

THE SMART-WORKING POLICY OF CLN GROUP

CLN Group believes in the fundamental principles of trust, autonomy and flexibility which are the basis of the smart-working model, and which contribute to aligning the company with changes in technology and new concepts of how to communicate. Furthermore, the Group recognizes that smart-working may help to reduce its carbon footprint and enhance the health and safety of its employees.

This Smart-Working Policy is governed by the Board of Directors of the CLN Group, represented by 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 principles of the UN Global Compact.
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 or support the principles set out in this Policy:

1. CLN Group Code of Ethics
2. CLN Group Equality and Diversity Policy
3. CLN Labour and Human Rights Policy
4. CLN Group Whistleblowing Policy
5. CLN Group Policy on Working Conditions
6. CLN Group Environmental Policy
7. CLN Group Health and Safety Policy

OUR COMMITMENTS

CLN Group recognizes the social and corporate value of smart-working as a model for embedding flexibility and mobility into our normal way of working, which may help the worker to achieve a better work-life balance and in some instances could favor an increase of productivity and efficiency. It will also allow the Group to better address issues of diversity by allowing excluded groups to achieve better results due to a more flexible approach to when or where they can conduct their work.

Moreover, in line with the principles and policies of CLN Group regarding respect for the environment, smart working allows for a reduction of CO₂ emissions by reducing unnecessary travel to and from the office.

CLN Group undertakes to consider a smart-working model with flexibility in time and/or location under the following conditions:

- The employee is able to demonstrate that he has suitable space and environment available to undertake his/her work, for example desk space, space for a computer, limited distractions;
- The employee and local human resource department agree that the work involved can be done at least as efficiently under the smart working scheme as it would be at the normal workplace;
- The work to be undertaken under the smart working scheme can be managed systematically through results rather than by presence;

- The required technologies or tools can be put in place to enable the employee to carry out his/her job and to properly communicate;
- Where face to face meeting is required, conditions are in place to enable such meetings to be undertaken in an efficient manner;

Where these conditions can be met, CLN Group will support a smart working scheme on a case by case basis, always ensuring that it is in compliance with local and national laws and regulations. In many cases smart working may entail one or more days per week being worked from home or more flexible working hours. In such instances the modalities of smart working should be coordinated in a logical manner – for example smart working on the same day(s) of the week to facilitate organization of meetings; or organizing in a way that provides cost savings such as reducing office heating costs or allowing coordination of schedules to allow space/desk sharing.

Where established daily and weekly schedules are required for operational reasons, the smart working scheme should ensure these schedules can be properly maintained.

The Group has set itself the goal of increasing the number of employees working under a smart-working regime through the careful application of different organizational models.

CLN Group will provide the necessary processes and tools/devices, as well as specific training for workers, where a smart working scheme is approved, with the aim of improving the match between digital technologies and soft skills acquired by employees (digital soft skill). For example, technology must be put in place to enable collaboration, document sharing and communication.

CLN Group guarantees that an employee working in under a smart working scheme will be treated no less favorably than he/she would have been in the event of activities being carried out within the company.

Any worker in in smart-working must be treated in accordance with CLN Group Policies, without any distinction or discrimination with respect to colleagues who work within the company offices.

Local Human Resources departments are responsible for analyzing opportunities for smart working and requests for smart working from employees and, where the above conditions are met, submitting these proposals to Group Human Resources for approval.

CLN Group will monitor the implementation of smart-working in the quarterly analysis in terms of the number of employees working under smart working schemes, and will take care to give feedback on the developments and evolution of flexible working within CLN Group.

RECIPIENTS OF THIS POLICY

This Smart-Working Policy is applicable to all companies within CLN Group.

COMMUNICATION AND TRAINING

This Policy must be circulated to all employees by the local Human Resources department. Training initiatives or other interactive communication sessions must be carried out locally in order to ensure that the Policy is properly understood and implemented. Local management should allow employees to communicate openly with them regarding working conditions and management practices without fear of reprisal.

POLICY APPLICATION

All employees should feel free to discuss the possibility of smart working with their managers and local human resources.

REPORTING CONCERNS

Any behavior which is inconsistent with this Policy should be reported to CLN Group Human Resources department.

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, 4th May 2020

Gabriele Perris Magnetto


Chief Executive Officer