

INTEGRATED POLICIES

QUALITY -ENVIRONMENT - OCCUPATIONAL HEALTH AND SAFETY - RTS

This document contains the founding principles through which the Company Trans Italia s.r.l., as part of its *activities of supplying third party transport services, both domestic and international, by road and intermodal, of different goods, of hazardous and non-hazardous waste and ADR dangerous materials*, ensures:

- The quality of the procedures adopted at every stage of the process of delivering transport services to ensure full satisfaction of customer needs and systematic compliance with the applicable legal requirements.
- The Management of its business aiming at protecting the safety of its staff and of all the people involved in the company's activities, such as its customers and the community in which it operates.
- The Management of its business so as to ensure The Road Traffic Safety
- The protection and safeguard of the environment and the sustainability of its activities and those under its control;
- The protection of Food Safety during all stages of transport of products intended for human consumption and animal feed.

In order to ensure the constant application of the above principles, **Trans Italia s.r.l.** is committed to support and ensure the implementation of a business management system in accordance with the rules:

UNI EN ISO 9001:2015

UNI EN ISO14001:2015

UNI ISO 45001 :2018

ISO 39001:2016

IFS Logistics Standard and Codex Alimentarius

In order to bring credibility and reliability to the GHG reporting and monitoring processes, in relation to the emission declarations and reduction projects implemented, the Company has validated the calculation methodologies through the criteria contained in standards 14064-1 and 14064-2.

In detail, these principles are expressed through specific Policies (here in after in the document), referring to the relative reference schemes, or inspired by shared principles of Ethics, Equity, Legality, Sustainability, Safety.

Date 25/10/2022

The Chairman



QUALITY POLICY

The Management of TRANS ITALIA s.r.l. considers the commitment to its customers as a priority, as a constant search to determine, understand and meet their requirements and needs in order to provide them with a service closest as possible to their demands.

It, therefore, believes that the Quality of the procedures adopted at each stage of the process of delivery of transport services and the constant analysis of risks and strategic opportunities are essential to achieving prominent positions in the market.

For this purpose, the creation and development of a Quality Management System, has been identified as the most appropriate means to achieve and maintain these goals.

The founding principles are as follows:

- ❖ Commitment of the Management to provide the resources for the proper operation of the Quality Management System.
- ❖ Commitment of the Management to ensure full compliance with all compulsory regulations in the transport sector.
- ❖ Commitment of the Management to the dissemination and making available to all stakeholders of the principles governing the Quality Management System.
- ❖ Commitment of the Management to involve the company's staff at all levels in the implementation of the Quality System.
- ❖ Commitment of the Management to promote actions aimed at improving the competence and efficiency of all staff.
- ❖ Maximum attention to the customers' needs in order to provide services that will bring about the full satisfaction of their explicit and implicit needs.
- ❖ Careful management of product and service suppliers, in order to ensure the continuity of quality parameters at all levels.
- ❖ Continuous monitoring of nonconformity and Complaints.

The main **objectives** that are to be achieved, monitored and improved through the application of the Quality Management System are as follows:

- Strengthen its market position and increase its competitiveness.
- Consolidate the company's reputation for reliability and professionalism.
- Customer loyalty.
- Rationalize and optimize various management and operational activities in order to reduce the impact of liabilities due to vehicle damage, maintenance, efficiency and wear and tear.
- Ensure the safety and reliability of its vehicles.
- Ensure the efficiency, accuracy and quality of its services.
- Increase the range of transport services offered.
- Increase the professional competence of all staff.
- Monitor the quality standards of product and service suppliers.

To **implement** all the above, the Management of TRANS ITALIA s.r.l. uses resources, methods, strategies and performance indicators that are listed in the document "Management review", which in fact periodically sets objectives for improvement and new indicators.



ENVIRONMENTAL POLICY

Since its foundation in 1984, **Trans Italia s.r.l.** had a prevailing objective: to **look for solutions that combined the reduction of operating costs with the reduction of its environmental impact.**

The Company has been pursuing this objective successfully since the mid-90s, as it was the first in Southern Italy to use the so-called “*sea highways*”, which, only years later, in June 2001 in Gothenburg, were adopted by the European Community with the objective of improving links with the peripheral regions of the European Union and **reducing the emissions of carbon dioxide into the atmosphere.**

Trans Italia s.r.l. is present, with quality services, also in all other countries in Continental Europe. On these traffic routes, to protect the environment and to cut costs, it is using rail intermodality.

Based on these values, Trans Italia srl is committed to constantly **improving its environmental performance**, also through the application of an effective Environmental Management System, in accordance with the requirements of UNI EN ISO 14001: 2015.

