

ANTI-CORRUPTION POLICY

We build value

Salini Impregilo is an international industrial group specialising in the construction of major works. The Group recognises the paramount importance of conducting its business with integrity, transparency and fairness in every country in which it operates.

To this end, Salini Impregilo promotes an Anti-Corruption Policy in order to consolidate the principles of its Code of Ethics and actively support initiatives intended to reinforce the guiding standards and principles of all personnel, in accordance with applicable legislation, and in order to avoid any harm to the Company or its image.

The Company Anti-Corruption Compliance System is based on the following principles:

- *any type of corruption in any form or by any method in any jurisdiction is prohibited, even if, in practice, such activities are permitted, tolerated or not prosecutable by law;*
- *it is strictly prohibited to offer, promise, authorise, accept or request any gifts or other benefits that:*
 - *could lead a public official, civil servant or private individual to perform their duties or any other activity in an inappropriate manner, or to compensate them for acting in such a way;*
 - *could influence an act or omission or any decision by a public official, civil servant or private individual in breach of a duty of office or obligation of loyalty;*
 - *may be intended to obtain an undue benefit of any kind, not only in the interests and/or for the benefit of the Company, but also for personal interest or benefit or for the interest or benefit of family members or acquaintances;*
- *accurate, complete and transparent records must be kept of all operations, in compliance with accounting standards, in order to obtain full traceability of all receipts, payments and other transactions.*

The Company establishes measures that are appropriate for the fulfilment of the above principles and implements all the procedures needed to verify compliance with this Policy, the Code of Ethics and the applicable anti-corruption laws.

Application of this Policy is the direct responsibility of all Salini Impregilo employees and of all third parties with whom the Company collaborates. Each director and manager is individually responsible for ensuring that his team respects the Anti-Corruption Compliance System.

Any employee refusing to act in a way that conflicts with this Policy and/or with anti-corruption laws will not be subject to any type of disciplinary measure or retaliation.

Any employee or collaborator who does not act in accordance with this Policy or who fails to report known or suspected infringements will be subject to disciplinary measures proportionate to the seriousness of the violation.

It is the Company's responsibility to regularly review and monitor the contents of this Policy and to ensure that it is applied.

Milan, June 2014

Pietro Salini
Chief Executive Officer
