



SUSTAINABILITY

Report

2024



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Letter to Stakeholders

Dear Terminal Darsena Toscana stakeholders,

We are pleased to present our first Sustainability Report after the acquisition of Terminal Darsena Toscana by the Grimaldi Group of Naples at the end of January 2024. This document confirms our commitment to sustainable, responsible growth in line with the values of the new owner, a leading global company in maritime transport and port logistics.

Operating according to a sustainable and socially responsible business model that creates value for customers, the community and the people who work in the group is an established and indispensable priority for the Grimaldi Group.

We are looking to the future of TDT with this mindset, with renewed commitment and with the support of the Group of which we now form a part.

The past year continued to be affected by the Russia/Ukraine conflict and that in the Middle East, with major repercussions on the global economic scenario and in particular maritime traffic.

The choice of the world's leading shipowners to avoid passing through the Suez Canal, giving up one of the main arteries of maritime traffic linking the Mediterranean Sea with the Middle and Far East, and choosing to pass around the Cape of Good Hope, has led to a sudden and substantial change in the main maritime services and an increase in the demand for ships due to longer routes.

In this context, maritime transport has once again proved its resilience and ability to adapt swiftly to different situations, often putting port logistics, by its very nature much more rigid in adapting to changes in infrastructural, organisational and social terms, at a disadvantage.

Maritime shipping continued to register a general increase in terms of size and unit transport capacity, and container ships of 20/24,000 TEU capacity began regularly calling at the ports of La Spezia, Genoa and Vado Ligure.

On the other hand, the evolution of Ro-Ro and Car Carrier vessels has been decidedly more modest than that of container carriers, with dimensions still compatible with the limitations of the port of Livorno.

The United States remained the most important country for Italian maritime exports, with a 26% share of the total, while China was the main country for maritime imports with a 19% share of the total.

There was also a substantial redefinition of the world's major shipping alliances in 2024, and a consequent reorganisation of maritime services, the effects of which became apparent in early 2025. In this complex and transitional scenario, Terminal Darsena Toscana has continued to operate with a strong capacity to adapt, maintaining its focus on the creation of sustainable value in the long term.

This Sustainability Report has been prepared with reference to the Global Reporting Initiative (GRI) standards, and provides an overview of our actions and performance in the economic, environmental and social spheres, taking into account the context in which we operate. We have identified the most significant material topics for our business and our stakeholders, analysing how economic trends,

social dynamics and political developments influence our operations and sustainability strategies. As part of an ongoing commitment to sustainability and operational efficiency, we have worked on and continued to invest in several key areas, including the development of the intermodal part, operating more than 1,300 trains and achieving a 20% share of traffic by rail with respect to the total number of 'hinterland' containers, with positive effects on CO₂ emissions and reducing traffic on major motorways.

At the same time, we have resolutely pursued the renovation of driving cabs in our yard vehicles, thereby improving the working conditions of our operators. We have introduced automatic reading systems using artificial intelligence, which have made it possible to automate certain operational processes, recovering important resources for activities with greater added value.

Careful management of resources and waste is a priority, pushing us to increase cooperation with our suppliers to ensure proper handling and subsequent disposal, minimising environmental impact. TDT cooperates actively and continuously with the authorities and bodies responsible for supply chain control in order to improve and streamline processes in full compliance with the regulations, while ensuring an increasingly efficient and punctual service for customers.

We are aware that our path towards sustainability requires continuous commitment and constant dialogue with all our stakeholders, with a special focus on social, environmental and economic dynamics.

We would therefore like to take this opportunity to thank all our stakeholders for their trust and cooperation, and invite you to read this Sustainability Report as a statement of our ongoing commitment to promoting the growth of the companies and communities in which we operate.

The General Manager
Marco Mignogna



Key Principles

Through this report, Terminal Darsena Toscana s.r.l. strives to transparently communicate how it intends to contribute to Sustainable Development, understood as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (World Commission on Environment and Development, Our Common Future, 1987).

10x10_SDG icons-individual-ENG-cmyk copy“A strategic approach to corporate social responsibility is increasingly important for competitiveness. It can bring benefits in terms of risk management, cost reduction, access to capital, customer relations, human resources management and innovation capacity”.

COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE OF THE REGIONS A renewed EU strategy 2011-14 for corporate social responsibility (COM/2011/0681 final of 25 October 2011).



TDT has decided to use the GRI (Global Reporting Initiative) Standards to report information on its economic, environmental and social impacts, including those on human rights, thereby increasing transparency regarding its contribution to Sustainable Development.

TDT reports information relating to its commitment to Sustainable Development in compliance with the principles of Accuracy, Balance, Clarity, Comparability, Completeness, Timeliness and Verifiability as defined in GRI Standard 1: Fundamental Principles 2021.

GRI Content Index

Declaration of use	Terminal Darsena Toscana has reported the information mentioned in this GRI content index for the period from 01/01/2024 to 31/12/2024 with reference to the GRI Standards.
GRI 1 Used	GRI 1 - Core Principles - 2021 version

GRI STANDARD	DISCLOSURE	LOCATION
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	2.16: Communication of critical concerns	28
	2.17: Collective knowledge of the highest governance body	Omitted
	2.18: Evaluation of the performance of the highest governance body	Omitted
	2.19: Remuneration policies	Omitted
	2.20: Process to determine remuneration	28
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	3.2: List of material topics	37
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	201.2: Financial implications and other risks and opportunities due to climate change	44
	201.3: Defined benefit plan obligations and other retirement plans	45
	201.4: Financial assistance received from government	45
GRI 202: Market Presence 2016	202.1: Ratios of standard basic wages by gender compared to local minimum wage	45
	202.2: Proportion of senior management hired from the local community	45
GRI 203: Indirect Economic Impacts 2016	203.1: Infrastructure investments and services supported	45
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GRI 204: Procurement Practices 2016	204.1: Proportion of spending on local suppliers	46
GRI 205: Anti-corruption 2016	205.1: Operations assessed for risks related to corruption	46
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GRI 206: Anti-competitive Behaviour 2016	206.1: Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	47
GRI 302: Energy 2016	302.1: Energy consumption within the organisation	49
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GRI 303: Water and Effluents 2018	303.1: Interactions with water as a shared resource	53
	303.2: Management of water discharge-related impacts	53
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GRI 304: Biodiversity 2016	304.1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	54
GRI 305: Emissions 2016	305.1: Direct (Scope 1) GHG emissions	55
	305.2: Energy indirect (Scope 2) GHG emissions	55
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GRI 306: Waste 2020	306.1: Waste generation and significant waste-related impacts	62
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GRI 308: Supplier Environmental Assessment 2016	308.1: New suppliers that were screened using environmental criteria	23
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GRI 401: Employment 2016	401.1: New employee hires and employee turnover	67
	401.2: Benefits provided to full-time employees that are not provided to temporary or part-time employees	69
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GRI 402: Labour/ Management Relations 2016	402.1: Minimum notice periods regarding operational changes	70
GRI 403: Occupational Health and Safety 2018	403.1: Occupational health and safety management system	71
	403.2: Hazard identification, risk assessment and incident investigation	72
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GRI 404: Training and Education 2016	404.1: Average hours of training per year per employee	83
	404.2: Programmes for upgrading employee skills and transition assistance programmes	85
GRI 405: Diversity and Equal Opportunity 2016	405.1: Diversity of governance bodies and employees	85
	405.2: Ratio of basic salary and remuneration of women to men	85
GRI 406: Non-discrimination 2016	406.1: Incidents of discrimination and corrective actions taken	85
GRI 407: Freedom of Association and Collective Bargaining 2016	407.1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	86
GRI 408: Child Labour 2016	408.1: Operations and suppliers at significant risk for incidents of child labour	86
GRI 409: Forced or Compulsory Labour 2016	409.1: Operations and suppliers at significant risk for incidents of forced or compulsory labour	86
GRI 410: Security Practices 2016	410.1: Security personnel trained in human rights policies or procedures	86
GRI 413: Local Communities 2016	413.1: Operations with local community engagement, impact assessments, and development programmes	86
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GRI 414: Supplier Social Assessment 2016	414.1: New suppliers that were screened using social criteria	23
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GRI 416: Customer Health and Safety 2016	416.1: Assessment of the health and safety impacts of product and service categories	87
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GRI 418: Customer Privacy 2016	418.1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	87

Index of non-relevant/non-material disclosures

Relevant GRI topics determined as non-material

TOPIC	DISCLOSURE	REASONS FOR OMISSION	EXPLANATION
GRI 207: Tax 2019	207.1: Approach to tax	Confidentiality constraints	TDT maintains an approach to taxation based on the principle of legality and compliance.
	207.2: Tax governance, control and risk management	Confidentiality constraints	
	207.3: Stakeholder engagement and management of concerns related to tax	Confidentiality constraints	
	207.4 Country-by-country reporting	Confidentiality constraints	TDT operates in Italy.
GRI 302: Energy 2016	302.2: Energy consumption outside of the organisation	Not available	The quantities of fuel consumed for employee commuting are not available. The activities upstream and downstream of TDT's production area, i.e. those related to the transport of containers to and from the Terminal, are not included among those subject to management control by TDT and therefore it is not possible to provide accurate consumption values, not even as an estimate.
GRI 301: Materials 2016	301.1: Materials used by weight or volume	Not relevant	TDT provides services to its customers; the main supplies concern services acquired externally; the acquisition of materials mainly concerns materials for the warehouse.
	301.2 Recycled input materials used	Not relevant	
	301.3: Reclaimed products and their packaging materials	Not relevant	
GRI 303: Water and Effluents 2018	303.3: Water extraction	Not relevant	There is no extraction from basins; the supply comes from the port aqueduct
GRI 304: Biodiversity 2016	304.2: Significant impacts of activities, products and services on biodiversity	Not relevant	There are no direct impacts on biodiversity
	304.3: Habitats protected or restored	Not relevant	There are no protected areas nearby; an area has been established (the WWF dunes of Calambrone) but it is not adjacent to the Terminal nor are there any direct impacts.
	304.4: IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not relevant	There are no protected species in the areas of operation of TDT.
GRI 404: Training and Education 2016	404.3: Percentage of employees receiving regular performance and career development reviews	Not relevant	There are no periodic or systematic processes for evaluating staff performance
GRI 411: Rights of Indigenous Peoples 2016	411.1: Incidents of violations involving rights of indigenous peoples	Not relevant	There are no indigenous peoples involved in the process
GRI 415: Public policy 2016	415: Political contributions	Not relevant	During 2024, TDT made no direct or indirect financial or in-kind political contributions.
GRI 417: Marketing and Labelling 2016	417.1: Requirements for product and service information and labelling	Not relevant	TDT is committed to fair and responsible marketing communications, and to ensuring access to information relating to the use of services to help customers and other interested parties make informed choices.
	417.2: Incidents of non-compliance concerning product and service information and labelling	Not relevant	During 2024, no non-conformities were detected referring to information related to the economic, environmental and social impacts of the service provided by TDT.
	417.3: Incidents of non-compliance concerning marketing communications	Not relevant	In the year 2024, there were no non-conformities related to marketing communications.





The organisation and its reporting practices

2.1 ORGANISATIONAL DETAILS

Terminal Darsena Toscana S.r.l. has its registered office in Livorno (Italy) at Via Mogadiscio 23, on the West Bank of the Industrial Port area called Darsena Toscana.

Port operations and services are provided by TDT on the West Bank of Darsena Toscana in compliance with the provisions of Italian Law 84/1994 as subsequently amended, on a total area of approximately 350,000 m2 granted in a 30-year concession by the Port System Authority of the Northern Tyrrhenian Sea, with deed registered under no. 48 on the Register of Concessions, ref. no. 07691 of 18/10/01, and subsequently amended.

TDT has the legal form of a Limited Liability Company.

2.2 ENTITIES INCLUDED IN THE ORGANISATION'S SUSTAINABILITY REPORTING

This Sustainability Report refers exclusively to the company Terminal Darsena Toscana S.r.l.; data from other entities or organisations are not reported.

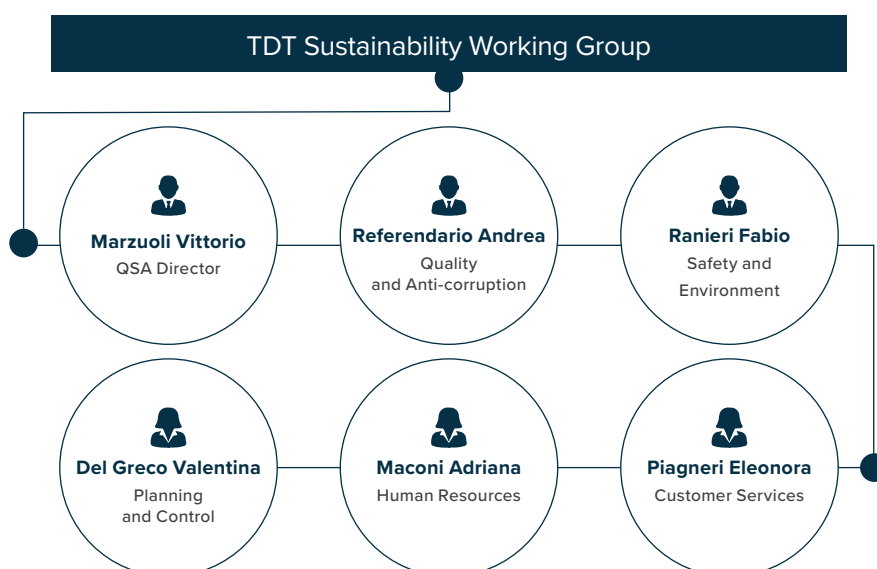
2.3 REPORTING PERIOD, FREQUENCY AND CONTACT POINT

The reporting period for this TDT Sustainability Report is the year 2024, from 1 January to 31 December, unless otherwise indicated.

The reporting frequency, i.e. the publication of this Sustainability Report, is annual; to allow comparability of performance and economic, environmental and social impacts over time, the data from the two previous years are reported.

For any questions about the reporting or disclosures provided, contact the TDT Sustainability Working Group using the following details:

- Ordinary mail: Terminal Darsena Toscana S.r.l., Via Mogadiscio 23, Darsena Toscana Porto di Livorno, 57123 – Livorno
- e-mail: sostenibilita@tdt.it



The document can be downloaded from the company website www.tdt.it

2.4 RESTATEMENTS OF DISCLOSURES

There are no revisions to the disclosures contained in previous Reports.

2.5 EXTERNAL ASSURANCE

TDT has decided not to subject the 2024 Sustainability Report to verification by an external certification body and will in any case notify GRI of the use of the GRI Standards and the related declaration of use.

Activities and workers

2.6 ACTIVITIES, VALUE CHAIN AND OTHER BUSINESS RELATIONSHIPS

Activities and sector

Terminal Darsena Toscana operates as a Terminal Operator in the port of Livorno, for containers and various goods including rolling stock.

The services provided by the Terminal, in the field of freight transport, are aimed at satisfying the needs of shipping companies on the one hand and freight forwarders, loaders and all other stakeholders and actors involved in the transport flow on the other.

TDT therefore acts as a link between the maritime mode of freight transport and land mode, both by train and by truck.

The commercial and administrative activities as well as those of planning, operational and control concern the loading and unloading, transshipment, storage, custody, movement of containers, various loose goods, including RORO goods, to and from trucks, ships, trains using rubber-tyred lifting equipment, of various types and capacities, and owned quay cranes.





Markets served

The year 2024 was marked by an unprecedented series of crises; as far as the shipping world is concerned, the most predominant of which was that in the Red Sea and Suez Canal, caused by the Houthi rebel attacks triggered by the flaring up of the Israeli-Palestinian context.

Despite the difficulties shipping companies encountered in circumnavigating Africa by systematically rounding the Cape of Good Hope, they have reaped considerable economic benefits from the crisis, which have translated into high and now stabilised shipping rates as the baseline for market negotiations. According to data from Transport Intelligence (Ti), shipping rates remained high throughout 2024, up 117.6 points from the beginning of the year¹.

The strategy applied by the Yemeni militia, consisting of targeted attacks on Western container carriers, has forced many ship owners to divert routes, thereby increasing journey times and triggering increased costs which, similar to the Covid-19 pandemic period, has benefited the companies themselves, even though they were victims of the attacks.

The geopolitical context, but also natural disasters and weather events such as drought in the Panama Canal, have altered the movement of goods which, with economic recovery, replenishment of stocks and the growth of e-commerce, have highlighted the vulnerability of the supply chain and the need to diversify trade routes.

This situation caused an increase in the demand for maritime transport and a rise in shipping costs, thus contributing to inflation and an increased state of uncertainty.

Some specific trade routes, such as those from Asia to Europe and North America, saw particularly high demand.

Freight rates for routes from Asia to Northern Europe have increased by 42% since the end of April, more than tripling compared to the same period last year. Fares from Asia to the Mediterranean have increased by 34% since the end of April, up 150% year-on-year.

Fares on Asia-India routes have risen by an average of 30% to 50% in the last three months, according to an analysis of data by the Journal of Commerce. This includes ports in India and Chinese ports such as Shanghai, Tianjin, Yantian, Ningbo and Nansha. Rates have also increased for shipments from other Far Eastern hubs to India. The analysis shows that shipping companies' quotes from Hong Kong to Nhava Sheva/Mundra have increased by about 45% since the end of March.

The increased need for maritime transport has also been affected by congestion at major global ports such as Los Angeles, Shanghai and Rotterdam, which has caused significant delays and increased transport costs.

At key Asian ports, current congestion ranges from two to seven days, with Shanghai, Singapore and Port Klang experiencing extended waiting times. The average wait time for export containers in Shanghai has reached 4.1 days, the highest in the last three years.

Rising operational costs, such as fuel, maintenance and wages, have intensified these problems, pushing carriers to pass on the additional costs to end consumers and contributing to the general increase in tariffs. It suffices to say that the average cost of transporting a container from China to the west coast of the United States reached up to USD 8,000 in May 2024, while in early 2020 it was USD 1,500².

The transport industry is responding to these challenges by investing in larger ships, as well as through alliances among shipping companies in order to increase hold capacity, optimise operations, reduce costs and improve the efficiency of transport services globally. The alliances basically involve ship-sharing agreements, whereby participating carriers share their fleets on specific routes. The aim is to create an economy of scale and ensure the reliability of services, as well as to offer broader global coverage and greater transport capacity, which individual companies would not be able to offer.

In addition to increasing its scale, the maritime industry relies on the adoption of advanced technologies such as automation, artificial intelligence and blockchain (an advanced database mechanism that enables the transparent sharing of information within a global network), which help to simplify operations, improve efficiency, safety and traceability.

The strategic imperative to go 'green' continues in 2024. The focus on sustainability has dramatically risen on the shipping agenda over the past decade, with environmental, social and governance (ESG) issues influencing financing, fleet renewals, port infrastructure and regulation across the industry. There is a strong push towards the use of cleaner alternative fuels such as hydrogen, methanol, LNG and ammonia. Ships with more energy-efficient designs and hybrid or

1 - Source *Shipping Italy*, 24/12/2024

2 - *Shipping containers* - 15/09/2024

electric propulsion systems are being developed. Digitisation and artificial intelligence are used to optimise routes and reduce fuel consumption. New rules have been introduced to prevent marine pollution caused by ships, including ballast water management, reduction of underwater noise, increased focus on the protection of marine biodiversity and the preservation of coastal habitats. In summary, the past year has been one of change for the maritime world, highlighting a sector that is constantly evolving while facing global challenges but also seizing growth opportunities.

Shifting attention to the area where the Terminal Darsena Toscana is located, i.e. the Mediterranean, we can say that despite the conflicts, it maintains its central position in the geo-economic context with an average annual growth forecast to 2028 of local container traffic of just over 3% against the world average of 2.5%. There is an emerging trend of growing interest in the regionalisation of trade flows, even though Asia, with China in the lead, remains a key player in world manufacturing. While US-China trade has decreased, EU-China trade has increased (in imports, China's share has risen from 15.8% to 20.5% and in exports from 8% to 8.7%), consolidating the Asia/Euro-Mediterranean sea route.

In this scenario, Italy continues to be a logistical hub between continental Europe and North Africa, counted among the world's largest exporters and sixth in the ranking after China, the United States, Germany, the Netherlands and Japan.

Italy can leverage its undisputed leadership in short sea shipping: it is the leading country in Europe by volume of goods handled, amounting to 305 million tonnes, with a market share of more than 17% of the total, ahead of the Netherlands (16%), Spain (13%) and Germany (9%). The value of the blue economy was € 59 billion, and the 228,000 companies in the maritime cluster, which form 3.8% of the Italian business fabric, employ 914,000 people, 3.6% of the total³.

In light of the above, the volumes handled by the main Mediterranean ports in the year just ended and the change compared to the previous year are shown below⁴.

Table of container movements in the top 10 Mediterranean ports for the period 2023-2024⁵

PORT OF	COUNTRY	TEU 2023	TEU 2024	CHANGE 24/23 (%)
Tanger Med	Morocco	8,617,410	10,241,392	18.85%
Valencia	Spain	4,804,000	5,475,773	13.98%
Algeciras	Spain	4,733,400	4,709,450	-0.51%
Piraeus	Greece	4,580,000	4,788,000	4.54%
Barcelona	Spain	3,548,827	3,886,000	9.50%
Gioia Tauro	Italy	3,548,830	3,940,452	11.04%
Ambarli	Turkey	3,170,400	3,009,700	-5.07%
Marsaxlokk	Malta	2,800,000	2,887,000	3.11%
Genoa	Italy	2,394,335	2,447,817	2.23%
Mersin	Turkey	1,942,100	1,889,900	-2.69%

3 - 11th Annual Report Italian Maritime Economy 2024

4 - Alphaliner Data

5 - Data from Industry Websites

With regard to the data from the main Italian ports, the port movements in TEU recorded in 2024 and the relative change compared to 2023⁶ are reported.

