

MDG GROUP POLICY

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ETHIC DECLARATION

The MDG Group is committed to socially and ethically responsible behaviour, that encourages its own suppliers to adopt a management policy that respects human rights, ethical and social principles of good conduct, the environment and safety.

The entire MDG Group is strongly oriented towards Corporate Social Responsibility (CSR) and compliance with the 10 Principles of the United Nations Global Compact* and, as specified in the following pages, the MDG Group is committed to:

- Implement and constantly monitor the Safety policy in the workplace;
- Ensure Health in the workplace;
- Condemn the use and abuse of alcohol and drugs;
- Recognise respect for Human Rights, **equal opportunities and equality at work**;
- Observe the Quality policy;
- Increasing the sustainability of its business;
- Ensure Privacy, through confidentiality and proper handling of data;
- Ensure good reputation, in order to protect the Group's image;
- Guarantee the transparency of its operations, condemning all forms of corruption;
- **Evaluate and select suppliers and sub-suppliers who share the principles of this Policy.**

The MDG Group distributes the corporate Policy to the whole Organisation through the delivery of the document to its human resources - both direct and indirect - from whom it requests the complete sharing of the corporate principles.

Everybody are asked for their responsibility, dedication and involvement towards the achievement of the objectives of this Company Policy, in order to ensure compliance with the regulations in force, the satisfaction of customer needs, internal organisational improvement, the reduction of possible damage to the environment, the safety and health of people and of all those involved in the activities of goods transport, warehouse management and logistics.

*Listed in the following page and in the following link: <https://www.globalcompactnetwork.org/en/the-un-global-compact-eng/global-compact/overview.html>

The UN global compact's ten principles



Global Compact
Network Italy

THE UN GLOBAL
COMPACT

THE UNGCN
ITALY

NETWORK
ACTIVITIES

NEWS AND
EVENTS

PUBLICATIONS
AND PRESS

The Ten Principles



"I call on you - individually through your firms, and collectively through your business associations - to embrace, support and enact a set of core values in the areas of human rights, labour standards, and environmental practices".

(Kofi Annan - Secretary General, United Nations
"World Economic Forum", 31 January 1999, Davos)

The UN Global Compact's Ten Principles in the areas of **human rights, labour, the environment and anti-corruption** enjoy universal consensus and are derived from:

- The [Universal Declaration of Human Rights](#)
- The [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#)
- The [Rio Declaration on Environment and Development](#)
- The [United Nations Convention Against Corruption](#)

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

Human Rights



Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2

make sure that they are not complicit in human rights abuses.

Labour



Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4

the elimination of all forms of forced and compulsory labour;

Principle 5

the effective abolition of child labour; and

Principle 6

the elimination of discrimination in respect of employment and occupation.

Environment



Principle 7

Businesses should support a precautionary approach to environmental challenges;

Principle 8

undertake initiatives to promote greater environmental responsibility; and

Principle 9

encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption



Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

QUALITY POLICY

To be synonym of quality and efficiency in transport and logistics is our main goal.

That's the reason why we provide our clients a service that exceeds their expectations. We therefor ensure satisfaction and we demonstrate credibility and reliability through behaviours in line with commitments, promises and results.

We have achieved this ambitious goal over the years and we maintain it through:

- a Quality Management System, certified since 1995 and constantly improved;
- compliance with and implementation of standards and regulations for people safety, property and the environment;
- our staff: professional, competent, qualified, motivated in sharing the Company Policy and constantly trained;
- logistical infrastructures and vehicles, always perfectly efficient;
- our suppliers of goods and services, carefully selected, qualified and monitored over the time, with whom we create additional value through constant collaboration;
- an innovative IT system, used in all phases of our services;
- measurements and analysis of service levels during and at the end of the service and simultaneous detection of Non-Conformities, to quickly intervene and constantly improve.

To these professional resources and skills we add our enthusiasm, passion and desire to always meet our customers' needs.

SAFETY POLICY

It is MDG's commitment to organise transport, goods handling, and all related activities in such a way as to ensure the safety of its personnel, associates, drivers, clients and all those involved in the activities. The active commitment of all the staff enables actions to prevent accidents, injuries and occupational diseases.

