

## **Global Compact**

# **TECNIMONT COMMUNICATION ON PROGRESS (COP)**

**Year 2011**

## **CONTENTS**

- 1 Statement of support**
- 2 Tecnimont in brief**
- 3 Our Sustainability Policy**
- 4 Human rights**
- 5 Labour standards**
- 6 Environment**
- 7 Anti-Corruption**
- 8 Performance Indicators**

### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castilia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)

## **1. STATEMENT OF SUPPORT**

Tecnimont confirms its intent and its commitment to support the ten principles of the Global Compact with respect to human rights, labour, environment and anticorruption.

Our intent remains to advance those principles which we meet as inside our direct or indirect influence. We confirm to be committed to make the Global Compact principles as essential and continuous part of our strategy, of our culture and of our daily operations. This is confirmed to be actuated at each of our locations, both permanent as engineering centres or branch offices, and temporary as construction sites or managed facilities.

In order to demonstrate our commitment and willing of communication, we already prepared and distributed our Social Accountability Policy, made available to our stakeholders and the general public.

Attached to this Statement of Support we include our Communication on Progress (COP) that describes our company effort to implement the ten Global Compact principles.

We confirm to support public accountability and transparency, and therefore we confirm to commit to report on our progress on a continual basis and whenever or performances will be able to contribute to the Global Compact COP policy.

***Roberto Folgiero***

Tecnimont Managing Director

### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castilia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)



## 2. TECNIMONT IN BRIEF

According to the Group's Code of Ethics, already well grounded in its business culture, in 2011 Maire Tecnimont launched the programme to implement, manage and certificate the Social Accountability management system.

In line with this new management system, Maire Tecnimont undertakes to fulfil its social obligation to provide a fair and humane working environment for each individual employee and the employees as a whole. The Social Accountability System is an integrated part of the overall business and is an essential element of management.

This system is based on the SA 8000 international reference standard, the Universal Declaration of Human Rights, and the UNO/ILO Declarations/Conventions, including, among its main objectives, the assessment of the ethics and the respect of workers rights within the Group companies and the diffusion of the same principles among the vendors and subcontractors on which Maire Tecnimont may have influence as a result of their involvement in operating projects.

Wherever control or influence exists, the Company will make a concentrated effort to improve the social accountability management system through the periodical verification of specific results and its overall implementation, including therein the possibility of every stakeholder to interact and contribute to the system's ongoing improvement.

### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castillia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)

### **3. OUR SUSTAINABILITY POLICY**

Tecnimont recognises the creation of a proper human workplace among the highest Corporate priorities, and as a key contribution to cultural sensitivity, sustainable development and therefore human evolution. Our goal is to promote continual improvement of our organization through education, training, communication and through the involvement of all employees.

This Social Accountability Policy is established to fulfil our social obligations to provide a fair and human working environment to each and to the whole of our employees. The Social Accountability System is to be considered both as an integral part of our business and as a key element of Management.

In pursuing its activities, Tecnimont is committed to develop increasing awareness, competence and control in compliance with applicable laws and regulations and other subscribed requirements, as well as to respect the agreed international labour criteria and their local interpretation.

Tecnimont management commits itself to accomplish perceived social obligation by taking all appropriate measures to meet and — wherever possible — to exceed requirements addressed by the International Standard SA 8000. The organization will therefore:

- avoid Child Labour,
- avoid Forced and Compulsory Labour,
- provide a Healthy and Safe workplace,
- respect Freedom of Association and Right to Collective Bargaining,
- not engage in or support Discrimination,
- minimize any Disciplinary practices,
- agree sustainable levels of Working Hours,
- ensure proper Remuneration,
- actuate an overall management system aimed at continual improvement.

Executive management will review adequacy, suitability and effectiveness of the company's SA 8000 Policy at least once a year.

Wherever Tecnimont has control or influence, including operations with contractors, we will improve our Social Accountability management system through periodical verification of specific results and of overall actuation.

We believe that by complying with this policy as well as with our customers' and stakeholders' cultures, we will ultimately contribute to enhance the standard of life of our employees, of our contractors and of our society in general.

## 4. HUMAN RIGHTS

### **Principle 1**

Businesses should support and respect the protection of internationally proclaimed human rights.

### **Principle 2**

Businesses should make sure that they are not complicit in human rights abuses.

Tecnimont employees are the essential asset of its business. Their dedication, knowledge and added experience make it possible for the Company to remain competitive and innovative. Tecnimont continued success is dependent upon its ability to meet the needs of its workforce located in the temporary or permanent sites.

Tecnimont recognises the creation of a proper human workplace among the highest Corporate priorities, and as a key contribution to cultural sensitivity, sustainable development and therefore human evolution. Our goal is to promote continual improvement of our organization through education, training, communication and through the involvement of all employees.

The Company is committed to providing a violence-free workplace. Acts or threats of physical violence, including intimidation, and harassment that involve or affect the Company or that occur in the workplace will not be tolerated. This prohibition against threats and acts of violence applies to all persons involved in Company operations, including, but not limited to, Tecnimont personnel, contract workers, temporary employees, and anyone else in the workplace.

