

# SUSTAINABILITY REPORT

2022





# Summary

## LETTER TO STAKEHOLDERS 6

## 1 FOREWORD 8

<b>1-1</b>	Basics	9
<b>1-2</b>	GRI content index	10
<b>1-3</b>	Index of non-relevant/non-material information	15

## 2 GENERAL DISCLOSURES 16

<b>THE ORGANIZATION AND ITS REPORTING PRACTICES</b>		<b>17</b>
<b>2-1</b>	Organizational details	17
<b>2-2</b>	Entities included in the organization's sustainability reporting	17
<b>2-3</b>	Reporting period, frequency and contact point	18
<b>2-4</b>	Restatement of information	18
<b>2-5</b>	External Assurance	18
<b>ACTIVITIES AND WORKERS</b>		<b>19</b>
<b>2-6</b>	Activities, value chain and other business relationships	19
<b>2-7</b>	Employees	25
<b>2-8</b>	Workers who are not employees	26
<b>GOVERNANCE</b>		<b>26</b>
<b>2-9</b>	Governance structure and composition	26
<b>2-10</b>	Nomination and selection of the highest governance body	27
<b>2-11</b>	Chair of the highest governance body	27
<b>2-12</b>	Role of the highest governing body in overseeing the management of impact	28
<b>2-13</b>	Delegation of responsibility for managing impacts	29
<b>2-14</b>	Role of the highest Governance body in sustainability reporting	29
<b>2-15</b>	Conflicts of interest	29
<b>2-16</b>	Communication of critical concerns	30
<b>2-20</b>	Process to determine remuneration	30
<b>2-21</b>	Annual total compensation ratio	30
<b>STRATEGY, POLICIES AND PRACTICES</b>		<b>31</b>
<b>2-23</b>	Policy commitments	31
<b>2-24</b>	Embedding of policy commitments	32
<b>2-25</b>	Processes to remediate negative impacts	33

<b>2-26</b>	Mechanisms for seeking advice and raising concerns	33
<b>2-27</b>	Compliance with laws and regulations	34
<b>2-28</b>	Membership associations	34
<b>STAKEHOLDER ENGAGEMENT</b>		<b>34</b>
<b>2-29</b>	Approach to stakeholder engagement	34
<b>3 MATERIAL TOPICS</b>		<b>38</b>
<b>3-1</b>	Process to determine material topics	39
<b>3-2</b>	List of material topics and related SDGs	39
<b>3-3</b>	Management of material topics	41
<b>4 ECONOMIC SUSTAINABILITY</b>		<b>42</b>
<b>201</b>	Economic Performance	43
<b>201-1</b>	Direct economic value generated and distributed	43
<b>201-2</b>	Financial implications and other risks and opportunities due to climate change	47
<b>201-3</b>	Defined benefit plan obligations and other retirement plans	47
<b>201-4</b>	Financial assistance received from the government	47
<b>202</b>	Market Presence	47
<b>202-1</b>	Ratios of standard entry level wage by gender compared to local minimum wage	47
<b>203</b>	Indirect Economic Impacts	48
<b>203-1</b>	Infrastructure investments and services supported	48
<b>203-2</b>	Significant indirect economic impacts	48
<b>204</b>	Procurement practices	49
<b>204-1</b>	Proportion of spending on local suppliers	49
<b>205</b>	Anti-Corruption	50
<b>205-1</b>	Operations assessed for risks related to corruption.	50
<b>205-2</b>	Communication and training about anti-corruption policies and procedures.	50
<b>205-3</b>	Confirmed incidents of corruption and actions taken	51
<b>206</b>	Anti-competitive behavior	51
<b>206-1</b>	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	51
<b>207</b>	Tax	51
<b>207-1</b>	Approach to tax	51
<b>207-2</b>	Tax governance, control and risk management	51
<b>207-3</b>	Stakeholder engagement and management of concerns related to tax	51
<b>207-4</b>	Country by country reporting	51



## 5 ENVIRONMENTAL SUSTAINABILITY

**54**

<b>301</b> Materials	57
<b>301-1</b> Materials used by weight or volume	58
<b>302</b> Energy	60
<b>302-1</b> Energy consumption within the organization	66
<b>302-2</b> Energy consumption outside the organization	66
<b>302-3</b> Energy intensity	66
<b>302-4</b> Reduction of energy consumption	67
<b>302-5</b> Reduction in energy requirements of products and service	67
<b>303</b> Water and effluents	69
<b>303-1</b> Interaction with water as a shared resource	69
<b>303-2</b> Management of water discharge-related impacts	69
<b>303-3</b> Water withdrawal	69
<b>303-4</b> Water discharge	69
<b>303-5</b> Water consumption	69
<b>304</b> Biodiversity	70
<b>304-1</b> Operational sites owned, leased, managed in (or adjacent to) protected areas and areas of high biodiversity value outside protected areas	70
<b>305</b> Emissions	71
<b>305-1</b> Direct (Scope 1) GHG emissions	71
<b>305-2</b> Energy indirect (Scope 2) GHG emissions	73
<b>305-3</b> Other Indirect (Scope 3) GHG emissions	73
<b>305-4</b> GHG emissions intensity	74
<b>305-5</b> Reduction of GHG emissions	76
<b>305-6</b> Emissions of ozone-depleting substances (ODS)	76
<b>305-7</b> Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions	77
<b>306</b> Waste	79
<b>306-1</b> Waste generation and significant waste-related impacts	79
<b>306-2</b> Management of significant waste-related impacts	79
<b>306-3</b> Waste generated	80
<b>306-4</b> Waste diverted from disposal	83
<b>306-5</b> Waste directed to disposal	83
<b>308</b> Supplier Environmental Assessment	83
<b>308-1</b> New suppliers that were screened using environmental criteria	84
<b>308-2</b> Negative environmental impacts in the supply chain and actions taken	84

<b>6 SOCIAL SUSTAINABILITY</b>	<b>86</b>
<b>401 Employment</b>	<b>88</b>
<b>401-1</b> New employee hires and employees turnover	88
<b>401-2</b> Benefits provided to full-time employees, that are not provided to temporary or part time employees	90
<b>401-3</b> Parental leave	91
<b>402 Labor/management Relations</b>	<b>92</b>
<b>402-1</b> Minimum notice periods regarding operational changes	92
<b>403 Occupational health and safety</b>	<b>92</b>
<b>403-1</b> Occupational health and safety management system	92
<b>403-8</b> Workers covered by an occupational health and safety management system	92
<b>403-2</b> Hazard identification, risk assessment and incident investigation	93
<b>403-7</b> Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	94
<b>403-3</b> Occupational health services	97
<b>403-6</b> Promotion of worker health	98
<b>403-5</b> Worker training on occupational health and safety	98
<b>403-9</b> Work related injuries – Accidents and near misses	99
<b>403-10</b> Work-related ill health	103
<b>403-4</b> Worker participation, consultation and communication on occupational health and safety	103
<b>404 Training and Education</b>	<b>105</b>
<b>404-1</b> Average hours of training per year per employee	105
<b>404-2</b> Programs for upgrading employees skills and transition assistance program	105
<b>404-3</b> Percentage of employees receiving regular performance and career development reviews	105
<b>405 Diversity and equal opportunity</b>	<b>108</b>
<b>405-1</b> Diversity of governance bodies and employees	108
<b>405-2</b> Ratio of basic salary and remuneration of women to men	109
<b>406 Non-Discrimination</b>	<b>110</b>
<b>406-1</b> Incidents of discrimination and corrective actions taken	110
<b>407 Freedom of association and collective bargaining</b>	<b>110</b>
<b>407-1</b> Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	110
<b>408 Child labor</b>	<b>110</b>
<b>408-1</b> Operations and suppliers at significant risk for incidents of child labor	110
<b>409 Forced or compulsory labour</b>	<b>111</b>
<b>409-1</b> Activities and suppliers at significant risk of incidents of forced or compulsory labor	111