MDG Holding is committed to:

- respect current laws and regulations and, in the absence of those above, to operate with a proper standard, individualised with responsibility;
- constantly train employees and drivers in order to improve the knowledge of real and potential risks for health and safety between people through the implementation of safety culture and the adoption of correct, precautionary and responsible behaviours, also according to **ISO 45001**, ISO 9001 and ISO 14001;
- rapidly deal with accidents or emergencies that can occur during all work activities
- develop and implement a specific programme to improve the safety and health of staff and reduce accidents and injuries in the workplace;
- adopt and ensure the application of 'security' procedures (protection against theft, acts of terrorism or vandalism, tampering or other malicious events that may affect persons, information and transported goods);
- analysing the causes of 'non-conformities' in order to apply appropriate and effective corrective actions, with the aim of avoiding recurrence and, consequently, reducing the number of cases;
- **encourage worker participation and consultation on Health and Safety in the workplace, with communication, information, training and coaching actions;**
- **methodically reviewing health and safety performance and results, setting targets and objectives for improvement.**

HEALTH POLICY

It's extremely important for MDG Group to organize its activities in order to protect the employees, suppliers, drivers, clients and others from the risks originated by use, handling and transport of dangerous goods, or in case of public health emergencies.

MDG Holding is committed to:

- Respect current laws and regulations and, in the absence of those above, to operate with a proper standard, individualized with responsibility;
- Constantly train employees and drivers in order to improve the knowledge of real and potential risks for health and safety between people through the implement of safety culture and the adoption of correct, precautionary and responsibly behaviours, also according to **ISO 45001**, ISO 9001 and ISO 14001;
- Ensure that all the procedures for the transport and handling of hazardous goods are well known, understood and implemented by the personnel **by adopting recognised Best Practices**;
- Rapidly handle with accidents or emergencies due to dangerous product spill;
- Provide continuous information on critical operations during normal working activities;
- Provide a working environment that is healthy and free from elements that may damage the health and safety of its employees;
- **Develop and implement a specific programme to improve the safety and health of its staff and reduce accidents and injuries in the workplace;**
- **Encourage the participation and consultation of workers on Health and Safety in the workplace through communication, information, training and coaching actions;**
- **Systematically reviewing health and safety performance and results, setting targets and objectives for improvement;**
- **Guarantee health insurance coverage for all workers.**

ALCOHOL AND DRUGS POLICY

It is MDG Group responsibility to maintain a safe, healthy, efficient and productive working standard and environment for its staff, associates and drivers.

The abuse or misuse of alcohol, drugs and similar substances by employees and associates negatively affects the conduct of activities and creates situations of danger to the safety of operators, customers and third parties involved. Therefore, the use, possession, distribution or sale of alcohol and illicit or controlled and non-medically prescribed drugs within the work environment is strictly prohibited.

Employees and drivers are prohibited from consuming alcohol, drugs or hallucinogenic and similar substances during or shortly before work activity.

The MDG Group considers it essential to:

- comply with relevant laws and regulations;
- not consume alcohol and/or use drugs during or shortly before work activity;
- check and verify without prior notice the presence of drugs and alcohol on board vehicles, instructing the controller to immediately suspend unsuitable employees from duty;
- carry out health checks to determine the improper use of alcohol and drugs; make all the staff aware of the dangers they may cause to their own and others' safety by abusing or misusing drugs and alcohol.

HUMAN RIGHTS POLICY

It is MDG Group's commitment to conduct its activities in a manner that respects the human rights of its staff, associates, drivers, customers and third parties.

It therefor promotes equal opportunities and equality at work, spreading an inclusive corporate culture and human resources policy, free from discrimination and prejudice, and capable of valuing talent in all its diversity by adhering to the Equal Opportunities Charter/EU Diversity Charters Platform.

www.ec.europa.eu/justice/discrimination/diversity/charters

The MDG Group believes that it is essential to:

- comply with existing laws and regulations on human rights and, in the event of their absence, operate with its own standard, identified with a sense of responsibility;
- provide training for its staff and drivers in order to improve their knowledge of the principles of our Human Rights Policy;
- respect principles of fairness and justice by always condemning:
 - all forms of corruption, including extortion;
 - child labour;
 - forced and compulsory labour;
 - failure to respect human rights;
 - lack of freedom of association and thought;
 - discrimination on the basis of religion, class, caste, birth, disability, race, gender and sexual orientation.

The MDG Group also guarantees that it treats staff with dignity and respect and does not support or tolerate the use of corporal punishment, mental or physical coercion, verbal and power abuse, harsh or inhumane treatment.

