SUSTAINABILITY POLICY

Sustainable development and **efficiency** and **respect** for people and the environment are the foundations that have always characterised the ERG Group's business approach.

These values translate into the ability to reconcile its activities with the need to protect the environment and health & safety, **maintaining trusting relations with its various stakeholders**. Moral integrity, personal honesty, correctness and transparency in relations must form the basis of the conduct of all those that work with the Group.

Through the Sustainability Committee and the support of all of the Business Units involved, the Group has established an organisational structure that allows it to pursue its goals and commitments as they are defined.

Appropriate reviews and checks of the present Policy are carried out periodically to assess its suitability and define any eventual improvement actions.

In this regard ERG operates in the belief that:

- sustainability is the driver of a continuous improvement process that guarantees results over time and the strengthening
 of its economic performances, reputation and the health and safety of its workers, as well as enabling it to meet its
 quals in the environmental and social spheres;
- the creation of "shared value" for stakeholders represents one of the main features of the Group's sustainability;
- merely respecting the law is not enough to guarantee its sustainability over time. For this reason, in its business activities
 the Group also adheres to the principles of the Code of Ethics and the 231 Models adopted by the individual companies,
 the anti-corruption guidelines and internal policies.

These values are applied to the following action areas:

A. People

The Group's sustainable approach can be seen in its policies to protect and develop its Human Capital by:

- monitoring respect for the principles recognised by the Universal Declaration of Human Rights, the declarations of the International Labour Organisation, the principles of the UN Global Compact;
- adopting and applying certified processes and procedures, also supported by the adoption of Safety Management Systems certified according to recognised standards, aimed at minimising risks and eliminating the causes that can jeopardise the health and safety of its employees and third parties that work in the Group's sites and/or offices;
- fully respecting legal obligations as regards involving employees, or their representatives, in company reorganisation
 processes; guaranteeing the equality of its people, understood as the desire to guarantee equal opportunities without any
 discrimination based on political opinions, nationality, age, sex, sexual orientation and/or any intimate personal characteristic;
- recognising its people's freedom to join and/or associate themselves with trade or workers' unions;
- defining policies and activities to help with the work-life balance;
- enhancing its people's contribution to achieving the company's targets using appropriate assessment systems and supporting professional development training initiatives.

In the awareness that the active contribution of all people is key to meeting the above goals, ERG pursues an ongoing targeted information, awareness and training programme.

B. Environment & Climate Strategy

In terms of its business culture, **environmental protection** is one of the Group's key values. For this reason ERG has developed a business model that enables it to produce energy with a much reduced environmental impact. In accordance with this principle the Group pledges to:

- prioritise the development of renewable sources and the use of fuels with low carbon intensity;
- minimise the environmental impact of its activities, reducing its energy consumption, atmospheric emissions and waste production also by improving the quality and efficiency of its plants;
- consider the protection of biodiversity, natural habitats and ecosystems as a key component of sustainable development when developing its projects;
- promote the informed and responsible use of all natural resources available to the Group;
- adopt Environmental Management Systems certified according to recognised standards in its operating companies
 with the aim of continuously improving its performances and mitigating risks.

C. Business partners

To ensure its business partners are inspired by the same ethical-social and environmental principles and criteria that guide the Group's operations, ERG pledges to:

- request them to adopt practices and conduct in line with the principles that inspire the ERG Group, as defined in the Code of Ethics, the Organisation and Management Models pursuant to Leg. Decree 231/01, the anti-corruption guidelines and the present document;
- consider organisational and ethical criteria and standards when selecting, qualifying and assessing the Group's business partners.

D. Community and Stakeholders

In order to guarantee and maintain an open **dialogue with the local communities** in which it works and with all stakeholders with whom it interacts (understood as "all legitimate stakeholders - implicit or explicit - influenced by its activities"), the Group pledges to:

- assess the specific economic, environmental and social impacts generated by its activities at local level;
- participate in the growth and development of the communities in which it works;
- establish, in respect for the principles of the Code of Ethics, constructive and transparent relations with stakeholders, informing them of the actions taken and the results achieved in relation to its economic-financial and social-environmental responsibility goals;
- publish an annual Sustainability Report, drafted in accordance with recognised standards, with the aim of communicating
 the actions taken and the results achieved in a clear, truthful and honest way.

In order to maximise the positive impact of its activities in the community in terms of growth and development, **the ERG Group analyses the requests that arrive from the community and chooses the most deserving** on the basis of the values they express and the positive effect they have on the community in question. The selected activities generally belong to one of the following categories identified as priority action areas:

- culture, knowledge and scientific research;
- environment, health and social;
- young people and sport.

E. Reputation and anti-corruption

The Group believes **that maintaining and protecting its reputation** is essential in order for it to be adequately perceived as an honest and reliable partner by all of its stakeholders.

To this end, the Group respects the laws and the regulations of the individual countries in which it operates, implementing measures to combat corruption and illegal practices. More specifically, in addition to its Code of Ethics and the Organisation and Management Models pursuant to Leg. Decree 231/01 adopted by the Group companies that exist under Italian law, which include specific codes of conduct, obligations and prohibitions in the area of corruption, ERG has defined the Anti-Corruption Guidelines which, together with the Code of Ethics, are adopted by all of the Group companies that fall under international law and which are therefore applicable in all foreign countries in which ERG operates.

To this end, ERG:

- does not tolerate any form of corruption, viewing it as a risk for a sustainable development economy, for good governance and fair practices;
- pledges to train and raise awareness among all of its people, as well as to develop suitable procedures, particularly as
 regards relations with the community, the authorities and institutions, suppliers and customers.

Genoa, January 2016 The Chairman Edoardo Garrone