, the present Model provides practical examples to support the users in applying the prescribed policies.

2. REFERENCES

2.1 Anti-corruption Laws

The International legislation on corruption is very extensive. The bribery of Public Officials is a crime in almost all countries, and in some countries it is considered a crime even the corruption of Public Officials of other countries.

Many countries have also laws that forbid even private corruption. Italy, by the recent Law n.190 of the 6.11.2012, intended to adapt the national legislation to the Strasbourg Convention of 27.01.1999.

Since Salini is international organization that performs its business activities in many countries and jurisdictions around the world, together with its personnel, must respect the law in Italy and in the other countries where it operates, including the laws of ratification of international conventions which forbid the bribery of Public Officials and private bribery, for example:

- the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Officials in International Business Transactions;
- the United Nations Convention against Corruption;
- the Foreign Corrupt Practices Act (FCPA) issued in USA;

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- the UK Bribery Act issued in UK;
- the Anti-corruption law n. 190 of the 6.11.2012 issued in Italy.

The Anti-corruption Laws very briefly:

- prohibit payments made either directly or indirectly - including those payments made to third parties knowing that that payment will be shared with a Public Official or a private - as well as offers or promises for a payment or other benefit to bribe Public officials or privates;
- require companies to acquire and keep books and accounting records that, with reasonable details, accurately and correctly reflect the transactions, the costs (even if not "significant" in accounting terms), acquisitions and disposals of assets.

In the past few years, the problems related to bribery have assumed increasing relevance internationally, with a progressive aggravation of the penalties associated with the violations of the relevant laws.

The recipients (individuals and legal persons) who violate the anti-bribery laws may incur fines, disqualification and imprisonment depending on the involved subjects, severely damaging the Company reputation.

It should be noted, also, that in order to maximize the effectiveness of sanctions, it is usually forbid to the Companies to exclude their employees from their personal liabilities arising from violations of the Anti-corruption Laws.

2.2 Roles and Responsibilities

All recipients are required to read, understand and put into effect the present Anti-corruption Model. This Model is subject to revision because the national and international anti-corruption regulations, referred to as *Best Practices*, may be subject to changes or interpretations of the law. The updated version of this Model will always be available on the [Salini Web page](http://XXXXXX/) <http://XXXXXX/>.

In this sense, if necessary any clarifications about the Model's content, including the application of its policies, the italian anti-corruption laws or the laws of country where the Group operates, or if the provisions contained in this Model would violate the local anti-corruption provisions, or for any necessary clarification, all recipients are encouraged to seek advice from the Anti-corruption Legal Support Unit or from the persons in charge of the implementation of the anti-corruption provisions identified during the adoption of the Model by each individual Group Company (*Annex 1*).

- **Anti-corruption Legal Support Unit**

Name, Surname

Telephone number

e-mail

It is important to receive legal advice from the Anti-corruption Legal Support Unit, prior any commitment in the name of or on behalf of Salini, if not related to routine business operations (such as those regulated by the company operating procedures).

Each Group Company must also formally adopt, by Board resolution, policies and procedures which this Model refers to. Moreover, if it should result necessary to adopt additional policies than what centrally defined by the Model, in order to ensure compliance with Anti-corruption Laws, each company (Italian or foreign) or foreign branch must send out a copy of the additional policies requesting prior approval to the Anti-corruption Legal Support Unit.

In this context, all the Company personnel must report suspected violations of this policy, of the ethical principles or any other anti-corruption law, by the Company, a colleague or a third party, including requests or offers of undue payments received by the latter. Reports of suspected violations should be made to an employee's manager, the Anti-corruption Responsible of reference or to a member of the Anti-corruption Legal Support Unit. In case an employee does not report known or suspected violations of which he is aware, the employee is subject to disciplinary action.

The Company will not allow retaliation of any kind against an employee who reports in good faith suspected episodes of misconduct.

Moreover, no employee will suffer adverse consequences for refusing to perform such an improper payment, even if it means for the Company a loss of business or it would have a negative impact on its programs.

2.3 Sanctions for violation

Policies and procedures contained in the Anti-corruption Model and relative annexes, represent an integral part of Salini's compliance program. Any employee or collaborator, who is not acting in compliance with these policies and procedures or who does not report known or suspected illegal

actions will be subject to disciplinary action commensurate with the seriousness of the carried out violation (including penalties provided for by their employment contracts, dismissal or relieving the initiation of actions in addition to any competent judicial offices). Such action can be taken or solicited by Salini, a Public Body or any other competent body.

Salini will not pay and / or support, directly or indirectly, any individual for a violation of the international anti-corruption laws, or for a violation of these policies and procedures.

Managers will be subject to disciplinary action if they are aware or have reason to suspect that the conduct prohibited by these policies and procedures is also just considered by the employees under their supervision, without implementing any action to avoid it, or if they are aware or have reason to suspect that the conduct prohibited by these policies and procedures have been perpetrated by those employees without having undertaken the necessary and appropriate corrective measures.

Managers are supposed to actively encourage their teams to observe policies and procedures contained in this Model, without ignoring the evidence of possible violations.

3. GENERAL ANTI-CORRUPTION POLICY

In accordance with the Code of Ethics, Salini prohibits the Personnel of all Group companies, Business Partners, and anyone who carries out activities in the name of or on behalf of a company of the Group, any offer, promise, request (active bribery) or acceptance (passive bribery) of any form of improper and / or illicit payment, either directly (by Salini personnel) or indirect (by anyone acting in the name of and / or on behalf of Salini), in cash or other utilities, or whatever represents advantage for the person, material or moral, economic or other, considered as such by customs and common belief, considered also as facilitation, or guarantee for the achievement of due performances, in business activities or also in relationships with its stakeholders or the Public Administration.

