YOUR LOGISTICS

MDG GROUP POLICY

Rev. 5 of 14/07/2025

www.messaggeriedelgarda.com

Index

ETHIC DECLARATION 3

The UN global compact's ten principles 4

QUALITY POLICY 5

SAFETY POLICY 6

HEALTH POLICY 7

ALCOHOL AND DRUGS POLICY 8

HUMAN RIGHTS POLICY 9

ENVIROMENTAL POLICY 10

POLICY ON PERSONAL DATA PROTECTION, INFORMATION SECURITY, AND CONFIDENTIALITY 11

POLICY FOR ACCOUNTABILITY, FAIRNESS AND TRANSPARENCY (ZERO CORRUPTION) 12

GENDER EQUALITY POLICY OF THE COMPANIES 13

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.

All collaborators 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

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, 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 the safety of people, property and the environment
- our staff: professional, competent, qualified, motivated in sharing the Company Policy and in constant training;
- logistical infrastructures and vehicles, always in a perfect state of efficiency;
- 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 adapt to our customers' requests.

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, individuated with responsibility.
- constantly train employees and drivers in order to improve the knowledge of real and potential risks for health and safety between people though the implement of safety culture and the adoption of correct, precautionary and responsibly 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, individuated with responsibility.
- Constantly train employees and drivers in order to improve the knowledge of real and potential risks for health and safety between people though 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.

POLICY ON PERSONAL DATA PROTECTION, INFORMATION SECURITY, AND CONFIDENTIALITY

The companies of the MDG Group, each within the scope of its roles and responsibilities, are committed to protecting personal data in compliance with Regulation (EU) 2016/679 (GDPR) and applicable national legislation.

Personal data is processed lawfully, fairly, and transparently, for specified, explicit, and legitimate purposes, limited to what is necessary, ensuring its accuracy, and retained only for the time strictly necessary, in accordance with legal obligations. The Group facilitates the exercise of data subjects' rights.

The Group protects personal data as well as company and third-party information in its possession by implementing and monitoring technical and organizational measures appropriate to the risks, thereby safeguarding the confidentiality, integrity, and availability of information. Data protection and information security are integrated into processes by design.

Employees and non-employee collaborators must use information exclusively for authorized business purposes, within the limits of the permissions and instructions received, and must also safeguard the confidential information of clients and third parties. Any personal data breach or information security incident—even if only suspected—must be reported without delay through the designated company channels to enable necessary assessments and statutory compliance. Confidentiality obligations remain in effect following the termination of the relationship, to the extent applicable, without prejudice to statutory obligations and reports or communications protected by law.

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 operations.

  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@messaggeriedelgarda.it

GENDER EQUALITY POLICY OF THE COMPANIES

MESSAGGERIE DEL GARDA SRL
MDG SERVIZI SRL
CLS - CHEMICAL LOGISTIC SERVICES SRL

Ed. 01 _ Rev. 00 _ 14.07.2025

The mission of the companies MESSAGGERIE DEL GARDA SRL, MDG SERVIZI SRL, and CLS - CHEMICAL LOGISTIC SERVICES SRL is to share their vision and values with the world, continuously and tangibly reinforcing the culture of diversity, inclusion, and gender equality.

These principles are also reflected in the United Nations 2030 Agenda's Sustainable Development Goals (SDGs), to which the Organization intends to adhere. Among these, for the purposes of this Gender Equality Policy, we highlight in particular:

- Goal 5: Gender Equality;
- Goal 8: Decent Work and Economic Growth;
- Goal 10: Reduced Inequalities.

To best achieve our goals, we rely on our primary asset: our people—each with their own characteristics, skills, and expertise. Only by fostering an innovative people strategy, respectful of diversity and aimed at removing any barriers arising from differences, including gender, will we be able to achieve the objectives we have set for ourselves.

To give further concrete substance to this positioning, we have established a Gender Equality Management System compliant with the national Reference Practice UNI/PdR 125:2022, which, starting from the planning of all relevant activities, enables their accurate management and continuous improvement over time.

