



Anas SpA Società con Socio Unico
Cap. Soc. € 2.269.892.000,00 – Iscr. R.E.A. 1024951 – P.IVA 02133681003 – C.F. 80208450587
Via Monzambano, 10 – 00185 Roma – Tel. 06 44461
Fax 06 4456224 – 06 4454956 – 06 4454948 – 06 44700852
Pec anas@postacert.stradeanas.it

Rome, November 2014

His Excellency Mr. BanKi – moon
Secretary-General
United Nations
New York, NY 10017
USA

Dear Secretary-General,

I am pleased and proud to confirm the full support of ANAS S.p.A. to the Ten Principles of the United Nations Global Compact this year too.

Being aware of playing an important role in the Italian context, ANAS carries out its activity of road and highway network manager fostering a fair and transparent policy that allows to manage and develop Italian road infrastructure heritage, with the aim of increasing quality service provided to citizens and setting an institutional framework which promotes the sustainable development of society.

Sustainability programmatic actions, in line with sustainable development, are reflected in the implementation of business management systems through quantitative and qualitative sustainable indicators which are annually published in the Integrated Report in accordance with the G.R.I. guidelines and the IIRC recommendations.

ANAS continued on its path towards a responsible future based on protection of workers' rights, environmental protection and fight against corruption. ANAS is highly committed to spread the sustainable culture among its stakeholders through the economic, environmental and social point of view. A culture in which the Ten Principles of the United Nations Global Compact can become always more a guiding light both in strategies implementation and in operational activities.

Yours faithfully.

The Chief Executive Officer
Pietro Ciucci



Human rights

Assessment, policy and goals

Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments and company goals on Human Rights.

ANAS, aware of human rights protection playing a key role in socially responsible society development, is committed to ensure compliance with international regulation concerning human right during its own activities and its suppliers activities execution.

ANAS operates principally in Italy where constitution and laws protect human rights in total compliance with both the UN Universal Declaration of Human Rights and the ILO Conventions.

These principles are also in the Code of Ethics of ANAS, that it's available on its website.

Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

ANAS requires compliance with Code of Ethics principles to all of its stakeholders, furthermore ANAS could apply sanctions in case of their violation.

Regarding its suppliers, ANAS carries out controls and assessments on human rights compliance directly during the early stage screening, as required by Italian law on public procurement.

In contracts with its suppliers ANAS includes specific clauses in order to ensure human rights conditions. In case of non-compliance with some of these clauses the contractor's charge could be revoked, even with work in progress.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

ANAS has carried out audit concerning human rights on its contractors that took part in tenders issued in 2013.

During 2013, ANAS has not been subject to inquiries, litigations, fines or other significant events related to Human Rights.

Labour

Assessment, policy and goals

Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities).

Description of written policies, public commitments and company goals on labour rights.

ANAS adopts regulations, behaviors and labour practices to promote fair and merit-based employment and in order to ensure adequate opportunity to each employee for fulfill his potential.

ANAS policies related to the rights of the workers are compliant with ILO Conventions and Italian laws concerning:

- upholding the freedom of association;
- elimination of all forms of forced and compulsory labour;
- not employing child labour;
- elimination of discrimination in employment and occupation.

Implementation

Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.

In order to promote a fair and upright human resource management, ANAS deems following aspect as extremely relevant:

- employees training program;
- equal opportunities;
- fair relationship with trade unions;
- meritocracy;
- health and safety at work.

Training is the main pillar by which ANAS is sustaining its scientific research process, as well as transmission, widespread and promotion of firm values.

For this reason in 2013 ANAS, through the Center for Higher Education, doubled investment in training compared to the previous year.

ANAS is committed to offer job opportunities to people belonging to disadvantaged groups; indeed more than 8% of ANAS workers has disability, as requested by Italian law (art. 3 and art. 18 of Law 68/199).

Moreover, in order to ensure equal opportunities between men and women, ANAS protects and encourages women's work providing a set of benefits:

- reduction of working hours (not paid) for employees with children younger than 3 years of age;
- benefits system (for specific reasons such as family or health related);
- summer Camps for employees' children.

Pointing out that 100% ANAS employees are covered by collective agreements, even this year ANAS has kept on its dialogue with trading unions in a productive and transparent way, aiming at ensuring an appropriate professional development to its employees.

