

## ACCIDENTAL AND LOCAL POLLUTION POLICY

Accidental and local pollution is the result of events that may occur during regular business activity or as a consequence of an emergency (for example, occur following the rupture of a pipe, a fire or an accident). Environmental damages include potentially serious risk to water related to underground sources or groundwater and land where there may be a risk to human health, moreover they could result in serious risks for protected species and their habitats. CLN is conscious that certain processes in its production facilities may cause environmental damage if not correctly managed and controlled, and is therefore committed to assuring a minimal impact on the environment. CLN Group Management is aware that businesses that cause environmental damage are responsible for the full consequences, and that local regulations might hold employees, directors and managers of Group companies jointly or personally liable for these damages.

In order to achieve this objective, the following related Principles and Commitments have been established and apply to all the companies of the Group:

### PRINCIPLES

- Follow all local and national legal directives
- Undertake responsible disposal
- Minimise the leakage of liquids and other substances from equipment
- Contain all accidental leakage/emission
- Actively support local and national pollution prevention initiatives
- Support transparency on the accidental pollution impacts of our activities
- Document procedures
- Insure

### COMMITMENTS

- **It is obligatory for CLN Companies to meet all applicable legislative and regulatory requirements with respect to accidental pollution.** Regularly review local and national laws regarding pollution treatment and disposal of waste, discharge of waste water, management of chemicals products and fully respect the national and local requirements.
- Use only accredited waste removal companies, that are fully licenced by the appropriate authorities, to dispose of leaked substances and waste matter and organize disposal according to the local and international legislation and best practices. Disposal into the environment (such as into streams or rivers or soil) or the municipal water system is strictly prohibited unless local authority authorisation to do so has been received.
- Perform regular preventative maintenance activities and monitoring to avoid/repair leaks to lubrication systems, emission systems, pipes, tanks, cooling operations, cleaning systems, waste water plants etc.
- Ensure all processes/equipment are properly isolated or contain adequate structures to capture any accidental leaks (for example to collect accidental leakage of lubricants from presses; to collect accidental leakage of chemicals from paint lines).
- Engage with local authorities and the local community and support their initiatives to reduce pollution; Share and promote these initiatives with other CLN plants and enterprises in the same geographical locality; Encourage awareness of collaborators the importance of protected local species and their habitats, including protected sites, water including underground sources or groundwater.
- Provide information about the organisation's impacts related to accidental pollution and how they are managed; Monitor the application of actions taken and their effectiveness, establishing specific responsibilities; Report to authorities and CLN head office on all serious incidents of accidental pollution and the remedial and containment action.
- Perform regular risk assessments to determine areas of the operation where accidental or local pollution could occur; Document procedures for all possible accidental and local pollution risks and for their operative control; Ensure dissemination of the procedures and monitor compliance.
- Ensure that there is adequate insurance in place to cover the risks of an accidental leak or pollution, for example to cover clean-up costs damage to the environment and legal costs.

CLN Group Management is committed to reviewing this Policy on an annual basis, and to communicate it to all interested parties. The Chief Executive Officer is responsible for its implementation.

Rivoli, 26/11/2018

Gabriele Perris Magonetto  
Chief Executive Officer

