

Annex I Approach to Sustainability

Mission

We approach each challenge with innovative, reliable and secure solutions to meet the needs of our clients. Through multicultural working groups we are able to provide sustainable development for our company and for the communities in which we operate.

Values

Innovation; health, safety and environment; multiculturalism; passion; integrity.

Countries in which Saipem operates

EUROPE

Austria, Belgium, Bulgaria, Croatia, Cyprus, Denmark, France, Grece, Italy, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Spain, Switzerland, Turkey, United Kingdom

AMERICAS

Bolivia, Brazil, Canada, Chile, Colombia, Dominican Republic, Ecuador, Mexico, Panama, Peru, Suriname, Trinidad and Tobago, United States, Venezuela

CIS

Azerbaijan, Georgia, Kazakhstan, Russia, Turkmenistan, Ukraine

AFRICA

Algeria, Angola, Congo, Egypt, Gabon, Libya, Mauritania, Morocco, Mozambique, Namibia, Nigeria, South Africa, Uganda

MIDDLE EAST

Iraq, Kuwait, Oman, Qatar, Saudi Arabia, United Arab Emirates

FAR EAST AND OCEANIA

Australia, China, India, Indonesia, Japan, Malaysia, Papua New Guinea, Singapore, South Korea, Thailand, Vietnam



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Approach to Sustainability

The Disclosure on management approach is provided below concerning the sustainability issues considered material, in compliance with the requirements laid down in Guideline GRI G4.

Conducting operations transparently and ethically

Saipem conducts its business with loyalty, fairness, transparency, integrity and in full observance of laws and regulations. On March 22, 2004, the Saipem SpA Board of Directors first approved the Organisation, Management and Control Model 'Model 231 (includes the Code of Ethics)' which implements Legislative Decree No. 231 of 2001.

This Model, as well as the Code of Ethics, also includes the risk analysis methodology, the tasks of the Compliance Committee, the recipients and scope of the Model, the structure of the disciplinary system, the control systems and rules for updating the Model itself.

Subsequently, following legislative interventions to the field of application of Legislative Decree. No. 231 of 2001, updates to Model 231 have been approved that have taken into account not only regulatory developments but also changes to Saipem SpA's corporate organisation. On April 27, 2015, the Saipem SpA Board of Directors (BoD) approved the latest Model update.

Among its various functions, the Compliance Committee has the task of monitoring the effectiveness of the Organisation, Management and Control Model and therefore of ensuring (as Guarantor of the Code of Ethics) compliance with the Company's Code of Ethics.

The Compliance Committee is also required to approve the annual programme of supervisory activities within the structures and functions of the Company ('Supervision Programme'), coordinate implementation of the Supervision Programme and implementation of control activities, review the results of the activities performed and relative reporting thereof, and finally to develop guidelines for the company functions. The complete list of Compliance Committee tasks can be found in the dedicated section on the website (Compliance Committee and Model 231).

All Saipem employees and stakeholders must report any violation (or alleged violation) of 'Model 231 (Code of Ethics included)'.

Any such report can be made by contacting a superior and/or the Compliance Committee. Saipem has various channels of communication, including, by way of example, postal addresses, fax numbers, e-mail addresses, communication tools on intranet/internet sites belonging to Saipem SpA and its subsidiaries.

The reporting parties in good faith are duly protected against any form of retaliation, discrimination or penalisation and their identities are kept confidential, without prejudice to the legal obligations and the protection of the Company's rights or those of persons accused wrongfully or in bad faith. The Internal Audit function ensures that all necessary investigations are carried out on the reported facts, by means of one or more of the following activities, ensuring that these operations are carried out as quickly as possible and in observance of completeness and accuracy of the preliminary investigations. The preliminary investigations include the following phases: (a) preliminary check; (b) assessment; (c) audit; and (d) corrective actions monitoring.

Further details can be found in the 'Model 231 (includes the Code of Ethics)', the 'Anti-Corruption' Management System Guideline, and the

'Whistleblowing reports received (including anonymously) by Saipem and by its subsidiaries in Italy and abroad' procedure.

