

## **HEALTH AND SAFETY POLICY OF CLN GROUP**

CLN upholds the principle that all its employees should have a safe and healthy working environment and acknowledges the obligations of employers to protect the health and safety of employees.

Industrial processes can be inherently hazardous, and when accidents or occupational illnesses occur, they may have serious or fatal consequences. The top priority of CLN is therefore health and safety. The CLN Health and Safety ('H&S') Policy gives guidance and direction as to how the operations undertaken by CLN Group companies should be managed to minimize the risk of accidents or occupational illnesses. It also sets out the Group's intentions and principles on H&S issues and provides the framework for the setting of objectives for H&S.

This H&S Policy is governed by the Board of Directors of CLN Group, represented by the Chief Executive Officer.

### **OUR COMMITMENTS**

CLN Group is committed to support the goals of the International Labour Organization Convention C155 on Occupational Health and Safety.

CLN Group is committed to demonstrating to internal and external stakeholders that the whole organization is required to recognize H&S as the top priority every day.

CLN commits to provide a healthy and safe working environment.

CLN Group is committed to protect the H&S of all its employees and the employees of subcontractors and suppliers on its premises by applying an approach to H&S that aims for the elimination of H&S risks through the identification, elimination or control of hazards and for reduction of risk. CLN recognizes that the elimination of accidents and occupational illness is a continuous journey of risk elimination.

CLN Group is committed to adopting the Precautionary Principle prior to the introduction of new products or processes or changes to existing operations, with an emphasis being placed on a preventive approach to avoid negative impacts on H&S.

CLN and all its employees commit to comply with all applicable H&S laws, regulations, and formal agreements in the countries in which it operates.

CLN Group commits to consultation and participation of workers and, where they exist, workers' representatives to improve performance in H&S.

CLN Group commits to publish this Policy on its Corporate Website so that it is accessible to all its employees and other stakeholders and is readily accessible the public.

### **APPLICABILITY OF THIS POLICY**

This Policy is applicable to all employees and companies within CLN Group.

## **INTERNAL REFERENCES**

The H&S Policy must be read in conjunction with the CLN Environmental Policy which covers areas which can also affect H&S, most notably Noise, Emissions, Effluents and Waste.

## **H&S MANAGEMENT SYSTEM**

CLN sites are required to establish, implement, maintain, and continually improve a H&S management system. The management system must cover the full scope of the site's processes, activities and products and assign clear accountability for H&S to senior management of the site and include a regular employee health and safety risk assessment.

The H&S management system should include preventive and protective control measures to be adopted including modification, substitution and elimination of processes, conditions or substances that pose a hazard or health risk. Where possible engineering and administrative controls should be put in place to avoid unsafe acts.

The management system must consider the needs and expectations of its employees through a clear mechanism or forum of consultation, preferably with a joint worker-management H&S committee, which ensures they have active participation in H&S matters and decisions that affect them, and that wherever possible there is collective agreement on employee H&S.

CLN sites are encouraged to align with the recognized international H&S management system, standard ISO 45001, or equivalent.

## **SAFE WORKPLACES**

Employees must be provided with a safe and healthy working environment which includes clean and hygienic workplaces.

CLN site management must ensure that the site's facilities, plant, infrastructure, equipment, tools, and workplaces are maintained in good order so that they do not pose risk to site employees or visitors to the site. Regular inspection or audit must be carried out on a regular basis to ensure the safety of equipment.

Detailed H&S risk assessments should be carried out regularly by the site EHS manager to try to ensure potential accidents are avoided by taking preventive action. Sites are advised to pay specific attention to workplaces and practices which are deemed inherently risky such as working at heights or handling chemicals.

## **PERSONAL PROTECTIVE EQUIPMENT**

Personal protective equipment must be provided to all employees when there is a risk to their H&S which cannot be reduced or eliminated through other measures, or it is required by local legislation. Risk assessments must be carried out throughout the site to identify the appropriate protective equipment for each specific area.

Personal protective equipment and work clothing must be of good quality such that it provides maximum protection to employees and allows them to fulfil their tasks comfortably.



## **CHANGE OF OPERATIONS**

CLN recognizes that increased H&S risks can occur because of a change of operations, for example when changing production references or starting to use new lines, tools, equipment, or machinery.