For us, the above represents an additional drive toward continuous improvement that enables us to achieve the following general objectives:

- Caring for our people by involving them in company policies and the pursuit of corporate goals, building a relationship of trust based on ongoing, transparent, and constructive dialogue, and jointly designing concrete solutions and support with clear, shared objectives;
- Serving as advocates for a culture that safeguards and promotes the principles of diversity & inclusion and gender equality, including toward our suppliers by evaluating them based on their compliance with ESG indicators, with the goal of creating a value chain that can have positive impacts for all stakeholders involved;
- Complying, in addition to the UNI/PdR 125:2022 Reference Practice, with national, European, and international legislation regarding sustainability—particularly social sustainability—and labor law, with specific reference to provisions on equal opportunities and gender equality.

Specifically, these general objectives will also be pursued through their implementation across the following related areas:

- Human Resources Management Processes: We are committed to promoting effective equality between men and women throughout all stages of employment, including recruitment processes, role assignments, performance evaluations, promotions and career advancement, remuneration, and termination of employment;
- Training: We intend to implement measures aimed at raising our people's awareness of our corporate Policies and topics surrounding equal opportunities, diversity, and inclusion, including through the development of information, training, and knowledge-sharing programs;
- Communication and Events: We are committed to disseminating our Gender Equality Policy and Diversity & Inclusion principles throughout the Organization and to our stakeholders, grounding both our internal and external communication in corporate principles and responsibility, using gender-sensitive language, and avoiding gender stereotypes. Furthermore, if we organize events such as—by way of example and not limitation—roundtables, conferences, debates, and public events, we commit to ensuring balanced and diverse participation of women and men, arranging panels where both genders are represented in as equal and balanced a manner as possible.

Additional specific objectives will be defined during the Management Review, during which this Policy may be confirmed or revised based on potential changes, monitoring outcomes, and regularly planned and conducted internal audits. The adequacy of general objectives will also be assessed in alignment with the Strategic Plan guiding the development of our oversight of Human Resources Management matters.

In particular, the company's Strategic Plan for Gender Equality will focus on, among others, the following topics: a) Recruitment and Hiring; b) Career Management; c) Pay Equity; d) Parenting and Caregiving; e) Work-Life Balance; f) Activities aimed at preventing all forms of physical, verbal, and digital abuse (harassment) in the workplace.

For the implementation, maintenance, and improvement of gender equality objectives, Senior Management allocates an annual ad hoc budget and appoints a Steering Committee for the effective adoption and application of the Gender Equality Policy and Strategic Plan, as well as a Gender Equality Officer equipped with organizational and gender-related expertise.

This Gender Equality Policy was defined by Senior Management, in coordination with the Steering Committee and the Gender Equality Officer of:

MESSAGGERIE DEL GARDA SRL – Mario Beschi

MDG SERVIZI SRL – Rebecca Beschi

CLS - CHEMICAL LOGISTIC SERVICES SRL – Alessandra Beschi

To report any violations of this Policy:
violazioni.policy@messaggeriedelgarda.it

This Policy is signed by the Senior Management of the MDG Group, represented by Dr. Mario Beschi, on July 14, 2025.



ADDRESSES:

MESSAGGERIE DEL GARDA Srl

Head office:
Via Montebianco, 17 - 20060 Truccazzano (MI) - Italy Tel. +39.02.95309212
Pec: messaggeriedelgarda@pec-mynet.it
VAT no. 09159810150 – C.F. 01489980209

Administrative headquarters and for correspondence:
Via Carpenedolo, 90 - 46043 Castiglione delle Stiviere (MN) - Italy Tel. +39.0376.94201
Mail: info@messaggeriedelgarda.it - commerciale@messaggeriedelgarda.it

C.L.S. Chemical Logistic Services Srl

Via Carpenedolo 90 – 46043 Castiglione delle Stiviere (MN)
Pec: cls2017@pec.it
VAT no: 0253739201

MDG SERVIZI Srl

Via Carpenedolo 90 – 46043 Castiglione delle Stiviere (MN)
Pec: mdgservizi@pec.it
VAT no: 02274330204

OMAC Srl

Strada per Carpenedolo 90 – 46043 Castiglione delle Stiviere (MN)
Pec: omacsnc@pec-mynet.it
Tax code and VAT no: 00595140203

www.messaggeriedelgarda.com

MDG HOLDING S.R.L.

Corso di Porta Nuova 16 – 20121 Milano
Pec: mdgholding@pec.it
VAT no: 11068330965