Reference must be made to the 'Annual Report 2015', the 'Corporate Governance and Shareholding Structure Report 2015' and to 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Fighting corruption

Saipem actively takes part in the fight against corruption by expressly prohibiting, in its Code of Ethics 'practices of corruption, unlawful favours, collusive behaviours, direct or indirect solicitations for personal benefits and career gains for oneself or for others'. Saipem undertakes to observe the United Nations Convention against Corruption, the OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions and the Business Principles for Countering Bribery developed by Transparency International.

In line with the principle of 'zero tolerance' expressed in its Code of Ethics, Saipem has sought to address the risks the Company may encounter while conducting its business by setting up a detailed system of rules and controls aimed at preventing corruption offenses (the so-called Anti-Corruption Compliance Programme), which stands out for its dynamism and constant attention to developments in the national and international regulatory scenarios and best practices.

Saipem's commitment was further strengthened in 2010 by two initiatives:

- the issuance of the Anti-Corruption Compliance Guidelines and the first two Anti-Corruption Ancillary Procedures, relating to joint venture agreements and intermediary agreements followed by other Ancillary Procedures in specific risk areas;
- the creation, within the Saipem Legal Affairs Department, of a dedicated organisational structure called the Anti-Corruption Legal Support Unit, in charge of providing the business units of Saipem and of its subsidiaries, both in Italy and abroad, with ad hoc legal advice and support on specific Anti-Corruption issues, promoting and co-ordinating the Anti-Corruption training and periodically reviewing and updating the Anti-Corruption Compliance Guidelines and submitting an annual report on its monitoring activities to the Compliance Committee.

Both the Anti-Corruption Compliance Guidelines and the relative Anti-Corruption Ancillary Procedures have been adopted by all Saipem subsidiaries, both in Italy and abroad.

With the aim of improving the framework of the Anti-Corruption rules and procedures implemented in order to maximise Saipem's compliance with the Code of Ethics and the national and international laws applicable in Italy and abroad, on April 23, 2012 the Board of Directors of Saipem SpA approved the new Management System Guideline 'Anti-Corruption'. The most important innovations introduced by the document are listed in the Anti-Corruption section on the website.

On June 30, 2015, Saipem SpA issued the latest revision of the 'Anti-Corruption' Management System Guideline which represents an improvement of the regulatory context of the Compliance Programme and the Saipem Corporate Governance systems on Anti-Corruption issues. Saipem requires compliance with the Anti-Corruption laws by all its intermediaries, its business partners, as well as by its 'covered business partners', who, in carrying out their activity in the interest of Saipem, could have relevant contacts with public officials.

Saipem personnel have the duty to comply with the Anti-Corruption laws. Saipem managers are called upon to carry out their tasks in observance of all applicable Anti-Corruption laws, the Code of Ethics and the Saipem Compliance Programme, to disseminate and transfer Saipem's values of integrity to all their colleagues and, through their own personal behaviour, represent a role model of correct conduct for said colleagues. All the relative documents are easily accessible via the Company's intranet portal.

In the knowledge that the primary element for developing an effective strategy to combat the phenomenon of corruption lies in developing a thorough understanding of the tools for its prevention, awareness and training activities have been launched. Furthermore, Internal Audit Management independently examines and checks, through specific internal controls, observance of the requirements laid down in the Anti-Corruption Guidelines, based on its annual audit schedule, approved by the Board of Directors.

Any violation, alleged or confirmed, of the Anti-Corruption laws or Anti-Corruption guidelines must be reported immediately via one of the channels indicated in the 'Whistleblowing reports received (including anonymously) by Saipem and by its subsidiaries in Italy and abroad' procedure. Disciplinary measures may be taken against Saipem personnel found guilty of breaching the Anti-Corruption laws, who do not take part in the prescribed training programme, who omit to report violations they are aware of or who retaliate against others who report violations. Further details can be found in the 'Anti-Corruption' Management System Guideline.