A specific risk assessment and control procedure should be put in place to anticipate the H&S risks related to such changes of operations.

A risk assessment should always be carried out on any new lines, tools, equipment, or machinery before they are put into use.

## **EMERGENCY PREPAREDNESS AND RESPONSE**

CLN sites must identify and assess potential emergency situations and have documented emergency preparedness and response processes in place to avoid and minimize the H&S impact of accidental and emergency situations. The site processes must include clear guidance and communication on how to react to such situations, including the impact on subcontractors and other parties on site, and must be tested on a regular basis.

All CLN Group facilities are required to put in place preventative maintenance programmes aimed at preventing spills and leakage. Storage areas for hazardous waste must effectively prevent the release of harmful elements which could impact H&S.

## **SUPPLIERS**

CLN suppliers are expected to put H&S management as a priority and to comply with local legislation. Where a supplier is found to work in a way that does not respect the H&S of its employees, CLN will request corrective action from the supplier.

CLN suppliers are encouraged to implement a certified H&S management system and to act in compliance with the H&S Policy of CLN.

## **LEGAL COMPLIANCE AND SIGNATORY OBLIGATIONS**

CLN and all its employees must commit to comply with all applicable H&S laws, regulations, industry requirements and formal agreements in the countries in which it operates. Local site management are required to have procedures in place to identify all H&S laws and regulations applicable to their site and to comply fully with them.

Significant non-complying situations, including potentially non-complying situations, are required to be reported to Groups Central EHS Department as soon as they are known. Significant fines and sanctions for non-compliance with H&S laws and/or regulations must be reported immediately to the Group Corporate Social Responsibility Officer.

Site senior management and EHS managers are responsible for addressing internal and external stakeholders' H&S concerns when these are brought to their attention.

## **ACCOUNTABILITY, COMMUNICATION AND TRAINING**

Site senior management are accountable for the H&S of their employees. CLN expects site senior management to demonstrate personal leadership and commitment with respect to H&S and to carry out a regular management review of H&S risks, opportunities, and performance.

Site senior management and EHS managers are jointly responsible in ensuring this Policy is translated into the local language and to make sure it is accessible, known, understood, and effectively implemented at site level by circulating it to all employees.

Site senior management and EHS managers are responsible for keeping all site employees informed about their H&S roles and responsibilities and for fostering the development of in-house learning, management capacity and leadership on H&S topics relevant to the site. Employees must be encouraged to raise, discuss, and participate in the resolution of H&S concerns with senior site management.

Training initiatives or other interactive communication sessions should be carried out locally to ensure that this Policy is properly understood, and sites are required to have comprehensive training programs in place for their employees on H&S matters.

This H&S Policy is applicable to all activities carried out by subcontractors and suppliers on site. CLN sites are required to provide training on H&S requirements to all subcontractors and suppliers working on site.

## **TARGETS, MONITORING AND MEASUREMENT**

All incidents including near-misses and occurrences of occupational diseases are to be reported to site senior management and to the Central EHS Department on an ongoing basis, and the site is required to undertake and properly document investigations, including reviewing absent or failed control measures, immediately after every incident. The objective of the investigation must be to identify effective actions site management can implement to prevent similar incidents re-occurring in the future.

CLN sites must keep records on:

- Incidents of work-related injury, illness or death.
- Received claims to compensate for work-related injury, illness, or death and how they have been dealt with.

CLN sites must work to improve H&S over time. To monitor the effectiveness of H&S activities, CLN Group companies are required to report KPI on H&S to the Group's Central EHS Department on a regular basis. CLN's Central EHS Department will set annual and long-term targets on H&S for all sites and will monitor action plans and progress against targets on a regular basis.

## **POLICY APPLICATION**

Regional management and site EHS managers are responsible for monitoring the application of this Policy.



#### **REPORTING CONCERNS**

Any behavior which represents a significant deviation from this Policy should be reported to the Group's Central EHS Department and to the Regional manager.

#### **REVISION**

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

Rivoli, May 2022

A handwritten signature in black ink, appearing to read "G. Perris Magnetto".

Gabriele Perris Magnetto  
Chief Executive Officer