Therefore, Salini prohibits from:

- inducing a public official, a public service officer or a private person to perform improperly any public function, or any activity associated with a business or reward him for having it carried out;
- influencing an act (or omission) or any decision by a public official or a public service officer or an individual in violation of an official or loyalty duty;

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- obtain, ensure or retain unfairly a business or an advantage in relation to business activities;
- obtain, ensure or retain an unfair benefit of any kind, not only in the interest and / or to the advantage of the Company but also for personal interests or interests of family members or acquaintances - in violation of the duty of loyalty;
- more generally, violate applicable laws.

The respect of the Anti-corruption Model is mandatory for all Personnel of Salini, Partners, Agents / Intermediaries and Relevant Third Parties representing Salini Group Companies, in particular:

- Salini Personnel is responsible, each within its competences, of the respect of the Anti-corruption Model. Furthermore, directors and managers are responsible for supervising the respect of the Model by its employees, and for adopting measures to prevent, identify and report potential violations;
- no activity that violates the present Anti-corruption Model and / or the Anti-corruption Laws can be justified or tolerated by the fact that it is "customary" in the field and / or in the countries where the Company operates. No performance may be imposed or accepted in violation of the Model;
- Partners, Agents / Intermediaries and Third Parties representing Salini Group companies that violate the Anti-corruption Model and / or Anti-corruption Laws will be subject to contractual provisions (such as the suspension of the contract execution, claims for damages, termination of the contract, the prohibition from doing future business with Salini);
- working treatment of Salini Personnel may nohow be affected, in the case of refusal by the Personnel to engage an action that violates this Anti-corruption Model and / or Anti-corruption Laws, even if such refusal has produced the loss of a deal or other detrimental consequences for the business.

3.1 Public Administration

The numerous interactions that occur with Public Administrations, may create potential risk situations, since Salini can be considered liable for corruption acts conducted or attempted to Public Officials, who may require improper benefits to act not in accordance with their duties or in violation of their official duties.

Possible interactions with Authorities or representatives of the Public Administration (hereinafter also "PA") mainly concern the following categories of relations:

- relations with PA, as buyer of a project – these relations may generate risks of corruption during the process of assignment or management of a contract and during any project phase such as, for example, the process of obtaining certificates of payment by a supervision body or the approval of modifications, extensions, variations, claims, defective or non-existent jobs, etc.;
- obtaining administrative decisions pertaining to PA – these activities may lead to corruption risks, among the most relevant processes it is included obtaining documents / requirements pertaining the PA (including licenses, permits, registrations, licenses and other authorizations necessary for the business), import or export of goods, management of health or safety inspections, etc.;
- fulfillment of obligations to PA – the fulfillment of these obligations, including the implementation of regulatory requirements, performance of specific audits, submission of declarations, etc., may create corruption risks;
- inspections and / or audits performed by PA – the management of these aspects, including inspections, verifications, audits, investigations, etc. in which Salini representatives are in charge of managing these requests, may generate risks for the Group;
- litigations with PA – litigations with Public Administrations and private entities generate potential risks of corruption in dealing with the Judicial Authorities.

Salini prohibits any improper payment, benefit or other advantage in favor of Public Officials in violation of this Anti-corruption Model and applicable Anti-corruption Laws, even if they were explicitly requested, or even if it is customary in a specific context, and this should lead to any kind of disadvantage for Salini or its personnel. Salini also requires its personnel to notify immediately the Anti-corruption Legal Support Unit any request considered unlawful received from Public Officials, and any doubt about behaviors should arise during the management of the relationships with them.



PUBLIC ADMINISTRATION – QUESTION:

During an inspection carried out by inspectors sent by the Public Administration, bureaucracy deficiencies have been detected relating to environmental issues. The inspectors mentioned that at the end of the inspection, the Company should pay a "fine" in cash, in order to fill these gaps and avoid the issue of the draft. Can we execute the payment?

ANSWER:

No, these kind of payments are prohibited. Each payment request, especially in cash, which has the aim to avoid actions by public entities, is an alert that there may be a request for a bribe useful to avoid potential consequences.

PUBLIC ADMINISTRATION – QUESTION

The local police has offered to make available, for a fee, off-duty police to improve the safety of our facilities. Can we do it?

ANSWER:

You must contact the Anti-corruption Legal Support Unit. This kind of assignment involves corruption risks, therefore it is necessary a careful evaluation of the situation. For it to be positively evaluated, they must meet certain minimum conditions, such payments must:

1. be made to the police department and not to individual officers,
2. respect applicable local laws and regulations,
3. be "reasonable" that means commensurate with the provided services,
4. not represent the compensation of "favors" granted to the company by individuals in the official role of police officials,
5. comply with the present Model.

3.2 Third Parties

Salini requires that relations with third parties (contractors, consultants, suppliers, and other individuals) entertained during the execution of business activities, are marked by the highest standards of correctness, transparency and traceability of information sources and in compliance with the Anti-corruption Laws and all other applicable laws.

3.2.1 Suppliers and Customers

Corruption activities carried out by or on behalf of suppliers (including sub-contractors) or customers of Salini, are sensitive to Anti-corruption Laws and Salini may be considered liable.

Salini makes obligatory for all suppliers and customers to respect Group ethical standards and applicable laws, including Anti-corruption Laws, as part of the business activities carried out with Salini. This requirement must be explicitly accepted in the phase of entering into contracts, as a result of the review of the documents showing Group ethical principles (Code of Ethics, International Anti-corruption Model, Model of Organization Management and Control, where applicable, etc.). In the event that the counterparty is provided with an organizational model, anti-corruption model or a code of ethics, Salini must provide a consistency check of the principles expressed in these documents, in relation to the principles adopted by the Group.

In particular, all contracts must contain a clause providing for the counterpart the "Administrative Liability" in which it is committed to acting:

- in compliance with the Code of Ethics , with the Organizational Model and the Anti-corruption Model of Salini;
- or in accordance with the principles provided by the Code of Ethics, the organization and / or anti-corruption model if they are consistent to Salini principles.