The MDG Holding also ensures:

- **remuneration commensurate with the duties held, obstructing undeclared work in every way possible;**
- equal pay between men and women for equal work performed;
- **intends to maintain as much as possible a workforce equally divided between men and women, in all positions.**

The right to equal opportunity is also respected when hiring, discharging, training or promoting.

ENVIROMENTAL POLICY

It is MDG Group's commitment to manage its activities with respect for and to protect the environment by observing all related laws and regulations, in accordance with the certified ISO 14001 Environmental Management System, working to ensure that the operating standard is publicized and then applied with a sense of responsibility.

The MDG Group considers it essential to:

- respect environmental laws and regulations;
- provide education and training for its staff and drivers in order to improve their knowledge of the environmental impact risks that may arise from their activities;
- develop and implement a specific program of environmental sustainability of the transport activity: reduction of air, soil and water pollution and improvement of transport safety with concurrent reduction of road accidents with loss of goods, especially if dangerous;
- **establish and monitor specific environmental KPIs;**
- **reduce greenhouse gas emissions, achieving at least the minimum targets set by the GHG Protocol;**
- manage emergency situations, with damage with environmental impact, in a prompt and determined manner, cooperating with relevant agencies;
- **maintain an "environmental emergency response" service with certified and contracted suppliers;**
- **increase the culture of sustainability among its suppliers, with acceptance of the principles of the MDG Policy;**
- analysing the causes of 'non-conformities' to apply suitable treatments and effective corrective actions with the aim of avoiding recurrence and, consequently, reducing the number of cases.

DATA SECURITY POLICY – PRIVACY – CONFIDENTIALITY OF INFORMATION

MDG Group ensures that the personal information acquired is appropriately protected, in accordance with the regulations, avoiding improper or unauthorised use, to protect the dignity, image and confidentiality of each person, whether internal or external to the Group.

Personal information is processed in a lawful and correct manner. Personal information is only collected when it is necessary for specific, explicit and legitimate purposes; it is only stored for a period of time not exceeding that necessary for the above-mentioned purposes.

Finally the MDG Holding pays particular attention to correctly informing the persons from whom data is requested about the type of information collected, the use to which it is intended to be put, and how to contact the company in the event of queries.

It is the obligation of the MDG Group's collaborators to ensure the confidentiality required by the circumstances for any information they learn in the course of their work.

Information, knowledge and data acquired or processed during one's work or through one's duties belong to the MDG Group and cannot be used, communicated or disclosed without specific authorisation.

POLICY FOR ACCOUNTABILITY, FAIRNESS AND TRANSPARENCY (ZERO CORRUPTION)

It is the commitment of the MDG Group.

- to ensure good reputation as an indispensable quality of the company.

Directors, managers, employees and collaborators of the MDG Group are required to share with each other the commitment to always and scrupulously respect the conditions of this Policy so that the good name, the esteem and the credit enjoyed by the MDG Group is protected - and not damaged.

- guarantee the transparency of its operation:

All activities must be carried out by directors, managers and collaborators of the MDG Group in accordance with the regulations in force and with the highest diligence, through responsible, correct, honest behaviour, moral integrity and professional rigour and condemning all forms of corruption.

- Zero corruption:

The MDG Group prohibits all forms of corruption, even attempted corruption, without exception.

It is therefore strictly forbidden:

- offering, promising, giving, paying, soliciting, authorising someone to give or pay, directly or indirectly, an economic advantage or other benefits to Directors, General Managers, Executives, Statutory Auditors and Liquidators or any other person with management functions, whether of third party companies or private entities, or of the MDG Group itself
- accepting a request from, or solicitation by, or authorising/soliciting someone to accept, directly or indirectly, including through an intermediary, an economic advantage or other benefits from any counterparty, when the intention is to induce the counterparty to perform or omit an act, in violation of the obligations inherent to one's office or the obligations of loyalty, even if the offer, promise or solicitation is not accepted.

Compliance with the principles of the Policy must be considered an essential part of the contractual obligations of the Company's employees, as Article 2104 et seq. of the Civil Code state.

The violation of the obligations of this Policy damages the relationship of trust established between the employee and the Company to which he/she belongs and may lead to disciplinary action and monetary compensation.

[For any reports of violation of this Policy: violazioni.policy@messengeriedelgarda.it](mailto:violazioni.policy@messengeriedelgarda.it)

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