<b>410</b>	<b>Security practices</b>	<b>111</b>
<b>410•1</b>	<b>Security personnel trained in human rights policies or procedures</b>	<b>111</b>
<b>413</b>	<b>Local Communities</b>	<b>112</b>
<b>413•1</b>	<b>Operations with local community engagement, impact assessments and development programs</b>	<b>112</b>
<b>413•2</b>	<b>Operations with significant actual and potential negative impacts on local communities</b>	<b>113</b>
<b>414</b>	<b>Supplier social assessment</b>	<b>113</b>
<b>414•1</b>	<b>New suppliers that were screened using social criteria</b>	<b>113</b>
<b>414•2</b>	<b>Negative social impacts on in the supply chain and actions taken</b>	<b>113</b>
<b>415</b>	<b>Public Policy</b>	<b>115</b>
<b>415•1</b>	<b>Political contributions</b>	<b>115</b>
<b>416</b>	<b>Customer Health and Safety</b>	<b>115</b>
<b>416•1</b>	<b>Assessment of the health and safety impacts of product and service categories</b>	<b>115</b>
<b>416•2</b>	<b>Incidents of non-compliance concerning the health and safety impacts of products and services</b>	<b>115</b>
<b>417</b>	<b>Marketing and labeling</b>	<b>115</b>
<b>417•1</b>	<b>Requirements for product and service information and labeling</b>	<b>115</b>
<b>417•2</b>	<b>Incidents of non-compliance concerning product and service information and labeling</b>	<b>116</b>
<b>417•3</b>	<b>Incidents of non-compliance concerning marketing communications</b>	<b>116</b>
<b>418</b>	<b>Customer privacy</b>	<b>116</b>
<b>418•1</b>	<b>Substantiated complaints concerning breaches of customer privacy and losses of customer data</b>	<b>116</b>

## LETTER TO STAKEHOLDERS

2022 was a year marked by significant international events, such as the OMICRON variant of the COVID-19 virus which affected important industrial and port districts in the Far East and, starting from February, the conflict between Russia and Ukraine.

In such an uncertain and disturbed global context, international trade has developed by dealing with different and interrelated phenomena, such as the interruption of logistic supply chains, the congestion of some ports, the sudden rise in energy and inflation.

The shipping companies have faced this scenario by continuing to modulate the hold capacity offered in order to continue to benefit from high maritime freight rates, well above the pre-covid situation, and by reinvesting part of the important profits in horizontal and vertical integration operations of the logistics chain.

In the meantime, TDT has maintained its commitment to providing a regular service that meets Customers' expectations, inspired by the desire to operate as the reference Terminal Operator for the Upper Tyrrhenian Sea, as an ideal partner for Customers and all Stakeholders, to contribute to sustainable growth of the goods logistics chain.

This commitment finds its full expression through the application of the values and principles expressed by the Code of Ethics, integrated into the growth strategies and corporate policies of TDT.

In 2022, TDT handled a total of 467,938 TEUs, in line with the traffic of 2021 (468,942 TEUs; -0.2%), but with a clear growth in gateway<sup>1</sup> traffic of goods in full containers (279,316 TEUs; +29%) and in handling of empty containers<sup>2</sup> (110,059 TEU; +43.9%); on the other hand, there was a clear decrease in transshipment traffic<sup>3</sup> (78,563 TEU; -55.4%).

The increase in *hinterland*<sup>4</sup> volumes attests to the improvement in TDT's competitiveness on the reference market and in particular on the one contested with other port terminals.



<sup>1</sup> harbor access to inland markets

<sup>2</sup> also indicated with the word handling

<sup>3</sup> also indicated with the word transshipment

<sup>4</sup> Hinterland



During 2022, TDT continued its investment policy, reserving an important share of resources for the improvement and automation of production processes, as a development lever and positive contribution to social, environmental and economic impacts. Among the interventions implemented we highlight:

- The installation of special "totems" at the entrance car park which allow transporters to perform all functions for collecting containers without getting out of the vehicle to carry out document operations;
- The adoption of a camera system on quay cranes for the automatic acquisition of container data during the unloading and loading phase, improving the safety, control and efficiency of operational processes;
- The implementation of the functionality called "Expert Decking" of our operating system, to improve the stowage of containers in the yard by reducing waste and rearrangement movements;
- The replacement of the control cabin on a quay crane with a latest generation one in order to improve the safety of operations (greater visibility and isolation from the external environment) and allow the reduction of the crane operator's muscular stress during manoeuvres;
- The renewal of the vehicle fleet with the purchase of 6 new forklifts for full containers<sup>5</sup> and one for empty containers;
- The purchase of a new people holding cell with innovative features, in order to improve the safety and efficiency of the lashing and unlashings operations of containers on board ships.

In the social sphere, TDT has maintained its support for the Local Community, both with economic contributions to associations and with the opening of the Terminal to initiatives linked to the world of school and research.

The results and initiatives undertaken were carried out to face the increasingly imminent environmental, social and economic challenges, in the direction of sustainability as an essential added value, and with the collaboration of the People who work in our Company, to whom my greatest heartfelt thanks.

The General Manager  
Marco Mignogna



<sup>5</sup> container forklifts are also called reach stacker





# T

# FOREWORD



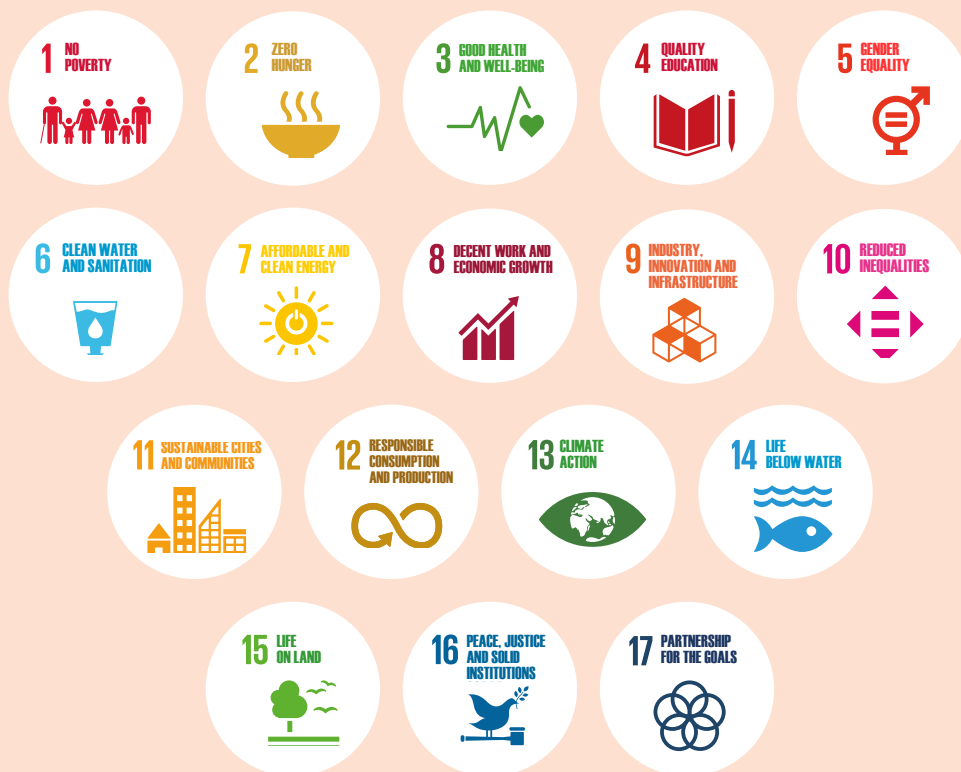
## REPORTING REFERENCES

### 11 Basics

Terminal Darsena Toscana s.r.l. a Socio unico, through this report, it strives to make known in a transparent way how it wants to contribute to Sustainable Development, understood as "development that meets present needs without compromising the ability of future generations to meet their own" (World Commission on Environment and Development, *Our common future*, 1987).

"A strategic approach towards the issue of corporate social responsibility is increasingly important for competitiveness. It can bring benefits in terms of risk management, cost reduction, access to capital, customer relationships, human resource management and innovation capacity".

#### SUSTAINABLE DEVELOPMENT GOALS



COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS Renewed EU strategy 2011-14 on Corporate Social Responsibility /\* COM/2011/0681 final of 25 October 2011.

With this intent, TDT has decided to make use of the guidelines provided by the GRI (Global Reporting Initiative) Organization and its standards to report information relating to its economic, environmental and social impacts, including those on human rights.

