

CLN GROUP TRAVEL POLICY

The purpose of this Policy is to help CLN Group to reduce the energy consumption and greenhouse gases attributable to its activities and to encourage a smarter approach to travel whilst enhancing the health and safety of its employees.

This Travel Policy is governed by the Board of Directors of the CLN Group, represented by the Chief Executive Officer. The responsibility for application rests with the Divisional CEO's and the CLN Group Human Resources Director.

This Policy supersedes all previous Travel Policies in the CLN Group relating to airline travel, car rental, car travel and hotels/lodging.

INTERNATIONAL REFERENCES

This Policy supports the following goals and agreements:

1. Goal 13 of the United Nations (UN) Sustainable Development Goals regarding the need to take urgent action to combat climate change and its impacts.
2. The 2016 Paris Agreement which aims to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius.

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 Policy on Working Conditions
3. CLN Group Environmental Policy
4. CLN Group Health and Safety Policy
5. CLN Group Human Resources Policy
6. CLN Group Smart Working Policy

OUR COMMITMENTS

CLN Group recognizes that climate change is now affecting every country on every continent. It is disrupting national economies and affecting lives, costing people, communities and countries dearly today

and even more tomorrow. A range of measures must therefore be taken by businesses that will reduce emissions and increase adaptation efforts. In line with the principles and policies of CLN Group regarding respect for the environment, this Travel Policy promotes a reduction of CO2 emissions by reducing travel and changing the medium of travel utilized.

RECIPIENTS OF THIS POLICY

This Travel Policy is applicable to all CLN Group companies.

The following rules should be followed by all CLN Group companies:

REMOTE MEETING RESOURCES

Travel is only permitted if the business objective of the trip cannot be achieved using remote meeting resources such as telephone conferencing or applications approved by CLN IT department, such as Microsoft Teams.

RAIL TRAVEL

Rail travel is the preferred option for travel for Group employees as it is both safer and more environmentally friendly than other methods of transport such as airline travel or using cars.

Rail travel should be the first preference where it is feasible to do so in terms of available routes to the destination and the time required to reach the destination. Consideration of rail transport is mandatory before considering other options of travel. As a general guideline, any trip which takes less than 5 hours by train must be made using rail travel rather than other forms of transport.

For rail travel standard economy tickets which allow changes (in case the trip timing must be modified) must be used for all individual journeys. Business class tickets **may be approved on a case by case basis** for example where there may be safety reasons such as a female employee travelling alone at night, or where one of the group you are travelling with is travelling in business class.

CAR TRAVEL

Car travel should be considered where several employees are travelling together and travelling by car therefore becomes more economical, or where rail travel is not feasible. Preference is for the car used for the trip to be a car owned by a CLN Group Company (for example a fleet car or individual company car).

In all cases where a car is used for a business trip it should conform to Euro 6 or equivalent standards.

CAR POOLING

The Group actively supports local initiatives for Car Pooling whereby several employees share their private car to go to and from work. However, the Group requires that the local HR and Legal team fully analyses the Companies legal responsibilities associated with such schemes to ensure the scheme does not carry legal risks and responsibilities for the company involved.

CAR RENTAL

Compact or intermediate size vehicles may be used when it is less expensive than to using taxis or public transport, or when such an alternative is practical. If car rental is necessary, employees should share rental cars in order to reduce the cost.

For safety reasons, employees are only permitted to use major car rental companies such as Hertz, Avis and Europcar.

AIRLINE TRAVEL

Flying is the most polluting form of travel. The Group actively encourages the avoidance of airline travel where other alternatives are available.

If Airline Travel is required, economy tickets which allow changes (in case the trip timing must be modified) must be used for all individual flights with a duration of up to 4 hours. Business class Airline Travel **may be approved on a case by case basis** for individual flights with a duration of over 4 hours.

Employees are expected to make every effort to use the lowest suitable fare option, including with low cost airlines, when a reasonable level of service is available, particularly for individual flights with a duration of up to 4 hours.

Airline travel must be approved by the Divisional CEO.

For safety reasons, no more than three employees are permitted to travel on the same aircraft without express approval of the Divisional CEO.

HOTELS/LODGING

Hotels/lodging selected should be those that are well established, reasonable in price and conveniently located in relation to the traveller's work.

Single room is standard policy.

Luxury hotels should be avoided.

EARLY BOOKING

Employees are required to book their travel/accommodation as early as possible to take advantage of the best deals available, in particular for internal meetings which should be easy to manage in a timely manner. Employees should give their travel organiser a minimum of two weeks' notice of the bookings required.

HEALTH & SAFETY

In special cases where the Health and Safety of the employee may be threatened by using a particular mode of transport, for example there are security or health issues in the country being visited, then due consideration must be given to the safest reasonable transport method available.

VACCINATIONS

Prior to undertaking any overseas travel, the employee is responsible for ensuring that he/she has the vaccinations required according to travel to the destination country, by checking on their national government website. The employee may claim the cost of any required vaccinations.

SPECIAL MEASURES DUE TO COVID 19

For the period 1 June to 31 July 2020 the following special measures apply:

- No international travel is permitted without the express authority of the Group CEO.
- No Airline travel is permitted whatsoever.
- Travel alone by car is preferred to any form of public transport.
- For car trips of under 2 hours employees are encouraged not to stop at roadside facilities such as cafes, shops or restaurants or other busy areas. Travel by car must be with a maximum of two people in the same car. The second passenger should travel in the rear seat on the opposite side of the car to the driver.
- The choice of hotel should take into consideration the application of anti-contagion protocols which protect the health of their guests.

- The employee must strictly follow the World Health Organisation guidelines to prevent infection with COVID 19, in particular:
 - o Wash hands frequently using soap and water or alcohol-based hand rub;
 - o Maintain social distancing of at least 1 metre from other people;
 - o Avoid touching eyes, nose and mouth;
 - o Cover your mouth and nose with your bent elbow or tissue when you cough or sneeze;
 - o Seek medical attention if you have a fever, cough and difficulty breathing;
 - o Refer to national and local public health authority for latest advice before the trip.
 - o Use face coverings/masks when using public transport;

The Group will consider whether it is appropriate to extend these Special Measures beyond July 2020 based on Governmental advice.

AUTHORISATION OF BUSINESS TRIPS AND EXPENSES

The rules regarding authorisations of individual trips and expenses are given in section 5.10 of the Group's Human Resources Policy.

COMMUNICATION

Each country in the CLN Group is required to apply the Policy by implementing a procedure in the local language and identifying a local resource to manage implementation. Local management should allow employees to communicate openly with them regarding this Travel Policy without fear of reprisal.

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, June 2020

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

Gabriele Perris Magnetto

Chief Executive Officer CLN

Chief Executive Officer MA Division

A handwritten signature in black ink, appearing to read "P. Bartoli".

Paolo Bartoli

Chief Executive Officer MW Division

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

Gianpiero Bessone

CLN Human Resources Director