This clause must provide the right to Salini to terminate the contract, stop payments and receive compensation for damages in case of violation by the counterparty of the obligations and statements listed above, or in case of violation of the Anti-corruption Laws or anti-corruption commitments provided by contract.

Salini pays particular attention to **contracts for consulting and professional services**, for whom, because of the high risk of the report, expects the observation of the following principles:

- these contracts must be concluded in accordance with business needs and within budget limits for them defined and approved;
- providers of these services should only be natural or legal persons well-known, reliable and with an excellent reputation (e.g. presence in the Suppliers Register, etc.);

- these contracts must be put in writing and include:
 - ✓ description of the services that the counterparty must provide, amount, terms and conditions of payment;
 - ✓ the right for Salini to perform audits on the counterparty, in the event that has a reasonable suspect that it may have violated the provisions expected in the contract and / or in the documents regulating ethical and control principles subscribed by the counterparty;
- there must be provided a declaration of the counterparty that the payable amount is only received as consideration for the services defined in the contract.

The supplying process and its activities are regulated in detail by the business and the operational procedures in the possession of the individual companies of the Group, who identifies the roles and responsibilities of the main actors involved in the supplying process and define methods of selection and management of suppliers, methods of reporting and control of the suppliers, as well as management methods of the relevant process documentation.



THIRD PARTIES – QUESTION:

It ended the creation of a work and the site is in the process of disposal of some equipments now obsolete. An employee got in touch with a counterparty that could deal with the disposal. However, the representative of the counterparty, pointed out that in order to proceed with the operation it is necessary to make a payment directly to the carrier for the costs of transport. Such payment must be made during the pick-up phase of the equipment. In this case the payment being made directly to the carrier does not appear paid in respect of a contract with the counterparty. How should we proceed?

ANSWER:

It is not possible to make the payment. Every not-traceable transaction shall represent an alert, as the payment mentioned could hide a bribe to a third party. It is necessary for the purposes of compliance with the Anti-corruption Model and applicable laws that all operations and related transactions arise from contracts according to applicable company procedures and the powers of attorney in place.

3.3 Relevant third parties

Salini Group companies and their employees can be considered liable for the misconduct of Relevant Third Parties. Third parties considered relevant to the Group are currently identified in:

- Business Partner (joint ventures);
- Agents and Intermediaries;
- Third parties involved in extraordinary transactions.

Misconducts performed by third parties, and in particular from relevant ones, may produce legal risks for the Group even if Salini and its employees have not authorized directly, or not they are aware, of irregular activities of the Relevant Third Parties. In particular, can be configured for Salini and its employees situations at risk of crime regarding corruption even if Salini employees were aware or should have been aware of improper payments or other irregular activities carried out by a Relevant Third Party.

Even a single operation with a Relevant Third Party can expose the Company to legal risks, therefore it is essential that all Relevant Third Parties are examined according to the criteria listed below and explained by the operational procedures adopted by the Company and by those procedures annexed to this Model.

Considering this introduction, the Company requires the compliance with applicable laws by Relevant Third Parties, including Anti-corruption Laws, during the business activities carried out with Salini.

Salini performs the proper procedures of control and approval to ensure that it is able to determine if a Relevant Third Party could potentially act or acts in violation of these Procedures, other Salini Guidelines, Code of Ethics or applicable laws.

In particular, Salini requires that before establishing a relation, and during the whole life of the contract with a Relevant Third Party, the following assessment procedures are performed:

- conduction of a proper verification (so-called *due diligence*), to be performed with the methods defined by the Compliance Procedures attached to this Model, prior to establish a relation or perform an operation with a Relevant Third Party;
- during the *due diligence* process, in case of alerts (so-called *Red Flag*), assessment that these have been adequately solved or that the appropriate safeguards are established to ensure the Group;
- monitoring any possible alert that might occur during the relationship or the execution of an operation with the Relevant Third Party, providing for the comprehensive review of all administrative and accounting aspects related to this relationship, the verification of the persistence of conformity requirements of the counterparty and general oversight over the activities of the Relevant Third Party.

These guidelines set out the necessary steps, which allow the Company to effectively assess the risks related to the Relevant Third Party. In particular, Salini employees must be able to document that:

- the Relevant Third Party has a reputation ethically verified;
- there is a valid business reason to justify a relation with that Relevant Third Party;
- the methods of payment are reasonable from the commercial perspective and proportionate to the level and type of the provided services;
- once the *due diligence* is carried out, according to the provisions prescribed by the Compliance Procedures attached to this Model, it was determined that there is no improper relation between the Relevant Third Party and Government Officials or individuals in conflict of interests with the Company, nor are they identified any other alerts that indicate possible irregularities;
- the relation is structured and regulated by specific written documents, containing appropriate contractual protections against improper behavior of the Relevant Third Parties;
- the relation is monitored effectively and promptly, from the inception of the agreement until the

end of that, taking care to check that all elements evaluated during the due diligence are valid for the entire duration of the contract

Before establishing a new relation with a new Relevant Third Party, Salini employees will have to take all the measures provided by this Model and the attached Compliance Procedures.

3.3.1 Partnership

Salini Group companies, if necessary, work with individuals or legal entities in order to, for instance, gain access to a particular market, to manage or develop contracts in special circumstances, or because of possible imposition of local regulations of the countries where it operates. These kind of cooperation, in some cases, are "joint venture". In most of the cases, the partner is a legal entity that shares the risks of investing, or the profits or property of an operation.

Joint ventures involve risks and specific responsibilities regarding the compliance with Anti-corruption Laws. The main risk related to this partnership is that the joint venture or partner act in violation of Salini procedures, believing to have more chance to "operate according to the local rules", because it is a person or a company of the place. These behaviors may create legal and reputational risks for the Group, even if the Company has not authorized or was not aware of the illegal activities carried out by the partner, or when the partner provide the joint venture with properties, authorizations, permits of the place or other assets obtained by means of corruption acts.