## 1.2 GRI CONTENT INDEX

<b>Declaration of use</b>	Terminal Darsena Toscana a socio unico has reported the information mentioned in this GRI content index for period 01/01/2022 - 31/12/2022 with reference to the GRI Standards
<b>GRI standard used</b>	GRI 1 - Fundamentals - 2021 version

<b>GRI STANDARD</b>	<b>DISCLOSURE</b>	<b>PAGE</b>
<b>GRI 2: General Disclosures 2021</b>	<b>2.1</b> Organizational details	17
	<b>2.2</b> Entities included in the organization's sustainability reporting	17
	<b>2.3</b> Reporting period, frequency and contact point	18
	<b>2.4</b> Restatements of information	18
	<b>2.5</b> External assurance	18
	<b>2.6</b> Activities, value chain and other business relationships	19 - 24
	<b>2.7</b> Employees	25
	<b>2.8</b> Workers who are not employees	26
	<b>2.9</b> Governance structure and composition	26, 27
	<b>2.10</b> Nomination and selection of the highest governance body	27
	<b>2.11</b> Chair of the highest governance body	27
	<b>2.12</b> Role of the highest governance body in overseeing the management of impacts	28
	<b>2.13</b> Delegation of responsibility for managing impacts	29
	<b>2.14</b> Role of the highest governance body in sustainability reporting	29
	<b>2.15</b> Conflicts of interest	29
	<b>2.16</b> Communication of critical concerns	30
	<b>2.20</b> Process to determine remuneration	30
	<b>2.21</b> Annual total compensation ratio	30
	<b>2.22</b> Statement on sustainable development strategy	6
	<b>2.23</b> Policy commitments	31
	<b>2.24</b> Embedding policy commitments	32, 33
	<b>2.25</b> Processes to remediate negative impacts	33



<b>GRI STANDARD</b>	<b>DISCLOSURE</b>	<b>PAGE</b>
	<b>2•26</b> Mechanisms for seeking advice and raising concerns	33, 34
	<b>2•27</b> Compliance with laws and regulations	34
	<b>2•28</b> Membership associations	34
	<b>2•29</b> Approach to stakeholder engagement	34 – 37
	<b>2•30</b> Collective bargaining agreements	47
<b>GRI 3: Material Topics – 2021</b>	<b>3•1</b> Process to determine material topics	39
	<b>3•2</b> List of material topics	39, 40
	<b>3•3</b> Management of material topics	41
<b>GRI 201: Economic Performance – 2016</b>	<b>201•1</b> Direct economic value generated and distributed	43 – 46
	<b>201•2</b> Financial implications and other risks and opportunities due to climate change	47
	<b>201•3</b> Defined benefit plan obligations and other retirement plans	47
	<b>201•4</b> Financial assistance received from government	47
<b>GRI 202: Presence on the market – 2016</b>	<b>202•1</b> Ratios of standard entry level wage by gender compared to local minimum wage	47
	<b>202•2</b> Proportion of senior management hired from the local community	26
<b>GRI 203: Indirect Economic Impacts – 2016</b>	<b>203•1</b> Infrastructure investments and services supported	48
	<b>203•2</b> Significant indirect economic impacts	48
<b>GRI 204: Procurement practice – 2016</b>	<b>204•1</b> Proportion of spending on local suppliers	49, 50
<b>GRI 205: Anti-corruption 2016</b>	<b>205•1</b> Operations assessed for risks related to corruption	50
	<b>205•2</b> Communication and training about anti-corruption policies and procedures	50
	<b>205•3</b> Confirmed incidents of corruption and actions taken	51
<b>GRI 206: Anticompetitive behavior – 2016</b>	<b>206•1</b> Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	51
<b>GRI 207: Tax – 2019</b>	<b>207•1</b> Approach to tax	51
	<b>207•2</b> Tax governance, control, and risk management	51
	<b>207•3</b> Stakeholder engagement and management of concerns related to tax	51

GRI STANDARD	DISCLOSURE	PAGE
	<b>207•4</b> Country-by-country reporting	51 – 53
<b>GRI 301: Materials – 2016</b>	<b>301•1</b> Materials used by weight or volume	58 – 60
<b>GRI 302: Energy – 2016</b>	<b>302•1</b> Energy consumption within the organization	66
	<b>302•2</b> Energy consumption outside of the organization	66
	<b>302•3</b> Energy intensity	66
	<b>302•4</b> Reduction of energy consumption	67
	<b>302•5</b> Reductions in energy requirements of products and services	67
<b>GRI 303: Water and Effluents 2018</b>	<b>303•1</b> Interactions with water as a shared resource	69
	<b>303•2</b> Management of water discharge-related impacts	69
	<b>303•3</b> Water withdrawal	69
	<b>303•4</b> Water discharge	69
	<b>303•5</b> Water consumption	69
<b>GRI 304: Biodiversity – 2016</b>	<b>304•1</b> Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	70
<b>GRI 305: Emissions – 2016</b>	<b>305•1</b> Direct (Scope 1) GHG emissions	71, 72
	<b>305•2</b> Energy indirect (Scope 2) GHG emissions	73
	<b>305•3</b> Other indirect (Scope 3) GHG emissions	73
	<b>305•4</b> GHG emissions intensity	74, 75
	<b>305•5</b> Reduction of GHG emissions	76
	<b>305•6</b> Emissions of ozone-depleting substances (ODS)	76
	<b>305•7</b> Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	77, 78
<b>GRI 306: Waste – 2020</b>	<b>306•1</b> Waste generation and significant waste-related impacts	79
	<b>306•2</b> Management of significant waste-related impacts	79
	<b>306•3</b> Waste generated	80 – 82
	<b>306•4</b> Waste diverted from disposal	83
	<b>306•5</b> Waste directed to disposal	84
<b>GRI 308: Supplier environmental assessment 2016</b>	<b>308•1</b> New suppliers that were screened using environmental criteria	84
	<b>308•2</b> Negative environmental impacts in the supply chain and actions taken	84, 85
<b>GRI 401: Employment – 2016</b>	<b>401•1</b> New employee hires and employee turnover	88 – 90