For the correct application of the system and for achieving the objectives set, the Management of Trans Italia s.r.l. undertakes to:

- ✓ Ensure that its activities are carried out in accordance with current legal provisions and with eventual agreed codes of practice.
- ✓ Make every effort in terms of organizational, operational and technological ways to prevent pollution of the water, air and soil.
- ✓ Minimize the consumption of energy and water and generation of waste, favoring recovery where possible.
- ✓ Define environmental objectives and targets, to be integrated with the operational management of the site, with business development programs.
- ✓ Ensure that this environmental policy and the environmental management system set up are implemented and maintained at all levels of the organization and are supported by education and training activities.
- ✓ Ensure that this document is available to the public.

A proper **Environmental Analysis** aimed at identifying the main environmental impacts, is considered by the Management as the main tool to achieve **environmental targets**.

The main objectives that are to be achieved, monitored and improved through the application of the Environmental management system are as follows:

- ✓ Decrease in the environmental impacts resulting from its activities.
- ✓ Increased use of intermodal routes.
- ✓ Increasing of the efficiency of vehicles to reduce consumption.
- ✓ Renewing fleet with the low-pollution vehicles.
- ✓ Use of the low-power electrical equipment.
- ✓ Proper waste sorting and management.
- ✓ Raising of awareness of the staff in relation to environmental issues.
- ✓ Reduction of environmental nonconformity.
- ✓ Selection of suppliers based on environmental performance.

To **implement** all the above, the Management of TRANS ITALIA s.r.l. uses resources, methods, strategies and performance indicators that are listed in the document “Management review”, which in fact periodically sets objectives for improvement and new indicators.



OCCUPATIONAL HEALTH AND SAFETY POLICY

It is the policy of **Trans Italia s.r.l.** to conduct its business in a way that protects the safety and health of its staff and of all those who are involved in its business activities, such as customers and the community in which they work.

For this purpose, the Management is committed to providing the organizational, material and economic resources necessary to activate and efficiently maintain an **Occupational Health and Safety Management System (OHSMS) in accordance with UNI ISO 45001:2018 Standard** and to organize the entire corporate structure (Employer, Head of the Prevention and Protection Service, appointed persons, security personnel, employees, casual workers) so that everyone is involved, according to their responsibilities and competences, to achieve the assigned safety objectives.

In order to guarantee the effective management of OHSMS, the Management agrees to ensure that:

- ✓ Compliance with the existing legislation on occupational health and safety is considered a priority.
- ✓ Information on occupational risks is spread to all workers.
- ✓ Workers' training is carried out and updated with specific reference to the tasks performed.
- ✓ Workers are consulted, also through the workers' safety representative, regarding occupational health and safety aspects.
- ✓ All workers are trained, informed and made aware to carry out their assigned tasks in field of safety.
- ✓ All members of the corporate organization participate, according to their abilities and competences, in achieving the safety objectives assigned.
- ✓ Planning of machinery, plant and equipment, workplaces, operating methods and organizational aspects are designed to safeguard the health of workers, third parties and the community in which the company operates.
- ✓ Emergent needs in the course of work activities are quickly and effectively faced.
- ✓ Preventive actions and internal survey for the protection of workers' safety and health have the priority in order to significantly reduce the probability of the occurrence of accidents, injuries or other nonconformity.
- ✓ The Policy, Objectives and implementation of OHSMS are periodically reviewed in order to achieve a continuous improvement in the level of occupational health and safety in the company.

The main objectives which they intend to reach are the following:

- ✓ Reduce the number of accidents in all work phases (loading, unloading, transport, etc.).
- ✓ Reduce the Complaints and nonconformity related to non-compliance with procedures and/or Safety Standards.
- ✓ Increase awareness, training and information of all staff regarding safety.
- ✓ Preventing the risk of occupational diseases.
- ✓ Handling nonconformity and reporting Near Misses.

The Management also believes that cooperation among company resources, collaboration with business organizations and with designated external bodies, are fundamental for an effective management of OHSMS. For this reason, this Policy is made public and made available to all stakeholders.



ALCOHOLIC BEVERAGES AND DRUGS POLICY

TRANS ITALIA Srl Management thinks it is necessary to point out its commitment in fighting any kind of addiction and draws all its staff's attention, both executive and operational, to the following points:

- ✓ The use of drugs and the abuse or misuse of alcohol or alcoholic drinks during working hours and especially while driving, negatively affects the staff's performance with possible dangerous consequences for them, their colleagues, the community and for road safety, being it the cause of several accidents.
- ✓ Alcohol can expose people to serious risks of accidents or injuries also if after one single and random episode of consumption, often considered as innocuous for their health and their capacity of reaction and attention. More specifically, drivers must be aware that drinking alcohol is absolutely forbidden, because it may pose a threat to their safety and to the safety of any other road user.
- ✓ We remind you that some kind of medicaments can negatively affect the operators' psychophysical capacities, so as to threaten safety and road safety. Therefore, their consumption prohibition extends to this medicament category, too.

