

**Issuer function**

General  
Management

**Recipients**

Employees and stakeholders in ITX Cargo's business

**Approver**

Chairs of the Board of Directors, July  
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# Company Policy and Code of Ethics

## Introduction

ITX Cargo provides shipping services for various goods nationally and internationally. The services are carried out in such a way as to reflect the company's commitment to conduct its activities in full compliance with the laws in force, guided by fairness and honesty.

This is the behavior that our customers expect from us.

This document sets out certain values and principles that ITX Cargo is committed to respecting in all the countries where it operates. The Code sets out certain minimum non-negotiable standards that we intend to respect and follow in the conduct of our business.

## Business fairness

**Principle of non-discrimination**

ITX Cargo does not discriminate in recruitment and employment procedures on the basis of criteria such as race, colour, religion, sex, age, physical ability, nationality or sexual orientation.

**Freedom of association and the right to collective agreements**

Unless otherwise provided and regulated by government authorities, the company is obliged to guarantee its employees freedom of association and the right to collective agreements.

**Integrity of Behavior**

ITX Cargo is inspired by the principles of Social Responsibility to protect its customers, suppliers, third parties, and for this reason ensures the maximum effort to guarantee the quality of its services and the transparency of its behavior on the market. These behaviors shun and repudiate the use of tools contrary to business ethics, such as corrupt acts, bribes, artificial creation of conflicts of



interest, fraud, money laundering, anti-competitive activities, favoritism and collusive behavior. To prevent corruption in relations with customers and suppliers, all staff are required to incur entertainment expenses (e.g. lunches, dinners) for an amount **not** exceeding € 150.00 per person.

## Sustainability

ITX Cargo supports and encourages applicable and sustainable operating practices, energy-saving practices and the containment of fossil fuel consumption.

## Labour standards

### **Prisoner work and forced labour**

ITX Cargo declares that under no circumstances does it use or otherwise exploit forced or compulsory labor.

Similarly, work required under any form of debt servitude is prohibited, as is the use of physical punishment, imprisonment, threats of violence or other forms of harassment or ill-treatment as a method of discipline or control.

ITX Cargo does not use service providers that exploit the work performed by tied unpaid workers, nor does it contract with subcontractors who use these practices and use these facilities.

Only services provided by workers who are following an official prison rehabilitation program constitute a form of work that is not considered a violation of the Code.

### **Child labour**

The use of child labour by the company and all relevant third parties is strictly prohibited. Child labour refers to those activities that are mentally, physically, socially and morally dangerous or harmful to children, or that interfere with their school activities.

### **Working hours**

ITX Cargo ensures that employees work in compliance with the mandatory industry laws and regulations in force regarding the number of hours and days worked.

### **Pay**

ITX Cargo employees receive salaries and benefits that comply with applicable laws and binding collective agreements, including those regarding overtime and other award agreements.

### **Training – Competence – Awareness**

ITX Cargo guarantees personnel the necessary training to carry out the tasks assigned. In the context of training, particular importance is given to aspects concerning workers' health and safety at work. In this context, ITX Cargo promotes the dissemination of behaviors that comply with behavior-based safety principles (BBS), verifying their effective application.

### **Non-discrimination**

ITX Cargo pursues a policy that complies with applicable laws, which prohibit discrimination in employment and employment practices on the basis of race, color, religion, sex, age, physical ability, national origin, or other grounds prohibited by law.

Disciplinary abuse and physical abuse, the threat of physical, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.



## Safety and health

### **Working environment**

ITX Cargo guarantees employees a safe and healthy working environment and, where required, safe living conditions. The following are guaranteed: drinking water, adequate toilets, fire exits and related safety devices, emergency medical assistance, adequately lit and equipped workstations. In addition, the structures are built and maintained according to the standards set by the codes and regulations in force.

### **Quality and safety of services**

All services offered by ITX Cargo meet the quality and safety standards required by the laws in force.

The service quality procedures comply with the principles expressed in the UNI EN ISO 9001 standard, which the company applies and recognizes as an operational reference standard.

## Environment

ITX Cargo operates with respect for the environment and ensures compliance with all laws and regulations in force in the countries where the products and services are carried out.

## Responsible Care

ITX Cargo SRL ensures that its commitment in the areas of safety, health and the environment is clearly understood as an integral part of the company's general policy and that management and employees are aware of the commitment and are involved in the pursuit of the objectives and in the awareness of the results achieved.

This commitment is expressed in a specific Responsible Care policy and is expressed through:

- Compliance with current regulations and the adoption of criteria, rules, procedures and behaviors aimed at improving performance, cooperating with national and international bodies, institutions, organizations to contribute to sustainable development.
- Assessing the impact of its activities and products on safety, health and the environment.
- Collaboration with the competent bodies in the definition and implementation of procedures and behaviors to improve its performance.
- Awareness-raising, information and training actions, involvement of human resources in the application of the Responsible Care Programme.
- In the choice of service partners, privilege towards suppliers who adhere to the Responsible Care program proposed by ITX Cargo



## Alcohol and Drug Use Policy

Employees and external collaborators, who work and carry out transport services on behalf of ITX Cargo, must operate in physical and mental conditions suitable for carrying out the work in the best conditions. These conditions include:

- absolute prohibition, both during work and during the break for a meal, to take alcoholic beverages and/or drugs
- prohibition to show up at the workplace in a state of alcoholic intoxication or under the influence of drugs
- responsibility, on the part of any employee or external collaborator used by the Company, to report any improper use of drugs or alcohol.

An employee caught red-handed is liable to disciplinary measures provided for in the employment contract and invited to leave the workplace immediately, pending further decisions by the Management.

External collaborators and service providers who do not comply with this principle will be excluded from the list of our business partners.

## Internal audit

The Management of ITX Cargo reserves the right to verify compliance with the contents of this code by employees, collaborators and suppliers. In the event that ITX Cargo detects actions or conditions that do not comply with the Code, ITX Cargo has the right/duty to request corrective measures. In addition, ITX Cargo reserves the right to terminate a contract with any relevant party that does not comply with the Code.

DARIO BRAGONZI/ROBERTO TAGLIARENI

Chairmen of the Board of Directors

July 17, 2024