INTEGRATED COMPANY POLICY

Rev. 0 of 02-01-2026

Dear Sirs,

FHP Intermodal adopts the Integrated Management System of Lotras and extends it to the other two operational units it incorporates, namely Piedimonte San Germano (FR) and Fiorenzuola d'Arda (PC).

We recall that Lotras, which changed its company name from 1st January 2026, has undertaken a path of adoption of "Management Systems" since 2013, obtaining in the same year the ISO 9001 Quality certification, ISO 14001 Environmental certification, and ISO 45001 Occupational Health and Safety certification.

In 2014, it also obtained the SA 8000 certification, aimed at certifying the compliance with the corporate management requirements concerning the Enterprise Social Responsibility: respect for human rights and labor rights, protection against child labor exploitation, and guarantees of safety and health in the workplace.

Since 2021, the company has been an Entity in Charge of Maintenance (ECM) in compliance with Implementing Regulation (EU) 2019/779, equipped with a railway vehicle maintenance system, including vehicles other than freight wagons, in accordance with Directive (EU) 2016/798 of the European Parliament and of the Council, repealing Commission Regulation (EU) No. 445/2011.

Safety and Security therefore become essential dimensions of corporate leadership and their application in the operational management of FHP Intermodal's core business activities, both as a Railway Infrastructure Manager, as an MTO, and as a warehouse operator.

Below we present our policy.

We wish you an enjoyable reading and extend our kind regards.

FHP Intermodal
Chief Executive Officer
Dr. Angelo Accomando

Corporate Policy

The management and competitive strategy of FHP Intermodal is based on strengthening its presence in reference markets in order to ensure sustainable growth and development prospects for its Customers, all employees, and the community as a whole.

The maintenance of high quality standards in the services provided is implemented in full compliance with laws and regulations, with particular attention to safeguarding the integrity, hygiene, and safety of transported products, to the safety of railway vehicles used in intermodal transport – and therefore to their maintenance processes – as well as to the protection and safeguarding of the environment and the community, in compliance with requirements relating to social responsibility, risk prevention, protection, and occupational health and safety for all employees and contractors.

FHP Intermodal operates in compliance with the adoption of an anti-corruption organizational model within the framework of corporate social responsibility.

To achieve this, Management has established the following objectives, in the various areas in which FHP Intermodal is committed to:

QUALITY

- develop continuous improvement actions for services and business processes, where technically and economically feasible, aimed at customer satisfaction, personnel safety, environmental impacts, and cost optimization;
- increase awareness among human resources of the need to meet customer requirements as a condition for company growth; for this purpose, continuous training and shared development paths are strategic both for internal communication and as tools for updating and engagement;
- provide professionals with the necessary and adequate resources to achieve the company's growth and development objectives.

GOVERNANCE

- comply with and meet the requirements of applicable laws, regulations, subscribed codes of ethics, corporate policies, and codes of good operational practice concerning provided services, environmental aspects, and health & safety at work. In line with integrity-based conduct, the Company considers the value of free and fair competition to be fully protected. For this reason, employees shall refrain from any conduct that may constitute unfair competition, including but not limited to: spreading biased or defamatory information about competitors' services or activities; misappropriating the merits of competitors' services; using names or distinctive signs that create confusion

with another company; diverting customers through the misuse of confidential information;

- promote cooperation and solidarity among company resources, as well as collaboration with business organizations and relevant external entities;
- adopt anti-corruption protocols in full compliance with the organizational model pursuant to Legislative Decree 231/2001 and prevent any form of crime against the environment and safety;
- ensure the reporting of unlawful conduct in compliance with Article 4, paragraph 1 of Legislative Decree No. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 on Whistleblowing, enabling employees, collaborators, consultants, and other eligible parties to report violations identified in the context of their working or professional relationships.

The internal reporting platform can be accessed at the following link:
https://private.mygovernance.it/mywhistleblowing/fhpintermodal/48017/report

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ENVIRONMENT

- adopt technological processes that ensure the lowest environmental impact through optimized technical and economic solutions;
- assess and monitor environmental impacts arising from products and operational activities, implementing management procedures to ensure that facilities and processes provide the highest level of environmental and community protection, quantifying greenhouse gas (GHG) emissions in order to implement carbon management policies and communicate environmental sustainability commitments to stakeholders.

SAFETY

- expand the potential market of interest for the Company, as the development and certification of Food Safety systems and processes allow the removal of barriers to entry in new markets/sectors, increasing market share;
- update and improve the effectiveness of the Quality System in line with the requirements of European Regulation 2019/779 of 16/05/2019 (ECM – Entity in Charge of Maintenance);

- periodically update the safety performance analysis system and risk assessment processes related to the operation of maintained railway vehicles, in order to collect, manage, analyze, and communicate maintenance feedback to stakeholders;
- periodically audit qualified workshops to ensure the maintenance of high standards consistent with maintenance safety;
- always ensure a safe and healthy working environment for every employee;
- guarantee that safety remains the primary driver of efficiency and reliability in railway services. In the event of conflicting business objectives, safety shall never be compromised. Vision, objectives, indicators, resource allocation, and all aspects of daily operations shall be consistent with these values;
- promote safety, communication, and the principles of a just culture based on trust and, initially, non-punitive approaches. Managers, employees, contractors, and suppliers shall jointly promote respect, mutual support, and cooperation, fostering trust and a shared understanding of the real working environment;
- encourage correct behavior and provide an appropriate environment for safe work, including job design, tools, training, and procedures;
- focus on system performance, conditions, and factors influencing work practices rather than assigning blame or individual responsibility, except in cases of evident negligence, intentional violations, or destructive acts compromising railway safety.

ETHICS

- ensure that the Company's most critical suppliers progressively apply the same standards established by the SA8000 program; compliance with this standard shall be a decisive criterion in the selection of new suppliers and a consolidating element for existing ones;
- prevent and oppose the use of child labor through the implementation of a remediation plan defining procedures to be adopted should such practices be identified within the Company's activities or those of its suppliers;
- ensure that working hours management, disciplinary procedures, and remuneration systems comply with legislation, applicable national collective labor agreements, trade union agreements, and industry standards;
- guarantee freedom of association and the right to collective bargaining;
- comply with international human rights standards, including the United Nations Guiding Principles, the International Bill of Human Rights, the Universal Declaration of Human Rights, the United Nations Sustainable Development Goals, the OECD

Guidelines for Multinational Enterprises, and the ILO Declaration on Fundamental Principles and Rights at Work.

To allow Stakeholders to actively contribute to the improvement of the Integrated Management System, FHP Intermodal has established a communication system for handling reports related to the application of the SA8000 standard.

Ethical complaints are made available to stakeholders of the "FHP Intermodal" Social Responsibility System to report any identified issues related to operational activities.

Such complaints may be submitted anonymously directly to the Certification Body **SGS**:
E-mail: sa8000@sgs.com

They may also be submitted anonymously to the **SAAS Accreditation Body**:
E-mail: saas@saasaccreditation.org

"In the cooperative spirit that we have proudly represented for years at national and international level, this long journey of ethics and responsibility takes shape, guiding us toward service, integrity and transparency, fairness in business, environmental protection, and respect for all people."