Therefore, it is important to Salini, knowing its potential partners and being able to assess risks that these partners have, or may have, because of activities prohibited or not in line with internal rules and / or ethical principles defined by the Group. In this sense, Salini requires its employees and managers to pay attention in the selection and the supervision of the partners.

The present Model and related Compliance Procedures, to be considered as integral parts of the former, set out the requirements for the selection, negotiation and control of the activities of these partners. These principles of behavior apply to all partnerships between a Salini Group company and partners.

For joint ventures in which Salini holds the control participation, Salini prescribes the adoption of the present Model together with the ethical principles defined by the Company. Therefore, Salini is directly responsible for ensuring the application of the control systems and of the ethical principles by the joint venture.

For joint ventures in which Salini holds a minority participation, it makes an effort in good faith to ensure that the company adopts an effective system of internal controls.



PARTNERSHIP - QUESTION:

For several years, Salini operates abroad in cooperation with a local Partner for a project related to the realization of a public work. We have no documentation regarding the execution of a *due diligence* on partners. What should we do?

ANSWER:

All partners, even those with whom Salini has had relationships for a long time, must be subject to a *due diligence* process set out in this Model and related Compliance Procedures.

If the *due diligence* has not been carried out in the past, you are obliged to perform it. You also need to contact the Anti-Corruption Legal Support Unit in order to define what level of *due diligence* is necessary in relation with the facts and the specific circumstances of the case.

3.3.2 Agents and Intermediaries

In some areas of the world, Salini uses Agents and Intermediaries as these play an important role in helping the Company in entering new markets and supporting the principal business activities. These rules of conduct are referred to all individuals or legal entities who have executed, or have been considered for the execution of intermediation and / or agency performances, paid either through success fee commissions or through other criteria.

The use of agents and / or intermediaries may represent a risk as Salini is potentially responsible for the misconduct of them. An essential problem associated with the use of agents and intermediaries is the risk that they may do improper payments or provide other benefits to a customer in exchange for favors to Salini.

An additional risk may be represented by the fact that a customer can try to force the Company to work with a specific agent or intermediary with whom the client has any sort of relationship in order to gain personal benefits. These and other conditions can cause legal risks for Salini, even when it has not directly authorized or does not have real knowledge of illegal activity carried out by the agent and / or by the intermediary. If the Company is aware or should be aware that an

agent and / or intermediary, who work on behalf of Salini, executed an improper payment or carried out illegal activities, Salini and its personnel may incur a violation of the Anti-corruption Laws.

Therefore, for the Group it is impossible not to consider the conduct of the agents and intermediaries who work for the company. Considering these risks, it is important to know agents and intermediaries and to be able to determine if each of them has executed, or if there is a reasonable possibility that they may execute, any activity prohibited by the Code of Ethics and policies defined by the Anti-corruption Model.

The *due diligence* verifications described in details in the Compliance Procedures attached to this Model, define the criteria and the methods of control which will enable Salini to effectively evaluate the risks associated with taking relations with Agents and Intermediaries.



AGENTS AND INTERMEDIARIES - QUESTION:

One of our local customs agent has just substantially raised the cost of the service related to our imports. When we asked him the reason of this raise, he told us that the official costs are going up. I checked with my logistics staff and they told me that, as far as they know, there has been no change in the customs treatment of our products and no cost or modification of imports and required permits. Do I have to accept these changes?

ANSWER:

As stated by the customs agent it is an important warning sign that suggests that he could make improper payments to customs officials invoicing the related expenditures Salini by increasing the cost of services. Salini policies and applicable laws require you to investigate the reasons for these increases – since accepting them without further verifications could be considered as connivance regarding undue payments with regard to the customs authorities. It is always recommended before agreeing to any suspicious modification of the terms and conditions of contract, contact the Anti-corruption Legal Support Unit. Even following the acceptance of the new terms it is recommended to verify, requiring for example documentation that shows the actual increase of the costs, that abnormal behavior have been adopted by the agent.

AGENTS AND INTERMEDIARIES - QUESTION:

I am the person in charge of the environment management in a site where one of our project is currently under realization. Local environmental laws are complex so I consult a specialized local lawyer, about some changes in environmental laws in order to verify how they impact the Company. We have had no dispute with the government and we always receive our environmental permits every year without any problem. Do I have to perform *due diligence* on the lawyer?

ANSWER:

No. In this case the lawyer does not interact with any Governmental Authority on behalf of Salini. The obligation to conduct a *due diligence* exists whenever someone assigned by the company interacts with any Governmental Authority on its behalf. Therefore, if in the future Salini will have an environmental dispute and will assign a mandate to an external lawyer for the related negotiation, then at that time you will be required to carry out a *due diligence* on the external lawyer.



AGENTS AND INTERMEDIARIES – QUESTION:

Salini commissioned an agent for the management of negotiations useful for the purposes of a contract in a foreign country. During a routine meeting, the agent let slip a comment about the execution of a payment in order to win the contract. The agent has already passed our *due diligence* process. What should I do?

ANSWER:

You must always pay attention to suspicious activities that might suggest corruptive actions by Agents appointed by us, even if they have worked with Salini for a long time. Moreover, it must be paid particular attention to the management of Agents when their work depends on an action of a Public Officer. If you suspect that an Agent has acted, or is going to act, in violation of Salini policies, you should immediately contact the Anti-corruption Legal Support Unit.

3.3.3 Extraordinary operations with Relevant Third Parties

The Company can be considered responsible in accordance with the relevant anti-corruption laws for acts of bribery done or attempted by a third party not linked to the Company and with whom the Company performs an extraordinary operation, as a merger, an acquisition or sale, even if the illegal behavior of the third party occurred before the completion of the transaction.

Salini provides that in case of extraordinary operations, in order to protect the Company from potential responsibilities, due diligence is carried out with particular attention to Anti-corruption Laws.