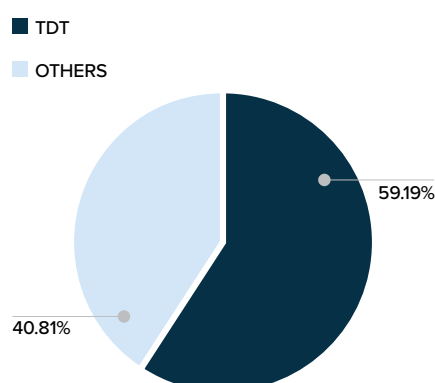
Table Container movement in Italy's main ports in 2024
(including Restow and Shifting)

PORT OF	2023	2024	Change 24/23 (%)
Gioia Tauro	3,548,830	3,940,452	11.04%
Genoa	2,394,335	2,447,817	2.23%
La Spezia	1,139,088	1,238,258	8.71%
Trieste	852,193	842,200	-1.17%
Livorno	669,414	663,622	-0.87%
Naples	595,740	646,409	8.51%
Venice	491,118	485,351	-1.17%
Salerno	345,949	358,316	3.57%
Savona-Vado	346,612	372,686	7.52%
Ravenna	216,981	201,776	-7.01%
Ancona	173,152	151,660	-12.41%
Cagliari	122,737	196,539	60.13%
Civitavecchia	101,319	106,592	5.20%

Terminal Darsena Toscana represents 60% of the Port of Livorno, with its 393,000 TEU movements out of 663,000 TEU total, closing the year virtually unchanged compared to 2023, with 86% local containers and the remaining 14% transhipments.

TDT in the port of Livorno- 2024 data

MARKET SHARE PORT OF LIVORNO 2024 (MOVEMENTS IN TEU)



In 2024 the Terminal set an intermodal record, operating more than 1,300 trains on its rail link. The share of containers transported on the tracks has also increased, reaching 20% of the total number of hinterland containers. TDT had already embarked on the path, but now more than ever it is focusing on rail connections alongside the 'more classic' road transport.

Times and needs change with the increasingly stringent goal of environmental sustainability, among other things, and the expansion of the port's catchment area.

Terminal Darsena Toscana became part of the Grimaldi Group in February 2024; it has become the port of call serving the markets of central and north-eastern Italy, i.e. the ideal sea outlet for a large hinterland formed mainly by Tuscany, Emilia-Romagna, Veneto, Marche and upper Lazio⁷. It is the key access point to European markets, playing an important role for the American markets, particularly the United States, and West Africa. TDT boasts a railway terminal of almost 50,000 square metres and has three internal tracks totalling 1,350 metres; its business plan includes the extension of the terminal to allow a total lengthening of 900 metres (300 each). The project to expand the internal connection aims to access more distant markets and enable the Terminal to move beyond a provincial and regional scope.

At the same time, with a view to environmental sustainability and logistical efficiency in the 'short haul', an intermodal rail link between central Tuscany and TDT began in the summer; this is used to transport mineral water from the Acqua Panna production site in Scarperia to the port of Livorno. This link is capable of replacing the equivalent of 1,500 trucks a year, with a 12% reduction in carbon dioxide emissions on the Scarperia-Livorno route and a reduction in traffic on the congested Florence-Pisa-Livorno artery⁸.

- Gateway traffic passed from 86.38% in 2023 to **85.26%** in 2024 (- 2.98%);
- Transshipment traffic increased from 13.62% in 2023 to **14.74%** in 2024 (+ 6.36%).

Supply Chain

To carry out its activities, TDT uses suppliers capable of satisfying both the Terminal's needs and the expectations of its customers and stakeholders, and the supplies received mainly concern goods, services and instrumental goods for carrying out its activities.

TDT aims to maintain a relationship with suppliers that brings mutual benefit to the Terminal and to the suppliers, whether they operate on site or off site, with the aim of achieving lasting and sustainable success for both parties to the benefit of the customers.

With this in mind, TDT shares with its suppliers the information on its Code of Ethics, on the Quality, Safety and Environment Policy and on the Anti-Corruption Policy, communicating and making them available on the website www.tdt.it.

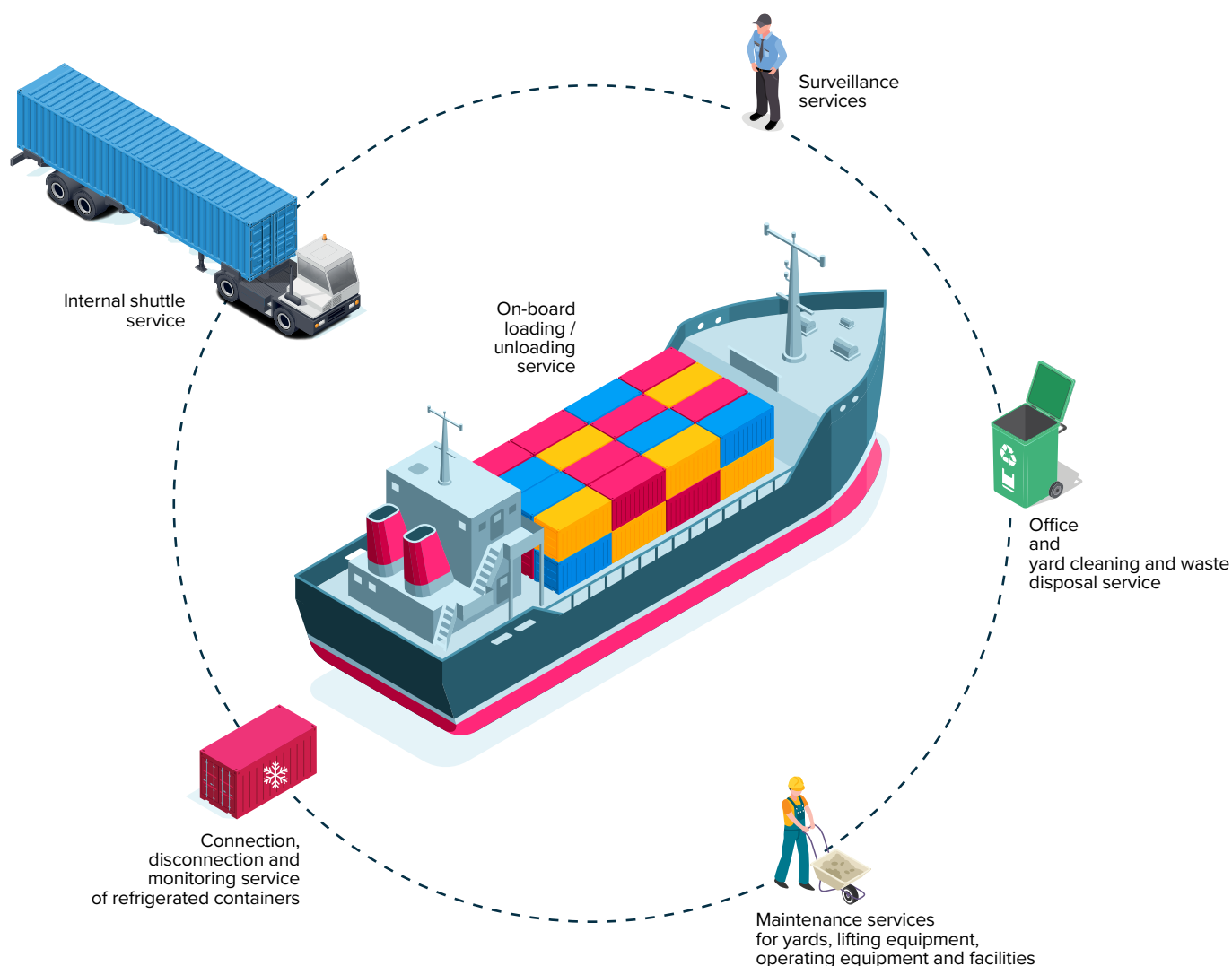
All suppliers influence the supply chain and are distinguished by the different characteristics and significance of the supplies provided; among these, those connected to the performance of activities are relevant.

In particular, suppliers whose activity directly intervenes in the execution of work cycles and clearly contribute to the achievement of company objectives and compliance with economic, environmental and safety aspects, and those of materials or services useful for logistical/organisational support for activities from a resilience perspective while ensuring compliance with the economic, environmental, safety and social criteria observed and defined by TDT, are significant.

7 - GDP Latium 0.21m, Emilia-Romagna 0.18m, Veneto 0.18m, Tuscany 0.13m, Marche 0.05m of the total per Region (ISTAT 2022)

4 - Alphaliner data

8 - Tirreno 19/02/2025



In particular, among the multitude of supplies of products and services that TDT acquires from its suppliers, the following typologies can be highlighted:

- On-board loading/unloading service;
- Internal shuttle service;
- Connection, disconnection and monitoring service of fridge containers;
- Maintenance services, lifting equipment, operating equipment and systems;
- Office and yard cleaning and waste disposal service;
- Surveillance services

During the period considered, there were no significant changes regarding the size and structure of TDT or its supply chain.

Environmental and social assessment of suppliers in the supply chain

308 SUPPLIER ENVIRONMENTAL ASSESSMENT

414 SUPPLIER SOCIAL ASSESSMENT

TDT has prepared and maintains specific procedures regarding the qualification of suppliers, i.e. their initial evaluation, selection and periodic re-evaluation, with particular reference to the aspects of quality, environment, safety and anti-corruption, in order to guarantee their ability to satisfy the requirements relating to supplies. This procedure is integrated with the controls of the Organisational and Management Model pursuant to Italian Legislative Decree 231/2001.

The qualification makes it possible to verify possession of the basic requirements to be able to operate with the Terminal and this process takes place in compliance with the criteria of transparency, equal opportunities of access, professionalism, reliability and cost-effectiveness, without prejudice to the prevalence of the legality requirements. This qualification allows the creation of a list of suppliers approved by TDT.

In addition to the qualification, TDT maintains a surveillance activity of its suppliers by monitoring the quality of supplies and services received, periodically re-evaluating them.

Qualification and monitoring activities allow the continuous identification of impacts and interferences that may pose risks to workers involved in activities within the TDT site or to the environment, for example with the generation of waste or exposure to social risks.

Based on the results of the qualification and monitoring processes, TDT works with the selected suppliers to agree on the appropriate measures to prevent environmental and social risks associated with the required performances.

For consultancy services, TDT takes into account the requirements of professionalism, reliability, integrity, confidentiality and diligence.

From an environmental perspective, indirect environmental impacts are due to activities related to those of the Terminal and delegated to subjects upstream with respect to the service provision processes. The Terminal exercises indirect management control over these activities and depends on the ability to influence the individual process or supplier.

The significant environmental aspects linked to activities carried out by suppliers in the supply chain are analysed within the context of environmental analyses and assessed, like the direct ones, based on criteria of severity, probability of occurrence, legislative compliance, risks/opportunities and human rights.

Among the suppliers present on the site, particular attention is paid to the maintainers of vehicles, equipment and systems, whose activities generate maintenance waste. TDT ensures the correct management through yard monitoring activities and/or supplier audits. Any abandoned or incorrectly disposed waste is managed with a view to remedying, treating and preventing the event from recurring.

For suppliers, there is also a "Supplier Code of Conduct" with specific provisions on environmental issues (in particular emissions and waste management), data and IT security and social issues (diversity and inclusion, health and safety).

308.1 NEW SUPPLIERS THAT WERE SCREENED USING ENVIRONMENTAL CRITERIA

414.1 NEW SUPPLIERS THAT WERE SCREENED USING SOCIAL CRITERIA

All new suppliers performing any of the activities listed in the following paragraphs were evaluated by environmental and social criteria prior to their employment.

During 2024, 6 new suppliers were evaluated.

308.2 NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN**414.2 NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN**

An analysis of the Terminal's supply chain revealed the following outsourced activities at the TDT site as significant:

- Internal transfer activities;
- Maintenance of lifting and transport equipment;
- Plant and equipment maintenance.

The significant negative environmental and social impacts were as follows:

- Atmospheric emissions;
- Energy consumption;
- Waste production;
- Soil contamination during works;
- Introduction of hazards and interference risks;
- Accidents at work;
- Staff conduct not in line with safety and environmental criteria.

Awareness-raising measures were implemented with the suppliers concerned, in order to manage the indicated aspects with a view to prevention and remediation:

- Integration of environmental and social criteria into contract documents and qualification activities;
- Organisation of information and engagement meetings at the beginning and during the works/services;
- Joint environmental and safety audits;
- Joint environmental remedial actions (managing spills and waste in TDT areas);
- Sharing of environmental and safety data related to significant aspects;
- Guidelines for reporting negative environmental and social impacts.

The aim of these measures is to create a culture of shared environmental and social responsibility throughout Terminal Darsena Toscana's supply chain.



2.7 EMPLOYEES

As at 31/12/2024, TDT directly employs 260 workers to carry out its activities. The data on TDT's employees and their composition are shown below.

Staff composition - number of people			
STAFF COMPOSITION	2022	2023	2024
Total employees	269	261	260
By gender			
Men	221	214	214
Women	48	47	46
By age			
Under 30	4	4	3
Between 30 and 50	161	145	133
Over 50	104	112	124
Average age of staff	48	49	50
By professional category			
Senior executives	7	7	7
Middle managers	2	3	3
White-collar workers	137	131	130
Blue-collar workers	123	120	120
By contract type			
Permanent	264	260	260
Temporary	5	1	0
Apprentices	0	0	0
By type of employment			
Full time	255	248	247
Part time	14	13	13

In TDT, which operates according to Art. 18 of L.84/94, the percentage of women employed is 18%, equal to 46 employees out of 260 employees.

The geographical origin of employees is listed below.

Employee origin			
EMPLOYEE ORIGIN	2022	2023	2024
Province of Livorno	93.69%	94.64%	85.38%
Other provinces in the region (Pisa, Lucca, Florence)	4.8%	4.6%	13.8%
Others outside the region	1.5%	0.77%	0.8%

2.8 WORKERS WHO ARE NOT EMPLOYEES

In addition to its own employees, TDT can avail itself of the services of the Port Employment Agency of Livorno, which is the only entity that can provide temporary port work, authorised under Art. 17 of Italian Law 84/94.

GOVERNANCE

2.9 GOVERNANCE STRUCTURE AND COMPOSITION

2.10 NOMINATION AND SELECTION OF THE HIGHEST GOVERNANCE BODY

2.11 CHAIR OF THE HIGHEST GOVERNANCE BODY

The governance model of TDT is inspired by the traditional model:

The Shareholders' Meeting appoints the Board of Directors and the Board of Auditors, approves the annual financial statements and, if necessary, convenes an extraordinary session to deliberate on matters within its competence, in accordance with the law and the Articles of Association.

The Board of Auditors, which exercises the supervisory functions provided for by the legislation in force, is composed of the President, two Statutory Auditors and two Alternates.

The company's financial statements for the year 2024 are certified by the auditing firm Price Waterhouse Coopers S.p.A.

These bodies are supported, in compliance with the establishment of the Management, Organisation and Control Model pursuant to Italian Legislative Decree 231/2001 established by resolution of the Board of Directors of TDT on 12.12.2009, by the Supervisory Body composed of two members.

The Board of Directors of TDT defines the strategic policies of the group and assumes responsibility for corporate governance, appoints the General Manager, determining his/her responsibilities and management powers through a specific proxy in accordance with the defined strategies and directives. There are no management and control committees within the Board of Directors.

The Board of Directors consists of Diego Pacella (Chairman of the Board of Directors), Ferraiuolo Domenico (Managing Director), Gian Luca Grimaldi, Emanuele Grimaldi.

The Chairman of the Board of Directors does not hold management positions in TDT.

2.12 ROLE OF THE HIGHEST GOVERNANCE BODY IN OVERSEEING THE MANAGEMENT OF IMPACTS

The Board of Directors promotes an approach to Terminal management geared towards strategic corporate objectives that are compatible and consistent with economic, environmental and social sustainability.

The strategic objectives defined by the Board of Directors are transferred to the management and leadership team, which integrate the environmental, economic and social expectations of internal and external stakeholders into the activities aimed at their achievement.

TDT identifies and manages its economic, environmental and social issues and the related impacts, risks and opportunities based on contextual analyses in which it identifies the relevant internal and external factors that can influence the achievement of the economic, environmental and social objectives determined in compliance with the needs of the interested parties.

To identify these issues, TDT, and in particular General Management, engages with its stakeholders, be they customers, investors, suppliers or authorities, both formally and directly, through specific audits or surveys conducted within the management systems, and indirectly during commercial or institutional meetings.

In conducting its business, TDT identifies, addresses and manages numerous types of risk that can potentially generate significant impacts of an economic/financial, asset-related, social, environmental and reputational nature, thus damaging the corporate image in the eyes of all Stakeholders.

TDT adopts operational and management objectives and plans capable of preventing and mitigating

the impacts of risks inherent in carrying out activities, ensuring the effectiveness of the actions undertaken, as well as compliance with mandatory regulations.

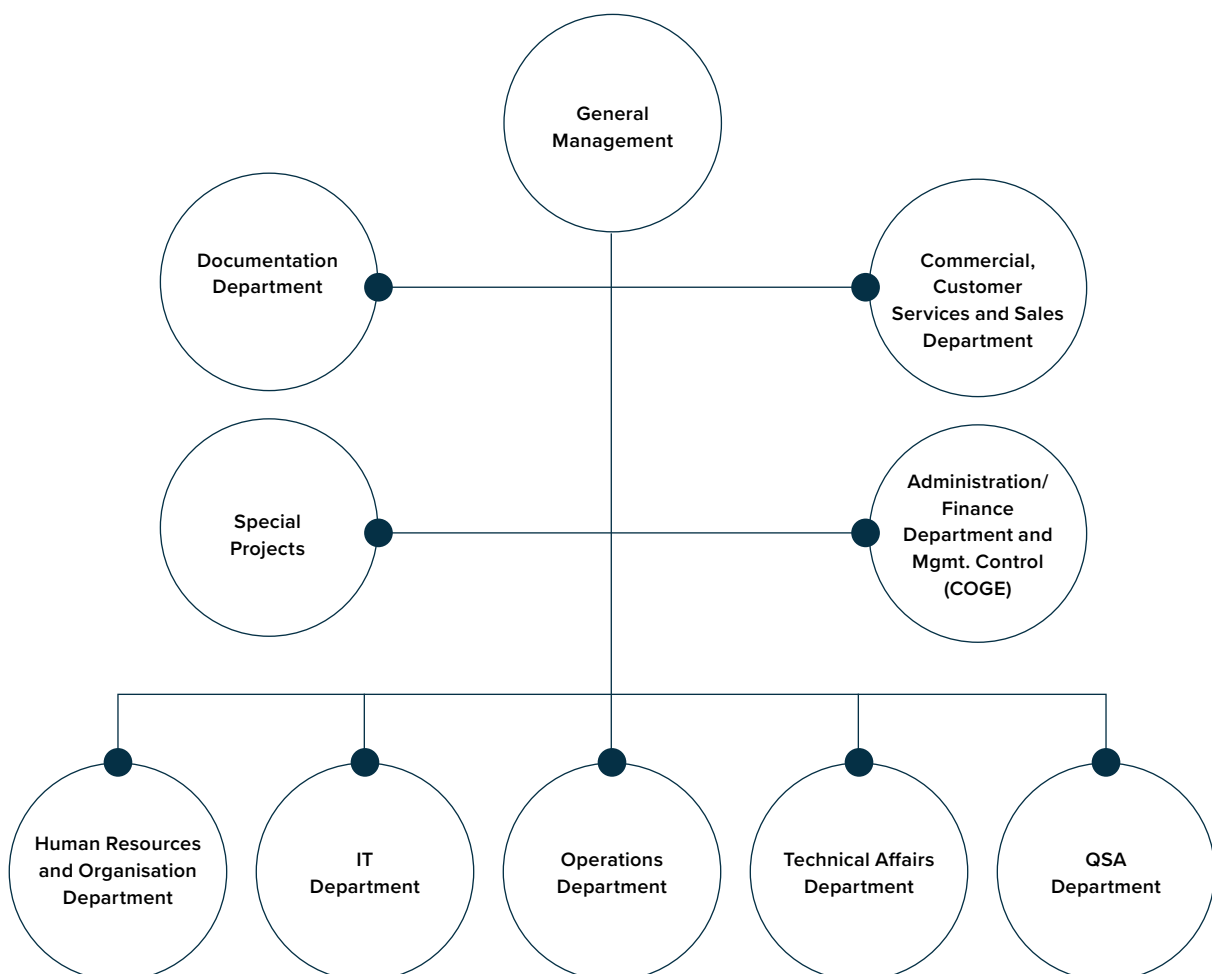
The Board of Directors and General Management are informed and updated on sustainability aspects relating to economic, environmental and social issues, both internal and external to the TDT organisation, through specific annual reviews and information meetings.

2.13 DELEGATION OF RESPONSIBILITY FOR MANAGING IMPACTS

The General Manager of TDT, Marco Mignogna, through the powers delegated to him by the Board of Directors and the Chief Executive Officer, is responsible for managing economic, environmental and social issues and their impacts and for implementing the strategies with the help of the Management Team, i.e., the appointed Department Managers.

The structure of the top management functions and the main reporting lines are represented in the following organisational chart:

TDT organisational chart as at 31.12.2024



2.14 ROLE OF THE HIGHEST GOVERNING BODY IN SUSTAINABILITY REPORTING

TDT Senior Management verifies and approves the Sustainability Report, in accordance with the determinations of the Board of Directors, guaranteeing the adequacy of the internal controls carried out to ensure that the contents and material topics related to the economic, environmental and social impacts resulting from the context analysis and communication with stakeholders are reported according to principles of integrity and credibility. The Report is then shared with the Board of Directors.