Our Company considers alcohol and drugs addiction as a curable condition. Therefore, those who think to be drugs – alcohol – beer or wine addicted have to ask for medical assistance before their condition negatively affects their working capacity. Particular attention must be drawn to the driving capacity, which, if reduced, may threaten one's own safety and the safety of other road users.

In view of the above, the whole staff is invited to read the following recommendations:

- During the working hours the consumption of alcoholic drinks, drugs or any other substance which can threaten the operators' psychophysical capacities is strictly forbidden;
- The Management also recommends that the employees abstain from their consumption also outside the working period, especially if the consequent effects persist during the following working duties:
- Nobody is allowed to start his/her job duties if he/she is not in good psychophysical conditions;
- Whenever an operator suspects that another one is working under the effect of alcohol, drugs or medicaments which have altered his/her psychophysical conditions, he/she will have to immediately inform the company's person in charge, so as to put in place the internal procedures. These procedures will include a prompt intervention and, in case of confirmation, the operator will be immediately discharged from the job duty at risk;
- The Company reserves the right to make controls inside the vehicles and in the working areas without previous notice, so as to check the presence of drugs and/or alcohol, even occasional and in small doses;
- We remind you that, in compliance with the Workers Statute, the use of drugs or the abuse of alcohol can be ground for dismissal



SECURITY POLICY

The protection against possible external attacks with reference to personal safety, cargo security and the presence of illegal immigrants on board is a primary concern of the Management of Trans Italia s.r.l.

This is why it undertakes to ensure that its own drivers and sub-carriers, involved in the international transport business, comply with the following guidelines:

- ❖ Use only motorways and ring roads, except for evident emergency cases (accidents, blocks, etc.) when the driver must notify the Carrier;
- ❖ Ensure the use of safety devices (seal, tilt cord, etc.);
- ❖ Stop in safe areas, with surveillance cameras and not near possible critical areas (close to ports / airports / borders and any railway station, where the driver might be at high risk of robbery / theft / assault to the trailer) ;
- ❖ Guarantee the confidentiality of the goods transported;
- ❖ Implement activities to prevent the access on board of illegal immigrants thanks to vehicles' accurate inspections, including the lower part of the vehicle, the roof and the tarpaulin, verifying the absence of any possible cut or laceration;
- ❖ Record the checks carried out on the vehicle safety checklist



ROAD TRAFFIC SAFETY POLICY

The Management of Trans Italia s.r.l considers Road Traffic Safety the founding principle of its work, for this reason it has decided to adopt a management system for road safety in compliance with the ISO 39001: 2016 (RTS) standard.

In order to obtain maximum performance from the adoption of this system, the Management undertakes to provide all the necessary organizational, instrumental and economic resources. It also undertakes to activate and maintain efficiency, and to organize the company structure so that everyone is involved, according to their responsibilities and skills, to achieve the road safety objectives that the Management establishes.

To ensure effective management of the RTS system, the Management undertakes to:

- ❖ Promote the awareness of traveling personnel through training on the principles of safe driving, eco-driving, respect for driving / rest times, and refresher courses on road safety;
- ❖ Communicate the policies and objectives resulting from the application of the RTS system;
- ❖ Monitor road safety performances through specific KPIs;
- ❖ Develop and test specific road emergency plans;
- ❖ Use the best technology on vehicles to ensure efficiency and prevent accidents;
- ❖ Investigate the causes of accidents and develop preventive actions
- ❖ promote, plan, dispose of means and resources to apply a BBS program, according to the criteria described in the guidelines published by CEFIC / ECT.

The BBS program is aimed at increasing the awareness of each operator involved in driving vehicles, through observation, coaching, communication and improvement plans, managed and carried out by competent, experienced and authoritative staff, designated by the Management.



CSR POLICY Corporate Social Responsibility - Ethical Code

Since its foundation in 1984, **Trans Italia s.r.l.** is committed to conduct its business and to manage internal business processes and those with customers in accordance with the principles of honesty, integrity and transparency while respecting the human rights and the interests of employees.

The complexity and multitude of interests with which **Trans Italia s.r.l.** operates, the ongoing challenges and the precise desire to improve and keep up with the market, reinforce the need and importance of defining the values and responsibilities on which the company founds itself upon building, day-by-day, step by step, a better future.