In particular, this activity should include:

- conducting an integrity due diligence of the target company and of its top management involved in the operation;
- including an anti-corruption risk assessment in the *due diligence* process in order to assess corruption trends in the industry and in the country of the target company;
- conducting a forensic review in order to identify and assess, in the target company, potential weaknesses of the internal control system and / or potential suspicious transactions (such as "*Red Flag*" relating to financial results not in line with expectations, unusual means of payment, suspicious interactions with public administrations, etc.).

For extraordinary operations an appropriate *due diligence* process is also crucial to avoid potential consequences, such as reputational damages, loss of Company value, problems to the operation.



EXTRAORDINARY TRANSACTIONS – QUESTION:

We are considering the acquisition of a company we have been working with for several years, in many Joint Ventures. The execution of *due diligence* prescribed by this Model would involve an extension of time for the operation. Can we proceed with the operation avoiding the *due diligence*?

ANSWER:

No. Extraordinary transactions are sensitive to anti-corruption issues. Therefore it is necessary to carry out a *due diligence* in order to safeguard the Company from potential future liabilities. For any questions, contact the Anti-corruption Legal Support Unit.

3.4 Facilitation payments

Salini prohibits to pay or promise payments or benefits in kind, directly or indirectly, in favor of public officials in order to accelerate or facilitate activities due as per their official duties. These payments, so-called "Facilitation payments" or "facilitations", are considered so whereas they concern activities that the public officer would do in any case, for routine and non-discretionary tasks, and that all legal requirements for obtaining performance have already been satisfied.

Payments for benefits include the giving of amounts in order to accelerate or facilitate, for example:

- obtaining non-discretionary permits for the conduct of the activity;
- non-discretionary processes, such as customs practices or visas;
- provision of a public service.



FACILITATION PAYMENTS – QUESTION:

After a storm, our offices (or sites) suffered of power outage. The local company that provides power has informed us that it could take from two to three weeks to restore it. The head of the company in charge of local public services and owned by the government says he will make sure that the power is restored within a few days in exchange for a payment of modest value. Can we make the payment?

ANSWER:

No. It would be a facilitation payment, since it would have the purpose of speeding up a routine action of the government, and Salini anti-corruption policy prohibits this kind of payments. You must say no to this request.

FACILITATION PAYMENTS – QUESTION:

During a shipment of goods in a foreign country, there was a mistake in the customs declaration. The customs officer detected the error and threatened to give a fine. However, he is also available to pass on the error in exchange for a small payment. We can make the payment?

ANSWER:

No. This payment would be intended to alter or affect the decision by an officer, in order to avoid the fine, and as such it would constitute a bribe. You have to say no to this request.

3.5 Sponsorship activities

Sponsorship activities are sensitive to matters relating to anti-corruption laws. Salini pays attention to any possible personal or corporate conflict of interest for any sponsorship activity, which may represent a risk to the Company if it was configured as a corruption act. Salini prescribes that sponsorships, in order to be carried out, are to be initiatives that have the exclusive aim of **promoting brand, activities or services and similar, of Salini.**

All sponsorship activities must be in writing form as a contract, in order to prevent to be considered as an illusory form of conferring a benefit to a third party to the advantage of the Company.

Salini sets the procedures for the authorization, execution and management of sponsorship contracts, which must comply with the following principles:

- sponsorships must be made in accordance with the approved budget;

- a check must be realized on potential conflicts of interest in the initiative that it intends to sponsor;
- partners in sponsorship contracts must be only organizations or individuals well-known, reliable and with an excellent reputation;
- a *due diligence* must be carried out on potential partners of the sponsorship contract, and the verification of the legality of the contract in accordance with applicable law;
- sponsorship contracts must be put in writing and include:
 - ✓ an adequate description of the nature and purpose of the single initiative, amount, terms and conditions of payment;
 - ✓ a statement of the counterparty that the amount paid is used exclusively for the purpose of the initiative;
 - ✓ a clause for the counterparty to comply with Anti-corruption Laws and applicable laws;
 - ✓ an "Administrative Responsibility" clause for the counterparty by which the latter is committed to act in accordance with the Code of Ethics, the Organizational Model and the Anti-corruption Model of Salini;
 - ✓ the right for Salini to terminate the contract, stop payments or receive compensation for damages in case of violation by the counterparty of the obligations and statements listed above, or in the event of violation of the Anti-corruption Laws or anti-corruption commitments required by the contract;
 - ✓ the right for Salini to perform audits on the counterparty, in the event that has a reasonable suspect that the latter may have violated the provisions required by the legislative instrument and / or the contract.



SPONSORSHIP – QUESTION:

During the execution of a project, a letter arrived to our offices from a company with whom we have been doing business for a long time, which ask for our participation in a sponsorship of an initiative promoted by this company. We know that this company is managed by people having family connections with Salini employees. Can we participate?

ANSWER:

Any request for participation in sponsorship initiatives should be carefully considered and should be performed a *due diligence* on potential partners of the sponsorship contract, a verification on potential conflicts of interest and a verification of the legality of the agreement in accordance with applicable laws. If you have any doubt about the level of *due diligence* to carry out, contact the Anti-corruption Legal Support Unit.

3.6 Political contributions

Political contributions represent a corruption risk for the Company. In particular, political contributions could be used as an improper means to obtain or retain a benefit, such as obtaining a contract, permit or license, orient political affairs etc.

Salini prohibits any direct or indirect form of pressure and / or influence politicians, and pays attention in the evaluation of grant contributions, in Italy and abroad, to:

- political parties, movements, committees, or their representatives or candidates;
- conferences, events or parties that have the purpose of political propaganda.

Political contributions with the purpose to influence or gain an advantage by public entities are prohibited. Using funds, proprieties, services and valuables of the Company for political parties, candidates for public offices, or to support them, is generally prohibited. Any exceptions to these prohibitions is supposed to be verified by the Anti-corruption Legal Support Unit, prior written approval of the Company CEO and the Board of Directors.