2.15 CONFLICTS OF INTEREST

During the year, no conflicts of interest were identified or communicated.

2.16 COMMUNICATION OF CRITICAL CONCERNS

With the establishment of the Management, Organisation and Control Model pursuant to Italian Legislative Decree 231/2001, TDT has defined the procedures to be followed for reporting potential or real concerns. Such reports are reported, in the most significant cases, to the Board of Directors. The information and critical issues that arise from the reviews of the management systems with reference to environmental and social aspects are integrated by Senior Management with the economic/financial information that emerges during the preparation of the annual Financial Statements and are brought to the attention of the Board of Directors during specific meetings. During the year, no critical issues or significant disputes were detected relating to economic, environmental and social issues that required the adoption of legal action or changes to the organisation or activities.

2.20 PROCESS TO DETERMINE REMUNERATION

2.30 COLLECTIVE BARGAINING AGREEMENTS

All TDT employees are classified in compliance with the national collective labour agreements applied in the company.

For managers, the national collective labour agreement (CCNL) for managers of industrial companies applies.

For employees with the qualification of “middle managers”, “white-collar workers” and “blue-collar workers”, reference should be made to the CCNL for port workers. Some resources with tasks of responsibility also have a component of their remuneration entitled “superminimo ad personam”, which is awarded by the company based on meritocratic assessment and the achievement of individual objectives.

Supplementary bargaining (or second-level bargaining), in particular, plays an important role in determining overall remuneration. Embedding the national collective labour agreement has the dual objective of creating organisational efficiency for the company, on the one hand, and bringing additional remuneration to workers, on the other. During 2021, the Company Supplementary Contract was renewed, which will be valid until 31/12/2024.

On the basis of the above assumptions, the TDT pro tempore company integrative contract introduced a flexible working regime spread over seven days (from Monday to Sunday with a variable weekly rest period).

2.21 ANNUAL TOTAL COMPENSATION RATIO

The ratio of the highest salary to the median salary values of the employees are reported below.

Ratio of highest salary to average salary

	2022	2023	2024
Ratio of highest salary to average salary	1.74	1.96	1.91

Ratio of the change in the highest wage to the change in the average wage

RATIO OF THE CHANGE IN THE HIGHEST WAGE TO THE CHANGE IN THE AVERAGE WAGE	2022	2023	2024
Change in highest paid	1.3%	1.01%	1.6%
Change in average salary	8.5%	1.03%	4.0%
Difference	7.2%	0.02%	2.4%



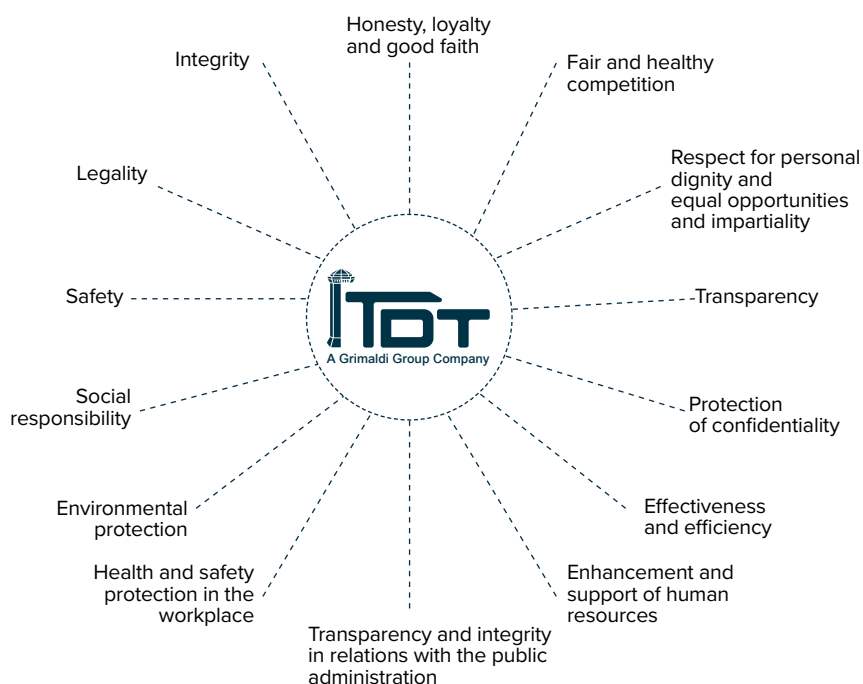
Strategies, policies and practices

2.23 POLICY COMMITMENTS

TDT has adopted its own Code of Ethics that defines the values, principles, commitments and ethical responsibilities that guide the management of the company's activities.

The commitment to respecting the values and principles indicated in the Code of Ethics is aimed at ensuring responsible, sustainable business conduct that respects internationally recognised human rights, with the intention of contributing to the achievement of the Sustainable Development Goals (SDGs) expressed by the United Nations.

The values expressed in TDT's Code of Ethics





The ethical principles set out in the Code of Ethics represent the foundations and guiding criteria for the actions and activities of the people working with Terminal Darsena Toscana. These principles focus on crucial issues such as fairness, reliability, corporate image and reputation, protection of assets, compliance with laws and regulations.

The Code of Ethics is available on the TDT website at the address www.tdt.it.

The Code of Ethics was approved by TDT's Board of Directors as part of the establishment of the Organisation and Management Model (OMM), as set out in Italian Legislative Decree 231/2001. The Code includes in its scope of application the prevention of certain types of environmental crimes, and represents a further system of guaranteeing and monitoring compliance with current legislation. The Code of Ethics is brought to the attention of all internal and external recipients through specific communication activities; the heads of departments and sectors as well as the heads of organisational units are responsible for its implementation together with the related procedures and regulations, in their areas of competence.

TDT has also adopted specific Policies on quality, safety, environment and anti-corruption, approved by the Terminal's Senior Management, in order to address and manage material topics with respect to the economic, environmental and social impacts of the Terminal.

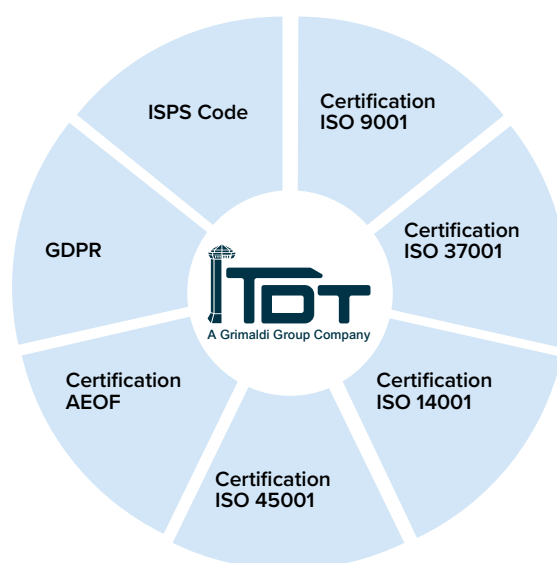
The Policies are available on the TDT website at the address www.tdt.it.

The Policies are brought to the attention of all internal and external recipients through specific communications; the heads of departments and sectors, as well as the heads of organisational units, are responsible for implementation in their areas of competence.

2.24 EMBEDDING POLICY COMMITMENTS

TDT has decided to integrate its commitments and responsibilities towards sustainability and respect for human rights by implementing and maintaining its management systems and extending the approaches required by these standards to other aspects and dimensions of the company.

TDT maintains an active Integrated Management System compliant with the following standards: ISO 9001:2015 (Quality Management System), ISO 14001:2015 (Environmental Management System), ISO 45001:2018 (Health and Safety Management System) and ISO 37001:2016 (Anti-Corruption Management System).



This internal control system is implemented within the application of the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/01 established in 2012 and updated in 2024.

For TDT, the purpose of this systemic approach is to achieve the expected benefits and outcomes, i.e. the satisfaction of stakeholders' needs, the strengthening of performance, compliance with the requirements and laws applicable to the reference context, the achievement of set objectives combined with the reduction of negative impacts and the improvement of positive impacts relating to economic, environmental and social issues.

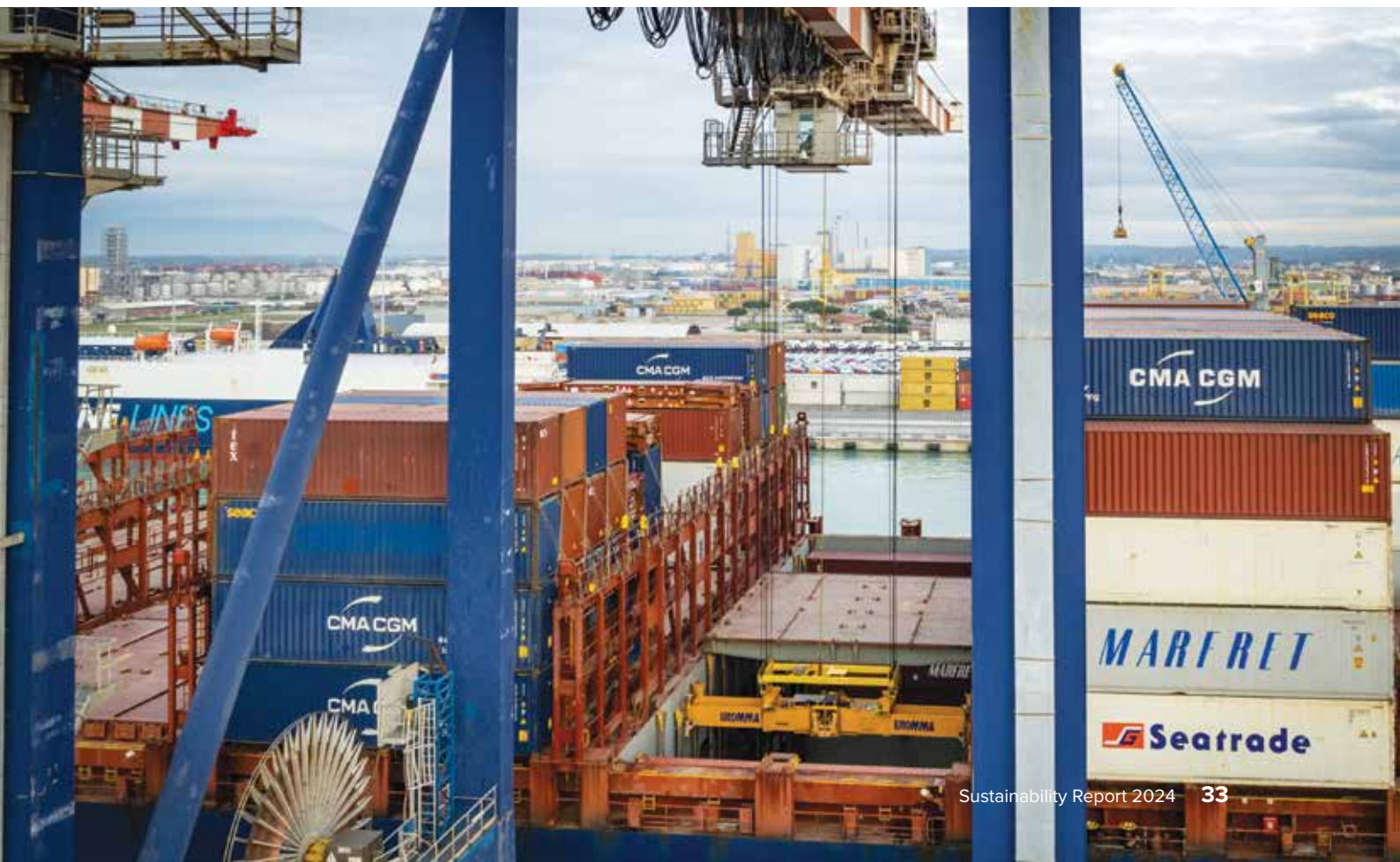
In line with the policies defined within the management systems, the objectives and targets are determined together with the related plans for achieving them and the relative attribution of responsibilities and resources.

TDT also complies with the provisions of the ISPS (International Ship and Port Facility Security) Code, which came into force on 1 July 2004. TDT has developed a Port Facility Security Plan that provides deterrent measures and response procedures for each scenario assessed in the Port Facility Security Assessment (PFSA) and applies the provisions of the GDPR, i.e. the General Regulation (EU) on the protection of personal data 2016/679, a tool that is part of what is already provided for by the Community Directive of 1995 and, in Italy, by law 675/1996 followed by the 2003 Code.

Complementing the above is the achievement of Full Authorised Economic Operator (AEOF) status from the Excise, Customs and Monopolies Agency, which is essential to balance the need for greater control and security of shipments with the need to facilitate legitimate trade.

2.25 PROCESSES TO REMEDIATE NEGATIVE IMPACTS

As part of the systemic approach to the management of material topics, in the event of reports from stakeholders or the detection of events with negative impacts on stakeholder expectations, TDT implements specific procedures for the management of complaints, reports and non-conformities with the aim of investigating and remedying negative events or expressions of concerns. Such remedial actions are brought to the attention of the stakeholders who made the report.



2.26 MECHANISMS FOR SEEKING CLARIFICATIONS AND RAISING CONCERNS

By resolution of the Board of Directors, TDT has established the Supervisory Body (SB), which has the function of supervising the implementation and compliance with both the Code of Ethics and the Organisation, Management and Control Model, adopted pursuant to Italian Legislative Decree 231.

Reports regarding unethical or illegal behaviour relating to compliance with the principles and values described in the Code of Ethics may be addressed to this body.

The implementation of the Corruption Prevention Management System, created in accordance with the UNI ISO 37001 standard, has led to the establishment of the Compliance Department, to which acts or suspected acts of corruption relating to the activities carried out by TDT can be reported.

A whistleblowing system has been established within the framework of the Organisational Model and the Anti-Corruption Management System, i.e. a reporting system that allows employees and other interested parties to report any concerns or illegal practices in breach of the Code of Ethics or with the approved Company Policies.

TDT guarantees the people who make the reports the due anonymity and confidentiality against the risk of retaliation and/or discrimination in compliance with its non-retaliation policy.

Reports of any violations or suspected violations of the Code of Ethics, the Anti-Corruption Policy and other Company Policies may be made in writing or orally.

Written reports are made through:

- Whistleblower Software platform, accessible at the following web address: <https://whistleblowersoftware.com/secure/terminaldarsenatoscana>;
- Ordinary mail addressed to the attention of the “Subject to whom reports are addressed” of Terminal Darsena Toscana, viale Mogadiscio 23 – Porto Industriale Livorno, with the wording “RISERVATA”.

Oral reports are made through:

- Voice message available in the Whistleblower Software Platform;
- Oral dialogue upon request of the whistleblower, with the Subject to whom reports are addressed, also submitted via telephone/messaging.

2.27 COMPLIANCE WITH LAWS AND REGULATIONS

No significant monetary penalties or non-monetary sanctions were imposed on the Terminal for non-compliance with social, environmental and economic laws and regulations over the last three years. TDT manages its socio-economic and environmental compliance, i.e. the overall level of adherence to applicable laws, as well as compliance with specific laws or regulations on social and economic matters, through its Organisation and Control Model pursuant to Italian Legislative Decree 231/2001 and its Management Systems.



2.28 MEMBERSHIP OF ASSOCIATIONS

Emanuele Grimaldi, member of the Board of Directors of TDT, is the President of the International Chamber of Shipping (ICS), the global trade association of shipowners and operators, representing national shipowners' associations and over 80% of the world's merchant fleet.

Stakeholder engagement

2.29 APPROACH TO STAKEHOLDER ENGAGEMENT

In the context of its commercial, operational and administrative activities, TDT interacts with numerous parties that have interests in or could be influenced by the decisions and actions of the Terminal.

The analysis of interaction patterns and their frequency has enabled the collection of useful information that has been examined and combined with the results of the context analysis, carried out to comply with the requirements of the ISO 9001, 14001, 37001 and 45001 standards. Based on this analysis, relevant stakeholders for the activities were mapped, identified and selected.

TDT is committed to maintaining stable, sound and transparent relations with all stakeholders in its contact with them, for example daily working relations, periodic meetings, participation in institutional roundtables and exchange of information flows. The objective is to identify negative and positive, actual and potential impacts, and to determine possible prevention and mitigation responses.

The main stakeholders towards which TDT considers itself primarily responsible for frequency and relevance of interaction are:

- Customers, Freight Forwarders and Transporters;
- Investors;
- Workers and Trade Unions;
- Authorities and control bodies;
- Suppliers.

TDT maintains active communication with its stakeholders on economic, environmental and social issues and the methods of contact and engagement include:

- Customer Satisfaction surveys, polls to monitor customers' perception of the services provided;
- Meetings and exchange of information and reporting with investors;
- Periodic meetings with Workers' Safety Representatives;
- Periodic meetings with Workers' Unions in the context of managing collective bargaining agreements;
- Discussions with authorities and control bodies or the renewal of concessions and authorisations, including the Port System Authority of the Northern Tyrrhenian Sea, the Harbour Master's Office and the Excise, Customs and Monopolies Agency, as required by the Regulations and Ordinances of the Port of Livorno;
- Meetings with suppliers for the definition of contractual relationships and the management of related activities for safety and environmental aspects.





3.1 PROCESS TO DETERMINE MATERIAL TOPICS

TDT is committed to systematically identifying and verifying its economic, environmental and social impacts. This process, integrated with operational activities, is essential to meet the requirements of ISO 9001, 14001, 37001 and 45001. The latter require mapping the context, identifying relevant internal and external factors, analysing stakeholder expectations and planning actions to manage uncertainties and opportunities. In addition, TDT carries out continuous system reviews to assess performance. These activities make it possible to identify the material topics to be addressed by TDT, assess their actual and potential economic, social and environmental impacts, and determine their impact.

Information on impacts and influence on stakeholders has been collected during official and unofficial meetings between stakeholders and TDT. Subsequently, the Working Group evaluated this information according to TDT's ability to manage and improve these impacts and influences.

Assessment of the extent of impacts is typically conducted within the management systems, in compliance with the applicable ISO standards, as well as the assessments carried out during the Board of Directors and Management Team meetings.

The materiality analysis was updated in 2022 on the basis of a combination of factors, including the impacts of TDT activities and interactions with business, supply chain and institutional partners, as well as the ability to influence them. TDT identified the topics considered material and defined their scope.

This scope differs from the commercial catchment area of Terminal Darsena Toscana, the Alto Tirreno Shipping market and the routes connected thereto with regard to partner customers, and mainly refers to the Port of Livorno and the stakeholders involved in the operations carried out by TDT in this geographical area.

3.2 LIST OF MATERIAL TOPICS

TDT has identified the material topics to be reported by assessing the needs of the relevant stakeholders, who have expressed their priorities through direct consultations (audits and interviews, or mediated consultations, i.e. based on questionnaires and requests sent by them to TDT).

These topics were considered material based on the cause or contribution of TDT with respect to the topic and its severity for the stakeholders, considering any requests on the topics as relevant to determine their materiality.

These topics mainly concern the areas of economic performance and corporate management, attention to the environment (consumption, use of resources, commitment to pollution prevention and reduction of emissions), attention to relations with workers, their rights, their health and safety and their growth and attention to the relationship with customers and users of the Terminal's services as well as with the surrounding community.

GRI STANDARD	TOPICS	MATERIALITY	SDG
201	Economic performance	Material	8-9-13
202	Market presence	Material	5
203	Indirect economic impacts	Material	8-9
204	Procurement practices	Material	8
205	Anti-corruption	Material	16
206	Anti-competitive behaviour	Material	16
207	Taxes	Non-Material	1 - 10 - 17
301	Materials	Non-Material	12
302	Energy	Material	13
303	Water and effluents	Material	6 -12
304	Biodiversity	Non-Material	15
305	Emissions	Material	13
306	Water discharges and waste	Material	12
308	Supplier environmental assessment	Material	-
401	Employment	Material	10
402	Relations between workers and management	Material	8
403	Health and safety at work	Material	8
404	Training and education	Material	8-10
405	Diversity and equal opportunities	Material	5-10
406	Non-discrimination	Material	8
407	Freedom of Association and Collective Bargaining	Material	8
408	Child Labour	Material	8 - 16
409	Forced or Compulsory Labour	Material	8
410	Security personnel training	Material	16
411	Rights of indigenous peoples	Non-Material	2
412	Evaluation of respect for human rights	Material	-
413	Local Communities	Material	1 - 2
414	Social Assessment of Suppliers	Material	8
415	Public policy	Non-Material	16
416	Customer Health and Safety	Material	16
417	Marketing and Labeling	Non-Material	12 - 16
418	Customer Privacy	Material	16

3.3 MANAGEMENT OF MATERIAL TOPICS

TDT addresses topics that have direct and indirect, actual and potential, short- and long-term negative impacts on the local economic, environmental and social system, including human rights.

From an economic point of view, it is crucial to consider the effects on the main stakeholders, i.e. investors, staff (in terms of economic performance and presence in the area of activity), suppliers and the local community (purchasing practices and indirect effects), as well as the authorities (sound management in terms of anti-corruption and fair competition).

With regard to the environmental aspect, it is crucial to consider the impacts of energy consumption, especially from non-renewable sources, and the use of materials. It is also important to assess emissions to the air, water, soil, sound and light, as well as waste generation. These aspects are managed in accordance with current regulations, through improvement actions aimed at prevention and reduction. TDT is committed to mitigating the negative impacts generated by the activities of suppliers, in a manner that is directly proportional to its influence on them and in accordance with the places of execution of the requested supplies.