Reference must be made to the 'Annual Report 2015', the 'Corporate Governance and Shareholding Structure Report 2015' and to 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

An ethical supply chain

Saipem is committed to keeping and developing long-lasting understanding and trust with the companies which work for and with Saipem. The Company has developed a structured qualification process to assess the reliability of potential vendors in terms of their technical, financial, organisational and managerial capacity. The qualification process includes compliance with the laws, the Saipem Code of Ethics and contractual obligations, as well as the monitoring of vendor performance.

The vendor qualification process is structured based on the criticality and level of risk of the products and services provided. The criteria used to select vendors include their capacity not only to fulfil the economic, financial, technical and organisational requirements, but also compliance with Saipem's Sustainability and HSE policies and company standards and procedures.

Fulfilment of the requested requirements is checked by means of questionnaires and, in certain cases, also through in-situ visits and inspections. For certain goods categories, vendor assessment is carried out on HSE (Health, Safety and Environment) issues and on aspects concerning human rights and workers' rights (for vendors operating in countries classified as at risk of violation of said rights).

In line with the 'Procurement' Management System Guideline, Saipem also implements counterparty risk assessment for certain goods categories, consultants and professional services providers. This process is also applied for screening potential subcontractors to be included in commercial offers. Counterparty risk assessment includes an analysis of economic-financial reliability, technical and organisational capacity, the shareholding structure and relative reputational profile (illegal conduct check).

Vendor performance monitoring and control is carried out by means of an important and constant Vendor Feedback process. This process covers all the stages of the relationship with the vendor (the offer, order management and execution) and characteristics of the actual relationship, such as for example, punctuality, quality, and conduct.

Furthermore, at the time of stipulating the contract, a sustainability clause is included in the contract document attesting that the vendor has examined Saipem's Sustainability Policy and Code of Ethics and that termination of the contract is foreseen for any behaviour in breach of these documents. To minimise the risk of working with counterparties who, due to their management procedures, are not in line with corporate standards, Saipem has adopted a series of tools and implemented ad hoc initiatives.

As of 2011, Saipem launched a campaign to assess the social responsibility of its supply chain by conducting audits inspired by the principles of international standards (ILO and SA8000), the Saipem Code of Ethics and local legislation and regulations. The audits aim to check company labour practices in terms of child labour, forced labour, freedom of association, disciplinary procedures, remuneration, working hours and workers' protection also in terms of health and safety issues. The audits identify any non-compliance and possible areas of improvement for the vendor, the resolution of which is then monitored over time.

Saipem has organised workshops in some countries on issues of social responsibility, safety and human rights aimed at involving and raising awareness along its supply chain.

Reference must be made to the 'Sustainability Performance 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Technological innovation and development

Technological innovation is essential for the Company's success because it makes it possible to anticipate the future needs of the Oil & Gas industry, while at the same time providing clients with the most advanced solutions available, making the most of new and challenging opportunities, achieving ever-better operational performance and reducing the environmental impact of construction activities.

Innovation for Saipem also concerns corporate processes, i.e. the development of working methods which make it possible to increase operational efficiency, reduce environmental impact or risks to the safety of workers. Sometimes an innovative idea is conceived while executing a specific operational project to solve a problem or manage a particularly complex activity. Saipem has developed special documentary tools for regulating the R&D process, management and protection of intellectual property and public disclosure of technical information.

Further information can be found in the 'Research & Technology Development' section on the Saipem website. Reference must be made to the 'Annual Report 2015' and 'Saipem Sustainability 2015' with regard to the year's performance goals.

Protecting the environment and minimising environmental impacts

Saipem is aware that all its activities, from the planning and design stages through to construction and operation, may potentially affect the environment.

This is why Saipem takes all necessary measures to ensure environmental protection during the execution of work, both for activities managed directly by its own personnel and using its own means and those operations over which it applies operational control. Saipem believes it is extremely important to correctly manage significant environmental aspects and the impacts deriving thereof, a process which it describes in detail in specific corporate documents. Moreover, Saipem pays maximum attention to the continuous improvement of its environmental performance and to minimising impacts caused by its operations. To achieve this, Saipem has adopted an Environmental Management System certified in accordance with international standard ISO 14001, a tool for keeping the environmental impacts of its activities under control, as well as to systematically strive for continuous improvement.