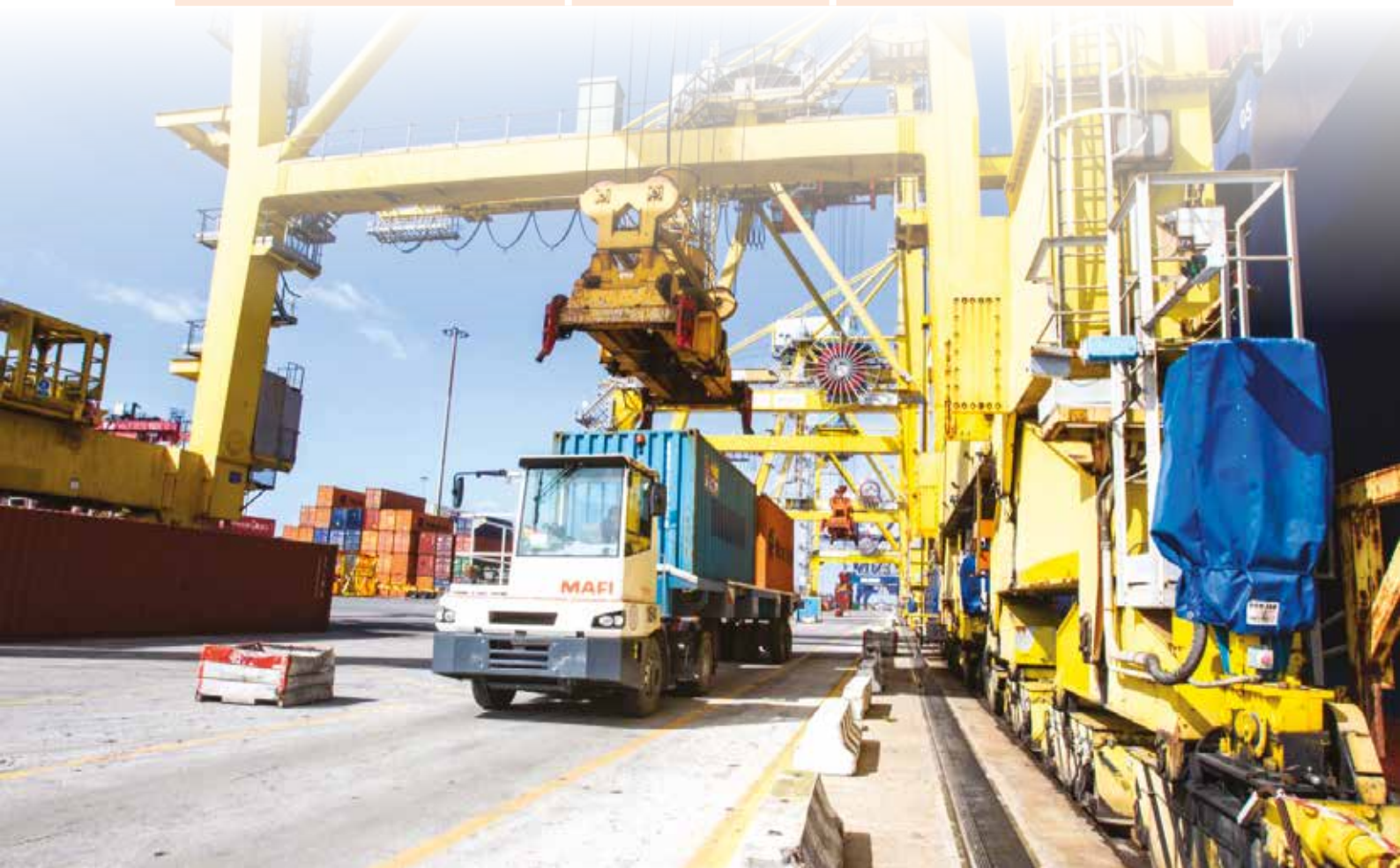
<b>GRI STANDARD</b>	<b>DISCLOSURE</b>	<b>PAGE</b>
	<b>401•2</b> Benefits provided to full-time employees that are not provided to temporary or part-time employees	90
	<b>401•3</b> Parental leave	91
<b>GRI 402: Labor/management relations 2016</b>	<b>402•1</b> Minimum notice periods regarding operational changes	92
<b>GRI 403: Occupational health and safety – 2018</b>	<b>403•1</b> Occupational health and safety management system	92
	<b>403•2</b> Hazard identification, risk assessment, and incident investigation	93
	<b>403•3</b> Occupational health services	97, 98
	<b>403•4</b> Worker participation, consultation, and communication on occupational health and safety	103
	<b>403•5</b> Worker training on occupational health and safety	98, 99
	<b>403•6</b> Promotion of worker health	98
	<b>403•7</b> Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	94 – 97
	<b>403•8</b> Workers covered by an occupational health and safety management system	92
	<b>403•9</b> Work related injuries – Accidents and near misses	99 – 102
	<b>403•10</b> Work-related ill health	103
<b>GRI 404: Training and Education – 2016</b>	<b>404•1</b> Average hours of training per year per employee	105
	<b>404•2</b> Programs for upgrading employee skills and transition assistance programs	105
	<b>404•3</b> Percentage of employees receiving regular performance and career development reviews	105 – 108
<b>GRI 405: Diversity and Equal Opportunity – 2016</b>	<b>405•1</b> Diversity of governance bodies and employees	108
	<b>405•2</b> Ratio of basic salary and remuneration of women to men	109
<b>GRI 406: Non-discrimination 2016</b>	<b>406•1</b> Incidents of discrimination and corrective actions taken	110
<b>GRI 407: Freedom of Association and Collective Bargaining – 2016</b>	<b>407•1</b> Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	110
<b>GRI 408: Child Labor – 2016</b>	<b>408•1</b> Operations and suppliers at significant risk for incidents of child labor	110
<b>GRI 409: Forced or Compulsory Labor – 2016</b>	<b>409•1</b> Operations and suppliers at significant risk for incidents of forced or compulsory labor	111

GRI STANDARD	DISCLOSURE	PAGE
GRI 410: Security Practices 2016	<b>410•1</b> Security personnel trained in human rights policies or procedures	111
GRI 413: Local Communities 2016	<b>413•1</b> Operations with local community engagement, impact assessments, and development programs	112
	<b>413•2</b> Operations with significant actual and potential negative impacts on local communities	113
GRI 414: Supplier Social Assessment - 2016	<b>414•1</b> New suppliers that were screened using social criteria	113
	<b>414•2</b> Negative social impacts in the supply chain and actions taken	113
GRI 415: Public Policy 2016	<b>415•1</b> Political contributions	115
GRI 416: Customer Health and Safety - 2016	<b>416•1</b> Assessment of the health and safety impacts of product and service categories	115
	<b>416•2</b> Incidents of non-compliance concerning the health and safety impacts of products and services	115
GRI 417: Marketing and Labeling - 2016	<b>417•1</b> Requirements for product and service information and labeling	115
	<b>417•2</b> Incidents of non-compliance concerning product and service information and labeling	116
	<b>417•3</b> Incidents of non-compliance concerning marketing communications	116
GRI 418: Customer Privacy 2016	<b>418•1</b> Substantiated complaints concerning breaches of customer privacy and losses of customer data	116



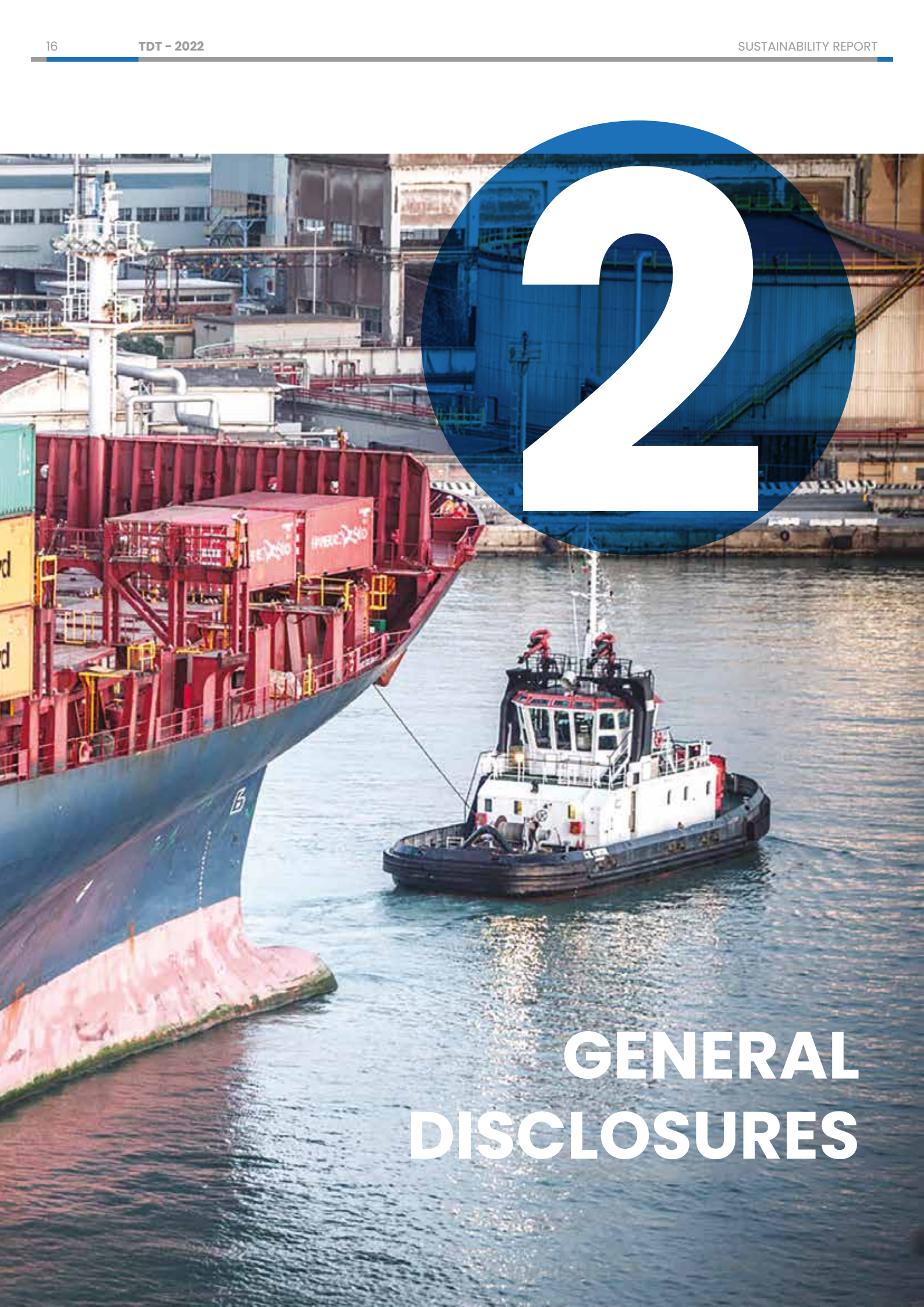
## 13 Index of non-relevant/non-material information