With regard to the social aspect, TDT is committed to ensuring inclusive, non-discriminatory management that respects the civil rights of direct and indirect employees. The company also undertakes to promote fair working conditions, effectively manage relations with workers, guarantee health and safety in its activities, develop the skills and abilities of its employees, and actively collaborate with the Port Community and the city of Livorno.

TDT manages its activities, its material topics and related impacts by implementing and maintaining its Quality, Safety, Environmental and Anti-Corruption Management Systems and extending the approaches required by these standards to other aspects and dimensions of the company.

TDT evaluates its methods of managing activities, material topics and related impacts with specific monitoring and measurement tools, by conducting internal audits, with performance reviews by Senior Management.

Following these checks and assessments, appropriate measures and actions are taken to improve, reduce or eliminate economic, environmental and social impacts. These actions are included in specific improvement programmes, which are constantly monitored throughout the year.







Pursuing economic sustainability for TDT means committing to consolidating over time the competitive position acquired in the upper Tyrrhenian market, increasing the efficiency of processes, and creating value for the benefit of investors, customers and workers, in collaboration with suppliers and institutions present in the territory in which it operates; in this sense, the economic/financial results must be interpreted also in consideration of aspects such as the creation of employment in the reference territory, from which almost all of the company's employees come, the remuneration of employees, the selection of suppliers located in the Livorno area and the contributions earmarked by TDT for the community.

201 Economic performance

201.1 DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED

During the year, the Company continued to carry out, within the area under concession in the port of Livorno, the main activity of loading and unloading containers and the secondary activity of loading and unloading new cars. The total number of cars moved during the year was 46,733.

In numerical terms, the volumes handled showed a -2.6% reduction. However, the excellent composition of managed traffic (high percentage of full containers - 62.1%) continued in 2024, with positive effects on the company's profitability, as full containers generate higher operating revenues.

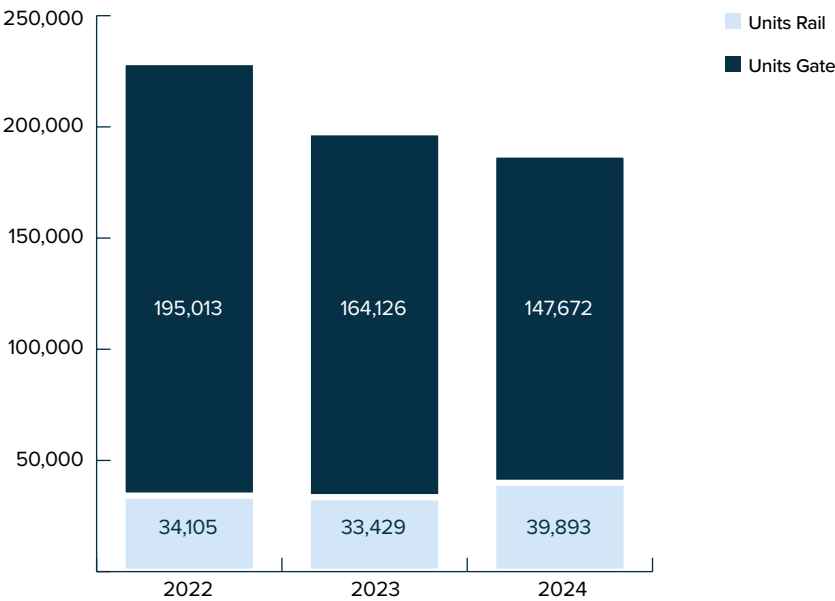
Ship data

SHIP DATA	2022	2023	2024
Ships docked	479	470	389
Total Units (disembarkation/embarkation/transshipment) of which:	278,342	228,118	222,216
• Full (%)	58.5%	62.0%	62.1%
• Empty (%)	24.5%	24.6%	23.3%
• Transshipments (%)	17.0%	13.4%	14.6%
TEU (disembarkation/embarkation/transshipment)	467,938	387,808	381,198
Total Cars (disembarkation/embarkation)	0	1,725	46,733

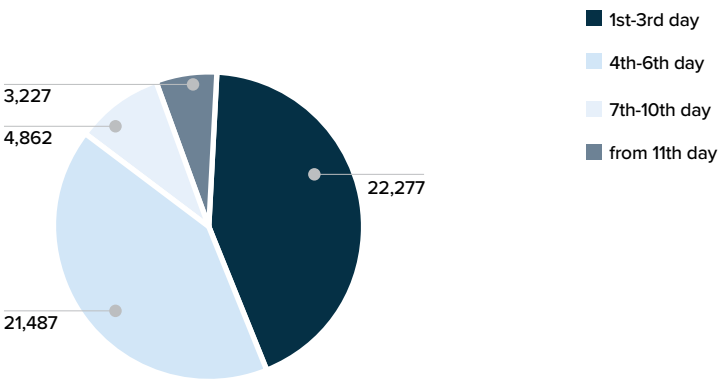
Gate - rail data

GATE - RAIL DATA	2022	2023	2024
Trucks served at gate	142,357	122,580	116,803
Average turnaround time of trucks w/ full containers (minutes)	23	19	20
TEU unloaded/reloaded from train	57,336	56,829	68,434
Dwell time of import containers	5.9	5.2	4.9
Total hinterland volumes	229,118	197,555	187,565
• Units via rail (%)	14.9%	16.9%	21.3%
• Units via gate n (%)	85.1%	83.1%	78.7%

Hinterland Traffic



Stock of full import containers



Total revenue showed an increase of 2.6% (€ +1,130,439 in absolute terms) over the previous year. Compared to 2023, the higher turnover of secondary car-carriers traffic management is € 2,439,107. An improvement in ancillary revenues is highlighted, with particular reference to reefer and railway revenues.

Income statement

INCOME STATEMENT	2022	2023	2024
Operating revenue	€ 56,267	€ 43,507	€ 44,638
- External operating costs	€ -21,105	€ -18,157	€ -19,217
= Added Value	€ 35,162	€ 25,351	€ 25,421
- Labour Cost	€ -18,824	€ -18,178	€ -18,888
= Gross operating margin	€ 16,338	€ 7,173	€ 6,533
-- Depreciation and impairment losses (including risk provision)	€ -2,585	€ -2,774	€ -2,749
= Operating Income	€ 13,753	€ 4,399	€ 3,784
+/- Financial assets balance	€ 304	€ -36	€ -199
+/- Ancillary assets balance	€ 0	€ 0	-
+/- Extraordinary assets balance	€ 518	€ 293	€ 172
- Taxes	€ -3,896	€ -1,179	€ -1,061
=Economic residual	€ 10,678	€ 3,476	€ 2,696

Balance Sheet

BALANCE SHEET	2022	2023	2024
ASSETS			
Fixed assets	€ 13,044	€ 13,052	€ 11,501
Intangible assets	€ 3,528	€ 3,106	€ 2,640
Tangible assets	€ 9,455	€ 9,871	€ 8,800
Financial assets	€ 60	€ 75	€ 61
Working capital	€ 21,784	€ 16,415	€ 17,973
Inventory	€ 839	€ 908	€ 948
Deferred liquidity	€ 16,292	€ 10,984	€ 9,025
Immediate liquidity	€ 4,653	€ 4,523	€ 8,000
Total Uses	€ 34,828	€ 29,467	€ 29,474
LIABILITIES			
Net capital	€ 7,193	€ 13,872	€ 13,872
Consolidated liabilities	€ 3,036	€ 1,815	€ 547
Current liabilities	€ 13,920	€ 10,304	€ 12,359
Total sources	€ 24,149	€ 25,991	€ 26,778
Operating profit	€ 10,678	€ 3,476	€ 2,696

During the financial year, the policy of streamlining external operating costs continued, also with the aim of offsetting increases due to contractual ISTAT revaluations.

With reference to some activities of the operating cycle, given the lower volumes handled, the company internalised part of the operating segments, such as the internal container shuttle service, which shows average self-production of 9.8%.

Electricity costs (€/MWh) decreased by 3.2%. As we know, over the last two years, these costs had reached critical levels caused by international geo-political scenarios and inflationary phenomena.

In this regard, the company has also continued to pursue energy efficiency policies aimed at addressing these phenomena.

The reclassification of the economic value generated and distributed reported below highlights the economic effect that the TDT activity has produced on the main categories of stakeholders, namely:

- Its employees, through salary remuneration;
- Lenders, through the distribution of dividends and the remuneration of credit institutions;
- Suppliers, through spending on supplies and investments;
- The Public Administration, through the payment of taxes;
- The Community, through the provision of contributions to non-profit organisations operating in local contexts.

Distribution of added value to stakeholders

DISTRIBUTION OF ADDED VALUE TO STAKEHOLDERS	2022	2023	2024
Economic value generated	€ 57,787,059	€ 44,487,045	€ 45,287,605
Revenues	€ 57,286,673	€ 44,281,820	€ 45,282,583
Proceeds (financial-extraordinary-from equity inv.)	€ 500,386	€ 205,226	€ 5,022
Economic value distributed	€ 43,641,306	€ 37,469,841	€ 38,957,499
Operating costs	€ 21,771,337	€ 18,857,919	€ 19,907,714
Employee remuneration	€ 17,708,838	€ 17,089,161	€ 17,782,196
Lender remuneration	€ 82,529	€ 164,403	€ 117,910
Remuneration of the Public Administration	€ 3,896,327	€ 1,178,682	€ 1,060,520
Local community remuneration	€ 182,276	€ 179,675	€ 89,159
Economic value retained in the company	€ 14,145,753	€ 7,017,204	€ 6,330,106
Depreciation and write-downs	€ 2,602,551	€ 2,725,396	€ 2,737,399
Provisions and reserves	€ 11,543,202	€ 4,291,808	€ 3,592,707

201.2 FINANCIAL IMPLICATIONS AND OTHER RISKS AND OPPORTUNITIES DUE TO CLIMATE CHANGE

TDT assesses its risks and opportunities related to climate change as a specific activity within the scope of the Environmental Management System certified in compliance with the ISO 14001 Standard. Moreover, in its Quality, Safety and Environment Policy it declares its commitment to reducing resource consumption and increasing the use of low-emission infrastructure and equipment.

TDT has identified and assessed, among the risks related to climate change, the physical risks caused by extreme weather events, in particular those due to the falling of customers' containers stored in the Terminal during adverse weather conditions with strong winds.

Such events can impact the supply chain served by the shipping companies and expose the Terminal to risks for workers, as well as for compensation for damages.

To deal with these risks, TDT has prepared appropriate measures and tools for monitoring wind intensity together with specific intervention protocols to be implemented in the event of receiving weather alert reports from the competent authorities.

In addition, some of the main actions implemented to combat climate change are listed below:

- The replacement of lighting systems with LED lamps, both in offices and on quayside and yard cranes;
- The progressive renewal of the diesel Reach Stackers fleet with new-concept vehicles.

201.3 DEFINED BENEFIT PLAN OBLIGATIONS AND OTHER RETIREMENT PLANS

As regards the coverage of pension costs, there are no company-defined benefit plans, nor does the company offer employees specific supplementary pension coverage, in addition to that already provided for by the relevant national collective agreements to which employees are free to adhere.

201.4 FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT

During 2024, the company benefited from public contributions of a legislative nature relating to Industry 4.0 (for a total of € 1,663,686, of which revenues pertaining to the financial year amounted to € 197,084).

202 Market presence

202.1 RATIOS OF STANDARD ENTRY LEVEL WAGE BY GENDER COMPARED TO LOCAL MINIMUM WAGE

TDT's employees are hired under regular employment contracts, based on the National Collective Agreement for Port Workers, which defines the minimum wage scales, including for newly hired staff.

202.2 PROPORTION OF SENIOR MANAGERS HIRED FROM THE LOCAL COMMUNITY

At the moment there are no Senior Managers of non-Italian nationality in TDT.

203 Indirect economic impacts

203.1 INFRASTRUCTURE INVESTMENTS AND SERVICES SUPPORTED

The economic impact of TDT does not end with the production and distribution of added value; the company's objective is not only to produce profits for members, but also to create job opportunities and economic growth for the local community.

As far as infrastructure is concerned, there have been interventions aimed at improving productivity and raising safety levels within the Terminal by improving the working conditions of staff.

The main investments made in 2024 by TDT are also summarised below.:

- The commissioning of two new port tractors;
- The purchase and installation of four new, state-of-the-art operating cabins on cranes No. 6 and No. 12 and RTGs No. 1 and No. 5, which allow a significant improvement in ergonomics and working conditions for crane operators.

203.2 SIGNIFICANT INDIRECT ECONOMIC IMPACTS

The significant indirect impacts of TDT investments include:

- Changes in the productivity of the logistics sector, thanks to the improvement of technology (increased use of IT technology such as OCR technology affects the speed of the local logistics chain);
- Improvement of the skills and knowledge of the professional community (the improvement of skills and knowledge favours the resolution of problems and the streamlining of activities for the benefit of the supply chain and end users);
- Improvement of safety conditions and reduction of resource consumption (investments such as the replacement of the lights on quay cranes with LED lights increase the safety levels of the Terminal, improve working conditions and reduce overall energy consumption and CO₂ emissions).

204 Procurement practices

204.1 PROPORTION OF SPENDING ON LOCAL SUPPLIERS

As regards supplies, in 2024 the total expenditure for services and consumables was € 18.2 million. The analysis by geographical area of origin highlights a clear prevalence of suppliers located in Italy, representing 98% of the total purchases made.

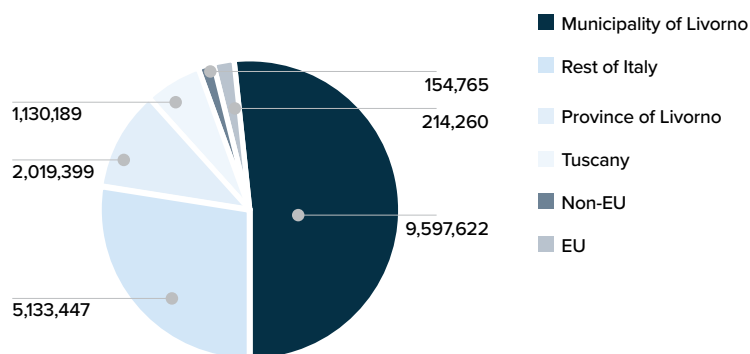
The following is a breakdown of the percentage shares of expenditure on the total purchases made.

Allocation of procurement costs

ALLOCATION OF PROCUREMENT COSTS	2022		2023		2024	
	AMOUNTS	%	AMOUNTS	%	AMOUNTS	%
Economic value generated	€ 21,875,673	97.2%	€ 18,064,152	97.7%	€ 17,880,657	98.0%
Revenues	€ 216,128	1.0%	€ 171,256	0.9%	€ 154,765	0.8%
Proceeds (financial-extraordinary-from equity inv.)	€ 424,255	1.9%	€ 268,009	1.4%	€ 214,260	1.2%
Economic value distributed	€ 22,516,056	100.0%	€ 19,403,417	100.0%	€ 18,249,682	100.0%

Value of supplies by geographical area

VALUE OF SUPPLIES BY GEOGRAPHICAL AREA



205 Anti-corruption

205.1 OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION

TDT maintains its Corruption Prevention Management System active, applicable to the main activities of loading, unloading, transshipment, container, rolling stock and miscellaneous goods storage as well as the accessory and complementary activities of provision and filling/emptying.

TDT has conducted an assessment of exposure to the risk of corruption in accordance with ISO 37001 and has equipped itself with adequate protocols and control measures to limit the risk of committing corrupt acts.

205.2 COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES

The Policy for the Prevention of Corruption has been communicated to the Management Team and Terminal employees, as well as to its business partners.

The documents relating to the corporate certifications obtained, the integrated quality, safety and environmental policies and the anti-corruption policies, organisational models pursuant to Italian Legislative Decree 231/01, codes of ethics and previous Sustainability Reports can be consulted on the TDT website (www.tdt.it).

All TDT Managers have been trained in the methods of implementing the system and those responsible for sensitive processes have been trained in the controls and reporting methods envisaged.

TDT includes specific clauses in contracts with suppliers and business partners recalling compliance with TDT's anti-corruption principles and requiring them to read TDT's Code of Ethics and Anti-Corruption Policy.

205.3 CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN

In 2024, no cases of corruption related or attributable to the company were reported or ascertained, no legal actions were taken, nor are there any pending and concluded legal actions relating to anti-competitive behaviour, violations of anti-trust and monopoly legislation, in which the company has been identified as a participant.

206 Anti-competitive behaviour

206.1 LEGAL ACTIONS FOR ANTI-COMPETITIVE BEHAVIOUR, ANTITRUST AND MONOPOLY PRACTICES

In 2024, TDT was not involved in any legal actions initiated under any national or international regulations aimed at regulating anti-competitive behaviour, antitrust or monopolistic practices.







For TDT, protecting the environment means conducting activities from a preventive and precautionary perspective, by reducing and eliminating, where possible, the causes of negative impacts related to the performance of operations, both directly and indirectly.

This approach, in addition to being expressed and described in the Environmental Analysis updated annually, is implemented in compliance with current environmental legislation and with the planning and monitoring of actions aimed at reducing energy consumption, water consumption, preventing pollution while respecting the environment surrounding the Terminal and containing emissions and waste production.

There are no constraints deriving from the Kyoto Protocol or from emission trading schemes at the Terminal.

302 Energy

Energy consumption within TDT is mainly related to the following activities:

- Loading/unloading from/to ship with quay CRANE;
- Container handling in the yard with operational vehicles;
- Temperature-controlled container connection (reefer);
- Yard lighting;
- Office activities;
- Auxiliary activities.

In addition to TDT's energy consumption, there are also those related to the transfer of containers in the yards and areas within the Terminal (shuttle service), which is outsourced and an integral part of the operational cycle.

Energy consumption data is collected monthly and monitored in the same way as data on other environmental aspects.

The energy vectors collected concern the consumption of fuels (diesel) and electricity (from the grid). Each energy vector is converted into GJ using an appropriate conversion factor.

302.1 ENERGY CONSUMPTION WITHIN THE ORGANISATION

A comparison of consumption in GJ in the year 2024 with previous years shows a substantial alignment of overall consumption with the previous year. This trend is related to the increase in electricity consumption due to higher consumption for the storage of refrigerated containers.

Energy consumption trend

ENERGY CONSUMPTION [UM]	ANNUAL CONSUMPTION			ANNUAL COMPARISON			COMPOSITION		
	2022	2023	2024	22/21	23/22	24/23	2022	2023	2024
Total Energy Consumption in TDT [GJ]	76,363	64,482	65,672	5%	-15%	2%	-	-	-
Of which:									
Diesel consumption [GJ]	50,652	44,134	44,437	4%	-13%	1%	66%	68%	68%
Electricity consumption [GJ]	25,711	20,349	21,235	7%	-21%	3%	34%	32%	32%

Diesel consumption trend

DIESEL CONSUMPTION	2022		2023		2024	
	[GJ]	[LITRES]	[GJ]	[LITRES]	[GJ]	[LITRES]
Diesel consumption Totals in TDT	50,652	1,420,392	44,134	1,237,604	44,437	1,246,095

DIESEL CONSUMPTION	22/21		23/22		24/23	
	[GJ]	[LITRES]	[GJ]	[LITRES]	[GJ]	[LITRES]
Diesel consumption Totals in TDT	4%	4%	-13%	-13%	1%	1%

DIESEL CONSUMPTION	22/21		23/21		24/21	
	[GJ]	[MWH]	[GJ]	[MWH]	[GJ]	[MWH]
Diesel consumption Totals in TDT	-4%	-4%	-9%	-9%	-8%	-8%

Electricity consumption trend

ELECTRICITY CONSUMPTION	2022		2023		2024	
	[GJ]	[MWH]	[GJ]	[MWH]	[GJ]	[MWH]
Electricity consumption Totals	25,711	7,142	20,349	5,652	21,235	5,899

ELECTRICITY CONSUMPTION	22/21		23/22		24/23	
	[GJ]	[MWH]	[GJ]	[MWH]	[GJ]	[MWH]
Electricity consumption Totals	7%	7%	-21%	-21%	4%	4%

ELECTRICITY CONSUMPTION	22/21		23/21		24/21	
	[GJ]	[MWH]	[GJ]	[MWH]	[GJ]	[MWH]
Electricity consumption Totals	-7%	-7%	-15%	-15%	-12%	-12%

302.3 ENERGY INTENSITY

The energy intensity indicator shows an increasing trend in the three-year period; this trend is mainly due to the contraction of units handled in the Terminal, which decreased more than proportionally compared to the decrease in consumption.

Energy intensity

ENERGY INTENSITY	Unit	2022	2023	2024	22/21	23/22	24/23	22/21	23/21	24/21
	GJ/units	0.274	0.283	0.296	7%	3%	5%	7%	10%	15%
Total Energy Consumption in TDT	GJ ¹	76,363	64,482	65,672	5%	-16%	2%	5%	-11%	-16%
Containers handled	Unit	278,340	228,118	222,218	-2%	-18%	-3%	-2%	-20%	-18%

1 - 1kWh = 3.6 GJ, 1l diesel = 35.65 GJ. Source of conversion factors used: "National Energy Balance 2007".

302.4 REDUCTION OF ENERGY CONSUMPTION

The analysis of diesel consumption for the year 2024 compared to the previous year shows a general decrease in diesel consumption for the organisation, with significant peaks for FL >6t (-89%), trucks (-27%), non-TDT external vehicles (-32%) and washing (-20%). The supplier's consumption did not follow this trend, also due to a greater outsourcing of the service in 2024 than in 2023 (+6.87%).

