

MODERN SLAVERY ACT CNIM GROUP'S TRANSPARENCY STATEMENT FOR 2020

Introduction

The CNIM Group has set up a voluntary Corporate Social Responsibility (CSR) policy.

Respect for fundamental rights at work is at the heart of the CNIM Group's corporate responsibility and ethics policy, integrating unreservedly in its governance the principles and rights of the International Labour Organization (ILO) Declaration of 1998, as well as the Modern Slavery Act of 26 March 2015.

The present statement is made pursuant to Section 54 of the Modern Slavery Act 2015, and describes the steps the CNIM Group has implemented to ensure that slavery and human trafficking are not taking place in its businesses or in its supply chains.

I. The CNIM Group's organization and businesses

For more information regarding the Group organization and its businesses, please refer to our website:

Universal Registration Document 2020

II. Group policies and practices

For more information on our policies regarding slavery and human trafficking, please refer to our website:

- Declaration of the Management Board
- CNIM Charter of Ethics
- CNIM Group Purchasing Policy
- CNIM Group Whistleblowing procedure and contact
- CNIM Group Corporate and Social Responsibility Report for 2020



III. Supply chain and due diligence process

Our supply chain mainly consists in:

- Goods.
- Services at construction sites,
- Services at our production and operation sites,
- Services at our client sites.

In order to mitigate the risk of slavery, servitude and forced or compulsory labor, and human trafficking, the CNIM Group has implemented the following measures:

- a) Supplier Questionnaire, that we ask our main new suppliers to complete and sign a before the contract starts, including commitments to respect human rights at work, in accordance with the ILO Conventions.
- b) Purchase orders: modification of the Group companies' General Conditions of Purchase, in order to integrate the commitment to respect the ILO Conventions, for our suppliers and their own supply chain.
- c) Internal due diligences, that we conduct for new suppliers after a risk analysis based on three criteria: the country of the supplier, the nature of the goods or services, or the supplier itself. In case of red flags, a complementary external due diligence may be requested.
- d) On-site suppliers' audits regarding social, environmental and ethical aspects, that we decide to launch after a risk analysis. Conducted by a notified body, these audits are based on the SMETA 6.0 requirements, adapted to the Group specific needs. In case improvement opportunities are identified, the relevant Purchasing Departments run the corrective action plans in cooperation with the suppliers.

IV. Training and awareness

Each new employee is given through the induction process, the Group charters, codes of ethics, and internal procedures.

In addition, CNIM Group ethics and CSR commitments are regularly updated, subject of communication to the staff as well as the stakeholders, and available online on the Group intranet and website.

This statement, covering financial year ending 31 December 2020, has been approved by the CNIM Group Executive Committee.