



## ALCOHOL AND DRUGS ABUSE POLICY

Termigas S.p.A., aware of the extreme importance of safeguarding and protecting the environment, health and safety (HSE) in all its construction sites, worksites and the companies where it operates, is fully committed to protecting, maintaining and improving the environment in which it carries out its business.

Termigas S.p.A. is aware that the abuse of alcohol, drugs and other similar substances by its employees may negatively influence the efficiency of their work performances and may have serious and damaging consequences for themselves and the safety of their co-workers.

Improper use of medicine or the use or possession of alcohol and illegal drugs that are either subject to controls or not prescribed by a physician, in work environments including construction sites, is strictly prohibited and must be considered grounds for appropriate disciplinary action including dismissal.

Though the policy explicitly refers to alcohol and drugs, its application extends to inhalants and all other forms of substance abuse.

To this regard, Termigas invites all persons who consider themselves dependent on the above substances to seek the advice of their physician and/or the company physician, and to undergo appropriate therapeutic treatment without delay before their condition may negatively influence their working abilities and be a hazard to their own safety, that of their co-workers and third parties, as well as the security of systems, machinery and work environments.

Termigas is aware that dependency on alcohol, drugs and medicine is a curable condition. Through its Company Physician, the company is at the disposal of those concerned who, on a voluntary and strictly reserved basis, wish to consult him for any form of information or collaboration.

The company wishes to emphasise that for all persons who know they have this problem, the guarantees provided for by the legal and contractual regulations in force shall be applied in the utmost respect for the dignity of the person and his privacy.

Notwithstanding the provisions of the previous point, should the employee's dependency on alcohol and narcotics be such that, though it does not imply an inability to work, it does however pose a potential hazard in carrying out the tasks that the job entails, to the detriment of their own safety, that of their co-workers or third parties or to the security of systems, the Company, in its legal obligation to provide safe workplaces and fulfil the current legal requirements, reserves the right to modify said tasks within the limits provided for by the law.

The employee's inability to fulfil specific work performances, having been verified through the legal procedures and due to dependency on alcoholic beverages or narcotics, even if following medical therapy, may result in termination of employment for justified grounds.

Furthermore, Termigas believes it is of the utmost importance to remind all workers that consumption of alcoholic beverages, drugs or similar substances is prohibited while working.

It is also recommended that employees avoid consumption outside of the work period, or immediately before or during official breaks (e.g. lunch break), as the effects may continue during the subsequent work performance.

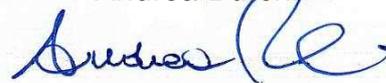
In compliance with this Policy, Termigas believes that personnel must not keep any of these alcoholic substances and narcotics at the workplace and on its premises. Offenders shall be subject to disciplinary measures in proportion to the seriousness of the offence including a report to the authorities.

The Company requests that its work and services contractors adopt a similar policy.

Lastly, in consideration of the increase in the consumption of alcohol and narcotics in all social sectors and with the aim of preventing the dependency of its workers to these substances, Termigas hereby communicates that during all training sessions held by the Company Physician, space will be reserved for information on the harms of alcohol and drugs, with emphasis on the diseases due to use or abuse of these substances.

January 2012

MANAGING DIRECTOR  
Andrea Burchi

A handwritten signature in blue ink, appearing to read 'Andrea Burchi', is written over a light grey rectangular background.