In 2013, ANAS carried on an internal selection process among its employees in order to ensure adequate opportunities for professional growth, to facilitate internal mobility and to create a tool aimed at retaining the best professional profiles within the organization, through skills appreciation.

In order to make sure that both the most brilliant employees and healthy competition dynamics can stand out, ANAS employees remuneration is identified on criteria that are:

- recognizing the responsibility and the expertise;
- ensuring a remuneration related to the level of individual performance;
- assessing the achievement of efficiency results and service quality.

With the aim of reducing as much as possible health and safety risks at work, during 2013 ANAS has carried out activities in order to verify the effective implementation of its Model of Organization, Management and Control (or MOG) both in the Departments and in the General-Directorate. By the controls performed, MOG (compliant with the requirement of British Standard OHS, Occupational Health and Safety) has resulted to be correctly adopted and no significant either structural or operational criticalities has stand out.

Moreover, in 2013 ANAS has carried out audits in some worksites related to ordinary maintenance activities (as in the previous two years such controls were carried out on larger worksites).

Measurement of outcomes

Description of how the company monitors and evaluates performance.

In 2013, ANAS achieved some important results, such as:

- 9% reduction in number of injury compared to the previous year;
- no recorded events of discrimination based on race, sex, religion or political opinion.

Environment

Assessment, policy and goals

Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities).

Description of policies, public commitments and company goals on environmental protection.

Aware of the necessity of tackling climate change through adoption of environmental impact and energy consumption reduction measures, ANAS actively operates for the environment safeguard.

Environmental issues are taken into account in all ANAS activities: from new works design and realization phase, to existing network management and coordination.

ANAS aims to improve continuously its environmental performance in compliance with the principles of environment protection and responsible use of resources.

Implementation

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

Due to ANAS peculiar activity, indirect environmental impact are more significant than direct ones. Indirect impacts are associated with the outsourced activities carried out by contractors which refer to new road construction and maintenance of existing ones.

For this reason, in accordance with main existing international methodological approaches, ANAS is committed to identify and, if possible, quantify and report on these impacts.

In particular:

- in the design phase of new constructions, system solutions are adopted to contribute to reduce energy consumption during operation, such as systems for regulating lamps flow in road tunnels and in junctions outside, using of lamps with high luminous efficiency (high pressure Sodium, LED), in centralized systems for the optimization of mechanical ventilation systems in tunnels and in the utilization of variable message signs with LED light sources;
- in the construction phase, control and monitoring activities are carried out in order to quantify impacts in terms of water, soil and air pollution as well as noise pollution both during and after the work construction comparing them with the environmental characterization made before worksite opening;
- in the existing network management and coordination phase, actions aim at energy saving, consumption efficiency and existing negative externalities reduction.

Moreover, environmental mitigation and compensation works are implemented in order to reduce environmental impact (such as noise barriers, air pollutants restraining and green areas around the infrastructure).

Environmental Impact Assessment (EIA) requirements are included within special tenders. Regarding generic tenders and contractors selection criteria, ANAS is compliant with Italian law.

Finally, in 2013, research activities in the acoustic and environmental field and studies in anti-noise flooring feasibility have been carried on, whereas research projects with universities and governmental authority have been confirmed.

Measurement of outcomes

Description of how the company monitors and evaluates environmental performance.

In 2013, ANAS continued Environment Management System (EMS) implementation according to ISO 14001 in order to identify, analyze, prevent and control the environmental effects of its activities. In particular, procedures and operational instructions have been implemented both in the General-Directorate and Territorial Offices, while internal training activities for EMS auditors have been carried out, following out the first internal audit cycle.

In 2013, as in the previous year, in the special tender contracts for works and services, four specific sections were included in order to regulate aspects related to the environmental management of construction sites. In particular, for projects overcoming €/million 50 threshold, work performers are required to:

- prepare and adhere to an Environmental Management Manual of the construction site;
- manage waste and environmental pollution obligations;

- fulfill charges relating to industrial waste, toxic and hazardous waste;
- obtain an environmental management system in compliance with the standard ISO 14001 or EMAS regulation criteria;
- perform all tasks scheduled in the Project Environmental Monitoring;
- appoint an Environmental Manager.