In any case, political contributions must comply with the following standards, and must also be consistent with the guidelines established by the Code of Ethics:

- should be granted only to beneficiaries known, reliable, with an excellent reputation and should be granted only to the beneficiaries to whom it can be excluded any connivance or influence aimed at advantaging the Company;

- must be limited to proposals coming from no-profit organizations and associations, with regular articles of association and incorporation and with high cultural or charity values.



POLITICAL CONTRIBUTIONS - QUESTION:

We are considering entry into a new country after the inauguration of a new government. In particular, the local government has launched a call for bids and we intend to participate. In this country, however, it seems to be customary for no-local companies grant contributions to politicians. Can we grant these contributions?

ANSWER:

Salini prohibits any form to pressure and / or influence politicians and consequently pays close attention in the evaluation of grant contributions. These contributions could be a instrument for obtaining a contract. You should contact the Anti-corruption Legal Support Unit in order to evaluate the opportunity of granting these political contributions.

3.7 Charitable contributions

Donations and charitable contributions in favor of a Public Official or individuals present a risk for the Company if they had the purpose to obtain or retain business or ensure to the Company an unfair advantage.

Charitable contributions and donations must belong to the initiatives that have the exclusive aim of the **social solidarity** for disadvantaged people.

Salini is committed to offer assistance to organizations and charitable causes that improve the life quality of the communities in which Salini operates.

Salini sets the procedures for the approval and the provision of charitable contributions and donations, which respect the following principles:

- contributions must be paid in consistence with the approved budget;
- verification on potential conflicts of interest in the solidarity initiative that it is intended to carry out;
- the beneficiaries must be well-known, reliable and excellent reputation;
- *due diligence* on the potential beneficiary and verification that it has all the certifications required for its activities and satisfied all requirements to operate in accordance with applicable laws;

- verification of the legitimacy of the contribution in respect to applicable Anti-corruption Laws;
- all the proposals must be verified and approved in advance by the Anti-corruption Legal Support Unit, as well as by their supervisors, as required by the company procedures in place.

Any request coming from a Public Administration representative or from a single employee of a specific organization is an alert. Similarly, there is an alert if a director or a manager of the proposed beneficiary is a Public Official or a Public Official's relative.

Moreover, all contributions must be granted by traceable and non-transferable payment means and covered with an official Company letter, confirming that the Company is aware that the purpose of the contribution is legitimate. If Salini intended to grant contributions in kind (supplying of building materials or building for charitable purposes), in addition to respecting the above described principles and requirements, contributions must be adequately accounted by means of all the necessary administrative and accounting supporting documentation. If appropriate, declarations and guarantees may be required from the contribution recipient relating the use of funds / donated goods or, if necessary, the provision of other reporting tools in order to monitor the donated funds.



CHARITABLE CONTRIBUTIONS - QUESTION:

We requested to a local public administration office the release of an administrative certification necessary for our plants. This certification, however, is undergoing significant delays due to continuous negative ratings in tests carried out on the plants by the public officers. During one of these tests, an official mentioned the customary in the country to participate in charitable initiatives towards the local community and invited us to do so through one of the initiatives he managed. Can we participate in the initiative?

ANSWER:

No. The request by the official may be the demand for a bribe hidden in the form of charity. Salini provides that all charitable contributions and donations must be initiatives that have the exclusive aim of the social solidarity for disadvantaged people and prescribes a *due diligence* on the potential beneficiary, the verification of potential conflicts of interest and the verification of the compliance to the Anti-corruption Laws. For any doubt, contact the Anti-corruption Legal Support Unit.

3.8 Gifts and free giveaways, entertainment and hospitality expenses

3.8.1 Gifts and free giveaways

Gifts, economic benefits and similar, can be granted or received if they belong in the context of commercial courtesy act and are such as to not jeopardize integrity and / or reputation of either party and if they cannot be interpreted by an external observer as aimed at creating an obligation of gratitude or to obtain an improper advantage. Salini prohibits the execution and the acceptance, directly or indirectly, of any form of gifts aimed at obtaining an improper advantage, personal or business related, or that could be interpreted so.

Gifts and / or free giveaways should not be granted if they may generate the violation of the corruption prohibition prescribed by Salini and / or applicable laws.

The only forms of gifts accepted, as business courtesy, must be:

- strictly limited value that is commensurate with the position and circumstances of the beneficiary and not luxurious;
- granted in good faith and in accordance with morality principles;
- compliant to generally accepted professional courtesy standards (e.g. Christmas gift) or having promotional / informational purposes;
- not granted in payment form;
- compliant with Anti-corruption Laws, local laws and applicable regulations.

These principles cannot be derogated and are applicable with regard to Salini employees and third parties, even in countries where it is customary to offer gifts and free giveaways, or any other benefits.

Moreover, Salini provides that, in the case of gifts or gifts given or received, is kept full traceability of the act, of the estimated value and the names of individuals / companies involved (e.g. beneficiaries and grantors).

With reference to entertainment and hospitality expenses, Salini provides, in addition to what listed above, that employees comply with the provisions of the Compliance Procedures attached to the present Model, especially with regard to the authorization process and traceability of all information sources.

3.8.2 Entertainment expenses, travel and hospitality

Even visits to the headquarters, off-site meetings and other transactions related to commercial activities that may involve the payment or the reimbursement by the Company of travels and related expenses (e.g. transportation, accommodation, meals and additional expenses) of individual administrative officials or employees of a business partner, may generate corruption risks.

Entertainment expenses incurred must be justified by business activities and they does not have as main purpose visits to tourist attractions or foreign officials' families.

Transactions, such as the payment of travel expenses, meals and / or accommodation for an official to let him attend an event sponsored by the Company or visit a Company's site must be properly accounted in order to ensure compliance to the Anti-corruption Laws. Similarly, local laws and regulations contain, in most cases, provisions regarding payments or reimbursements of expenses incurred by third parties. Even where local laws allow the company to pay the expenses of an official, there may be applicable legal requirements for the management, accounting and reporting of such payments.