Rejecting all forms of discrimination and corruption, **Trans Italia s.r.l.** operates with the utmost respect for human dignity, equality and freedom of individuals.

The company also bases its management on solid principles and promotes the fundamental values of moral integrity, fairness, consistency, good faith, transparency, integrity, diligence, honesty.

All this being said, **Trans Italia s.r.l.** states that the **founding principles of its Ethical Code of Conduct** are as follows:

- ❖ **Compliance with the Law:** the company and its employees/collaborators must comply with the applicable laws of the country in which they operate.
- ❖ **Relationships with employees/collaborators:** the selection of staff is carried out with respect to equal opportunities, considering profiles of professionalism of interested parties and without distinction of race, religion and/or sex. The company is constantly engaged in the growth of its employees through internal and external training courses. **Trans Italia S.r.l.** respects the dignity of the individual and supports the rights of free association and collective bargaining. The remuneration of employees complies with the contractual standards provided by law.
- ❖ **Customer Relationships:** **Trans Italia S.r.l.** pursues its growth objectives through the provision of quality services on competitive terms and in the respect of fair competition. The style of behavior towards customers is based on the values of listening, dialogue, timeliness, availability, respect and courtesy. In managing its credits, **Trans Italia S.r.l.** undertakes not to abuse its position to its own advantage/benefit and to operate according to objective and documentable criteria.
- ❖ **Conflict of interest:** **Trans Italia S.r.l.** expects that all employees will refrain from taking advantage of the personally privileged position and of privileged information obtained and related to their function. In addition, they are required to avoid any kind of activity, behavior or subjective situation that may constitute a conflict between individual interests and the company.
- ❖ **Integrity and transparency of accounting:** **Trans Italia S.r.l.** does not give, directly or indirectly, bribes or gifts from which to draw an undeserved competitive advantage. No employee is allowed to receive gifts. Accounting is accurately reported: there are no untaxed accounts, funds or capitals which are not recorded. It is forbidden for its employees to display behavior that could adversely affect the transparency and traceability of budget information.



Supplier Policy Supplier Code of Conduct

Compliance with the principles of legality, honesty, equality, confidentiality, fairness, integrity, transparency and sustainability, defined in the company's Code of Ethics, also finds application in its relations with third parties with whom Trans Italia srl enters whilst carrying out its activities.

In this context, to regulate relations with its suppliers, Trans Italia S.r.l. has decided to adopt a Code of Conduct for suppliers, in order to guarantee that they implement safe working conditions, that their employees are treated with respect and that their production processes are responsible and respectful of the environment.

All this being said, the company declares that the **founding principles**, shared with suppliers through the signing of the Code of Conduct, are as follows:

❖ Compliance with regulations

Compliance with the laws and national and international regulations together with any other applicable international agreement and commitment to operate in compliance with the principles set out in the Supplier Code of Conduct.

❖ Anti-corruption and anti-money laundering

Compliance with applicable anti-corruption laws and regulations and with anti-money laundering, self-laundering and fencing of money, goods or other benefits.

❖ Equal opportunities, non-discrimination and fair working conditions

To guarantee all people equal employment opportunities without any discrimination based on race, color, gender, language, religion, ethnic origin, disability, marital status, sexual orientation, political and trade union opinion.

❖ Health and Safety of workers

Compliance with all applicable laws and regulations of the rules relating to the health and safety of workers, occupational hygiene and the prevention of accidents at work.

❖ Compliance with environmental regulations and environmental management systems

Compliance with the applicable laws and regulations on environmental matters, the adoption of a precautionary approach with a view to preserving natural resources and the use of efficient technologies, which aim to reduce the environmental impact.

To prefer the use of renewable sources, minimize the environmental impact of its activities, protect local ecosystems and biodiversity and promote the conscious and responsible use of all natural resources available, also supported by the adoption of certified management systems according to recognized standards.



ADOPTION OF THE OPERATION CLEAN SWEEP® PROGRAMME (OCS)

Thanks to the adoption of the Operation Clean Sweep®, Trans Italia is committed to proactively contributing to reducing marine pollution caused by microplastics.

This programme aims at guaranteeing that any transport and plastic pellets handling is carried out following good operating procedures, including cleaning operations and containment of accidental loss of pellets so as to **reach the global goal of zero pellet loss into the environment.**

In order to guarantee an efficient adoption of the Operation Clean Sweep Programme, Trans Italia's Management is committed to:

- ✓ Respecting all the applicable environmental regulations, relevant to the Transport sector, concerning the pellets containment;
- ✓ Identifying the storage and warehousing sites and all the critical points inside which pellets loss might occur;
- ✓ Guaranteeing that these sites have got facilities and adequate equipment suitable for pellets cleaning and for reducing pellets loss;
- ✓ Guaranteeing the adoption of appropriate procedures apt to reduce pellets loss;
- ✓ Guaranteeing adequate training to the employees involved in the programme implementation;
- ✓ Making regular audits of all the pellets storage and/or warehousing sites.



