



European company with a Board of Directors and a share capital of €39,442,878
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Claranova's Slavery and human trafficking statement for 2019-2020

This statement is made on behalf of the Claranova group (the “**Group**”) regarding the steps taken within the Group to prevent modern slavery and human trafficking from occurring in our own operations and supply chains.

Organization structure and supply chains

Claranova is an international technology group operating in three key markets: Internet, Mobile and IoT.

Claranova SE, France, is the parent company of the Group. It operates as a lead holding company for the entire Group (Executive Management, finance, communication, strategy, disposals and acquisitions, etc.).

The Mobile division includes the PlanetArt companies, which aim to provide consumers and small businesses with the tools, content and services to create quality personalized products that are both innovative and affordable.

A detailed presentation of the Group's activities is set out in the Group's Universal Registration Document¹.

The Group's main suppliers are printers, software developers and logistics service providers. While the Group does not yet have a formal purchasing policy, ad hoc initiatives take into account environmental and social factors.

Policies in relation to slavery and human trafficking

We are committed to ensure that all efforts are being made so that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Claranova fully adheres to the principles and fundamental rights outlined in both the UN Universal Declaration of Human Rights² and the Charter of Fundamental Rights of the European Union³ and is committed to fighting all forms of slavery and human trafficking.

Claranova is committed to conducting its business in accordance with the Ten Principles of the United Nations Global Compact⁴, which aims to meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

Due diligence processes - Risk assessment and management

Claranova's affiliates locally choose suppliers of confidence based on their expertise. They conduct local due diligence based on past practices on any supplier before entering into a new contract. The due diligence may include online search to evaluate that the particular organization has never been convicted of offences relating notably to modern slavery, and local on-site audit.

¹ https://www.claranova.com/wp-content/uploads/2019/11/CLARANOVA_URD_2018_19_FR.pdf

² <https://www.un.org/en/universal-declaration-human-rights/>

³ https://www.europarl.europa.eu/charter/pdf/text_en.pdf

⁴ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

We will aim to put in place global and local robust systems and measures, which are intended to:

- Identify parts of our supply chains that could potentially be at risk of slavery or human trafficking including mapping those countries, sectors and transactions which provide the greatest risk;
- insert appropriate commitments into contracts with new suppliers or have them adhere to a local code of conduct;
- add commitments into contracts with existing suppliers, when those contracts come up for review or renewal.

Claranova's affiliates will be required to respect local legislation on anti-slavery and human trafficking, taking into account local specificities as applicable. Our policies will form part of our contracts with suppliers, and such suppliers will be required to confirm (either directly in contracts or through adherence to specific code of conducts) that no part of their business operations contradicts those policies by confirming to us that, as a minimum standard:

- they have taken steps to eradicate modern slavery and human trafficking within their business;
- they hold their own suppliers to account over modern slavery and human trafficking;
- they pay their employees any prevailing local minimum wage applicable within their country of operations and provide safe working conditions in accordance with local legislation;
- we reserve the right to terminate the contract of a supplier at any time should any instances of modern slavery or human trafficking come to light.

Key performance indicators to measure effectiveness of steps being taken

We will regularly assess the effectiveness of these systems, to confirm that they meet our objectives, and to determine whether further steps are required.

We will determine the effectiveness of the steps that we are taking to assess if slavery and/or human trafficking is taking place within our business or supply chain, if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Training on modern slavery and human trafficking

We acknowledge that all staff should be aware and understand the risks of slavery and human trafficking.

We will aim to conduct training on awareness, particularly for employees within our organization working in procurement/buying teams or involved in recruitment so that they can look out for the signs of modern slavery and understand what to do if they suspect that it is taking place within our business and/or supply chains.

After discussions, and in compliance with Section 54 of the UK's Modern Slavery Act, the Board of Directors has approved the present statement.

Paris, January 28, 2020

Mr. Pierre Cesarini
President of the Board of Directors
Claranova