

POL_INT_2021	INTEGRATED CORPORATE POLICY	
rev.00 of 07.04.2021		

NUOVA TRANSPORTS is a logistics provider active at national and international level that guarantees a transversal offer to the B2B with direct control of all activities: transport, land shipments and integrated logistics, collaborating with several partners and suppliers in the field of complex and innovative supply chains. One of the Company's first goal is to provide its Customers with services that meet their specific needs and are characterised by elements of added value, in terms of efficiency, quality and safety.

The Company is also committed to achieving this goal by protecting the workers' rights, their health and safety, also with respect to the environment, working with a view to continuous improvement and making its suppliers aware of the same principles.

The Integrated Policy, which is the subject of this document, is the result of NUOVA TRANSPORTS' will to operate in a proactive and transparent manner in several areas, in order to harmonise the needs linked to the company's development with those of protecting resources, both internal and external.

Therefore, the Integrated Policy includes the following topics:

- Social liability and business ethic
- Safeguard of health and safety at work
- Environment safeguard
- Quality of internal processes and services offered
- Outsourced process control

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SOCIAL LIABILITY

The Company's commitment has always been to create an environment in which the rights of employees are respected, both from a human and a work point of view.

Moreover, the company aims to progressively improve the internal environment, in order to favour a serene, welcoming and stimulating company climate, in which an exchange process is triggered to promote the professional growth of employees and, consequently, the progressive improvement of the company itself.

Respect for human freedom and dignity

The use of any form of physical, corporal and mental coercion, verbal offence or any other offence against the dignity of any person is forbidden.

NUOVA TRANSPORTS guarantees the support, respect and defence of internationally recognised human rights.

Respect for childhood right and protection of young workers

In full respect of human rights, NUOVA TRANSPORTS does not accept any form of work carried out by children, without hindering the enter of young people into the world of work, even those not yet of legal age but already in working age, protecting them and providing them with a dedicated integration without dangerous tasks.

“Zero tolerance” towards discrimination, harassment and abuse

NUOVA TRANSPORTS adopts a zero tolerance policy towards harassment, abuse, discrimination and intolerance of age, gender, religion, ethnicity, sexual orientation, etc.

Should any of the above behaviours occur within the Company, NUOVA TRANSPORTS, in compliance with the provisions of the national contract applied, will take immediately corrective measures which may also result in disciplinary measures that, in extreme cases, could result in an interruption of the employment relationship.

Refuse of forced or compulsory labour

In order to guarantee workers' freedom, NUOVA TRANSPORTS undertakes to prevent any form of forced labour, by prohibiting any form of physical and mental coercion, corporal punishment and severe or inhuman treatment, including verbal abuse.

Freedom of association and collective bargaining

In compliance with the principles of the Constitution and the provisions of the Workers' Statute, L. 300/1970, NUOVA TRANSPORTS reiterates that *“workers, without distinction of political, trade union and religious beliefs, have the right, in their workplace, to freely express their thought”*.

Workers also have the right to freedom association and participation in collective bargaining within the terms set out in the CCNL applied.

Right to a decent wage and proper working hours

According to the laws that The Company guarantees the economic recognition of its human resources, without discrimination between men and women

The organisation guarantees the economic recognition of its human resources, without discrimination between men and women, in accordance with the laws governing company consultation such as national labour

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contracts, company negotiations and trade union agreements. It also ensures extensive application of the principles laid down in current legislation, with regard to working hours, pay levels, regulations on holidays and rest breaks and overtime, to be carried out on a non-continuous basis and never imposed by the company. In any case, at least one day off per week will be guaranteed. NUOVA TRANSPORTS ensures that the composition of remuneration and extra benefits is regularly and clearly detailed and that the remuneration is paid in full compliance with the laws in force. The right to equal opportunities is also respected during recruitment or dismissal as well as in cases of promotion and training.

Business ethic

NUOVA TRANSPORTS, in accordance with the principles of the holding company RHENUS LOGISTICS, works in compliance with business ethics, guaranteeing and promoting:

- Respect for competitors
- Zero tolerance towards corruption
- Absence of conflicts of interest
- Transparency and cooperation with the authorities

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HEALTH AND SAFETY AT WORK

In pursuing the goal of continuously improving its performance in the field of health and safety at work, the Management is committed to:

- comply with the laws and regulations on occupational safety and health protection and any other health and safety requirements that may be subscribed to;
- take the necessary measures to prevent accidents and occupational diseases resulting from their activity
- regularly analyse accidents, near miss, injuries and risk situations, in order to verify the effectiveness of the corrective actions taken and ensure the application of the company policy with a view to continuous improvement;
- carry out and keep updated the risks analysis, including accidental events and emergency situations defining the prevention and protection measures necessary to eliminate them and, if it is not possible, to reduce them;
- promote a culture of safety and awareness of the importance of compliance with the relevant regulations in all workers, including contract workers working in company workplaces, through example and systematic monitoring;
- set goals for safety management, expressed in a plan of objectives and related programmes, periodically reviewed and revised if necessary, making resources available to achieve them;
- maintain a company management system based on procedures, instructions and control forms aimed at the correct performance of tasks and the control of their effectiveness;
- to maintain and improve workplace safety conditions in line with evolving technological knowledge, also to cope with present and future emergency situations that can have a strong impact on workers' health and safety, as well as on Business Continuity;
- ensure maximum collaboration by all personnel for the implementation of the occupational health and safety management system through continuous specific training activities and related monitoring;
- disseminate its occupational health and safety policy to stakeholders;
- guarantee company security through preventive measures aimed at preventing events that could cause damage to company assets, people or clients' material or intellectual property, such as theft and fire or even damage to the IT system;
- raise awareness and encourage all employees to carry out their activities in the safest possible way, through observation of their behaviour and subsequent information, training, suggestions and/or advice.

