

EQUALITY AND DIVERSITY POLICY

The CLN Group is committed to promoting equality and diversity as founding values of an inclusive corporate culture, that celebrates the differences and recognises the value, experiences and origins of the personal identity of each individual. For us, the meaning of "Equality" is the elimination of all forms of discrimination and the right to equal opportunities for each and every individual. The meaning of "Diversity" is giving value to the differences of each individual, and considering their contributions fundamental to the creation of a work environment in which every single person can feel respected in his/her identity. Equality and diversity are not interchangeable but interdependent values: no equal opportunity can exist if diversity is not celebrated.

INTERNATIONAL REFERENCES

This Policy supports the following treaties of International and European Law and applies their founding principles:

1. The International Bill of Human Rights of the United Nations (UN)
 - a) Universal Declaration of Human Rights;
 - b) International Covenant on Civil and Political Rights;
 - c) International Covenant on Economic, Social and Cultural Rights.
2. The Convention on the Elimination of All Form of Discrimination against Women (CEDAW) of the United Nation
3. The Council Directive 2000/43/EC
4. The Council Directive 2000/43/EC
5. EU Charter of Fundamental Rights

INTERNAL REFERENCES

The following internal documents are linked to and support the principles set out in this Policy:

1. CLN Group Code of Ethics
2. CLN Group Labour and Human Rights Policy
3. CLN Group Whistleblowing Policy

OUR COMMITMENTS

For the CLN Group no form whatsoever of intimidation, bullying, persecution, or harassment is tolerated and, in particular, no form of discrimination based on sex, sexual orientation, gender identity, ethnic origin, skin colour, civil status, pregnancy and maternity, disability, religious belief, age, social position, personal convictions (also with reference to membership and militancy in political parties and workers' unions).

The CLN Group is engaged in the fight against all forms of discrimination in the workplace through the adoption of concrete actions:

- to integrate the principle of equal treatment in the processes that regulate all stages of professional life and value of human resources, so that decisions relating to recruitment, training and career development are taken solely on the basis of people's skills, experience and professional potential;
- to sensitise and train all levels of the organisation on the value of diversity and on how to manage it, through training courses that spread the culture of respect for the person;
- to identify and provide staff with internal instruments to guarantee effective protection of equal treatment;
- to eliminate the causes and/or dysfunctions in the work organisation that, even unwittingly, can lead to discrimination;
- to condemn the persecutory, oppressive, moral or psychological abuse practices in a systematic, iterative, intentional manner, with the intent to be afflictive and with discriminatory motivations;
- to adopt detecting tools regarding the perception of the discriminatory phenomenon, even by dissemination of questionnaires;
- to prepare a procedure for formal or informal reporting of complaints of discrimination or harassment;
- to guarantee the right to privacy both for those who suffered discrimination or harassment, and for those who caused the act;
- to activate a monitoring action on the effectiveness of the Policy, arranging any additions or changes.

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THE RECIPIENTS OF POLICY

This Equity and Diversity Position Statement is intended to state the company's commitment to all CLN staff members, our suppliers, contractors and subcontractors at any tier, and partners, resellers and other people impacted by our value chain.

All CLN Group employees are called upon, accountable and responsible to observe behaviour that promotes dignity, equality and respect in relationships with other employees, as well as in relationships with external consultants, customers, suppliers, collaborators, and visitors:

- refraining from engaging in any form of discrimination and, in particular, discrimination by sex, sexual orientation, gender identity, ethnic origin, skin colour, civil status, pregnancy and maternity, disability, religious belief, age, social position, personal convictions (also with reference to membership and militancy in political parties and workers' unions);
- refraining from inducing, pressuring or persuading others to discriminate or harass or even to hypothesize an act of discrimination or harassment;
- refraining from persecuting a worker who has complained of an act of discrimination or harassment or has taken legal action or given testimony or information in a case of discrimination or harassment;
- refraining from taking part and/or encouraging rumours about cases of alleged or actual harassment or discrimination;
- supporting anyone who claims to have been discriminated or harassed, directing him to report the case to our internal *whistleblowing* system;
- informing through the *whistleblowing* portal of any harassment and discrimination that one may become aware of.

Each Line Manager must also:

- promote the creation of a work environment in which members of their staff feel free to express and share their personality and needs;
- verify that the members of their staff read and are informed about the principles stated by this Policy and seek clarification from their manager where required, as well as comply with the periodic training provided by the CLN Group;
- instruct, support and encourage members of their staff to adopt behaviour that respects the principles stated by the Policy and denounce the discriminatory acts they are aware of, which is a breach of the Policy.

COMMUNICATION AND TRAINING

This Policy shall be circulated to internal and external stakeholders through specific communication initiatives. Training initiatives will be carried out in order to ensure that the Policy is properly understood by all CLN Group employees.

POLICY APPLICATION

The behaviour of all staff of the CLN Group must conform to the principles dictated by this Policy both in the context of the workplace and during external work-related events (meetings, social events, transfers).

REPORTING CONCERNS

If you suspect any behaviour which is inconsistent with this policy, you can notify us through the following communication channels:

- electronic whistleblowing portal: <https://leaks.gruppocln.com>
- postal address: CLN SpA – Whistleblowing – via Pavia 71, 10098 Rivoli (TO) Italy

REVISION

This Policy will be revised periodically to ensure its adequacy and effective implementation. All revisions shall be subject to approval by the Board of Directors of CLN Group.

Rivoli, 24th April 2018


Gabriele Perris Magnetto
Chief Executive Officer