The Company also invests in research and development programmes for the creation of technologies that minimise environmental impacts and organises specific initiatives to promote environmental awareness and the dissemination of best practices.

Further information can be found in the 'Environment' section on the Saipem website. Reference must be made to the 'Annual Report 2015', 'Sustainability Performance 2015' and 'Saipem Sustainability 2015' with regard to the performance for the year.

Spill prevention and response actions

Spills are one of the most critical environmental issues for the sector in which Saipem operates. Saipem's strategy to prevent and manage spills is based on the following cornerstones:

- Prevention: action has been taken to harmonise and improve processes and the operational control of those sites and vessels most at risk.
- Training and preparedness: specific training packages are delivered on spill prevention and periodically spill drills are organised which are designed to strengthen emergency management skills.
- 3) Emergency response: all Saipem sites have the necessary equipment for tackling any emergency which may arise.
- Reporting: the data concerning spills and 'near misses' are monitored and subsequently analysed to assess the causes and prevent recurrence.

Further information on Saipem's approach, the objectives and the performance for the year can be found in the 'Sustainability Performance 2015' and 'Saipem Sustainability 2015' documents.

Climate change and energy efficiency

Saipem is constantly committed to the containment of greenhouse gas emissions resulting from its activities. Growing attention to climate change issues represents not only a commitment for Saipem but also an opportunity.

Saipem's approach to energy efficiency (and consequently emissions) has become increasingly more structured over the years. Saipem has

developed a method for estimating emissions for each specific source of emissions. This method was reviewed and certified in 2011 and is still in force. All Saipem projects and sites monitor energy consumption and air emission data on a monthly basis. Such data is published annually in the sustainability documents.

Since 2013, energy assessments have been carried out in line with standard ISO 50000:2001 on a number of offices, vessels, work sites and drilling vessels. The choice of assets to be analysed is made in accordance with the following criteria: criticality in terms of consumption, the level of control, the real possibility of intervention, the need for regulatory compliance. These assessments are the first step towards identifying those areas where it is possible to improve energy efficiency. In fact, possible areas of improvement have been identified and for each one a feasibility study has been carried out with the results submitted to management for identification of an action plan.

Over the years, Saipem has implemented a number of initiatives aimed at increasing the energy efficiency of its operations, for example the optimisation of the shipping routes for its vessels. It has also structured several training tools to increase knowledge and raise awareness on environmental issues, such as, for example, adherence to international campaigns, the organisation of events and the drafting and dissemination of newsletters.

Since 2009, Saipem has been answering the 'Carbon Disclosure Project' questionnaire relative to the Company's approach to climate change. In 2015, it obtained a score of 92 B.

Reference must be made to the 'Annual Report 2015', 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Saipem's people

Saipem believes that human capital is a key element for lasting competitive success. This is why it is vital to ensure adequate protection of labour, the continuous development of skills and competencies, the creation of a working environment that offers equal opportunities for all on the basis of merit and without discrimination, while at the same time guaranteeing respect for and adaptation to the characteristics of individual situations. Industrial relations are handled with due regard for the specific local socio-cultural contexts, as well as for the labour laws in force in the country of operation.

Sustainable work practices

Saipem observes the laws and regulatory requirements of the country in which the Company operates and is in line with international standards such as the Universal Declaration of Human Rights, OECD Guidelines for Multinational Enterprises and the core conventions of the International Labour Organisation. Furthermore, Saipem is inspired by the UN Global Compact principles in the performance of its activities.

Saipem repudiates all forms of forced or child labour. During the recruitment process, all candidates are required to produce ID as proof of their real age. As for working hours, these are usually established in the individual collective bargaining agreements. In those countries where there are no collective bargaining agreements, working hours are defined based on local regulations and international standards. In the maritime sector, in 2013 Saipem also obtained the Maritime Labour

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Certification for its fleet in compliance with the Maritime Labour Convention 2006 (MLC, 2006).

