

POLICY FOR THE PREVENTION AND COMBATING OF THE CORRUPTION

Italgas has as its primary goal the development of its business according to the principles of loyalty, fairness, transparency, honesty and integrity, in compliance with laws, regulations, international standards and guidelines. To this end, it has established an integrated management system for the prevention and combating of corruption based on company policies and in compliance with the Code of Ethics.

The Management System of ITALGAS S.p.A. and ITALGAS RETI S.p.A. Management is developed in an integrated manner in accordance with the requirements provided:

- by the UNI ISO 37001:2016 "Anti-bribery management systems - Requirements and guidance for use", according to which "*a commitment to meet the requirements of the anti-bribery management system*" and "*a commitment to the continuous improvement of the anti-bribery management system*", which Italgas has decided to comply with;
- from the tenth principle of the Global Compact, according to which "*companies undertake to combat corruption in all its forms, including extortion and bribes*" to which Italgas has adhered.

Italgas considers its own Management System as one of the main incentives for the involvement of its personnel in preventing and combating corruption and for improving its processes.

The Management System, with reference to the prevention and combating against corruption, applies to Italgas S.p.A. e to Italgas Reti S.p.A. In any case, all Italgas Group companies are required to formally adapt to the Management System by means of an act taken by their administrative body.

All the requirements of the reference legislations are fully applied within the Management System.

The Italgas Policy is based on the following principles:

- to oppose without exception practices of corruption, illegitimate favors, collusive behavior, solicitations, direct and/or through third parties, of personal and career advantages for oneself or others;
- managing activities in compliance with the Anti-Corruption Laws, all the other administrative provisions and the supplementary and improved company provisions;
- to carry out checks, inspections and audits, to evaluate the performances and conducts and review the objectives and programs, submitting to a periodic review the policy to

- assess its effectiveness by adopting the requisite measures;
- to promote the identification of risks, in a proactive manner, favoring coherent, informed and conscious decisions aimed at pursuing the prevention and combating of the corruption;
 - to guarantee, through appropriate procedural, management and organizational tools, the fulfillment of the anti-bribery management system requirements;
 - to elaborate and activate all the organizational and procedural solutions necessary to prevent and combat the corruption phenomena;
 - to ensure the information, training, and awareness of personnel for an active and responsible participation in the implementation of the principles and the achievement of the objectives;
 - to select and promote the development of suppliers according to the principles of this policy, committing them to maintain consistent behavior with it;
 - to encourage personnel to report suspects in good faith, or on the basis of a reasonable and confidential conviction, without fear of retaliation by making use of the specific procedure on the process of receiving, analyzing and processing the reports sent or transmitted;
 - to pursue continuous improvement of its own anti-bribery management system, characterizing it to the efficiency, through the control and management of risk factors;
 - to ensure adequate independence and authority to the compliance function for preventing and combating corruption so that it can guarantee the functioning of the management system, assessing its adequacy over time and its effective implementation, also through a periodic update of the governing body and the high direction;
 - to impose disciplinary measures and take any other legal action against Italgas Group Personnel operating in violation of the Anti-Corruption Laws, the principles of this policy for the prevention and combating of corruption, as well as the Code of Ethics;
 - to subject the Business Partners who operate in violation of the Anti-Corruption Laws, of the principles of the present policy for the prevention and contrast of corruption, as well as of the Code of Ethics, to the contractual remedies, including the suspension of the execution and up to the termination of the contract, to prohibition from dealing with the Italgas Group and to the claims for damages.

This policy is communicated to stakeholders in a perspective of transparency and collaboration and is available to the public and to anyone who requests it.

Milan, December 1, 2018

The CHIEF EXECUTIVE OFFICER
Paolo Gallo