Regarding procurement process, in 2013, ANAS has continued procurement policies implementation with an economic, environmental and social sustainability approach, as follow:

- products / services purchase with a low or lower impact on environment due to the manufacturing (e.g. writing materials, clothing, PPE, furniture);
- introduction of specific items in the contract that stimulate suppliers to offer products with the best environmental performance in the market;
- dematerialization of documents and technology use (digital signature in public tender and contracts, vendor lists and archives digitization).
- inclusion of sustainable criteria in the evaluation of bids, ex art. 44 of Legislative Decree 163/2006 and subsequent amendments.

In 2013 ANAS efforts to reduce the environmental impact of its activity have set the following results compared to 2012:

- 1% reduction in energy consumption (both direct and indirect);
- 19% reduction in water consumption;
- 1% reduction in CO₂ emissions;
- 30%¹ reduction in waste production;
- 2% increase in renewable energy production (from solar panels).

During 2013 ANAS has not received significant environmental fines or penalties.

Anti – Corruption

Assessment, policy and goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

ANAS operates in compliance with Italian regulation and adopts a zero-tolerance policy towards any form of corruption, extortion and bribery among its employees or between them and third parties.

ANAS has developed and adopted a Model of Organization, Management and Control (MOG) in compliance with the Legislative Decree 231/01. ANAS Code of Ethics, necessary tool for MOG implementation, set some essential concepts:

- prohibition of any action to/from third parties, aimed at promoting own interests, gaining an advantage or able to affect impartiality;
- prohibition of giving or taking sums of money, gifts or favours to/from third party in order to get direct or indirect advantages for the company;

¹ Waste refers only to headquarters and research center of Cesano.

- prohibition of accepting gifts, goods or other benefits from subjects who have or might have a business relationship with.

Implementation

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

In line with legality and transparency strategies pursued by ANAS Management and with the Italian Law 190/2012, in 2013 ANAS has played an active role in the anti-corruption working group fostered by Global Compact Italian.

During 2013 employees have been trained on anti-corruption; moreover the Center for Higher Education organizes training activities on the use of a new software application called SISTRA, that aimed at publishing corporate data related to works, goods and services contracts signed by ANAS on the website. All the 207 owners of those procedures were involved in training course.

Measurement of outcomes

Description of how the company monitors and evaluates anti-corruption performance.

In accordance with the Model of Organization, Management and Control adopted, ANAS entrust the control systems to different corporate entities, such as:

- Internal Audit Unit;
- Supervisory Board;
- Responsible Officer;
- Legality and Transparency Unit.

Internal Audit Unit assesses internal control systems adequacy and reliability through audits in the Organizational Units. In particular, until the end of 2013, 65 audits were completed that involved 9 of the 19 processes in which the ANAS activity has been divided and they involved 18 of 20 Departments.

Generally, the continuous monitoring activities performed during the year by Internal Audit Unit did not reveal significant deficiencies; sometimes such controls identified areas of improvement and its related actions to be implemented.

ANAS Supervisory Board is in charge to monitor effective implementation, adequacy and updating of MOG rules and tools which are able to prevent any criminal behavior carried out by “apical” parties or under their management/supervision. During 2013, the Supervisory Board has carried out a gap analysis between requested and existing standards in order to update and adequate the Model of Organization, Management and Control.

The Responsible Officer in charge of preparing the corporate accounting documents and verifies appropriateness of controls (in accordance with Risk Control Matrix - RCM) aimed at reducing the risk of error over financial reporting. Testing activities conducted during 2013 have resulted in consistently positive results.

The Legality and Transparency Unit performs a continuous monitoring of public order situation in ANAS worksite, as well as the accurate application of anti-mafia legislation by departments. These

activities are carried out in close partnership with Prefectures and include specific requirements control, such as:

- inclusion of legality protocols references in the calls for tenders and in the special tender specifications;
- verification of the financial flows tracking clause insertion in the contracts;
- training programs to the institutions involved in the monitoring process of corruption phenomenon.

In 2013, as a result of these controls, 55 exclusions from works were done (the same amount of 2012).

The Legacy and Transparency Unit has accomplished a Data Bank (Ce ANT) that collects data of all performers with details of those subjects that have been affected by anti-mafia interdiction measures. In order of further discourage illegal and extortive behaviors, ANAS applies the 10% penalty against the companies affected by these disqualifications. The sums enforced are managed by ANAS and deposited in an interest-bearing current account.