These laws and regulations must be observed also during the planning of an official trip paid by the Company. Each situation must be evaluated rigorously, taking into account all relevant facts and circumstances.



TRIPS AND GIFTS - QUESTION:

Some Customer representatives travel from the capital to our site once a year to carry out an inspection on the proper conduction of the work. The local law requires that companies subject to the inspection pay travel expenses, meals and accommodation of inspectors. Is this against to the principles defined in the Anti-corruption Model and / or in the applicable Anti-corruption Laws?

ANSWER:

Expenses for visits, meetings, other commercial activities or related to Salini's business may be paid directly by Salini if they are accounted in accordance with the Company procedures and applicable laws. Moreover, any reimbursement must be executed directly to the local Public Administration and not to individuals, upon presentation of receipts documenting incurred expenses, which must be properly reported in the company's books. For any doubt, contact the Anti-corruption Legal Support Unit.

3.9 Recordkeeping and bookkeeping

The principal Anti-corruption Laws impose obligations relating recordkeeping designed, among other, to deter and detect payments and receipts executed with corrupt aims.

Salini prescribed that the bookkeeping must be compliant with applicable accounting principles, completely and transparently reflecting facts of each transaction. All costs and charges, revenues and receipts, income. payments and expenditure commitments should be financially recorded immediately, in a complete and accurate manner and have adequate supporting documents issued in accordance with all applicable laws and with the relevant provisions of the internal control system.

Salini, in accordance with its procedures, prescribes the maintenance of accounting books and related documentation making it available to the external auditor, in order to justify carefully all receipts, payments and in general all transactions, and clearly identify the purpose of such events.

In order to meet these requirements, Salini employees must, with no exception, comply with business accounting requirements. Salini personnel must not ever agree with requests for a false or misleading bill or payment of unusual , excessive or not adequately described expenses, and in any case not enough documented and has to ask for support in accordance with these policies and procedures or business guidelines about financial statements and recordkeeping.

No accounting record or other document related to a transaction must be falsified in any way that would make unclear or falsify the real transaction. No employee must take dispositions that are as inaccurate entries in the accounting books and in Salini documentation. No payment on behalf of Salini can be approved or executed if there is an explicit or implicit agreement that part of the payment will be used for a different purpose than the one described in the supporting documentation of the payment. Hidden or unregistered funds and accounts are prohibited. These requirements apply to all transactions regardless of the financial relevance.

Moreover, all employees must totally observe any applicable requirement for the preparation and delivery of expense reports (for example, they must describe a financial purpose related to expenses for meals and entertainment with administrative officials, list all participants and attach all necessary receipts). In case of any doubts or questions, refer to the Anti-corruption Legal Support Unit.

4. HUMAN RESOURCES

Salini may be held responsible for conduct engaged in by some of its personnel not in accordance with Anti-corruption Laws. Consequently, Salini personnel is required to be compliant with this Model and the Anti-Corruption Laws and it will not be applied any disciplinary measure or similar in case they refuse to commit or omit an action that violates this Model Anti-corruption and / or anti-corruption laws.

In case of violation of this Model, Salini applies, on the contrary, disciplinary actions as prescribed by the Code of Ethics and the internal regulations of the Company.

4.1 Personnel training

Salini, in order to disseminate adequate knowledge and understanding of the contents of this Model, provides that, during the recruitment phase, the selected candidates are required to receive copy of the Organizational Model ex Legislative Decree 231/2001 and copy of the Anti-corruption Model , and to sign a declaration of commitment to the principles there contained.

Salini also envisages that, within the first six months of the date of hire and thereafter, periodically, it will be granted a training course on the present Model and the Anti-corruption Laws, in order to disseminate the principles, commitments and how to implement them.

The Human Resources Department is responsible for the planning of the courses, archiving the distributed material and registration of participants, as well as keeping any information element in compliance with applicable laws.

The International Anti-corruption Model is available for all the Stakeholders in the Group's corporate website <http://XXXXXX/>.

5. INTERNAL CONTROL SYSTEM

All business activities, as well as providing specific controls carried out during the normal course of operations, are to be conducted in accordance with the following principles:

- detection and segregation of incompatible activities/processes, to be achieved through the application of both organizational tools, such as the segregation of duties and responsibilities, and access tools to information and data, whose availability should depend on the responsibilities assigned to the personnel;
- adoption and implementation of appropriate internal regulations in order to define the operational methods to perform the relevant processes and activities;

- recognition of qualified individuals in order to carry out specific control and authorization activities and assignment of appropriate powers and responsibilities in accordance with the assigned tasks;
- traceability of all transactions executed and the regular accurate recordkeeping and bookkeeping.

6. ALERTS

Salini personnel is required to report any possible, suspected or clear violation of this Anti-corruption Model and/or the internal and/or external laws, executed by the Company, colleagues or Third Parties. Alerts must be sent to the dedicated functional mailbox which has as recipients the persons in charge of the implementation of the anti-corruption provisions or the Anti-corruption Legal Support Unit. Communication must be also sent for information to the relevant manager of the employee.

The Anti-corruption Legal Support Unit, once has ascertained the nature of the alert, notifies it to the Company's Watch Structure.

Those who report are protected against any form of retaliation, discrimination or penalization and, in any case, is guaranteed the confidentiality of the reporting party, except as obligations required by law and the safeguard of the Company or persons rights wrongly accused and / or in bad faith.

7. GLOSSARY

Active corruption – deliberate action of anyone who promises or gives, directly or indirectly, a financial benefit or other utilities to a public official or public service officer or to an individual, for himself or for third parties, to make him act or refuse to act in accordance with its duties or in the exercise of his functions in breach of the obligations inherent his office or duties of loyalty.