GRI TOPICS ESTABLISHED AS NON-MATERIAL		
TOPIC	REASONS FOR OMISSION	EXPLICATION
<b>GRI 1: Fundamental Principles 2021</b>		
<b>301-2:</b> Recycled input materials used	Not relevant	Being a service business, there are no products. 301-1 reports the only recycled material used (paper for office use)
<b>301-3:</b> Reclaimed products and their packaging materials	Not relevant	Being a service activity, there are no recycled products
<b>304-2:</b> Significant impacts of activities, products and services on biodiversity	Information not available/incomplete	There are no direct impacts on biodiversity
<b>304-3:</b> Habitats protected or restored	Not relevant	The only nearby protected areas are the WWF dunes of Calambrone, on which however there are no direct impacts
<b>304-4:</b> 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 surrounding areas
<b>411-1:</b> Incidents of violations involving rights of indigenous peoples	Not relevant	There are no indigenous peoples involved in the process





## 2



# GENERAL DISCLOSURES





# THE ORGANIZATION AND ITS REPORTING PRACTICES

## 2.1 Organizational details

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

TDT has the legal form of a single-member limited liability company and is 100% controlled by the company GIP, Gruppo Investimenti Portuali S.p.A., a holding company founded in 1993, with the aim of becoming an active part of the logistics chain of containerized goods.

**Since February 2017, with the entry of two specialized infrastructure funds, Infracapital and Infravia, which acquired 95% of the ownership, GIP has continued its growth through the implementation of organizational and procedural review processes.**

To date, GIP takes advantage of the strategic business and international vision of the company structure to position itself on the market as one of the main terminal operators in Italy, thanks to the full ownership of the TDT Terminal Operator and the participation in other important Italian container terminals such as PSA GENOVA PRÀ, PSA SECH and PSA VENICE.

Port operations and services are provided by TDT on the West Bank of the Darsena Toscana, in compliance with the provisions of Law 84/1994 and subsequent amendments, on a total surface area of approximately 350,000 m<sup>2</sup> entrusted under a thirty-year concession by the Port System Authority of the Northern Tyrrhenian Sea, with deed registered at no. 48 of the Concessions Register, prot. n° 07691 of 10/18/01, and subsequent amendments.

## 2.2 Entities included in the organization's sustainability reporting

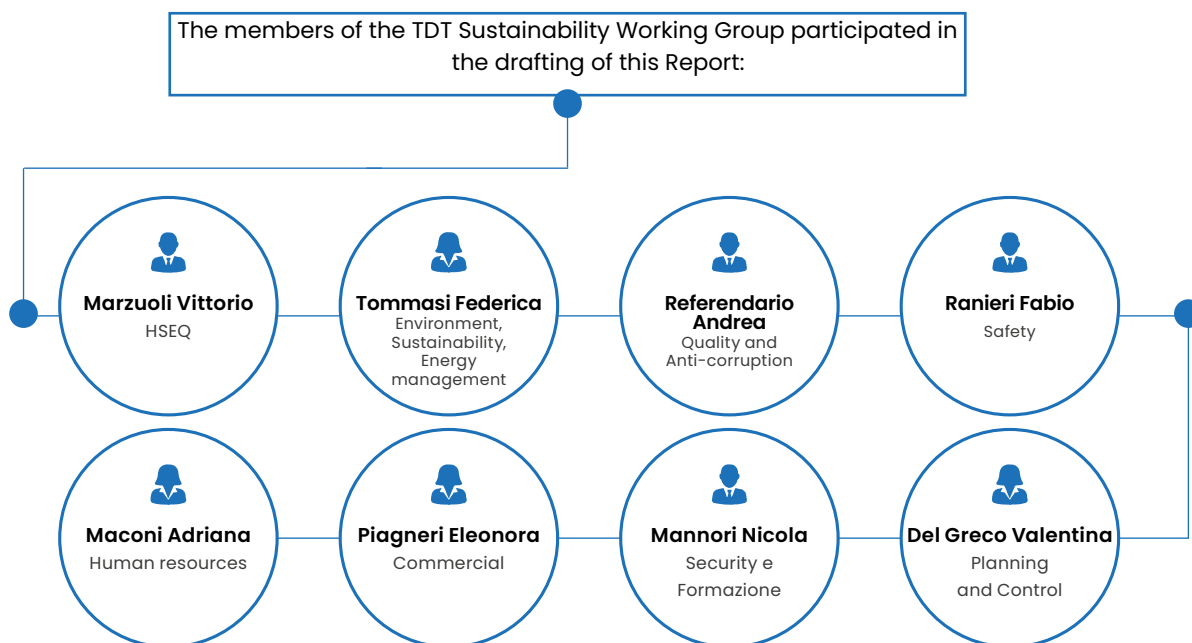
This Sustainability Report refers exclusively to the company Terminal Darsena Toscana s.r.l. above, there are no other entities to include.



## 2.3 Reporting period, frequency and contact point

The reporting period of this TDT Sustainability Report is the year 2022, from 1 January to 31 December.

Data from the previous two years are reported to allow comparison over a three-year period. The reporting frequency is annual.



For information, comments, requests or observations on the contents of the TDT Sustainability Report you can write to the relevant functions by sending a letter or email to the following contacts:

**Terminal Darsena Toscana S.r.l. a Socio Unico,**  
Via Mogadiscio 23, Darsena Toscana Porto di Livorno, 57123 – Livorno  
[sostenibilit @tdt.it](mailto:sostenibilit @tdt.it)

*This document can be downloaded from the company website [www.tdt.it](http://www.tdt.it)*

## 2.4 Restatement of information

There are revisions to the information contained in previous reports in section 301 materials year 2021.

## 2.5 External Assurance

TDT has decided not to subject the 2022 Sustainability Report to verification by an external certifying body, but to proceed with registering or sending it to the GRI, as required by the 2021 Guidelines.



## ACTIVITIES AND WORKERS

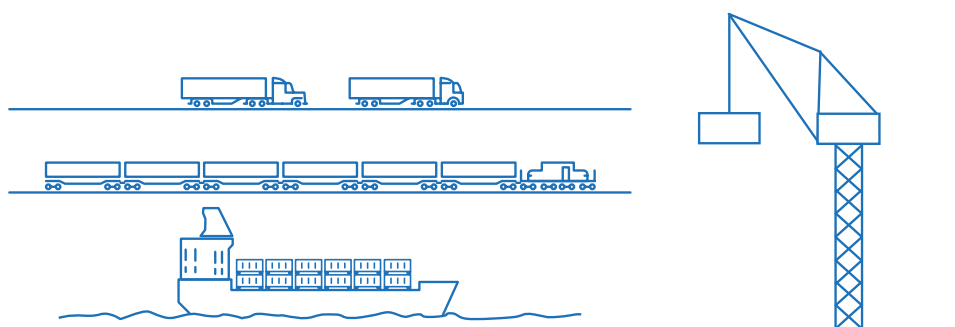
### 2-6 Activities, value chain and other business relationships

#### Activities and sector

Terminal Darsena Toscana S.r.l. a Socio Unico (TDT) carries out the container terminal operator activity in the port of Livorno.

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

Commercial and administrative activities as well as planning, operational and control activities concern loading and unloading, transshipment, storage, custody, movement of full and empty containers, various loose goods to and from trucks, ships, trains using lifting equipment wheeled vehicles, of various types and capacities, and owned quay cranes.



#### Markets served

Despite the long wave of Covid-19 and the Russia-Ukraine conflict having redefined the geopolitical and maritime scenarios, international trade by sea did not stop even in 2022, remaining the driving factor of trade and marking a +1.1% compared to 2021<sup>6</sup>.

There has been an improvement in the freight trend, with record increases in the three-year period 2019-2021.