In each country where there is collective bargaining, remuneration for employees is defined in said agreement and is periodically updated taking into consideration various local factors, such as inflation. In all other cases Saipem aligns remuneration with local labour market policies. Saipem guarantees its employees, based on the specific local circumstances, different types and modes of benefits that may primarily concern: supplementary pension funds, additional health funds, mobility support services and policies, initiatives in the field of welfare and family support policies, catering and training courses aimed at ensuring more effective integration within the socio-cultural context of reference. These benefits, when envisaged, today are applied to the whole specific reference population regardless of the type of contract (temporary/permanent), except for those particular services where the time scale of performance delivery may not be compatible with the duration of the contract. The Company monitors the observance of local laws and working practices also for agency personnel.

Saipem undertakes to offer, in full compliance with applicable legal and contractual provisions, equal opportunities to all its employees, making sure that each of them receives fair statutory and wage treatment exclusively based on merit and expertise, without discrimination of any kind.

The Company undertakes to:

- adopt, in any situation, criteria of merit and ability (and anyhow strictly professional) in all decisions concerning Saipem's human resources;
- always select, hire, train, compensate and manage human resources without discrimination of any kind;
- create a working environment where personal characteristics or beliefs do not give rise to discrimination and which allows the serenity of all Saipem's people.

Reference must be made to the 'Annual Report 2015', 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Training and development

Saipem builds its business success on strong technical capacity both in terms of assets and human resources. Continuous training and the development of skills are key elements in personnel management and development.

Saipem promotes learning programmes aimed at ensuring the development of personal knowledge and the behavioural skills of all its collaborators.

Saipem has structured a process for evaluating individual performance aimed at making performance management a widespread process tracked on an international level.

Reference must be made to the 'Annual Report 2015', 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Diversity and gender equality

The safeguarding of specific categories of workers is protected through the application of local regulations and reinforced by specific corporate policies. The aim is to ensure equal opportunities for all different types of workers with the intent of deterring the onset of any kind of possible prejudice, harassment and discrimination (e.g. relating to sexual orientation, colour, race, nationality, ethnicity, culture, religion, age and disability) in full observance of Human Rights. In different operating contexts said protection is particularly reflected in the scope of specific regulations which include, for example, obligations to hire personnel with disabilities, young persons or observe a set ratio between local and expatriate personnel.

Saipem monitors the number of managerial positions filled by women and data on remuneration by gender. Saipem promotes the work/family balance of its personnel through regulations and/or local policies that guarantee parental leave. In all environments, maternity/paternity leave is regulated and only differs in timing and type of leave from work. This is accompanied by possibilities of leave for breastfeeding, child or family member illness, and raising a child (flexible and part-time working hours).

Reference must be made to the 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Safety of personnel and operations

Striving for integrity in operations, meant as protection, during the execution of Saipem's activities, of people, partners, corporate assets and the environment, is a top priority and a value shared among all its people.

Saipem adopts and implements international principles and best practices to protect integrity in operations and promotes the acquisition of certificates of conformity to national and international standards for its processes. Saipem plans the integrity objectives and defines the roles, responsibilities, planning, execution and control methods of its processes which it manages in an integrated manner. Saipem promotes continual improvement of the integrity of its operations monitoring the achievement of its goals, analysing any variances and identifying and implementing any necessary corrective actions.

Saipem undertakes to prevent risks to improve the integrity of its operations; for this purpose it adopts a proactive approach in the mitigation of risks as an integral part of its management and business activities. The Company promotes among its partners conduct which is in line with its standards of integrity in operations.

Occupational health and safety for all Saipem personnel is a priority objective which is constantly monitored and guaranteed in the management of its activities by means of an integrated HSE management system. In fact Saipem has an Integrated Health, Safety and Environment Management System compliant with international standards and the strictest legislation in force. Many of the operating companies of the Saipem Group are certified in accordance with the schemes provided by ISO 14001 and OHSAS 18001. This makes it possible to guarantee a structured management of health, safety and the environment through: organisational procedures, operating instructions, health protocols and training all aimed at continuous improvement in HSE performance.