Diesel consumption analysis

DIESEL CONSUMPTION [LITRES]		ANNUAL CONSUMPTION			ANNUAL COMPARISON			COMPOSITION		
Consumption Type	Consumption Points	2022	2023	2024	22/21	23/22	24/23	2022	2023	2024
Operational	Reach Stacker	545,653	422,703	419,272	6%	-23%	-1%	38.4%	34.2%	33.6%
Operational	RTG	400,630	412,287	386,830	15%	3%	-6%	28.2%	33.3%	31.0%
Operational	Truck	49,023	65,128	47,386	6%	33%	-27%	3.5%	5.3%	3.8%
Operational	EXTERNAL MEANS (Non TDT)	4,007	2,846	1,949	-30%	-29%	-32%	0.3%	0.2%	0.2%
Heating	Changing rooms	8,254	7,532	7,213	5%	-9%	-4%	0.6%	0.6%	0.6%
Non-operational	Internal Cars	9,457	6,437	6,765	-4%	-32%	5%	0.7%	0.5%	0.5%
Non-operational	Refuelling Van	400	150	137	433%	-63%	-9%	0.0%	0.0%	0.0%
Non-operational	Fork Lift Port.>6t	2,700	3,294	357	-40%	22%	-89%	0.2%	0.3%	0.0%
Non-operational	Fork Lift Port.<6t	1,170	699	4,833	-7%	-40%	591%	0.1%	0.1%	0.4%
Non-operational	Gen Sets	1,514	429	518	-72%	-72%	21%	0.1%	0.0%	0.0%
Non-operational	TDT washing	206	373	299	-12%	81%	-20%	0.0%	0.0%	0.0%
Non-operational	EWP (elevating work platforms)	478	636	816	-48%	33%	28%	0.0%	0.1%	0.1%
Total TDT	TDT consumption	1,023,492	922,514	876,375	8%	-10%	-5%	72.1%	74.5%	70.3%
Operational	Shuttle (Non TDT)	396,900	315,090	369,720	-4%	-21%	17%	27.9%	25.5%	29.7%
Total TDT site	Total Consumption	1,420,392	1,237,604	1,246,095	4%	-13%	1%	100.0%	100.0%	100.0%

An analysis of the total electricity consumption for the year 2024 compared to the previous year shows an increase in consumption (+4%), which is mainly related to consumption for reefer container connections (+13%), electric vehicle recharging (+100%) and light tower use (+4%). Other electricity consumption still shows a reduction.

Electricity consumption analysis

ELECTRICITY CONSUMPTION [MWh]	ANNUAL CONSUMPTION			ANNUAL COMPARISON			COMPOSITION		
Consumption Points	2022	2023	2024	22/21	23/22	24/23	2022	2023	2024
Light Towers	632	594	618	-10%	-6%	4%	8.9%	10.5%	10.5%
Gateway Area	116	95	87	-15%	-18%	-9%	1.6%	1.7%	1.5%
Reefer Container	3,898	2,706	3,045	-17%	-31%	13%	54.6%	47.7%	51.9%
Offices	414	357	331	-21%	-14%	-7%	5.8%	6.3%	5.6%
Electric Cars	2	3	5	30%	45%	100%	0.0%	0.0%	0.1%
GC and Maintenance Area	93	91	86	-1%	-2%	-6%	1.3%	1.6%	1.5%
Quay Crane Use	1,951	1,774	1,696	-13%	-8%	-4%	27.3%	31.6%	28.9%
Medium-Voltage Consumption	7,105	5,619	5,868	-15%	-21%	4%	99.5%	99.4%	100.0%
Low-Voltage Consumption	37	33	30	9%	-3%	-8%	0.5%	0.6%	0.0%
Total Consumption	7,142	5,652	5,899	-15%	-21%	4%	100%	100%	100.0%

The reductions in energy consumption calculated on an annual basis are linked to the specific initiatives implemented by TDT for energy conservation and efficiency have led to organisational or technological changes that allow a process or task to be carried out using a smaller amount of energy.

Energy conservation and efficiency initiatives

INITIATIVE	REDUCTION ACHIEVED (SOURCE CONCERNED)	24/23
Purchase of two new port tractors for operational use	Reduction of diesel consumption	-27%
Reorganisation of container storage operations with optimised handling and use of vehicles	Decreased diesel consumption (RS, RTG, Truck, external vehicles)	-5%
Installation of LED lamps (consequences of the completion of previous investments)	Decrease in electricity consumption (Offices)	-7%
Decommissioning and dismantling of buildings for better use of areas	Decrease in electricity consumption (Gateway area)	-9%
Restoration of GC areas/storage for better use of the area (consequence of the completion of previous investments)	Decrease in electricity consumption (General Cargo area)	-6%

302.5 REDUCTION IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES

Energy intensities, broken down by type of energy used, highlight the different uses of energy related to the activities carried out to provide services. The intensity of diesel indicates the amount of litres of diesel used to move a container, while the intensity of electricity shows the amount of kilowatt hours consumed for a single container.

For the year 2024, the data show two similar trends.

Diesel intensity

DIESEL INTENSITY [LITRES]	2022	2023	2024	22/21	23/22	24/23
TDT Diesel/Units	3.68	4.04	3.94	10%	10%	-2%

Electric energy intensity

ELECTRICITY INTENSITY [KWH]	2022	2023	2024	22/21	23/22	24/23
EN.EL.-Reefer/Units	11.66	12.92	12.84	-3%	11%	-1%

303 Water and effluent

303.1 INTERACTIONS WITH WATER AS A SHARED RESOURCE

The water supply is guaranteed by the port aqueduct whose operator carries out ordinary and extraordinary maintenance of the water supply and distribution systems in the port area. The water extracted is consumed for civil uses, such as toilets and washing operating vehicles.

The water discharges originating from the activities carried out inside the TDT Terminal are domestic (toilets) and industrial (vehicle washing). The wastewater, previously treated within the 5 purification plants, is released into the sea (4 purifiers) and into the ground (1 purifier).

The drains do not have a flow meter, so it is assumed that all the water extracted is subsequently discharged.

303.2 MANAGEMENT OF WATER DISCHARGE-RELATED IMPACTS

The company is required to ensure the correct functioning of the wastewater discharge systems and to communicate any changes; to this end, it uses a specific service for the ordinary and extraordinary maintenance of the purification systems and analysis, on a quarterly basis, of the discharges. Any malfunctions and deviations from the quality objectives required by law are managed with extraordinary maintenance, external emptying, washing and adjustments.

Spills and leaks of polluting substances on the ground are managed and rationed promptly, in order to prevent their flow into the sea.

All authorisations have been included in the Single Environmental Authorisation (AUA) with a 15-year expiry and updated in 2020 for the replacement of a biological purification plant.

303.3 WATER EXTRACTION

303.4 WATER DISCHARGE

Third Party Water extraction and Water Discharge

THIRD PARTY WATER EXTRACTION IN MEGALITRES	2022	2023	2024	WATER DISCHARGE IN MEGALITRES	2022	2023	2024
Extraction Points				Discharge by destination			
Office area and changing rooms	6.35	3.54	13.67				
Gate and office reception area	0.30	0.32	0.29				
G.C./washing area (industrial)	0.66	0.66	0.61				
Pif area	0.59	2.73	0.26	Discharge into the sea	7.90	7.25	14.82
TERFER area	0.03	0.17	0.04	Discharge to the ground	0.03	0.17	0.04
Total water extraction	7.93	7.42	14.86	Total water discharges	7.93	7.42	14.86

303.5 WATER CONSUMPTION

Water consumption is monitored through meter readings and compared with the consumption shown on the invoice.

Sometimes consumption can be influenced by hidden leaks, due to broken pipes or meters which are then detected and resolved, or by supply services to the Port System Authority or to suppliers who need water supply, with a consequent increase in average statistical consumption data.

304 Biodiversity

304.1 OPERATIONAL SITES OWNED, LEASED AND MANAGED IN, OR ADJACENT TO, PROTECTED AREAS AND HIGH BIODIVERSITY VALUE AREAS OUTSIDE PROTECTED AREAS

The area occupied by the Terminal is located in a Site of Regional Interest (SIR) (since 2014, first Site of National Interest in Livorno) in the vast industrial and port area of Livorno north, within the territorial system called "Port Territorial System and Activities, Port subsystem No. 5A" as indicated in articles 23 and 24 of the "Technical standards for the implementation of the Urban Planning Regulations" approved by CC Resolution No. 19 of 25/01/1999, and is bordered to the north by the railway, to the east by the Darsena Toscana, to the south/south-east by the industrial canal, and to the west by the railway terminal.

Consultation of the current General Regulatory Plan (P.R.G.) of the Municipality of Livorno shows that the area where the Terminal falls is classified as area B and D pursuant to Italian Ministerial Decree 1444 of 2/4/1968.

In these areas it is possible to build buildings for port, production and storage activities, parking lots, and it is also allowed to build ecological pole plants such as: treatment of solid and liquid waste, incineration plants, waste-to-energy plants.

There are no protected areas and/or areas of high biodiversity value nearby.

305 Emissions

The information relating to emissions concerns the activities under the direct control of TDT; these activities are the same as those identified with reference to energy consumption.

305.1 DIRECT (SCOPE 1) GHG EMISSIONS

GHG emissions are in line with the previous year. Direct emissions include those related to the internal container transfer service.

Scope 1									
SCOPE 1 INTERNAL ENERGY SOURCES				ANNUAL COMPARISON			COMPOSITION		
	2022	2023	2024	22/21	23/22	24/23	2022	2023	2024
Emissions tCO ₂ eq from Diesel	3,741	3,260	3,282	4%	-13%	1%	-	-	-
Of which:									
Carbon dioxide - CO ₂	3,724	3,245	3,267	4%	-13%	1%	99.5%	99.5%	99.5%
Nitrous oxide - N ₂ O	16	14	14	7%	-13%	0%	0.4%	0.4%	0.4%
Methane - CH ₄	1	1	1	0%	0%	17%	0.0%	0.0%	0.0%

305.2 ENERGY INDIRECT (SCOPE 2) GHG EMISSIONS

Scope 2									
SCOPE 2 - EXTERNAL ENERGY SOURCES				ANNUAL COMPARISON			COMPOSITION		
	2022	2023	2024	22/21	23/22	24/23	2022	2023	2024
Emissions tCO ₂ eq from Electricity	1,963	1,559	1,621	7%	-21%	4%	-	-	-
Of which:									
Carbon dioxide - CO ₂	1,948	1,547	1,609	7%	-21%	4%	99.2%	99.2%	99.3%
Methane - CH ₄	5	4	4	0%	-20%	-8%	0.3%	0.3%	0.2%
Nitrous oxide - N ₂ O	10	8	8	11%	-20%	4%	0.5%	0.5%	0.5%

305.3 OTHER INDIRECT (SCOPE 3) GHG EMISSIONS

Currently, the quantities of GHG emitted within the TDT supply chain are not available; moreover, the activities upstream and downstream of the TDT production area are not included among the values to be typically reported by the port terminals.

Emissions from employee commuting by means of their own vehicle (Scope 3) are estimated on the basis of the length of the journey to work.

Scope 3						
SCOPE 3 COMMUTING	2022	2023	2024	ANNUAL COMPARISON		
				22/21	23/22	24/23
Emissions [tCO ₂ eq]	291	279	276	4%	-4%	-1%
Employees	269	262	260			
Average route	13.5	13.5	13.5			
Shifts worked	64,033	61,321	60,723			

305.4 GHG EMISSIONS INTENSITY

The slightly increasing trend in emissions intensity is mainly due to the reduction in units handled in the Terminal, which decreased more than proportionally compared to the emissions themselves.

Emission intensity							
EMISSION INTENSITY	U.M.	2022	2023	2024	ANNUAL COMPARISON		
					22/21	23/22	24/23
Emission intensity [tCO ₂ eq]	[tCO ₂ eq]	0.020	0.021	0.022	7%	3%	4%
Scope1+Scope2 Emissions	[tCO ₂ eq]	5,704	4,819	4,903	5%	-16%	2%
Containers handled	Unit	278,340	228,118	222,218	-2%	-18%	-3%

305.5 REDUCTION OF GHG EMISSIONS

The initiatives taken to reduce energy consumption, already described in section 302-4, have also had a positive impact on GHG emissions, enabling the reduction of emissions by 13% for diesel combustion emission sources and by 21% for electricity sources.

During the year, TDT was also a partner of choice for customer initiatives aimed at reducing greenhouse gas emissions.

- New intermodal connection between the Toscana Centrale Interport and the port of Livorno. The main customer of this new container train is Acqua Panna, which will use it to transport mineral water from the production site in Scarperia, in the province of Florence, to the port of Livorno, via Prato, from which the cargo will then be sent to the United States and other international markets. The long-term goal is to increase the full service to three full trains per week, corresponding to about 75 containers, with a 36% reduction in CO₂ emissions;
- Arrival at the quayside of the M/V Cma Cgm Fort Bourbon, a ship operating on the Medcaribe service, and the first LNG-fuelled vessel to sail from the Darsena Toscana Terminal. The company Cma Cgm is at the forefront of carbon footprint reduction, and already employs numerous carbon-neutral ships; this commitment will continue on new builds. Built by the Samsung Heavy Industry Korean shipyards in Gejoe, the ship has a capacity of 7007 TEU with the possibility of connecting 1385 reefer containers; it is 268 metres in length by 43 metres in width, and as far

as environmental sustainability is concerned, the declared data concerning emissions are: 6.16 g CO₂/tonne-mile, compared to IMO Tier III NO_x compliance, SO_x compliance.

305.6 EMISSIONS OF OZONE-DEPLETING SUBSTANCES (ODS)

In TDT, the production, import or export of substances that deplete the ozone layer is not carried out, but air conditioners are used for heating and cooling buildings. The use of such systems implies the presence of ozone-depleting substances (ODS). The systems are monitored in compliance with the legislative provisions and the maintenance plan defined by TDT in agreement with the supplier envisages further checks beyond what is required by law.

When gas is topped up, TDT determines the quantities of CO₂ dispersed into the atmosphere.

Location and type of air conditioners and gas

LOCATION	QUANTITY AIR CONDITIONERS	QUANTITY BY TYPE OF GAS	GAS TYPE	Q.TY GAS [Kg]	[TCO ₂ EQ]
CRANE	47			67.38	120.3705
		19	R32	15.98	13.0473
		28	R410A	51.4	107.3232
BUILDINGS	122			118.79	194.3677
		42	R32	38.88	31.3308
		80	R410A	79.91	163.0369
PIF	2			8	31.3760
		2	R404A	8	31.3760
GATE	5			20	28.6000
		5	R134A	20	28.6000
TDT GATE	4			22	31.4600
		4	R134A	22	31.4600
Total	180			236.17	406.1742



305.7 NITROGEN OXIDES (NOX), SULPHUR OXIDES (SOX) AND OTHER SIGNIFICANT AIR EMISSIONS

Over time, various environmental surveys have been conducted aimed at characterising air quality in terms of concentration of dust, volatile organic substances and combustion fumes; this is carried out with the objective of evaluating workers' exposure to the various chemical compounds resulting from emissions produced by combustion exhausts from operating vehicles, from the wear of the road surface and tires, from fumes from ships on the dock and from reclaimed landfill basins.

The analyses carried out and repeated yearly from 2004 to 2021, including those related to the preparation of the second landfill basin, which involved the transport of sludge to this basin, did not reveal the exceeding of any gas and breathable dust limits.

The deviation from the TLV (Threshold Limit Value)⁹ of the various substances being assessed was verified and, as regards gases, a verification carried out to show how many times the value equal to one tenth of the TLV was exceeded during sampling. For dust, the results obtained were compared with the reference values (the TLV as regards breathable dust).

The survey found concentration values lower than the limits taken as a reference for all the parameters observed.

The emissions of substances for diesel combustion and use of electricity are reported below.

SCOPE 1							ANNUAL COMPARISON		
GAS EMISSIONS FROM DIESEL COMBUSTION	[UM]	FdC STEC.	2021 [KG]	2022 [KG]	2023 [KG]	2024 [KG]	22/21	23/22	24/23
CO	g/kg fuel	7.58	8,617	8,990	7,833	7,887	4%	-13%	1%
TSP	g/kg fuel	0.94	1,069	1,115	971	978	4%	-13%	1%
CO ₂	kg/kg fuel	3.14	3,569,549	3,724,126	3,244,874	3,267,136	4%	-13%	1%
Benzo(a)pyrene	g/kg fuel	0.00	0	0	0	0	0%	0%	0%
NMVOC	g/kg fuel	1.92	2,183	2,277	1,984	1,998	4%	-13%	1%
NH ₃	g/kg fuel	0.01	15	15	13	14	4%	-13%	1%
Pb	g/kg fuel	0.00	0	0	0	0	0%	0%	%
N ₂ O	g/kg fuel	0.05	58	60	53	53	4%	-13%	1%
Indeno(1,2,3-cd)pyrene	g/kg fuel	0.00	0	0	0	0	0%	0%	0%
Benzo(b)fluoranthene	g/kg fuel	0.00	0	0	0	0	0%	0%	0%
Benzo(k)fluoranthene	g/kg fuel	0.00	0	0	0	0	0%	0%	0%
NO _x	g/kg fuel	33.37	37,935	39,578	34,485	34,721	4%	-13%	1%
CH ₄	g/kg fuel	0.04	45	47	41	42	4%	-13%	1%
SCOPE 2							ANNUAL COMPARISON		
GAS EMISSIONS FROM DIESEL COMBUSTION	[UM]	FdC STEC.	2021 [tCO ₂ eq]	2022 [tCO ₂ eq]	2023 [tCO ₂ eq]	2024 [tCO ₂ eq]	22/21	23/22	24/23
Carbon dioxide - CO ₂	tCO ₂ EQ/kWh	272.79	1,821	1,948	1,547	1,609	7%	-21%	4%
Methane - CH ₄	tCO ₂ EQ/kWh	0.62	5	5	4	4	0%	-20%	-8%
Nitrous oxide - N ₂ O	tCO ₂ EQ/kWh	1.41	9	10	8	8	11%	-20%	4%

9 - These refer to ambient concentrations of airborne chemicals and indicate concentrations below which it is believed that most workers may be exposed repeatedly day after day, for their entire career, without negative health effects.



Other emissions

Noise emissions

Noise emissions from the Terminal must comply with the limits in the acoustic zoning plan of the territory, drawn up by the Municipality of Livorno on the basis of Italian Law 447/95 and Regional Law 89/98, "Class VI Exclusively industrial areas". In fact, there are no sensitive and/or vulnerable settlements in the immediate vicinity of TDT activities: there are only and exclusively other industrial structures attributable to the typical activities of the port sector. The nearest sensitive receptors are located several hundred meters from the settlement area and all see the interposition of other activities that are also part of the port area. All neighbouring areas are classified in Class V or Class VI.

Values of the maximum limits of the equivalent sound level (Leq A) relating to the classes of intended use of the reference territory

PRIME MINISTERIAL DECREE 15/11/1997	REFERENCE TIMES	
LAND USE CLASSES	DAYTIME	NIGHTTIME
I Specially protected areas	50	40
II Mainly residential areas	55	45
III Mixed-type areas (yellow)	60	50
IV Areas of intense human activity (orange)	65	55
V Mainly industrial areas (red)	70	60
VI Exclusively industrial areas (blue)	70	70

The assessments relating to the noise impact produced by the activities that take place inside the Terminal have been subject to assessment in accordance with the provisions of Italian Law 447/95, in relation to the acoustic classification of the territory. The last assessment carried out by the Port Authority in the entire state-owned area was in 2018, while the Terminal's was carried out in 2019, ten years from the previous one, as some noise sources had changed: the survey does not detect acoustic emissions, input and differential values (in the classes where applicable) above the limit levels.

On the other hand, assessments relating to the exposure of workers to noise are carried out at least every four years or following changes in activities.



Electromagnetic Radiation Emissions

ERD are linked to the presence of electrical systems, transmitting antennas, racks (servers), mobile phones and two-way radios for communication between people employed in the operational offices when they are working in the yard and between the internal planning and operational management offices.

In TDT, the last technical assessment carried out in 2021 addressed the issue of workers' exposure to electromagnetic fields. There were 81 measurement points and concerned: Terminal structures (Electrical Substations, Reefer Towers, Access Point Towers, offices, etc.), outdoor areas, equipment and operational means in use.

From the reconnaissance and measurements carried out, with the active sources analysed, it is not clear that the action limits provided for by the legislation have been exceeded for workers.



Light Emissions

The sources of light emission, designed to ensure safe working conditions at night, are represented by:

- 33 LED light towers (TF);
- LED lighting of cranes and RTG.

The intensity has been adjusted according to the minimum ground lighting requirements in port areas provided for by the various UNI standards (e.g. UNI EN 12464), while the orientation has remained downwards, with a protective structure above each row of headlights, in order to avoid dispersion and therefore light pollution. During routine maintenance, the correct orientation of the lamps is checked. The savings have been quantified as 47% of past consumption.

Ionising radiation

There are no sources of ionising radiation, except for those emitted by the X-ray machines of the scanner (fixed and mobile) of the Customs Agencies during the scanning of the containers, which is in any case carried out without any personnel within the area, and through the application of specific procedures.