The SCFI (Shanghai Containerized Freight Index), the most used indicator to evaluate freight trends, after reaching the historical peak of 5,000 points in January 2022, fell further over the twelve months to reach 1,100 points in end of December 2022. The main reason for the decline appears to have been the reduction in demand for goods linked to soaring prices for consumers.

The figure was further impacted by the Chinese government's "zero Covid" policy, with the rotational closure of Shanghai from March to June 2022. Although the port of Shanghai, which handles a fifth of the dragon's trade volumes, remained in operation during throughout the lockdown, its capacity was inevitably reduced, often generating delays, cancellations or diversion of goods traffic to other Chinese ports.

The congestion of the Chinese mega port has alarmed all international logistics as part of an increase in bottlenecks in supply chains. The volumes of goods blocked on containers due to delays and supply chain problems have shown how the post-pandemic problems, exacerbated by the new Chinese restrictions, have an international scope. While a significant portion of traffic was redirected to the Chinese port of Ningbo-Zhoushan, import data showed that container dwell times had skyrocketed due to difficulties with land connections and closed factories in the Chinese region.

The above has represented a concern for both United States and Northern European ports, so much so that new trends have emerged aimed at intensifying *nearshoring/friendshoring* (return of production to friendly countries). In fact, 60% of European and US companies plan to bring part of their Asian production back to Europe and the USA in the next three years. Just think for example of giants such as Apple, Benetton or Ikea, which will move part of their production from Asia to Turkey. We return to creating stocks in warehouses, moving from a just in time perspective to a just in case perspective.

Not even the punctuality and reliability of scheduled services<sup>7</sup> have alleviated **port congestion**, so much so that in July there was a peak of over 37% of containers unavailable due to long waits in the harbor. It is becoming increasingly clear that, in light of the above, one way to reduce obstacles lies in a good logistical partnership between the various shipping players, and between carrier and terminal operator.

Therefore, both the trend of vertical integration of logistics continues, with large maritime carriers entering terminal and logistics activities, and that of horizontal integration, just think that the first 10 top carriers in the world achieve a market share of 84%. The three large global alliances: 2M (Maersk and MSC), Ocean Alliance (COSCO/OOCL, CMA CGM and Evergreen) and The Alliance (made up of Hapag Lloyd, HMM, ONE and Yang Ming), achieve a market share on the Asia route -Europe of 99% and 88% of Asia-North America; these quotas allow us to control the supply through *blank-sailing*<sup>8</sup> which continued throughout 2022.

The outbreak of the **conflict in Ukraine** exacerbated an already critical situation in the context of supply chain interruptions. The imposition of sanctions on Russia and the limitation of trade from Ukraine with the blockade of the ports of Odessa and Mariupol have increased the inflationary pressure as well as the price of raw materials. The most evident aspect of the conflict, in fact, concerns the surge in energy costs<sup>9</sup> which has brought bunker prices to record levels and impacted transport costs, generating greater inflationary pressure on key economies and industrial activity.

These prospects have generated an intensification of regional trade and increased the centrality of areas such as the Mediterranean basin and the Suez Canal for the transit of global trade.

In fact, the Mediterranean continues to maintain its attractive capacity and to be an area of strong port competition, so much so that the gap with the ports of Northern Europe is constantly decreasing and the Port Liner Shipping Connectivity index of the ports of the "Mare nostrum", in the second quarter 2022, is up about 20 points from 2006.

The Suez Canal also shows important numbers: in the first eight months of 2022 it was crossed by 15,329 ships, 15.1% more than the previous period. The Egyptian passage therefore remains a strategic hub for trade in the Mediterranean, representing 12% of world traffic and 7-8% of oil traffic, despite inflationary trends having pushed the canal to review rates from January 2023<sup>10</sup> and despite the new disruptions at global chokepoints<sup>11</sup>, including Suez, have once again highlighted the vulnerability of long chains.

**Table 1:**

TOP 30 PORTS IN 2022 (INCLUDING ESTIMATES) – SOURCE ALPHALINER – CLASSIFIED BY TOTAL VOLUME IN MILLION TEU, WITH THE PREVIOUS YEAR'S POSITION IN BRACKETS

POSITION	PORT (* = ESTIMATE)	COUNTRY	TEU (M)	Δ '22/'21 (%)
1 (1)	Shanghai	Cina	47,28	0,5
2 (2)	Singapore	Singapore	37,29	-0,5
3 (3)	Ningbo-Zhoushan	Cina	33,36	6,8
4 (4)	Shenzhen	Cina	30,04	4,3
5 (6)	Qingdao	Cina	25,66	7,6

<sup>7</sup> "It improves the reliability of scheduled services, with "schedule reliability", i.e. the percentage of ships arriving in ports on time, which in July 2022, for the third consecutive month, reached the percentage of 40.5%". – SRM 09/29/2022.

<sup>8</sup> Ships to direct destination

<sup>9</sup> "The price of gas in Europe increased by 334% between January and August 2022, touching 340 euros per megawatt-hour and then falling to 181.8 after the sole announcement of a possible ceiling on the price of gas (Price Cap) imposed from Europe – SRM 09/29/2022.

<sup>10</sup> "+15% for all types of ships excluding bulk carriers and cruise ships for which the price increase will be +10%" – SRM 09/29/2022.

<sup>11</sup> The temporary blockage of the Affinity V tanker on 1 September 2022 which blocked the southern section of the Suez Canal (one year after the blockage of the container ship Evergreen) further highlights the supply chain difficulties – SRM 09/29/2022.

<sup>12</sup> Value

POSITION	PORT (* = ESTIMATE)	COUNTRY	TEU (M)	Δ '22/'21 (%)
6 (5)	Guangzhou-Nansha	China	24,60	1,7
7 (7)	Busan	Souht Korea	22,07	-2,9
8 (8)	Tianjin	China	21,03	3,7
9 (9)	Los Angeles/Long Beach	USA	19,04	-5,3
10 (10)	Hong Kong	China	16,64	-7,0
11 (11)	Rotterdam*	Netherlands	14,46	-5,8
12 (12)	Dubai/Jebel Ali	UAE	13,97	1,6
13 (15)	Antwerp-Bruges	Belgium	13,50	-5,5
14 (13)	Port Kelang	Malaysia	13,22	-3,8
15 (14)	Xiamen	China	12,42	3,1
16 (16)	Tanjung Pelepas*	Malaysia	10,51	-6,5
17 (18)	New York/Newark	USA	9,49	5,3
18 (17)	Kaohsiung	Taiwan	9,49	-3,9
19 (20)	Laem Chabang	Tailandia	8,74	2,5
20 (19)	Hamburg*	Germany	8,35	-5,4
21 (21)	Ho Chi Minh City*	Vietnam	N.A.	-
22 (23)	Tanger Med	Morocco	7,60	5,6
23 (22)	Colombo	Sri Lanka	6,86	-5,6
24 (24)	Jakarta	Indonesia	6,42	-5,2
25 (25)	Mundra	India	6,50	-2,5
26 (26)	Nhava Sheva	India	5,96	5,5
27 (28)	Savannah	USA	5,89	4,7
28 (32)	Rizhao	China	5,80	10,7
29 (33)	Lianyungang	China	5,57	9,5
30 (35)	Manila	Philippines	5,47	9,1

\* change based on 2022 estimates. Alphaliner rankings include estimates for ports that have not reported their full-year figures, and rankings may change. Alphaliner N° 13/2023



Disruption to supply chains, port congestion, conflict and the drive for decarbonisation are impacting our ports which are once again proving resilient.

In fact, in the financial year just ended, the containerized traffic moved in Italian ports stood at around 11.6 million TEU, practically the same result achieved in 2021, albeit with some differences and particularities.

A first difference concerns transshipment traffic: while transshipment in the port of Gioia Tauro grew by at least 7% (3.4 million TEUs) thanks to the boxes transported by MSC and handled by the Calabrian terminal arm Medcenter Container Terminal, the transshipment in the port of Livorno it has almost halved compared to 2021 (-55% in 2022).

If the container traffic destined for transshipment was in the order of at least 4.2 million TEUs at a national level, the containerized load volumes for import-export through the other Italian gateway ports were also around 7.4 million in 2022 of Teu. A stable quantity for several years now despite the entry or return to the market of new terminal capacity around Italy (e.g. Vado Gateway, Terminal Bettolo, Mito, San Cataldo Container Terminal and Hhla Plt Italy).