Safety is managed by means of specific activities, divided as follows:

 the identification of hazards and the assessment of risks associated with the safety of personnel, suppliers and other individuals involved in company activities, as well as risks to corporate assets;

- the assessment of risks caused by interference between activities when work is contracted out to suppliers operating on Saipem premises or worksites;
- personnel training;
- the development of appropriate preventive measures to protect assets and people, keeping them constantly effective over time;
- operational controls of activities for purposes linked to safety;
- the reporting, recording, analysis and investigation of accidents, injuries and near misses;
- relations with local authorities;
- follow-up and checks on the effectiveness of the prevention and protection measures implemented;
- safety performance consolidation and analysis.

The Company, in accordance with structured processes, carries out various types of internal HSE audits: on the HSE management system, on HSE regulation conformity, technical audits and audits on processes inherent to safety. These audits are also carried out on subcontractors. HSE training is an essential and necessary process for guaranteeing HSE expertise and contributing to a reduction in injuries, occupational diseases and environmental accidents. Depending on the professional role covered, Saipem provides a specific HSE training plan.

Over the years the Company has launched numerous awareness campaigns aimed at the widespread dissemination of a safety culture. In 2010, Saipem created the Leadership in Health and Safety (LHS) Foundation, which takes its name from the cultural change programme developed and successfully implemented by Saipem since 2007, with the aim of encouraging at all company levels, leadership focused on safeguarding the company's key values: occupational health and safety. Reference must be made to the 'Financial Report 2015', 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Creating local value

Saipem is an international contractor operating in the Oil & Gas sector. The Company operates in over 60 countries, often remaining there for medium- or long-term periods, even in difficult and 'borderline' contexts. In such contexts, Saipem has always strived to minimise any adverse impacts on the territory and contribute to maximising positive impacts through the implementation of strategies aimed at sustainable local development.

Relations with the local context

Wherever it operates, Saipem plays an active role in the community, contributing to the social and economic life of the territory, also but not only in terms of local employment and the creation of value. Saipem's local presence principally assumes two different forms: a long-term presence, where the Company owns construction sites or other operational structures; and a short- to medium-term presence, where

Saipem executes a specific project. Saipem's involvement and the dialogue with local stakeholders therefore depend on the type of presence the Company.

In those contexts where Saipem has a long-term presence, the Company carries out specific assessments designed to analyse the potential effects of their activities on the local socio-economic context, also through the use of tools such as the Socio-Economic Impact Assessment (SIA) or the ESIA (Environmental Social Impact Assessment). Following these assessments, which also include mapping of the main stakeholders involved, Saipem draws up an action plan aimed at managing the impacts generated on local communities and stakeholder involvement. To support this process, Saipem has implemented specific tools for analysing the local context and for the identification and analysis of the main stakeholders for the purpose of defining intervention plans.

In operational projects, Saipem supports the client's activities, in line with the requests and indications provided by the same, in order to define an action plan for the creation of local value for the specific project.

The Company, in some important operational realities, has implemented grievance management systems designed to ensure effective communication with communities.

Reference must be made to the 'Financial Report 2015', 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

Creating local employment and supporting local economies

One of the pillars of Saipem's sustainability strategy is the promotion of Local Content, meaning both the purchase of goods and services from local suppliers and the creation of employment at the local level. In this way Saipem contributes to creating development opportunities for the people and companies in those communities where it operates.

For Saipem, maximising Local Content also means developing and maintaining a continuous relationship with local communities, clients and suppliers making it possible to obtain benefits also in terms of reductions in overall project costs and the overall risk profile associated with operational activities. The Local Content strategy provides important socio-economic benefits for local communities in terms of investments, employment and local market development.

Another aspect of the Local Content strategy is the ever-increasing diversity of its employees – a pool of young talent from a multitude of countries whose professionalism grows with that of Saipem in the various projects in which they are involved, either in their own countries or abroad.

Saipem has internally developed a model (SELCE, 'Saipem Externalities Local Content Evaluation' Model) to quantify the value of its presence in the local territory in terms of economic, employment and growth of human capital.

Reference must be made to the 'Financial Report 2015', 'Sustainability Statements 2015' and 'Saipem Sustainability 2015' with regard to the goals and performance for the year.

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