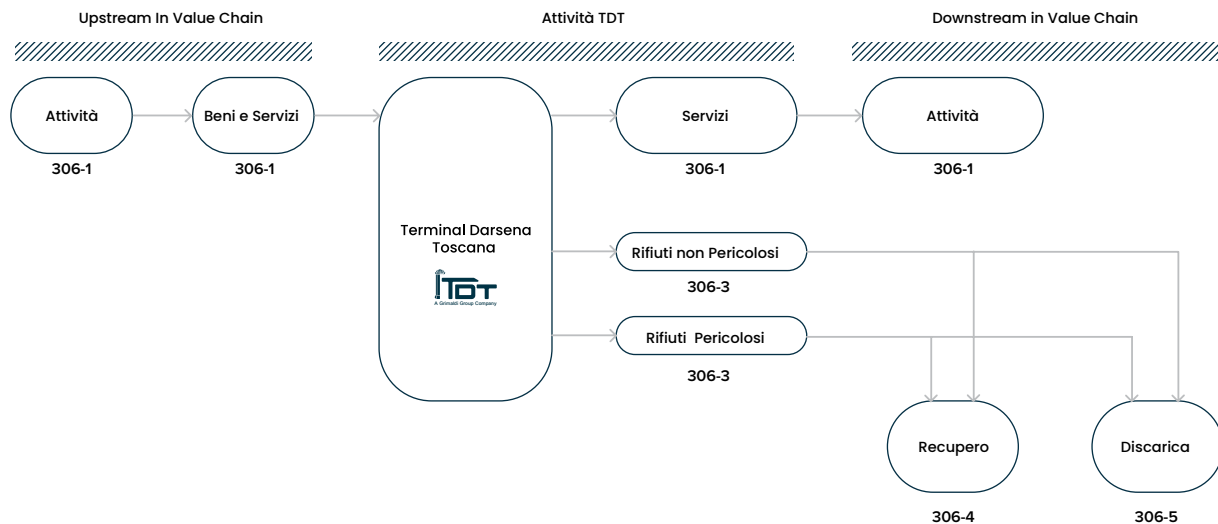
Odorous emissions

The activity carried out indoors does not have significant olfactory impacts, as they are limited to emissions from motor vehicles and handling vehicles. More significant odorous emissions may instead be caused by the simultaneous presence of ships on the quay and railway locomotives.



306 Waste

306.1 WASTE GENERATION AND SIGNIFICANT WASTE-RELATED IMPACTS



TDT purchases goods and services both for the provision of its service of loading and unloading containers, goods and RORO, and for carrying out the necessary processes to support this activity. Waste generation is closely linked to support activities and, in particular, to the maintenance of operating equipment and buildings.

In addition to ordinary maintenance activities, TDT may occasionally dispose of equipment, containers used for archives/storage or abandoned goods and, in these circumstances, other types of waste are generated.

Waste generated in TDT is stored in a designated area and managed according to current legislation and the provisions of the internal waste management procedure.

Random leakage from containers and spills from operating vehicles can generate waste and are managed according to specific operating instructions that include confining, cleaning and sometimes the reclamation of the area with the subsequent disposal of the resulting material.

Waste generated by contracted and supplier activities is their property and subject to their management, unless otherwise established in the contractual agreements. Staff and suppliers have been informed about the correct management of waste from their activities through periodic information, training activities, compliance management meetings and specific contractual clauses.

All outgoing waste is entrusted to specialised transporters with authorisation for transport to accredited facilities for recovery or disposal in landfills.

306.2 MANAGEMENT OF SIGNIFICANT WASTE-RELATED IMPACTS

TDT is committed to the management of its waste, paying particular attention to the possibility of sending the waste produced for recovery, rather than to landfill. To this end, an in-house waste area has been set up and the following measures implemented: monitoring use of the waste disposal area, reprimands for improper deliveries, training and information for internal and external staff, inclusion of environmental clauses in service-provider and tender contracts, and recovery of products, components and materials from waste through preparation for reuse and recycling.

The management of waste leaving TDT is entrusted to third parties (intermediaries and waste

collection centres) which take care of the collection, transport, recovery and disposal of waste. TDT actively cooperates with these third parties to manage operations appropriately, both with respect to the type of waste to be treated (hazardous or non-hazardous) and to its destination.

All waste is then entrusted to transporters with appropriate authorisation and is managed by recovery or disposal at accredited landfills.

The data collection and monitoring processes refer exclusively to the TDT site.

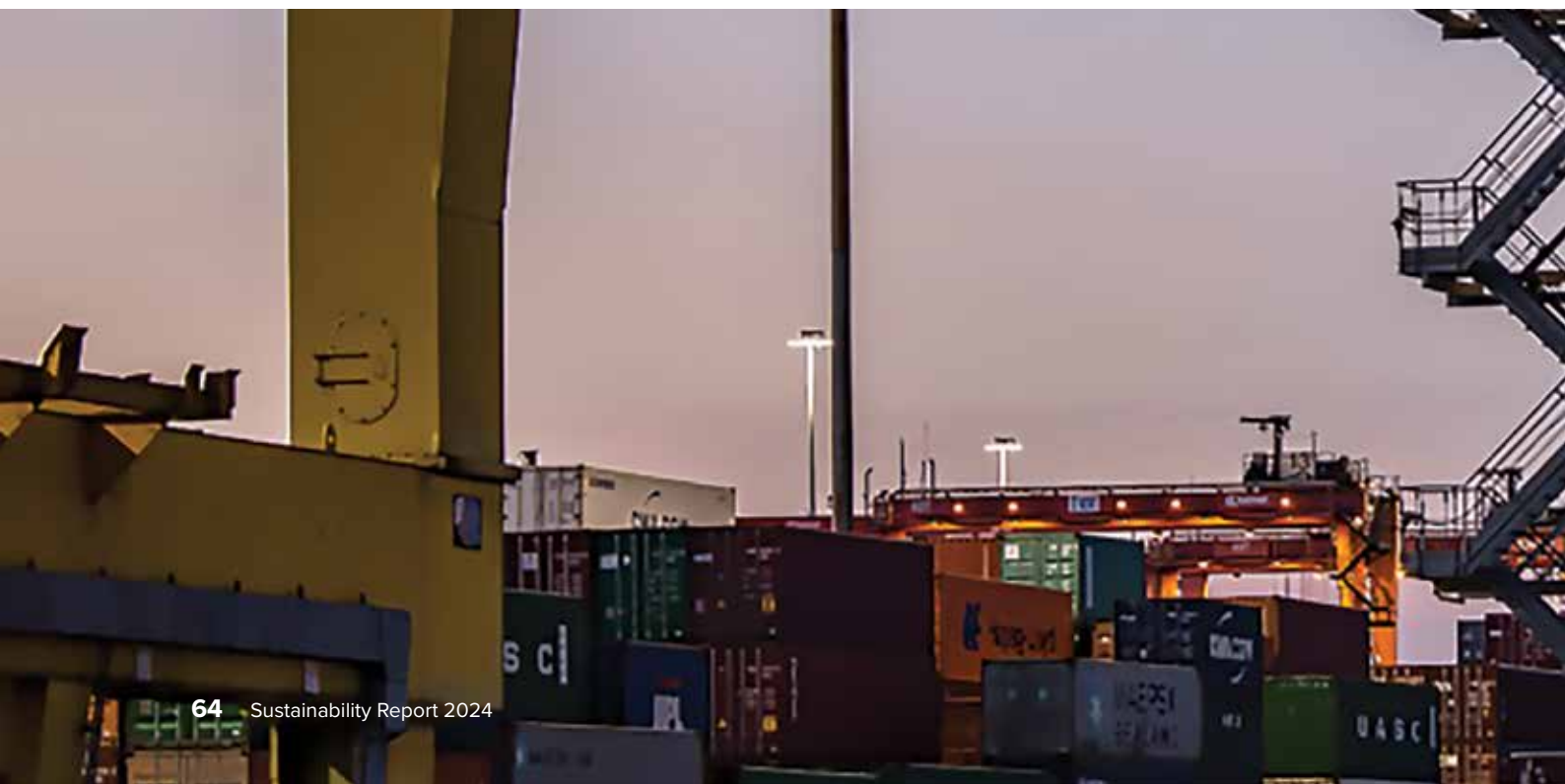
306.3 WASTE GENERATED

In the three-year period 2022 - 2024, the following waste was produced, classified by EWC.

Waste produced					
EWC (European waste catalogue)	DESCRIPTION/TYPE OF WASTE	P/NP	2022	2023	2024
02 03 04	Waste unsuitable for consumption or processing	NP	-	-	-
07 02 13	Plastic waste	NP	-	-	-
07 06 11*	Sludge produced by on-site effluent treatment, containing hazardous substances	P	280	-	220
07 06 12	Sludge removed from on-site effluent treatment	NP	5,900	26,140	-
08 01 11*	Waste paints and varnishes	P	342	43	-
08 03 18	Used printing toners, other than those referred to in heading 08 03 17	NP	-	30	18
13 02 08*	Other Engine, Gear & Lubrication Oils	P	15,400	13,000	10,600
13 07 03*	Other fuels (including blends)	P	-	-	65
15 01 01	Paper and cardboard packaging	NP	4,510	5,988	1,426
15 01 02	Plastic packaging	NP	-	-	47
15 01 03	Wooden packaging	NP	8,120	-	-
15 01 06	Mixed packaging	NP	7,130	14,300	15,200
15 01 10*	Packaging containing residues of hazardous substances or contaminated with such substances	P	196	1,256	1,027
15 02 02*	sanitary pads, filter materials, rags and protective clothing, contaminated with hazardous substances	P	3,010	3,415	1,148
16 01 03	End-of-life tires	NP	-	-	-
16 01 04*	End-of-life vehicles	P	-	4,000	-
16 01 07*	Oil filters	P	978	325	852
16 01 20	glass	NP	400	-	91
16 01 21*	Hazardous components other than those referred to in headings 16 01 07 to 16 01 11, 16 01 13 and 16 01 14	P	408	520	155
16 02 11*	end-of-life equipment, containing chlorofluorocarbons, HCFCs, HFCs	P	100	-	204
16 02 13*	end-of-life equipment containing hazardous components other than 16 02 09	P	-	70	36
16 02 14	end-of-life equipment other than that referred to in items 16 02 09 -16 02 13	NP	1,136	1,052	615
16 02 15*	Hazardous components removed from end-of-life equipment	P	-	-	-
16 02 16	Components removed from other end-of-life equipment referred to in 16 02 15 (toner)	NP	-	1,071	343
16 05 04	Gases in pressure vessels (including halons) containing hazardous substances	NP	-	-	-
16 06 01*	Lead-acid batteries	P	2,137	1,740	1,451
16 06 02*	Nickel-cadmium batteries	P	3	-	-
16 06 04	Alkaline batteries	NP	-	-	9

16 06 05	Other batteries and accumulators	NP	14	-	-
16 10 01*	Aqueous liquid waste, containing hazardous substances	P	-	-	-
17 01 01	Cement	NP	-	43,120	240
17 01 07	Mixtures of cement, bricks, tiles and ceramics, other than those mentioned in 17 01 06	NP	-	-	320
17 02 01	Wood	NP	4,460	10,540	14,020
17 02 02	glass	NP	648	32	208
17 02 03	Plastic	NP	2,687	2,334	3,466
17 04 05	Iron and steel	NP	23,270	99,270	144,150
17 04 11	Cables, other than those referred to in heading 17 04 10	NP	-	-	311
17 06 03*	Other insulating materials containing or consisting of hazardous substances	P	40	1,086	134
17 08 02	Gypsum-based building materials other than those referred to in heading 17 08 01	NP	80	1,160	2,960
17 09 03*	Other construction and demolition wastes (including mixed wastes) containing hazardous substances	P	-	-	-
17 09 04	Mixed waste from construction and demolition activities, other than that referred to in items 17 09 01, 17 09 02 and 17 09 03	NP	6,120	-	-
19 08 10	Grease and oil mixtures produced by oil/water separation, other than those mentioned in 19 08 09	P	-	-	360
20 01 01	Paper and cardboard	NP	-	1,770	1,440
20 02 01	Biodegradable waste	NP	-	-	4,440
20 01 21*	Fluorescent tubes and other waste containing mercury	NP	118	76	105
20 01 36	electric and electronic end-of-life equipment other than that referred to in items 20 01 21, 20 01 23 and 20 01 35	NP	-	-	-
20 03 01	Unsorted municipal waste	NP	-	-	-
20 03 03	Residues from street cleaning (sweeping)	NP	56,130	17,530	54,100
20 03 04	Septic tank sludge	NP	-	-	-
Annual total (kg)			143,617	249,868	259,761
Equal to tonnes			143.617	249.868	259.761

For the year 2024, there was an increase in the production of waste compared to the previous year (+4%), which was mainly attributable to the activities of selling and disposing of obsolete equipment that is no longer in use, the refurbishment of areas of the Terminal and the related extraordinary cleaning activities of the Terminal's yards.

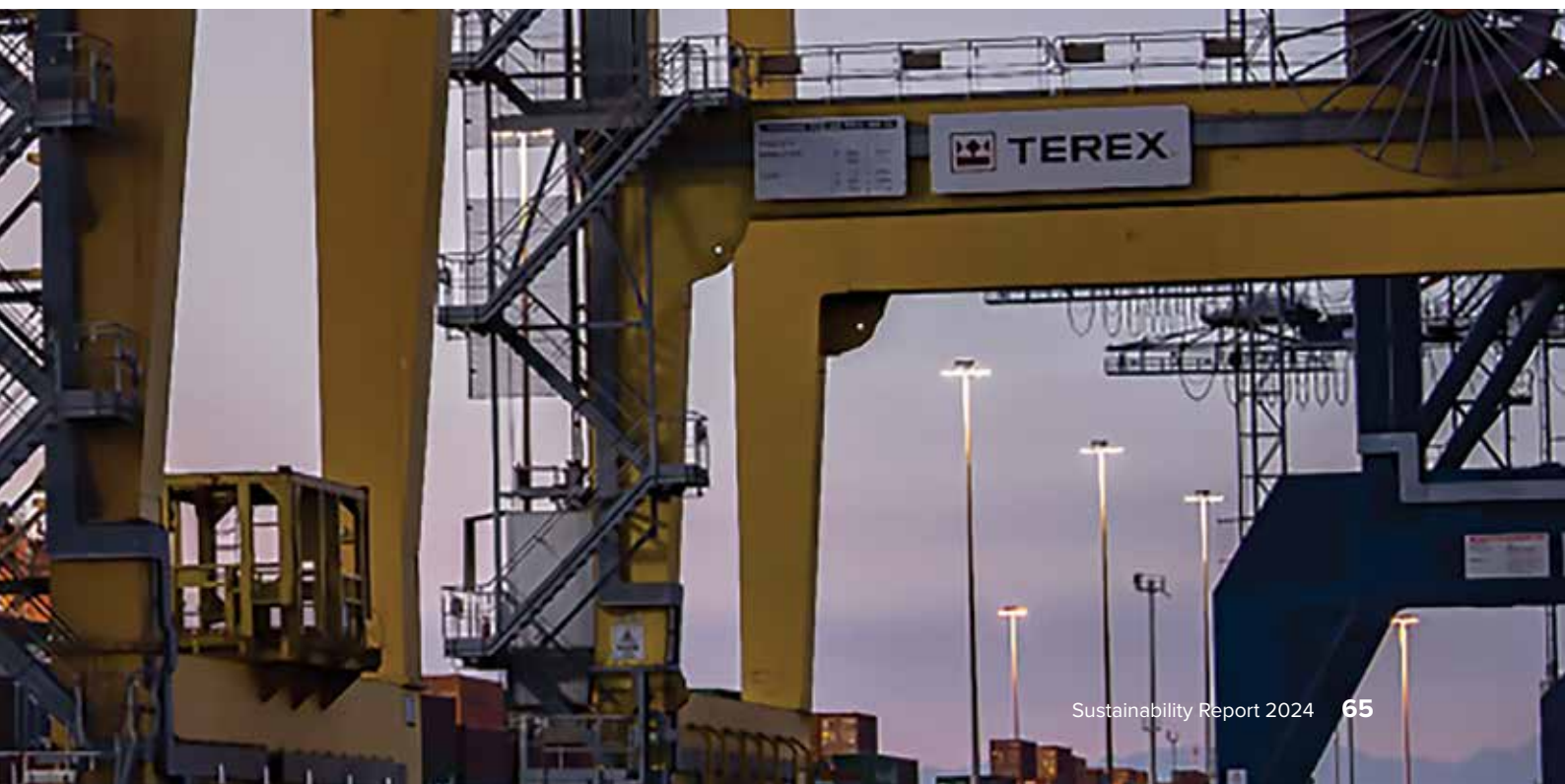


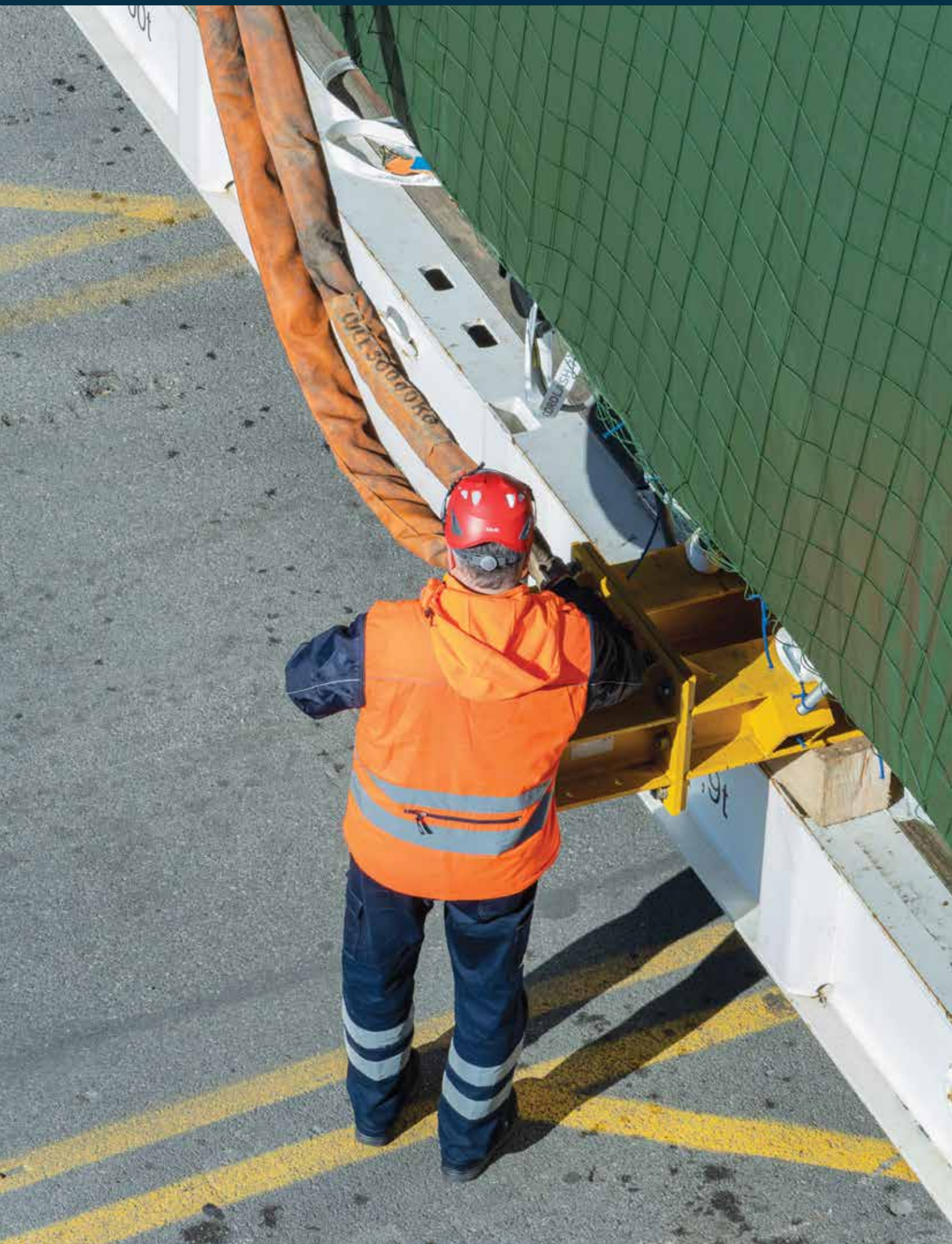
306.4 WASTE DIVERTED FROM DISPOSAL**306.5 WASTE DIRECTED TO DISPOSAL**

The details of recovery or disposal destinations are below.

	2022	2023	2024
WASTE NOT INTENDED FOR DISPOSAL IN [T] - RECOVERY	137.40	222.64	259.407
Hazardous waste	22.69	24.45	16.00
Preparation for reuse	-	-	-
Recycling	-	-	-
Other recovery operations	22.69	24.45	16.00
Non-hazardous waste	114.71	198.20	243.40
Preparation for reuse	-	-	-
Recycling	-	-	-
Other recovery operations	114.71	198.20	243.40

	2022	2023	2024
WASTE DESTINED FOR DISPOSAL IN [T]	6.22	27.23	0.354
Hazardous waste	0.32	1.09	0.354
Incineration (with energy recovery)	-	-	-
Incineration (without energy recovery)	-	-	-
Landfilling	-	-	-
Other disposal operations	0.32	1.09	0.354
Non-hazardous waste	5.90	26.14	-
Incineration (with energy recovery)	-	-	-
Incineration (without energy recovery)	-	-	-
Landfilling	-	-	-
Other disposal operations	5.90	26.14	-







With a view to social sustainability, TDT has always responsibly applied national and international regulations on employment contracts, health and safety, respect for human rights, avoiding any form of discrimination or violation of civil and political rights and ensuring its commitment to activities aimed at protecting these inalienable rights.

For this reason, and to ensure a transparent image of the company to all external (suppliers, public institutions, communities, etc.) and internal stakeholders, TDT has prepared and adopted the Code of Ethics, which is accompanied by the Anti-Corruption Policy issued at the time of implementation of the Anti-Corruption Management System in accordance with ISO 37001.

The Code of Ethics sets out the set of values and principles, commitments and ethical responsibilities that inspire Terminal Darsena Toscana in the conduct of business and corporate activities and which are required to be observed by all those who have relations with the company, in any capacity.