SUSTAINABILITY POLICY

Sustainability is a central *driver* for the development of *Trans Italia's* strategy: the main commitment areas as well as Company's objectives - set out in the **Sustainability Report** - range from environmental to social protection, up to local communities' enhancement to make the Group increasingly responsible, innovative, and inclusive, in constant dialogue with its territory and community needs.

Trans Italia S.r.l. has always chosen to act responsibly to develop a long-term sustainable business, which complies with the highest Environmental, Social and Governance standards. To comply with this commitment, together with Model 231, the Code of Ethics, the Code of Conduct for third parties and the other Integrated Policies, the Company follows these principles:

- To train the staff on sustainability issues at 360 degrees, with the awareness that Company's sustainable development is possible only with the involvement of the people it is made up of and requires the knowledge of ESG principles.
- To build an organizational culture of transparency and integrity, based on ethical behavior and compliance with the law, which prioritizes integration, quality of life and personnel safety, as well as the wellbeing of local communities.
- To maintain a work environment which is respectful of people's fundamental rights and dignity.
- To promote diversity and reject any type of discrimination, whether based on gender, sexual orientation, ethnicity, color, age, religion, or political opinion.
- To promote environment protection both in transport services provision and "well-rounded", seeking the efficient use of resources and collaborating with international intermodal operators to proactively address climate change and reduce emissions throughout the supply chain.

Trans Italia S.r.l. is responsible for the freight transport chain of its customers and understands the impact that its environmentally sustainable transition process has on them: the Company has already reached the goals of the "Fit for 55" climate package - set by the European Commission for 2030 - thanks to both the use of bio-LNG, in latest-generation vehicles, and road-sea-rail multimodality.

The **ISO 14064** certification process activation responds to the Management's will to contribute to the timely monitoring of environmental issues. The ISO 14064 standards have the main aim to guarantee and trust the processes of reporting and monitoring of GHG, in relation to emission declarations and projects for their reduction.

Specifically, the Company has "designed" the **GHG inventory** - with annual update - and manages **projects to reduce emissions / increase removals**, through the integration of the following schemes:

- ❖ **UNI EN ISO 14064-1: 2018**, accounting for its GHG emissions at the organizational level both to implement *Carbon Management* policies and communicate the environmental sustainability commitment to its stakeholders through the verification statements.
- ❖ **UNI EN ISO 14064-2: 2019**, validating the methodology for calculating emissions from transport services and reporting the GHG removals thanks to the use of *green* vehicles / intermodality / multimodality. This allows us to grant accredited environmental certificates to our customers.

The sustainability winning approach is also reflected in qualification processes on our partner platforms as well as in international ratings.



FOOD SAFETY POLICY

The management of TRANS ITALIA S.R.L. considers priority the commitment to meet customer requests in relation to food safety, food defense, food fraud, and any other requirement to ensure the safety of products intended for human consumption and / or animal feed transported.

To this end, it has decided to develop its own HACCP food safety management system, based on the principles set out in the Codex Alimentarius and inspired by the principles contained in the standard "IFS Logistics 2.3 and doctrine"

This system applies only to the transport activity on behalf of third parties, national and international, by road and intermodal of food for human use and animal feed, at controlled or non-controlled temperature.

The Senior Management is therefore committed to:

- ❖ Provide resources and investments necessary to ensure the safety, legality and quality of the products transported;
- ❖ Respond to the needs, requests and requirements of customers present in the contractual specifications, in relation to the products transported;
- ❖ Regularly review the food safety management system to ensure its effectiveness;
- ❖ Provide resources necessary to carry out internal audits and audits aimed at monitoring the infrastructures and work environments dedicated to the food safety management system;
- ❖ Implement a HACCP food safety management system, based on the principles of the Codex Alimentarius;
- ❖ Appoint a HACCP Team made up of competent personnel adequately trained in the principles of the Codex Alimentarius;
- ❖ Ensure the hygiene of staff and all working environments and/or infrastructure dedicated to the management of food and animal feed;
- ❖ Make resources available to carry out planned maintenance of all infrastructures, machines, plants and equipment dedicated to the transport of food and / or animal feed;
- ❖ Plan and implement Pest Control, food defense, food fraud prevention activities.

