SUSTAINABILITY POLICY

Ghella's mission is to build excellence in a sustainable and innovative way.

We work with our clients to provide efficient infrastructure that creates social and economic value for the communities where we operate and we strive to achieve this in the most responsible way, towards the environment as well as society.

Our commitment to sustainability is demonstrated in the following areas, where we:

Ethics and Transparency

- · Hold compliance with all legal, contractual and local requirements as a priority;
- · Have zero tolerance for corruption and provide reporting channels for breaches, as outlined in our Code of Ethics, Anti-Corruption Guidelines and Whistleblowing Policy;
- Respect the human rights of all employees and others affected by our operations, as outlined in our *Human Rights Guidelines*.

Local Communities and Stakeholders inclusion

- Engage with all stakeholders and proactively listen to the legitimate expectations of local communities to leave a positive legacy behind our projects;
- · Protect and promote the wellbeing, human capital and environmental, historical and cultural heritage of local communities.

Staff Wellbeing and Development

- Ensure health, wellbeing and safety to the highest standards in all workplaces and promote a 'Zero Harm' culture, as outlined in our *Health and Safety Policy*;
- · Value and promote equality and inclusion in our workforce and do not tolerate any discrimination or inappropriate behaviours, as outlined in our *EDI Policy* and *Appropriate Workplace Behaviour Policy*;
- · Develop the skills of our people and promote a healthy work-life balance.

Environmental Protection

- Evaluate, monitor and reduce our environmental footprint and, where possible, create environmental benefits, as outlined in our Environmental Policy;
- · Adopt eco-design principles in our projects, where appropriate.

Supply Chain engagement

- · Work with suppliers to ensure an ethically and environmentally sustainable supply of goods and services for our business, as outlined in our Sustainable Procurement Policy;
- · Give preference to materials and services with the greatest circular-economy benefit.

Innovation and continuous improvement

- · Promote innovation by creating a sustainability culture integrated at all levels, where ideas are freely expressed and considered;
- · Strive to be at the forefront of technological, design and management innovation;
- · Continuously improve our standards, policies and procedures to enhance the implementation of the principles expressed in this policy.

This policy is communicated to our employees as part of the mandatory induction process and it is available to all stakeholders via the company's website and the intranet.

It is reviewed annually during management system reviews to ensure it is consistent with the company's mission and vision.

Enrico Ghella Chairman, January 2020