Compliance with the indications of the Code of Ethics, including those relating to respect for human rights, and the Anti-Corruption Policy are also reported in the contracts with suppliers, who are asked to read them and adopt appropriate conduct that complies with these specifications.

401 Employment

401.1 NEW HIRES AND TURNOVER

People actively contribute to the achievement of results and are an essential corporate resource; their growth is a fundamental and indispensable factor for the Terminal's development.

The search and selection process aims to ensure the skills necessary to offer a quality service to our customers: it is managed by the Human Resources Department, which also oversees relations with schools, universities and employment centres.

The search and selection procedures comply both with the principles of the Code of Ethics adopted in the company and with the National Collective Labour Agreements (CCNL Ports and CCNL Industrial Company Managers).

The company's policy guarantees equal opportunities for men and women in access to employment, without discrimination on the grounds of sex, ethnicity, nationality, language, religion, political opinions, sexual orientation, personal and social conditions in line with the applicable legislation and, in particular, with the Equal Opportunities Code (Italian Legislative Decree 198/06).

Staff are hired only on the basis of regular employment contracts, with no form of irregular employment being tolerated, either for Italian or foreign citizens. The candidate must be made aware of all the characteristics pertaining to the employment relationship.

The recognition of salary increases or other incentive tools and access to higher roles and positions (promotions) are based on meritocratic assessments, in compliance with the rules established by law and the collective bargaining agreement for the sector, and on assessments by Management.

Employee hires and departures

EMPLOYEE HIRES AND DEPARTURES	2022	2023	2024
Employees hired during the year	9	1	0
Men	9	1	0
Women	0	0	0
Under 30	3	1	0
Between 30 and 50	6	0	0
Over 50	0	0	0
Employees who left in the year	8	9	2
Men	6	8	1
Women	2	1	1
Under 30	0	1	0
Between 30 and 50	3	2	2
Over 50	5	6	0

In the last three years, the workforce of TDT has suffered a slight decline (about -3.35%), mainly due to exits for reaching retirement requirements (six out of 19 departures), to which are added six voluntary resignations, four voluntary terminations and three dismissals.

Permanent contracts are the currently used form of contract, accounting for 100% of the total number of contracts in force.

The overall turnover rate, i.e. the staff who entered and left during the period compared with the average workforce for the period, is shown below.

Overall turnover rate

OVERALL TURNOVER RATE	2022	2023	2024
Men	5.60%	3.40%	0.38%
Women	0.75%	0.38%	0.38%
Under 30	1.12%	0.75%	0.00%
Between 30 and 50	3.36%	0.75%	0.75%
Over 50	1.87%	2.26%	0.00%
Total	6.34%	3.77%	0.77%

Below is the Positive Turnover Rate, i.e. those entering during the period/staff at the beginning of the period.

Positive turnover rate

POSITIVE TURNOVER RATE	2022	2023	2024
Men	3.37%	0.37%	0.00%
Women	0.00%	0.00%	0.00%
Under 30	1.12%	0.37%	0.00%
Between 30 and 50	2.25%	0.00%	0.00%
Over 50	0.00%	0.00%	0.00%
Total	3.37%	0.37%	0.00%

Below is the negative turnover rate, i.e. those who left during the period/workforce at the beginning of the period.

Negative turnover rate			
NEGATIVE TURNOVER RATE	2022	2023	2024
Men	2.25%	2.99%	0.38%
Women	0.75%	0.37%	0.38%
Under 30	0.00%	0.37%	0.00%
Between 30 and 50	1.12%	0.75%	0.77%
Over 50	1.87%	2.24%	0.00%
Total	3.00%	3.36%	0.77%

Below is the Turnover compensation rate, i.e. entered during the period/left during the period.

Turnover compensation rate			
TURNOVER COMPENSATION RATE (%)	2022	2023	2024
Men	150.0%	12.50%	0.00%
Women	0.00%	0.00%	0.00%
Under 30	300.00%	100.00%	0.00%
Between 30 and 50	200.00%	0.00%	0.00%
Over 50	0.00%	0.00%	0.00%
Total	112.5%	11.11%	0.00%

During the two-year period 2022-2023, seven blue-collar and four white-collar workers were hired at TDT; there were no new hires in 2024.

The negative turnover rate of the three-year period remained fairly constant, which was due to the continuation of a policy of encouraging the exit of workers who had met their pension requirements.

401.2 BENEFITS PROVIDED TO FULL-TIME EMPLOYEES THAT ARE NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES

As regards the coverage of pension costs, there are no company-defined benefit plans, nor does the company offer employees specific supplementary pension coverage, in addition to that provided for by the relevant national collective agreements.

Since 2005, there has been the Priamo Pension Fund for executives, white- and blue-collar workers, which all employees can join by having their accrued severance pay merged with an additional equal employee-company contribution of 1% of the salary elements valid for the calculation of the severance payments provision.

In addition to the legal pension plans guaranteed by the payment of mandatory INPS contributions, employees are awarded, at the time of termination of the employment relationship, severance pay for those who have not joined the supplementary pension, while those who have joined the

supplementary pension have the possibility of receiving from the Priamo Fund, and for Managers from the Previndai Fund, a life annuity and/or redemption of the accrued pension position. In the cases provided for by the CCNL, the employee is also awarded compensation in lieu of notice. The composition and movement of the TFR (staff leaving indemnity) and other personnel funds as of 31 December 2024 is detailed below:

Benefits due upon termination of employment

TERMINATION BENEFITS	2022	2023	2024
Severance payments provision	€ 864,847	€ 815,423	€ 818.886
Other (substitute allowances, IMA, etc.)	-	-	

401.3 PARENTAL LEAVE

TDT operates in compliance with the legislation on parental leave, the aim of which is to allow employees to enjoy leave and subsequently return to work carrying out the same or equivalent duties.

Parental leave

PARENTAL LEAVE	2022		2023		2024	
GENDER	M	F	M	F	M	F
Number of workers entitled to parental leave	221	48	215	47	214	46
Number of workers taking advantage of parental leave	10	5	24	3	22	4
Number of workers who returned from parental leave in the reference year	10	5	24	3	22	4
Number of workers who returned to work at the end of parental leave and were still employed in the following 12 months	6	5	10	5	24	3
Percentage (%) of workers who returned to work at the end of parental leave and are still employed in the following 12 months	100	100	100	100	100	100

402 Labour/management relations 2016

402.1 MINIMUM NOTICE PERIOD REGARDING OPERATIONAL CHANGES

TDT adopts arrangements for consulting employees and their representatives with regard to notifications of significant changes in the operation of the business.

These consultations take place in compliance with the legal and contractual provisions governing relations between employer and trade unions and are specifically implemented for the management of changes that have impacts on the health and safety of workers.

TDT communicates significant operational changes with reasonable notice, even if not determined in national and second-level contracts, both to employees and their representatives, and to the competent government authorities, so that they can promptly receive all the information necessary to make an informed decision.

403 Occupational health and safety

403.1 OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Terminal Darsena Toscana (TDT) operates in the port environment, which is intrinsically characterised by complex and potentially high-risk activities (handling heavy goods, use of complex machinery, presence of vehicles, working at heights, etc.). The occupational health and safety (OHS) of all workers, including direct employees, temporary workers and the staff of contractors and subcontractors working within the terminal, is a top priority and a core value for TDT.

TDT's commitment goes beyond mere regulatory compliance. The primary objective is to create and maintain a safe and healthy working environment, preventing accidents, occupational diseases and continuously improving working conditions. This commitment is underpinned by a robust Occupational Health and Safety Management System (OHSMS), integrated into the company's strategies and operations.

TDT has implemented and maintains its OHSMS in accordance with the requirements of the international standard ISO 45001:2018 and applicable laws. This external certification attests to the adoption of a structured, risk-based approach to the management of health and safety at work. The OHSMS covers all activities, processes and operational areas of the terminal.

TDT has a specialised internal structure (with its own employees) dedicated to the management of health and safety at work, namely the Prevention and Protection Service, composed of the Safety Director/PPSM, the Health and Safety Management System Manager/APPs, two APPs and an operational control and support service for surveillance activities, operating 24 hours a day, implemented by a private security institute.

There are also three Workers' Safety Representatives (WSR) elected by the workers, who have the task of representing the workers for all aspects of health and safety in the workplace, one of whom is also a Site Representative, who covers the area of the entire Port of Livorno.

Periodically, as part of the System Review, the implementation status of the system is verified, within which, among other things, the improvement actions undertaken are reported and the areas requiring the greatest attention are defined as an output, together with the actions to be implemented to control and reduce risks and the indicators to measure performance.



403.2 HAZARD IDENTIFICATION, RISK ASSESSMENT AND INCIDENT

TDT, in compliance with the provisions of the ISO 45001 standard which calls for greater attention to the needs and expectations of workers and other interested parties, has carried out an in-depth analysis of the context, identifying the relevant internal and external factors capable of influencing the achievement of its objectives, the expectations of interested parties and the risks and opportunities related to health and safety at work, while establishing a series of actions aimed at mitigating the identified risks and seizing the identified opportunities. The status of the actions and their effectiveness in effectively reducing the identified health and safety risks are periodically analysed.

The specialised structure dedicated to workplace safety, the constant monitoring of activities and the handling of any reports relating to health and safety aspects, wherever they come from, also allow TDT to promptly identify the presence of any dangers and to react to them through a specific analysis and the identification of the relevant measures for the elimination or reduction of the associated risk, while improving the performance of the system.

In the event of any significant change (including changes in staff, replacement of equipment or machinery, operational changes, etc.), TDT carries out a preliminary analysis of the consequences and the advantages or disadvantages that derive therefrom, involving the sectors and workers affected at any given time, to ensure maximum participation and sharing in the choices and prevention and protection measures identified in order to eliminate or reduce the resulting risks.

In compliance with the regulatory provisions and the Code of Ethics adopted, TDT guarantees the worker the right to leave the workplace or a dangerous area in the event of serious and immediate danger that cannot be avoided, without suffering any prejudice and protected from any harmful consequences. Similarly, the Terminal has equipped itself with a specific procedure for managing reports that ensures the confidentiality and anonymity of the whistleblower, providing for the implementation of a series of actions against the hypothetical risk of retaliation and/or discrimination.



403.3 OCCUPATIONAL HEALTH SERVICES

In accordance with the obligation laid down in Art. 41 of Italian Legislative Decree 81/2008 and the National Collective Agreement, all workers are required to undergo health surveillance to ensure the protection of their health and safety, according to a Health Surveillance Plan drawn up on the basis of the results of the company risk assessments to which they are exposed, the environment in which they work and the type of activity carried out.

Health surveillance is managed by the appointed Company Doctor and includes: preventive medical examinations to assess the worker's suitability for the specific task, periodic medical examinations to monitor the workers' health and verify that the requirements of suitability for the task are maintained, medical examinations at the worker's request, medical examinations on return from long periods of absence due to illness or accident (60 days).

Health checks and medical examinations take place in the company, during working hours, in a room provided for that purpose and made available by TDT. The Company Doctor has all the necessary qualifications and requirements laid down by law and is registered on the Ministry of Health's national list of company doctors, and is present in the company on a weekly basis to perform his or her duties.

403.4: WORKER PARTICIPATION, CONSULTATION AND COMMUNICATION ON OCCUPATIONAL HEALTH AND SAFETY

TDT uses various tools to ensure that communication, participation and consultation of workers are always live and active processes, with regard to both employees and to stakeholders in general:

- **Drafting of disclosures on topics relevant to safety**, which aim to inform staff or remind/raise awareness among staff (including external) on important, already-known safety aspects. In particular in 2024, 11 disclosures were provided, among which, for example, findings on the periodic checks of lifting accessories, correct posture to be kept on quay cranes, reminders on compliance with the procedure requiring the keys to be removed from the ignition of all operating vehicles left parked, special precautions in the use of specific trailers during operations, rules on the use of under-board de-rigging stations, etc.;
- **Collection and management of reports from employees/suppliers, impacting safety aspects**: these reports reach the Safety Office both through the WSR, and through direct contacts with the workers themselves (email or verbally). These reports are collected, recorded and managed by the PPS, which follows their progress and closure. Following these reports, simple treatments can be identified or improvement actions studied and implemented with a significant impact on various aspects of the OHSMS (e.g. participation, involvement, consultation) and on health and safety (e.g. emergency management, vehicle control, etc.);
- **Meetings with SUPPLIERS on common aspects with impact on safety and health**: periodic meetings/conferences with suppliers have enabled the sharing of information relevant to safety, as well as projects that can generate impacts on companies operating in TDT, through the sharing of impressions, specific problems and solutions. Extraordinary meetings are also called as required. The outcomes of these meetings are reported in the meeting minutes/reports. The actions that arise from these meetings are recorded and followed within the OHSMS on a specific SI;
- **INTERNAL meetings between the Safety Office and Workers' Safety Representatives and/or Sector Managers** that are convened when necessary or when significant data has been collected on the status of the projects being carried out. Also in this case, the outcomes of these meetings are recorded and the resulting actions registered and monitored within the Management System for Health and Safety at Work on a specific IT system;

- **Electronic noticeboard on the IT system:** with a view to continuous information sharing with an impact on safety and health, TDT maintains a special computer workstation for the Company Doctor to allow access to all data (Risk Assessments, Procedures, Instructions, etc.) relevant to health and safety. With this in mind, the company electronic bulletin board is also available and kept updated and available to all employees.

During the year under review, five monitoring inspections (without prior notice) were conducted by the local Local Health Authority (two of which without the issuance of an access report), as officers of the Public Prosecutor (pursuant to Art. 21 of Italian Law 833/78), from which no recommendations were issued for TDT. Following the inspection, the officials requested the sending of company evidence and documents (Specific Risk Assessments, Employee Training Courses, Job Suitability, etc.), which were always deemed compliant and complete.

Also for monitoring purposes and to encourage feedback from external parties on safety-relevant aspects, the PPS carries out:

- **Meetings for ongoing discussion with suppliers** on relevant aspects of safety issues, also for the purpose of illustrating and reporting on the status of the Safety Management System, the requirements required of external parties as well as to share objectives and results; these meetings are formalised and any actions recorded on the IT System (five meetings formalised in 2023);
- **Continuous cooperation with the local AUSL (Local Health Authority) and AdSP (Port System Authority)** regarding the monitoring of accident rates and involvement in the implementation phase of projects with the widest impact on safety;
- **Continuous involvement of permanent and external suppliers** in relation to the analysis of any accidents that may have repercussions on TDT; this activity also concerns the joint analysis, where necessary, of incidental events or near misses.



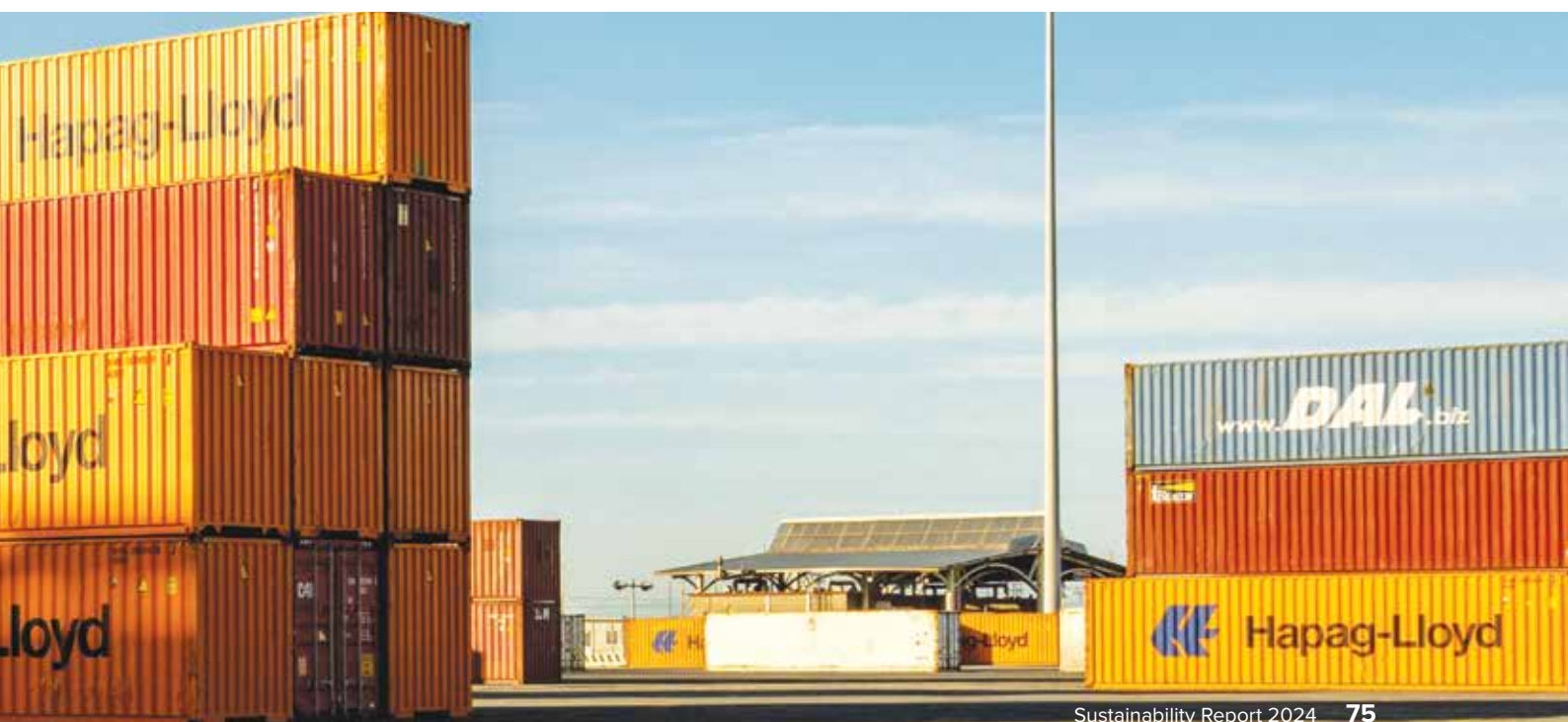
403.5 WORKER TRAINING ON OCCUPATIONAL HEALTH AND SAFETY

Occupational health and safety training is governed by a specific company procedure, which defines the requirements in terms of content, delivery methods, planning, participation and qualification of trainers. The Human Resources Department is responsible for supervising the training process, with the support of the Prevention and Protection Service for technical and regulatory aspects.

All safety training courses are held during working hours and are compulsory for the workers concerned. The training interventions are designed in full compliance with the minimum requirements of the regulations in force, but are constantly supplemented with additional specific contents in order to provide more complete information that aligns with the risks actually present in the various company operating contexts.

Particular attention is paid to training effectiveness: in addition to complying with legal requirements in terms of duration, TDT delivers more training hours than the minimum required, including practical modules and targeted in-depth training. The aim is to provide not only the theoretical knowledge, but also the operational skills necessary to carry out activities under safe conditions.

The training is delivered through various methodologies (lectures, audiovisual, practical exercises, seminars, analysis of real cases and events), using clear and accessible language and appropriate teaching materials. Learning tests are also provided to assess the actual acquisition of knowledge. During the course of the year, if specific gaps or critical issues emerge as a result of events or reports, targeted training sessions are organised on specific topics, with the aim of strengthening workers' skills and preventing the recurrence of risky situations. All training interventions are systematically documented and tracked.



403.6 PROMOTION OF WORKER HEALTH

With the aim of protecting and improving the health and well-being of all workers, the company supplements the compulsory health surveillance — carried out in accordance with current legislation — with supplementary health coverage for all employees.

This insurance, as set out by the relevant CCNL, is fully borne by the employer and can also be extended to employees' family members on a voluntary basis.

The policy offers a wide range of health benefits, including medical assistance, specialist examinations and tests at affiliated facilities, annual screening examinations and the possibility of consultations with medical specialists to obtain qualified clinical opinions.

403.7 PREVENTION AND MITIGATION OF OCCUPATIONAL HEALTH AND SAFETY IMPACTS DIRECTLY LINKED BY BUSINESS RELATIONSHIPS

TDT recognises that the protection of occupational health and safety (OSH) is not only an internal responsibility but also involves its business relations, in particular with suppliers, contractors and other partners operating in or near the company's port areas.

The complexity and risk profile associated with port operations make proactive and structured risk management indispensable throughout the value chain. With this in mind, TDT is actively committed to preventing and mitigating negative impacts on the health and safety of workers employed in activities directly or indirectly related to its operations.

To this end, the company adopts a systematic approach that includes, among the main measures: assessing and qualifying suppliers also in relation to OSH standards, conducting inspections and periodic audits at suppliers' premises, inserting specific contractual clauses on health and safety that clearly define obligations, responsibilities and requirements to be met, and holding preliminary and periodic meetings with business partners, aimed at operational coordination and sharing procedures and preventive measures.





Dangerous goods management

The TDT dangerous goods yard (IMO¹⁰) is located in an internal area of the terminal authorised by the local Port System Authority; it has a storage capacity of 864 TEU, which can be extended by a further 576 TEU if necessary. In order to comply with the provisions of local, national and international regulations for the management of dangerous goods, TDT has identified specific predefined areas (holds), dedicated to the parking of containers containing dangerous goods pursuant to the IMDG Code. In these areas, IMO containers are stowed respecting the safety distances (damage distance and segregation) and any additional requirements indicated from time to time by the local Port Chemical Service. Specific areas are dedicated to the parking of rolling stock, considered IMO pursuant to the IMDG Code (e.g. UN 3166 and UN 3171), and to the opening and loading checks required by the local authorities.