**Table 2:**  
CONTAINER TRAFFIC IN THE MAIN ITALIAN PORTS, YEARS 2020-2022 (PRELIMINARY DATA IN TEU)

PORT OF	2020	2021	2022
Gioia Tauro	3.193.364	3.146.533	3.380.053
Genoa	2.352.769	2.557.847	2.532.532
La Spezia	1.173.660	1.375.626	1.262.496
Trieste	776.022	757.255	877.795
Livorno	716.233	791.356	751.811
Naples	643.540	652.599	684.111
Venice	529.064	513.814	533.991
Salerno	377.886	419.102	361.884
Savona-Vado	146.081	223.265	266.591
Ravenna	194.868	212.926	228.435
Ancona	158.677	167.338	165.346
Cagliari	68.406	109.653	140.216
Civitavecchia	106.695	100.248	112.200

The port of Livorno, despite having been overtaken by Trieste in the ranking of the main Italian ports, remains at the top of the ranking, closing the past year at 751,811 TEU, a decrease of approximately 6% compared to 2021.

2022 was a good year where the Terminal Darsena Toscana was able to recover important import and export market shares.

At the top of the market share of the Livorno harbor we find, as always, the Terminal Darsena Toscana, with its 467,938 TEUs (2021 volumes were 468,942, equal to -0.21%).

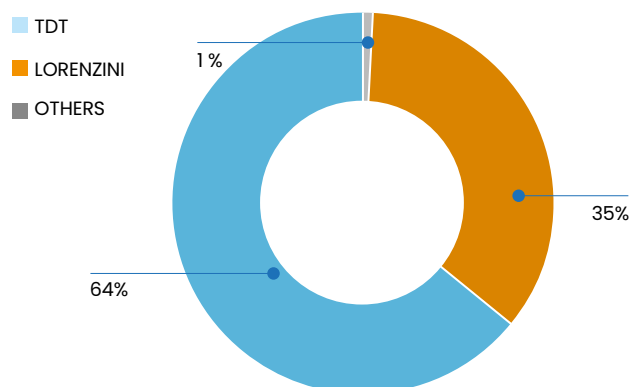
**Table 3:**

TDT IN THE PORT OF LIVORNO – 2021/2022 DATA (WITHOUT RESTOW AND SHIFTING)

TML	TEU 2021	TEU 2022	Δ 2022/2021	MARKET SHARE 2021 (%)	MARKET SHARE 2022 (%)
TDT	468.942	467.938	-0,21%	61%	64%
Lorenzini	298.731	255.335	-14,53%	38%	35%
Others (Cilp, LTM, Sintermar, Marterneri)	4875	3987	-18,22%	1%	1%
Total	772.548	727.260	-5,86%	100%	100%

**Graph 1:**

TDT IN THE PORT OF LIVORNO – 2022 DATA

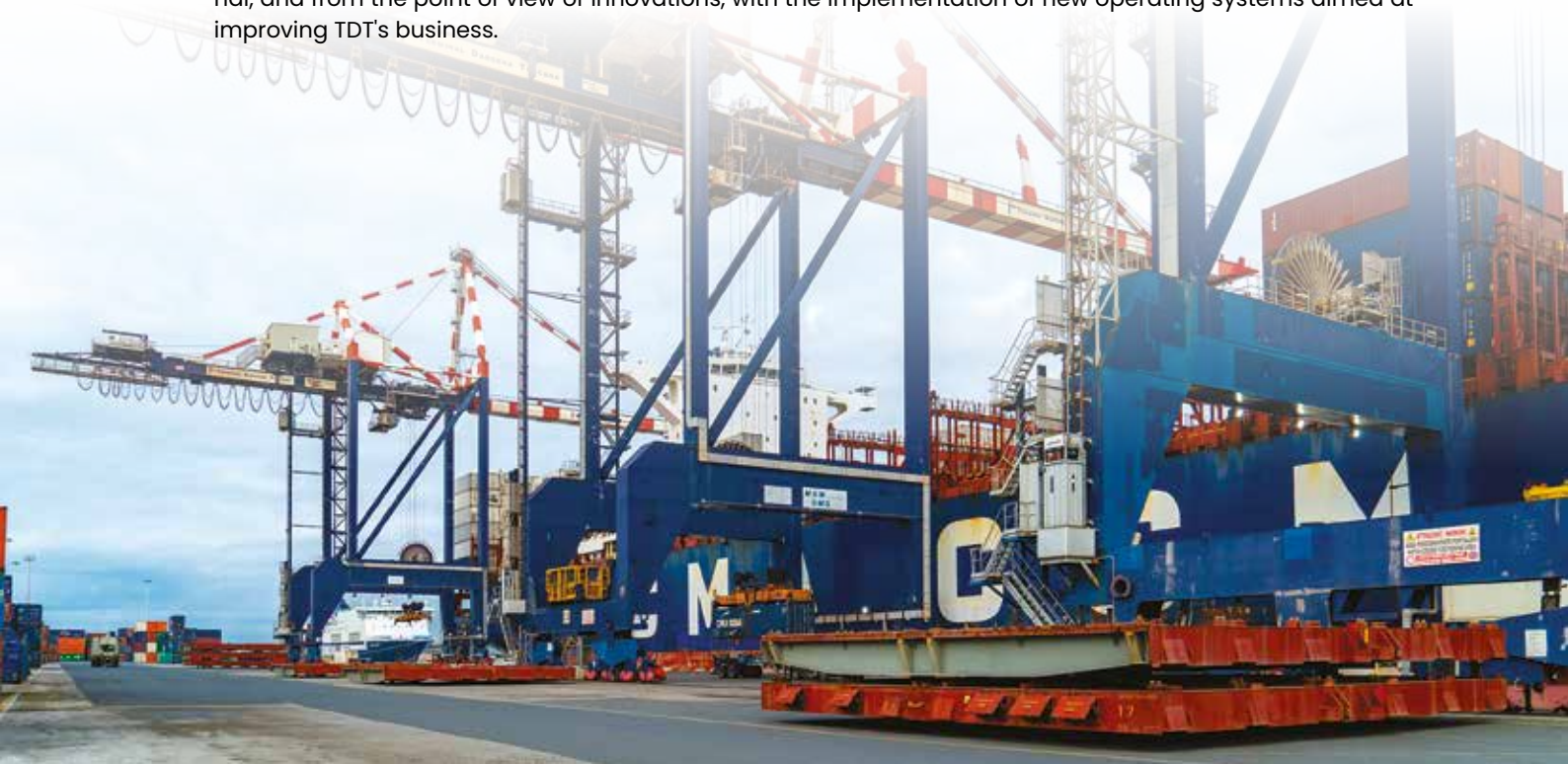


Change in the TDT traffic composition:

- gateway traffic clearly growing, with 279,316 full TEUs (+29%)
- handling of empty containers equal to 110,059 TEU (+43.9%)
- transshipment traffic (78,563 TEU in 2022) halved (-55.4%)

