

LABOUR AND HUMAN RIGHTS POLICY

Respect for human rights is a fundamental value of the CLN Group.

The CLN Group believes in sustainable business development and considers respect for human rights and the proper adherence to labour rights as an integral component of responsible business behaviour.

The CLN Group is committed to identify, prevent, or mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes.

This Labour and Human Rights Policy is overseen by the CLN Group's Board of Directors, including the Chief Executive Officer.

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 core conventions of the International Labour Organization (ILO) - no. 29, 87, 98, 100, 105, 111, 138, 182 - and the Declaration on Fundamental Principles and Rights at Work.
3. The United Nations Convention on the Rights of the Child.
4. The European Convention on Human Rights.

The latest versions of the following business standards and voluntary initiatives have also been taken into consideration:

1. The UN Global Compact principles.
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises.
3. The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.
4. The "UN Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework".

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 Equality and Diversity Policy
3. CLN Group Whistleblowing Policy

OUR COMMITMENTS

Forced Labour and Human Trafficking

We prohibit the use of all forms of forced labour, and any form of human trafficking.

Child Labour

We do not employ child labour and we do not employ people younger than that established for starting work by the legislation of the place where the work is carried out and, in any case, younger than fifteen, unless an exception is expressly provided for by international conventions and by local legislation.

We are also committed to not establishing or maintaining working relationships with suppliers that employ child labour. We have standard processes to verify age and eligibility to work.

Safe and Healthy Workplace

We recognise health and safety in the workplace as a

fundamental right of employees and a key element concerning the sustainability of the Group.

We provide and maintain a safe and healthy workplace and comply with applicable safety and health laws, regulations, and internal requirements.

We intend to ensure excellent working conditions at industrial level, according to the principles of hygiene, industrial ergonomics and individual organisational and operational processes.

We believe in the dissemination of a culture of accident prevention and risk awareness among workers, and actively promote this policy, in particular through appropriate training courses and information.

Employees shall be personally responsible and take the preventive measures set by the CLN Group for the protection of their health and safety and communicated through the specific Health and Safety Policy, and relevant guidelines, instructions, training and information. Each

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employee is responsible for proper management of safety and should not expose him or herself or other workers to dangers that can cause injury or harm to themselves.

Freedom of Association and Collective Bargaining

We respect freedom of association and the right to collective bargaining in accordance with local laws, enabling employees to join a union and voluntarily negotiate.

We are committed to cooperating with employee representative organisations and to having meaningful and constructive relationships with trade unions at the local and national level.

We engage in social dialogue at the regional and global level, and have entered into bi-partite agreements that advance the rights of workers.

Work Hours, Wages, and Benefits

We compensate employees competitively relative to the industry and the local labour market.

We follow applicable wage, work hours, overtime and benefits laws in the countries where we operate, or, in the absence of such laws, in compliance with international labour standards.

We attempt to prevent compulsory redundancies. In cases where these are unavoidable, the company promotes responsible redundancy procedures.

We promote a good work-life balance for our employees and apply workplace and worktime flexibility strategies to accommodate this.

Workplace Security

We provide and maintain a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats.

We consider absolutely unacceptable any type of harassment or harassing behaviour, such as that related to ethnic origin, gender or other personal characteristics, which have the purpose and effect of violating the dignity of the person to whom such harassment or behaviour is addressed.

External engagement; Community and Stakeholders

We are committed to engaging in dialogue with stakeholders on human rights or labour rights issues related to our business where appropriate, taking the view that local issues are most appropriately addressed at the local level.

THE RECIPIENTS OF POLICY

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

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 CLN Group staff 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 Peris Marnetto
Chief Executive Officer