The procedures require that the IMO fleet structure, correct segregation and the presence of any anomalies are constantly monitored. The presence of dangerous goods inside a temporary port warehouse is, in fact, subject to continuous changes, being constantly influenced by the handling activity (loading/unloading) that takes place inside it. Therefore, the risk analysis is dynamic and is managed through a dedicated software, Hacpack, used in many other Italian terminals, which allows the risk to be constantly assessed based on the type of goods, the hazard class, the weight of each individual package and overall load weight of the containers present in the fleet. Furthermore, the software is also able to provide real-time safety data sheets for goods in storage to allow for the rapid and correct management of any emergency interventions to protect workers and users of the Terminal. In addition to Hacpack, TDT implemented, at the end of 2022 and fully operational in 2023, the “Expert Decking” function of Navis N4, which automatically assigns positions to IMO containers taking into account the segregation rules and distances permitted under the IMDG Code, highlighting any positioning anomalies to yard planning operators.

TDT also ensures specific training for all employee personnel, as well as information for all third-party personnel about the risks present, the behaviors to be followed and the emergency procedures adopted.

To contain any spills, the Terminal has equipped itself with mobile systems, more precisely 3 45' MAFIs, equipped to contain spills of solid or liquid materials from containers.

To deal with any emergencies, the area is covered by 50 kg wheeled dielectric powder fire extinguishers, A-B-C approved, located in the outdoor areas; lastly, an emergency management team is always present, with equipment available for intervention and for demarcation of the area.

403.8 WORKERS COVERED BY AN OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

The Occupational Health and Safety Management System adopted by TDT covers the entire company scope, extending to all categories of workers: direct employees, temporary workers, contractors, suppliers, visitors and others who, for various reasons, operate in or access the Terminal's area of responsibility.

TDT adopts an integrated risk prevention and reduction policy, which applies not only to its own staff, but to everyone who enters workplaces under its control. With this in mind, comprehensive and timely information is provided on the risks present and the safety measures envisaged, through tools such as specific information, risk assessment declarations, coordination protocols, work permits and other dedicated technical documents.

10 - *International Maritime Dangerous Goods Code: the international reference regulation for the maritime transport of dangerous goods drawn up by the IMO (International Maritime Organisation).*

The system's proper functioning is periodically checked during the Management Review, during which the state of implementation of the OHSMS is analysed, the improvement actions implemented are monitored and the areas that need more attention are identified. As an output of the process, actions to be taken to reduce residual risks are defined and performance indicators for measuring the effectiveness of the system are established.

403.9 WORK-RELATED INJURIES

Following the occurrence of any incidental event, including accidents and near misses (those incidents that only by chance did not turn into an accident at work), TDT reacts immediately by launching in-depth investigations, necessary to ensure a timely reconstruction of the dynamics of the same. Analysis of the data and testimonies collected makes it possible to identify the root causes underlying the occurrence of the events and to determine the actions to be implemented to prevent their recurrence, while improving the health and safety conditions of the workplace.

The analysis of these events represents an important prevention tool, as it provides TDT with significant information regarding signs of malfunction or opportunities for improvement of the Occupational Health and Safety Management System.

For this purpose, the Prevention and Protection Service maintains a database that collects all the incidental events that have occurred over the years, also taking into account those involving external suppliers/users. It is customary for registrations to be systematic and for all events that cause damage to be recorded as an incident.

The analysis carried out by the Prevention and Protection Service is aimed at identifying any corrective or improvement actions, and is carried out with a methodology identical to that applied to the examination of accidents. If it is believed that the events require immediate measures, we proceed, in accordance with what is established in the reference procedure, through meetings or ad hoc meetings, to determine the causes and corrective measures to be prepared immediately.

The data relating to the accident trend of TDT are shown below.

Occupational accidents of employees				
EMPLOYEES	2021	2022	2023	2024
No. of incidents at work	0	1	1	1
- of which serious ¹¹	0	0	1	1
- of which fatal	0	0	0	0

Occupational accidents of non-employees*				
WORKERS WHO ARE NOT EMPLOYEES	2021	2022	2023	2024
No. of incidents at work	10	6	2	9
of which serious	3	1	0	5
of which fatal	0	0	0	0

* Data from the main companies (six) that work more or less steadily in TDT are included.

¹¹ - Serious injuries are defined as those resulting in more than 39 days of absence from work.

Occupational injuries KPI for workers

OCCUPATIONAL INJURIES FOR WORKERS	2021	2022	2023	2024
Incidence Rate	0	3.72	3.77	3.84
Frequency Rate	0	2.61	2.77	2.74
Fatal Frequency Rate	0	0	0	0
High-consequence work-related injuries frequency rate	0	2.61	0	2.74
Recordable work-related injuries frequency rate	0	0	2.73	0
Severity Rate	0	0.65	0.01	0.12
Average Duration	0	249	4	44

The injury rates follow the following calculation methods, in accordance with the GRI guidelines:

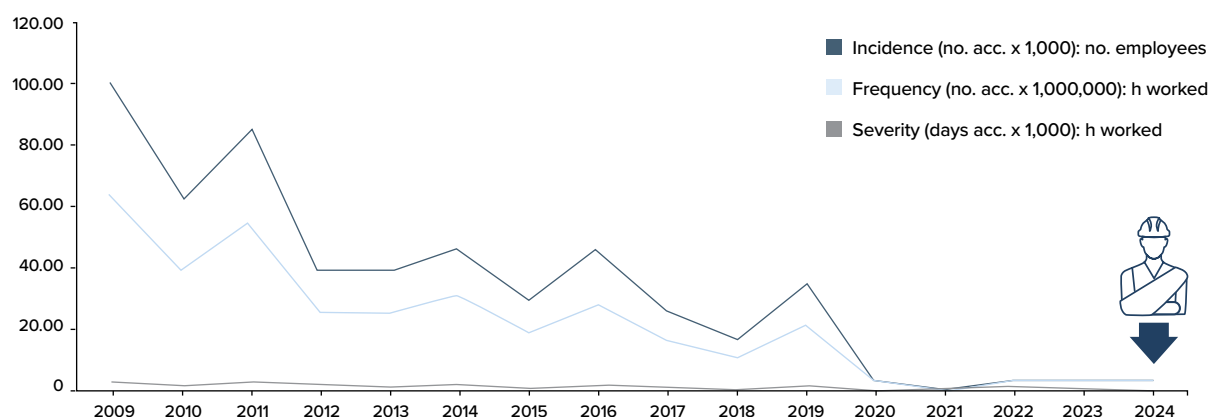
- Incidence Rate¹²: (No. of accidents * 1000/No. of employees);
- Frequency Rate¹³: (total injuries/total hours worked) *1,000,000;
- Severity Rate: (total days lost/total hours worked) * 1,000¹⁴;
- Average Duration: (no. of days absent from work due to injury/no. of injuries).

In 2024, only one work-related injury was recorded. The figure has significantly improved compared to the already positive trend that was recorded starting from 2012 (where an average of just over nine injuries/year was recorded), already progressively improving compared to the previous period 2006-2011 in which the average was 28 injuries/year; the last three years, as can be seen from the table, recorded an average of one injury/year.

The number of days of absence from work resulting from this single injury, with a rather simple dynamic (a fall in an office corridor), was 44 days.

The analysis carried out over a multi-year time frame shows a constant improvement in the trend lines of all the indices.

TDT incidents trend



12 - This index is calculated using a multiplier of 1,000 to obtain a value aligned with the legal parameters.

13 - This index is calculated using a multiplier of 1,000,000 to obtain a value aligned with the legal parameters.

14 - Compared to other indicators, this index is calculated using a multiplier of 1,000 to obtain a value representative of the company size.

Below are the main causes of injury distinguished between internal (I), i.e. employed workers (I) and external (E), i.e. non-employed workers, but whose activity or workplace is controlled by TDT.

Accident Causes in TDT

YEAR	2021		2022		2023		2024	
ACCIDENT CAUSES	I	E	I	E	I	E	I	E
Anti-competitive	0	8	1	5	1	2	1	9
of Technical Affairs	0	1	0	0	0	0	0	0
Organizational / managerial	0	0	0	0	0	0	0	0
Procedural	0	0	0	0	0	0	0	0
Other	0	1	0	1	0	0	0	0
Total	0	10	1	6	1	2	1	9

As far as TDT is concerned, the data show that the accidents that occurred in the years 2022 and 2023 are linked to behavioural aspects. This macro category includes events such as, for example, accidental falls, incorrect handling or misuse of equipment, procedures not followed, incorrect handling of loads, etc. However, during the analysis, especially in cases where the cause is to be attributed to 'behaviour', the conditions at the origin of the event are always considered, such as, for example, process factors and interfaces that can lead to forgetfulness or confusion (whether at work or not). The identification of these elements is essential in order to be able to significantly affect them and therefore bring about concrete and effective improvement.

On the other hand, as regards non-employee personnel working in the Terminal, nine accident events were recorded in 2024. Analysis of the individual events made it possible to detect that these are not attributable to critical issues detected in the workplace, but derive from the performance of the specific activity of the permanent supplier. The number of accidents concerns nine different companies that deal with: maintenance of operating vehicles, maintenance of fire extinguishers, monitoring of refrigerated containers, work activities on board, security service for access control, cleaning service and internal container transport service, office cleaning, terminal infrastructure maintenance activities, evaluation activities.

As for the dynamics, which are also distinguished between internal (I) and external (E), the following table is shown:

Accident Causes TDT

YEAR	2021		2022		2023		2023	
ACCIDENT DYNAMICS	I	E	I	E	I	E	I	E
Injury while climbing/descending	0	2	0	1	1	1	0	0
Fall on level ground/stumble	0	1	0	0	0	0	1	0
Road conditions	0	0	0	0	0	1	0	0
Impact	0	2	0	1	0	0	0	0
MLH* - manipulation	0	3	1	2	0	0	0	9
Accident between vehicles	0	0	0	1	0	0	0	0
Inappropriate movement	0	1	0	0	0	0	0	0
Other - Presence	0	0	0	1	0	0	0	0
Technique - mechanical breakage	0	1	0	0	0	0	0	0
Total	0	10	1	6	1	2	1	9

*MLH = Manual Load Handling

403.10 WORK-RELATED ILL HEALTH

Occupational diseases - employees

OCCUPATIONAL DISEASES - EMPLOYEES	2021	2022	2023	2024
Number of occupational diseases	0	0	0	0
Number of deaths resulting from occupational diseases	0	0	0	0
Occupational diseases rate [(total occupational diseases/ total hours worked) * 100,000].	0	0	0	0

Types of occupational diseases of internal (I) and external (E) employees

YEAR	2021		2022		2023		2024	
TYPES OF OCCUPATIONAL DISEASES TDT	I	E	I	E	I	E	I	E
Lumbosacral spondylodiscitis	0	N.A.	0	N.A.	0	N.A.	0	N.A.
Total	0	N.A.	0	N.A.	0	N.A.	0	N.A.

During 2024, TDT received one request for occupational disease, which was defined negatively (not recognised) by the competent authority.

404 Training and education

Staff education and corporate training have become an important element in achieving success in businesses and it is clear that, in any work and production environment, to operate in a cohesive and efficient manner, it is necessary to be united and ensure that all employees, from first to last, feel they are taking part in a common project.



Breakdown of staff by educational qualification

BREAKDOWN OF STAFF BY EDUCATIONAL QUALIFICATION	2022	2023	2024
Bachelor's degree	9.9%	8.81%	8.46%
High School Diploma	46.8%	47.13%	47.69%
Professional qualification	0.7%	0.7%	0.77%
Elementary/middle school	43.5%	43.3%	43.08%

It is believed that, including from a psychological point of view, corporate training fulfils an indispensable task in terms of usefulness and benefit from a dual perspective: for workers, because they feel valued and relevant for the performance of the company, and for the company, because in this way employees will work with greater commitment and motivation.

Human resources are undoubtedly the tool with the greatest influence on the growth of companies and the importance of corporate training is evident because, through the personal and professional development of individuals, improvements are made across the entire work line.

Following the training activities, creativity and spirit of initiative benefit, the ability to find shared solutions increases and employees acquire greater awareness of the meaning and importance of their role in the company; therefore, the importance of corporate training should not be underestimated, because it allows for the cultural growth of employees and translates into general development for TDT.

404.1 AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE

Below are some tables that provide an overview of the training carried out in the company.

Average hours of training

AVERAGE HOURS OF TRAINING (H)	2022	2023	2024
Total hours provided	5,982	3,896	6,980
Of which internal teaching	4,784	2,810	4,383
Average hours per employee*	29	20	34
Average hours per total of employees	22	15	27
Average hours by employee category			
Senior executives	31	57	19
Middle managers	12	24	32
White-collar workers	12	16	23
Blue-collar workers	40	26	22
Average hours by employee gender			
Men	32	15	31.73
Women	17	22	43.51
Employee coverage %	76%	73%	79%

*calculated on employees who have received training

Hours provided by type of course

HOURS PROVIDED BY TYPE OF COURSE (H)	2022	2023	2024
Managerial training	0	0	40
Safety training	1050	1471.5	993
Professional updating	4932	2424.5	5947
Total	5,982	3,896	6,980

Training costs

	2022		2023		2024	
Cost of funded training	€ 30,183	63%	€ 25,434	49%	€ 11,416	39%
Cost of non-funded training	€ 17,363	37%	€ 26,470	51%	€ 17,739	61%
Total	€ 47,546	100%	€ 51,903	100%	€ 29,155	100%

The economic investments made over the last three years in training have been covered for more than 50% by the income received from private inter-professional funds, such as Fondimpresa and Fondirigenti, of which the company has been a member for several years.

Details of investments in training in the last three years are shown in the following table.

Investments in funded and unfunded training

INVESTMENTS IN TRAINING	2022	2023	2024
Funded training	€ 30,183	€ 25,434	€ 11,416
Of which:			
Private funds	€ 30,183	€ 25,434	€ 11,416
Public funds	€ 0	€ 0	€ 0
Unfunded training	€ 17,363	€ 26,470	€ 17,739
Total training	€ 47,546	€ 51,903	€ 29,155

Amounts per thematic area

AMOUNT PER THEMATIC AREA	2022	2023	2024
Managerial training	€ 0	€ 0	€ 1,000
Safety training	€ 9,118	€ 12,219	€ 11,124
Professional updating	€ 38,428	€ 39,684	€ 17,031
Total	€ 47,546	€ 51,903	€ 29,155
Delivery method			
% Face-to-face	92%	88%	94%
% Online	8%	12%	6%

404.2 PROGRAMMES FOR UPGRADING EMPLOYEE SKILLS AND TRANSITION ASSISTANCE PROGRAMMES

In 2024, 6,980 hours of training were provided, divided as follows:

- Approximately 80% allocated to training for departments dedicated to port operations and services, of which 16.50% (1,152 hours) carried out for qualifications for new tasks and to obtain new qualifications for operating pool staff hired during the year 2022, 1.22% (85 hours) for job updates of operating pool staff and the remaining 62.52% (4,364 hours) for on-the-job training for job changes of operating pool staff;
- For safety, quality and environment training, about 14.23% of the total hours (993 hours) were carried out, mainly for mandatory safety training;
- For training relating to professional updates and language training, approximately 5.52% of the hours were carried out (386 hours).

405 Diversity and equal opportunities

405.1 DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

With reference to the management and the Board of Directors, there are currently no female members within it.

TDT Board of Directors Composition by Gender

YEAR	2022	2023	2024
Men	3	3	4
Women	0	0	0
Percentage Women	0%	0%	0%

405.2 RATIO OF BASIC SALARY AND REMUNERATION OF WOMEN TO MEN

TDT does not practice any discrimination between the sexes and supports equal opportunities, in compliance with the regulations in force, also with reference to remuneration policies.

Ratio of remuneration of women to men divided by salary level

SALARY LEVEL	2022	2023	2024
1st level	-4.80%	-7.5%	-4%
2nd level	1.20%	4.1%	6.7%
3rd level	0.60%	1.4%	1.4%
4th level	0.90%	1.5%	1.5%
5th level	-2.90%	0%	0%

406 Non-discrimination

406.1 INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN

During the periods considered, no incidents of discrimination were reported, understood as acts and their consequences resulting from the unequal treatment of persons through the imposition of unequal burdens or the denial of benefits, contrary to the treatment of each individual impartially on the basis of individual merits.

407 Freedom of association and collective bargaining

408 Child labour

409 Forced or compulsory labour

407.1 OPERATIONS AND SUPPLIERS IN WHICH THE RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING MAY BE AT RISK

408.1 OPERATIONS AND SUPPLIERS AT SIGNIFICANT RISK FOR INCIDENTS OF CHILD LABOUR

409.1 OPERATIONS AND SUPPLIERS AT SIGNIFICANT RISK FOR INCIDENTS OF FORCED OR COMPULSORY LABOUR

TDT is committed to establishing relations with suppliers based on clear and transparent rules, explicitly defined in the contracts signed and in the documents annexed to them, such as the Code of Ethics, the Quality, Safety and Environment Policy and the Policy for the Prevention of Corruption. TDT requires that all activities and operations conducted through its suppliers be guided by the values set out in its Code of Ethics, paying particular attention to the respect and enhancement of human resources. TDT does not tolerate any form of irregular work and requires that the laws and practices on labour and employment are respected within supplier organisations, with particular regard to respecting freedom of association, the prohibition of the use of child labour and forced labour. Based on the qualification and due diligence activities carried out, TDT has not identified activities and suppliers at significant risk of violation of the right to freedom of association and collective bargaining, of the use of child labour and of the use of forced or compulsory labour.

410 Safety practices

410.1 SECURITY PERSONNEL TRAINED IN HUMAN RIGHTS POLICIES OR PROCEDURES

Security personnel carrying out activities at TDT participate in training according to IMO Model Course 3.24, which, in the areas relating to inspections and checks on personnel, visitors, drivers, etc., requires that these be carried out in compliance with human rights, with particular reference to gender and different cultural and religious sensitivities, as well as in compliance with privacy.

All security personnel working in the Terminal, both employees and external, are trained on policies or procedures concerning human rights.

Specifically, during 2024, the recipients of this training are:

- TDT staff starting in a new role, with specific security assignments;
- Newly hired personnel from external companies called upon to perform security services on behalf of TDT.

413 Local communities

413.1 OPERATIONS WITH LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS AND DEVELOPMENT PROGRAMMES

413.2 OPERATIONS WITH SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON LOCAL COMMUNITIES

TDT pays constant attention to the impacts that its activities can have on stakeholders and the local community. In this respect, participation in and support for initiatives promoted by authorities such as the Port System Authority, research bodies and charitable bodies are continuous.

Sponsorships and donations TDT

SPONSORSHIPS AND DONATIONS TDT	2022	2023	2024
Palliative Care Association Livorno	€ 20,000	€ 20,000	€ 20,000
Other donations	€ 2,500	€ 6,000	€ 3,500
Total	€ 22,500	€ 26,000	€ 23,500

416 Customer health and safety

416.1 ASSESSMENT OF THE HEALTH AND SAFETY IMPACTS OF PRODUCT AND SERVICE CATEGORIES

416.2 INCIDENTS OF NON-COMPLIANCE CONCERNING THE HEALTH AND SAFETY IMPACTS OF PRODUCTS AND SERVICES

Within the Management System for Health and Safety at Work, the activity of evaluating the legal requirements in terms of safety is of particular importance. This requires analysing a considerable quantity of provisions of various degrees and levels which, in some cases, can be controversial to apply.

Each analysis carried out and the results of such analyses are tracked in the system through a specific register of legal and signed requirements. This activity also includes in-depth analyses of specific topics that may involve various branches/sectors of the company and with which opinions and results are shared.

Furthermore, topics deriving from sector guidelines, inquiries, ministerial and/or professional opinions are examined and evaluated in a systematic and continuous manner, leading, in some cases, to analysis of the technical standards (UNI, CEI, EN) applicable to TDT suppliers and service providers with the greatest impact on safety.

In accordance with the provisions of the Organisation and Control Model pursuant to Italian Legislative Decree 231/2001 adopted by TDT, the support activities for the Supervisory Body are continuous, including, periodically, meetings to assess the application of the model and/or the sending of information flows relating to the activities to the Supervisory Body.

During the course of operations at the TDT site, activities aimed at protecting the health and safety of customers, visitors and users of TDT services are therefore continuous and implemented in compliance with legal requirements and with the provisions of the Policy for Health and Safety at Work applicable by the related Management System.

Customers, visitors and users of TDT services are therefore recipients of the Policy and the measures taken to implement the system.

In 2024, no non-compliance with applicable regulations and Policies relating to the protection of the Health and Safety of customers, visitors and users was detected.

418 Customer privacy

418.1 SUBSTANTIATED COMPLAINTS CONCERNING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA

TDT is committed to respecting the confidentiality of its customers and takes reasonable measures to ensure the protection of personal data collected, stored and processed, and is also committed to not disclosing or using the personal information of customers for any purpose other than that foreseen, communicating directly to customers any changes relating to policies or measures regarding data protection.

TDT maintains its active commitment to operate in compliance with existing laws, regulations and/or other self-regulatory rules on the protection of customer privacy with particular attention to compliance with the provisions of the European Regulation on the protection of personal data (EU Regulation 2016/679 - GDPR) and the relevant national legislation (Italian Legislative Decree 196/2003 and subsequent amendments and Italian Legislative Decree 101/2018).

In order to protect its data and those of its customers, TDT has adopted, inter alia, specific organisational measures such as a procedure for the Management of Data Residing in IT Systems, a Regulation on the use of internal IT tools, a security procedure against cyber-risks and a Regulation to govern the use of the Video Surveillance System.

TDT did not detect any substantiated complaints regarding customer privacy breaches or customer data leaks during the year.





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