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ENVIRONMENT

Due to the intrinsic characteristics of its activity, especially in the field of shipping activities, NUOVA TRANSPORTS is aware that it has many areas in which to intervene to reduce its impact on the territory and the environment and to preserve its natural heritage and resources.

With this policy, the company aims to harmonize environmental protection with all necessary decisions, processes and company resources.

NUOVA TRANSPORTS aims to make its commitment concrete, in this sense, both through the step by step achievement of short-term objectives and by undertaking a path that will lead it to build, in the medium term, a structured and certified management system.

The Company identifies the following areas of intervention as priorities:

- the optimisation of energy and fuel consumption;
- the improvement of waste management, reducing its production and promoting its reuse and separate collection;
- the reduction of the impact linked to transport activities, favouring solutions with a lower environmental impact;
- the selection of suppliers of products and services with concrete attention to environmental issues;
- the promotion of forms of work with a reduced impact on the environment.

Below are some of the actions already taken by the company:

- 100% electricity supply from renewable sources;
- replacement of heating systems with latest generation boiler;
- use of transport suppliers with low consumption vehicles (euro 5 or more or LPG or electric vehicles) for the activities of the Customer Solutions Division;
- promotion of the use of information technology for video communication, in place of meetings in attendance.

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QUALITY

NUOVA TRANSPORTS has set the goal of constantly improving the quality of the services offered, expanding the range of solutions offered, in a perspective of efficiency and innovation.

In order to achieve and maintain over time what has been established, the Company has implemented a Certified Quality Management System, in compliance with the UNI EN ISO 9001:2015 technical standard, which is kept up to date with the evolution of company processes, the context in which the Company finds itself and the applicable regulations. The system has been developed to keep processes under control, starting from their planning, focusing on the expectations of Customers and other interested parties.

Within the organisation this means:

- promotion of a culture of quality among company staff, increasing awareness of the role played by each individual in contributing to the achievement of objective
- information, training and education for the functioning and control of processes;
- enhancement and development of personal skills, responsibility for areas of competence;
- promotion of shared values and correct models of behaviour;
- sharing and keeping under control the documented information necessary to ensure the effective and efficient functioning of processes;
- control of the services provided and customer satisfaction;
- periodic review of the proposed solutions and the results achieved, in order to be at the forefront from a technological and organisational point of view, favouring solutions with low environmental impact and minimising the risk of accidents, *near misses* and injuries;
- use of procedures for the management of complaints and non-conformities that allow for the timely resolution of complaints submitted by clients through appropriate corrective actions aimed at in-depth examination and implementation of effective solutions to avoid repetition;
- availability of records, reports, statistics, i.e. all those data that constitute objective evidence of service quality;
- interventions aimed at increasing staff motivation and involvement through the creation of a serene, comfortable, stimulating work environment that encourages interpersonal relations;
- carrying out internal audits to monitor the degree of compliance of processes with system procedures and evaluate any improvement actions.

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Appendix to Integrated Policy – Supplier choice and management

Suppliers are an integral part of the company's production process and must therefore be suitably selected and subsequently monitored in order to guarantee their continuous adherence to and respect for the principles underlying this policy, as well as their ability to offer the highest possible guarantees to the company and all interested parties.

To this end, the Management is committed to:

- accept only suppliers in compliance with current national and international laws and regulations, with particular regard to the protection of workers, safety and the environment;
- define supplier evaluation criteria to ensure effective supplier selection;
- periodically monitor the supplier's performance in order to identify opportunities for improvement;
- identify adequate communication interfaces with suppliers in order to make them aware that their contribution is an essential part of service quality;
- carry out inspections of suppliers where necessary;;
- ensure that the specific requirements or limitations of sectors requiring particular attention are met (e.g. chemical, food, etc.);
- allow sub-contracting only after written authorisation for sectors requiring particular attention (e.g. chemical sector);
- provide its employees/collaborators with the necessary training and resources for the correct management of suppliers;
- make its suppliers aware of an ever-increasing attention to safety and environmental protection;
- ask suppliers and any subcontractors to respect the principles of social responsibility pursued by the company.

In order to provide the necessary guidelines for a choice of suppliers based on criteria of reliability and quality of the service provided, NUOVA TRANSPORTS has included, in the company's Quality Management System, a procedure for the management and control of all phases of the process of evaluation, qualification and monitoring of suppliers, an indispensable aid to operate more effectively and, therefore, improve Customer satisfaction.

Should the company find, among the suppliers with whom it collaborates, one or more cases of violation of the requirements considered fundamental and/or the principles contained in this policy, it shall request the supplier involved to take immediate action to correct the non-compliance found, producing evidence thereof, in the absence of which the company reserves the right to stop the collaboration with the non-compliant supplier.

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