Agent – individual or legal person who is in charge of promoting the commercial interests of Salini or facilitates the execution and / or performance of contracts with third parties on behalf of Salini, from which has received mandate with or without representation.

Anti-corruption Laws – include Italian Penal Code, Legislative Decree 231/2001 and other applicable measures, the FCPA, the UK Bribery Act and other laws, in force in the entire world, of public and commercial law against corruption and international anti-corruption treaties, such as the Convention of the Organization for Economic Cooperation and Development on the fight against corruption of Foreign Public Officials in international business transactions and the United Nations Convention against Corruption.

Anti-corruption Legal Support Unit – Unit established within the XXXXXXXX Department responsible for providing specialized assistance concerning Anti-corruption matters, related to operating activities directly managed by Salini.

Bribe – anything that has a value (e.g. money or any other utilities) offered, promised, required or accepted by / to a third party in order to act or refuse to act according to its duties or in the exercise of his functions, in violation of obligations relating to its office or loyalty duties.

Conflict of interest – a situation that occurs when a person, entrusted with a particular decision-making responsibility has personal and / or professional interests in conflict with the impartiality required of this responsibility, which may be affected by the interests in place.

Consulting – providing intellectual services related to opinions and studies aimed at the establishment of guidelines, action plans or feasibility studies to support management decisions on specific issues (e.g. strategic / directional issues) identified as priorities for the corporate and / or for know-how development.

Direct corruption – act of corruption executed directly from one person to another.

Due diligence – verification activity of the counterpart aimed at assessing risks that the company may accept entering into agreement with a third party. This evaluation activities can be performed periodically in order to assess possible new risks in the management of the relationship with a third party.

Entertainment expenses – Free provisions of goods and services deriving from relational obligations and / or hospitality duties, based on business customary in the field and related to business activities.

Facilitation –see "*facilitation payment*".

Facilitation payment – payment to a Public Officer in order to speed up, facilitate or ensure a routine activity and having no discretionary nature, or an activity however expected within his official duties.

Forensic Review – control activities performed to identify and evaluate potential weaknesses in the internal control system and / or potential suspicious transactions carried out by third parties with whom we would create a relationship.

Free giveaway – see "*Gift*".

Gift – good (including services) bestowed as liberality, given as unilateral act without any compensation.

Hospitality expenses – entertainment expenses incurred (e.g. travel expenses, accommodation and meals) to give hospitality to suppliers/customers or other individuals, with regard to business activities.

Indirect corruption – act of corruption executed by a third party acting on behalf of another person.

Intermediary – individual or legal person that connects two or more parties in order to procure / provide or entertain a deal, without the duty of collaboration, dependency or representation.

Joint Venture – contracts in which two or more companies, even belonging to different States, agree to collaborate for the realization of a project sharing risks and taking advantage by their respective skills and aimed at establishing joint ventures, consortiums, temporary associations of companies (TAC), collaboration agreements or other entities with or without legal personality, where Salini holds an interest..

Passive corruption – deliberate action of a public official or public service officer or an individual who, directly or indirectly, demands or receives advantages of any kind, for himself or a third party, or accepts the promise or advantage, to act or refuse to act according to his duty or in the exercise of his functions in violation of the obligations inherent in his office or duties of loyalty.

Person in charge of the implementation of the anti-corruption provisions – reference person of the Company for anti-corruption matters. The person in charge of the implementation of the anti-corruption provisions is identified and appointed during the adoption of the Anti-corruption Model by each company.

Professional service – intellectual services assigned to third parties related to the ordinary business activity (e.g. selection / training of personnel, technical and specialized activities, IT services, etc.) for which it is required knowledge, skills or resources currently not available in the Company or, due to the law, it must be necessarily assigned to third parties.

Public Officer – includes any public official in general, elected or appointed; any employee or other person acting as or on behalf of a public official, an organism, an instrumentality or a company that performs a governmental function; any employee or other person acting for or on behalf of an entity entirely or partly owned or controlled by the government; any political party, officer, employee or other person acting for or on behalf of a political party or any candidate for public office; or any employee or person acting for or on behalf of a public international organization (such as the UN or the World Bank). This definition includes all officers and employees of companies owned or controlled, even if only partially, by the government. So this includes all employees of companies and government-owned instrumentality, even if the companies are managed as private companies.

Red Flag – any circumstance or event able to alert, with respect to a possible hazardous situation, a violation of anti-corruption laws or principles contained in this Model.

Relevant Third Party – individual or legal person that, in performing its activities, acts on behalf of Salini (such as an Agent or Intermediary), or a partner (including joint ventures), or a legal person subject of an extraordinary transaction.

Social Solidarity – free activity provided to people in a "state of need and disadvantage" inclining to offer social assistance, health care support, social rehabilitation, social rehabilitation and protection of rights.

Something of value – includes, for example, cash, cash equivalents (such as checks, money orders, coupons / gift certificates or coupons), gifts, travel, meals, entertainment, accommodation or valuable favors (such as opportunities for education and employment for friends and relatives). For the purposes of this policy, a "something of value" does not have a minimum value. Even a small gift can be considered as "something of value." In addition, charitable donations, contributions with equal money, investment opportunities, subcontracting, financing of events, positions in joint ventures, convenient contracts, business opportunities and similar elements are all considered as "things of value" that can be used in violation of the policy of Salini and the reference anti-corruption laws.

Third Party – individual or legal person, external to Salini (e.g. suppliers, customers, etc..).

Annex 1 – References for Anti-corruption issues

- **Anti-corruption Legal Support Unit**

Name, Surname

Telephone number

e-mail

- **Person in charge of anti-corruption provisions Company X**

Name, Surname

Telephone number

e-mail

- **Person in charge of anti-corruption provisions Company X**

Name, Surname

Telephone number

e-mail

- **Person in charge of anti-corruption provisions Company X**

Name, Surname

Telephone number

e-mail