Tecnimont is committed to user privacy in its products and services and seeks to provide a secure business environment for the protection of employees' and customers' private information. Tecnimont considers it to be its duty to invest in the development of its employees. Innovation and excellence are the at heart of the Tecnimont culture, and constitute the reason why its commitment also includes investment for the development of new, more environmentally friendly technologies and other innovations to improve its standards of quality.

The Group consolidated its efforts to enhance HSE awareness and knowledge at all the permanent offices and temporary sites, paying special attention to key roles and responsibilities. The HSE Management System is designed to also enhance the awareness of local experiences, knowledge and, therefore, the local culture with the aim of promoting the Maire Tecnimont open-mind business culture.

In addition, Tecnimont ensures that its employees:

- are aware of their own human rights and respect the rights of others;
- receive a fair compensation and have a flexible workplace that serves the requirements of both the Company and the employee;
- have the opportunity to voice their complaints or concerns regarding the business environment;
- have the opportunities and resources needed to enhance their competencies and performance.

### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castillia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)

## 5. LABOUR STANDARDS

### **Principle 3**

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

### **Principle 4**

Businesses should support the elimination of all forms of forced and compulsory labour.

### **Principle 5**

Businesses should support the effective abolition of child labour.

### **Principle 6**

Businesses should support the elimination of discrimination in respect of employment and occupation.

The consolidation of the Health, Safety and Environmental Management System in 2011 achieved its corporate vision of continued excellence in HSE performance and its proactive implementation in each of the Company's business operations and projects. This approach attests the Group's focus on the key strategic issues of the Tecnimont business ethic and the priority to safeguard the health of its employees, to ensure the safety of its operations, and to protect and preserve the environment.

The HSE Management System is in place at each permanent workplace and each construction site. Further resources were dedicated to the effort to diffuse, reinforce and verify the system's implementation and operation, and to improve its performance, as well as to guide staff in adopting the principles and pursuit of the HSE Policy objectives. The HSE management System also is up and running in all the Group's subsidiaries.

The Social Accountability Policy is established to fulfil our social obligations to provide a fair and human working environment to each and to the whole of our employees. The Social Accountability System is to be considered both as an integral part of our business and as a key element of Management.

In pursuing its activities, Tecnimont is committed to develop increasing awareness, competence and control in compliance with applicable laws and regulations and other subscribed requirements, as well as to respect the agreed international labour criteria and their local interpretation.

Tecnimont's safety performance record outperformed the benchmark and the accepted national and international standards. We highlight the excellent safety record of the foreign construction sites, where the Group carries out most of its activities, which achieved a significantly higher-than-average result in terms of comparable sector activities.

#### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castillia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)

## 6. ENVIRONMENT

### **Principle 7**

Businesses should support a precautionary approach to environmental challenges.

### **Principle 8**

Businesses should undertake initiatives to promote greater environmental responsibility.

### **Principle 9**

Businesses should encourage the development and diffusion of environmentally friendly technologies.

We reiterate our commitment to consolidate the HSE performances, to refine the criteria for HSE monitoring, to update risk and impact analyses and action plans, to further standardize procedures across all the sites of system implementation, and to implement the audit of the construction sites and offices by increasing the dedicated specialized resources.

The proactive design of the HSE Management System enables the Group to implement, control and monitor applicable or required preventive and corrective actions, while also ensuring a cultural sensitivity to the customs and traditions of local participants in the ongoing improvement process, also to ensure that the Group's developed operations are adapted to potential changes in conditions.

Regular HSE monitoring of subcontractors remains an essential system function and, to achieve its objectives, the HSE Management System assigns roles and responsibilities to all the personnel involved. The HSE Department has introduced specific updates to incorporate the experiences learned through project development, internal verification, and the best practices ensuing from cooperation with the relevant business associations, universities, national and international authorities, and certification bodies.

The Group consolidated its efforts to enhance HSE awareness and knowledge at all the permanent offices and temporary sites, paying special attention to key roles and responsibilities. The HSE Management System is designed to also enhance the awareness of local experiences, knowledge and, therefore, the local culture with the aim of promoting the Tecnimont open-mind business culture.

#### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castillia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)

## 7. ANTI CORRUPTION

### ***Principle 10***

Businesses should work against corruption in all its forms, including extortion and bribery. Tecnimont is committed to upholding high moral and ethical principles and specifies the basic norms of behavior for its employees.

Tecnimont's business practices is consistent with the ethical business practices in the markets in which it operates We believe that honesty is the essential standard of integrity throughout every location and every project that we undertake. We therefore base each activity on integrity and respect, and this principle is included in each our organization or management procedure.

Wherever Tecnimont has control or influence, including operations with contractors, we will improve our Social Accountability management system through periodical verification of specific results and of overall actuation.

We believe that by complying with our principles and policy as well as meeting with our customers' and stakeholders' cultures, we will ultimately contribute to enhance the standard of life of our employees, of our contractors and of our society in general.

#### **Tecnimont SpA**

Registered Office Milan:  
Via Gaetano De Castillia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)



## 8. PERFORMANCE INDICATORS

We at Tecnimont became signatories of the UN Global Compact in May 2011. This is our first COP including the very first year of performances and progress connected with our beginning effort to demonstrate what we feel to be. A company devoted to meet different cultures constructing common shared evolved human Culture.

	Actuated System	Measures 2011	Achievements 2011
<b>Principle 1:</b> Support of human rights	<ul style="list-style-type: none"> <li>• Human Rights Position</li> <li>• Procurement Policy</li> <li>• Requirements introduced for suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Strategy development and expansion of our global commitment in the field of EPC</li> <li>• Development of a procedure for suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• SA 8000 management system actuation and request for certification</li> </ul>
<b>Principle 2:</b> Exclusion of human rights violations	<ul style="list-style-type: none"> <li>• Compliance System</li> <li>• Procurement management</li> <li>• Human Resources Governance</li> </ul>	<ul style="list-style-type: none"> <li>• Risk analysis in Procurement</li> <li>• Dialogue with politicians and NGOs</li> </ul>	<ul style="list-style-type: none"> <li>• SA 8000 management system actuation and request for certification</li> </ul>
<b>Principle 3:</b> Observance of the right to freedom of association	<ul style="list-style-type: none"> <li>• Group works councils</li> <li>• Human Rights Position</li> </ul>	<ul style="list-style-type: none"> <li>• Expansion of Tecnimont management system across worldwide controlled companies</li> </ul>	<ul style="list-style-type: none"> <li>• SA 8000 management system actuation and request for certification</li> </ul>
<b>Principle 4:</b> Abolition of all forms of forced labour	<ul style="list-style-type: none"> <li>• Human Rights Position</li> <li>• Compliance System</li> <li>• Procurement management</li> </ul>	<ul style="list-style-type: none"> <li>• Issue of dedicated management procedure</li> </ul>	<ul style="list-style-type: none"> <li>• SA 8000 management system actuation and request for certification</li> </ul>
<b>Principle 5:</b> Abolition of child labour	<ul style="list-style-type: none"> <li>• Human Rights Position</li> <li>• Procurement management</li> </ul>	<ul style="list-style-type: none"> <li>• Issue of dedicated management procedure</li> </ul>	<ul style="list-style-type: none"> <li>• SA 8000 management system actuation and request for certification</li> </ul>
<b>Principle 6:</b> Elimination of discrimination	<ul style="list-style-type: none"> <li>• Human Rights Position</li> </ul>		<ul style="list-style-type: none"> <li>• Increase in percentage of women in senior management</li> <li>• SA 8000 management system actuation and request for certification</li> </ul>

### Tecnimont SpA

Registered Office Milan:  
Via Gaetano De Castilia 6 A, 20124 Milan, Italy  
P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
Register of Enterprises of Milan,  
Tax/VAT File No. 01628410159  
Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)

	Actuated System	Measures 2011	Achievements 2011
<b>Principle 7:</b> Precautionary environmental protection	<ul style="list-style-type: none"> <li>HSE management system</li> </ul>	<ul style="list-style-type: none"> <li>Regular HSE audits</li> <li>Training in methods of management system meaning and participation</li> </ul>	
<b>Principle 8:</b> Specific commitment to environmental protection	<ul style="list-style-type: none"> <li>Tecnimont HSE Improvement Plan</li> <li>Statement of the UN Global Compact participation</li> </ul>	<ul style="list-style-type: none"> <li>Investigations into permanent location environmental aspects</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Confirmation of worldwide ISO 14001 certification for all Tecnimont activities</li> </ul>
<b>Principle 9:</b> Diffusion of environmentally friendly and technologies	<ul style="list-style-type: none"> <li>HSE management system</li> <li>Tecnimont HSE Improvement Plan</li> <li>Best Practice Office (BPO) operations</li> </ul>	<ul style="list-style-type: none"> <li>Development of innovative air emissions processes</li> <li>BPO analyses and documentation</li> </ul>	
<b>Principle 10:</b> Measures to fight corruption	<ul style="list-style-type: none"> <li>Tecnimont Policy</li> <li>Procurement management</li> </ul>	<ul style="list-style-type: none"> <li>Corporate compliance campaign</li> </ul>	

**Tecnimont SpA**

Registered Office Milan:  
 Via Gaetano De Castilia 6 A, 20124 Milan, Italy  
 P +39 02 63131 F +39 02 63139052

Sole Shareholder Company,  
 Subsidiary of Maire Tecnimont S.p.A

Share Capital € 52.000.000, fully paid-up  
 Register of Enterprises of Milan,  
 Tax/VAT File No. 01628410159  
 Economic Administrative Repertory No. 574643  
[www.mairetecnimont.it](http://www.mairetecnimont.it)