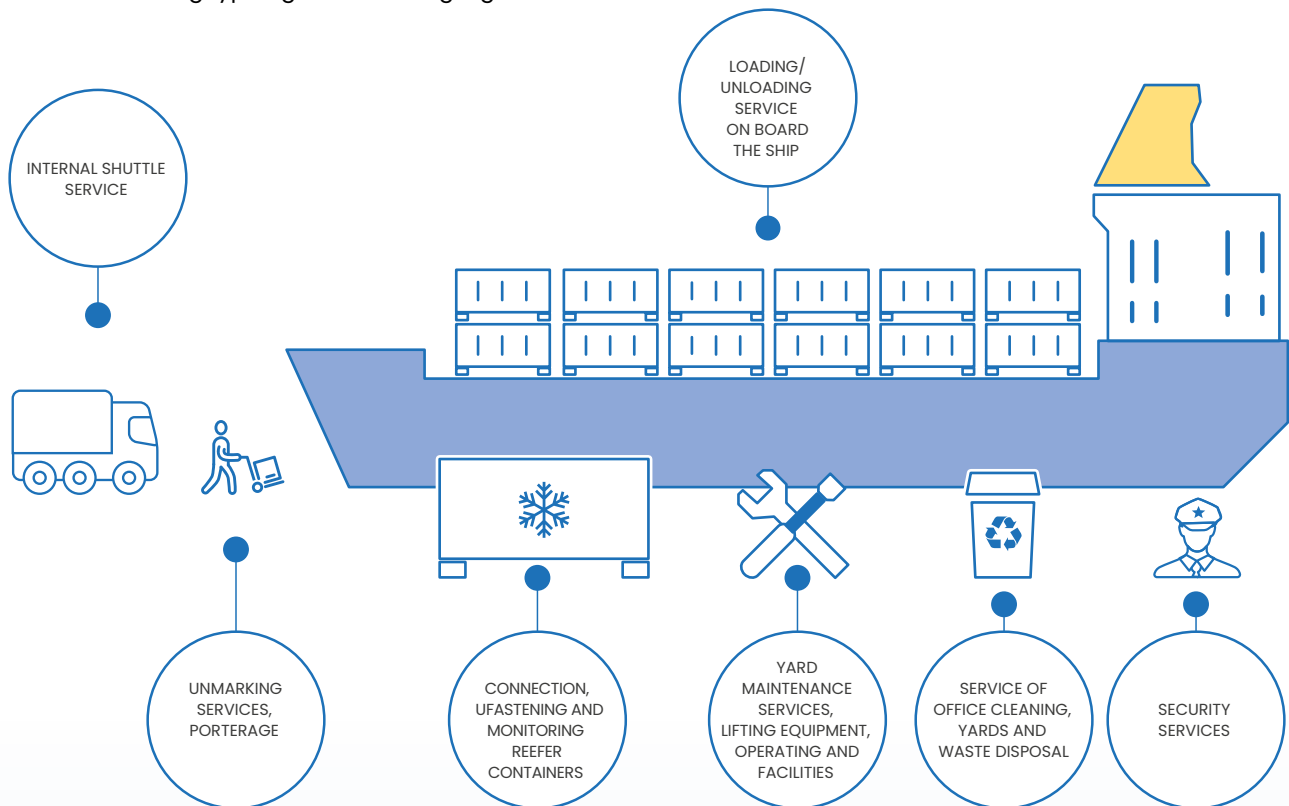
The “stretch” on hinterland volumes and in particular on full containers compared to last year, as well as the decline in transshipment, is due to a change in the Hapag Lloyd network at the end of 2021.

We can therefore say that 2022 ended positively for the Terminal Darsena Toscana, both for the results achieved from a commercial point of view, thanks to the consolidation of the services that scale the Terminal, and from the point of view of innovations, with the implementation of new operating systems aimed at improving TDT's business.



## Supply chain

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



## Suppliers

All suppliers have relevance in the chain of supply and are distinguished by the different characteristics and significance of the supplies provided

To carry out its activities, TDT uses suppliers capable of satisfying its needs and at the same time satisfying the expectations of customers and stakeholders

The supplies functional to the provision of the services dispensed by TDT are assigned to suppliers operating in the geographical area of Livorno or surrounding areas

In particular, both the suppliers whose supply sets in directly in the execution of the work cycles and clearly contribute to the achievement of company objectives and compliance with economic, environmental and safety aspects, as well as those of materials or services capable of ensuring logistical-organizational support for activities also ensuring compliance with TDT's economic, environmental, safety and social criteria

During the estimated period of time, no significant changes occurred regarding size, structure, ownership of TDT or its supply chain



## 2.7 Employees

As of 31.12.2022 TDT directly employs 269 workers to carry out its activities.

Below is the data on TDT's employees and their composition.

**Table 4:**  
STAFF COMPOSITION – NUMBER OF PEOPLE

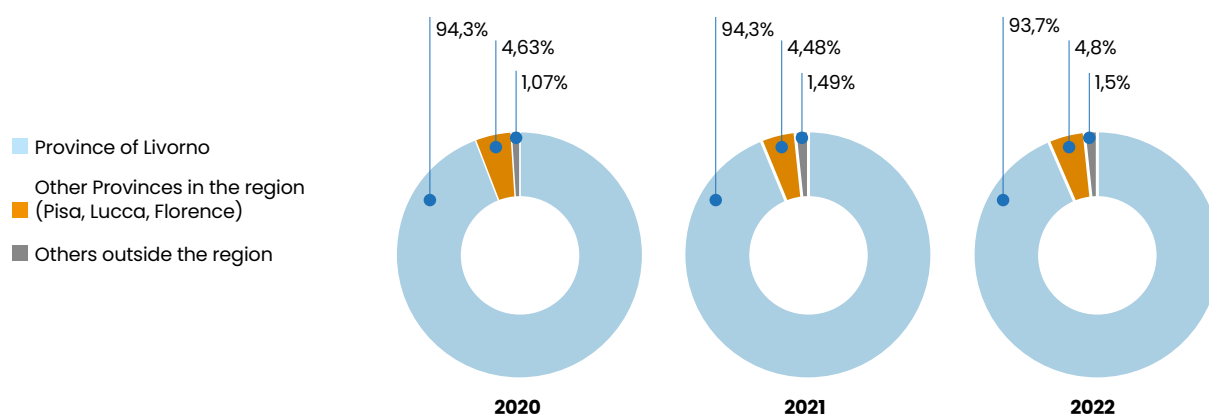
STAFF COMPOSITION	2020	2021	2022
Total employees	281	268	269
By gender			
Men	231	218	221
Women	50	50	48
By age			
Under the age of 30	3	1	4
Between 30 and 50 years old	186	176	161
Over 50	92	91	104
Average age of staff	47	47	48
By professional category			
Senior executives	6	8	7
Middle Managers	6	2	2
Employees	149	140	137
Workers	130	118	123
By type of contract			
Indefinitely	292	268	264
Temporary	0	0	5
Apprentices	0	0	0
By type of employment			
Full time	275	252	255
Part time	17	16	14

In TDT, which operates according to art.18 of L.84/96, the percentage of women employed is 18%, equal to 48 employees out of 268 employees.

Below is the geographical origin of the employees.

All senior managers come from the catchment area of TDT (i.e North Tyrrhenian sea area)

**Graph 2:**  
*ORIGIN OF EMPLOYEES*



## 2.8 Workers who are not employees

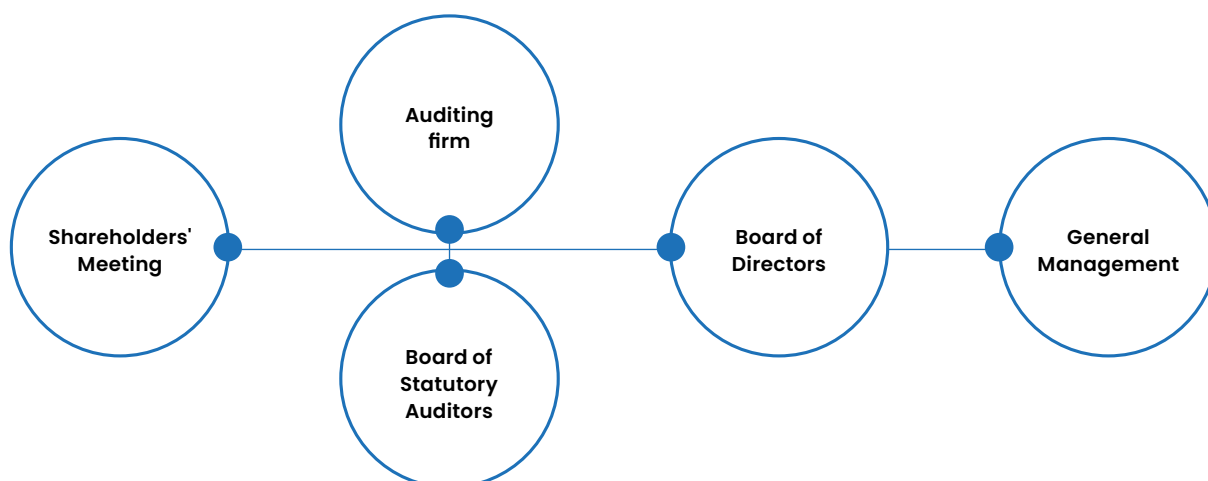
In addition to its own employees, TDT makes use of the services of the Port Labor Agency of Livorno which represents the only entity that can provide manpower, authorized pursuant to art. 17 L.84/94.

# GOVERNANCE

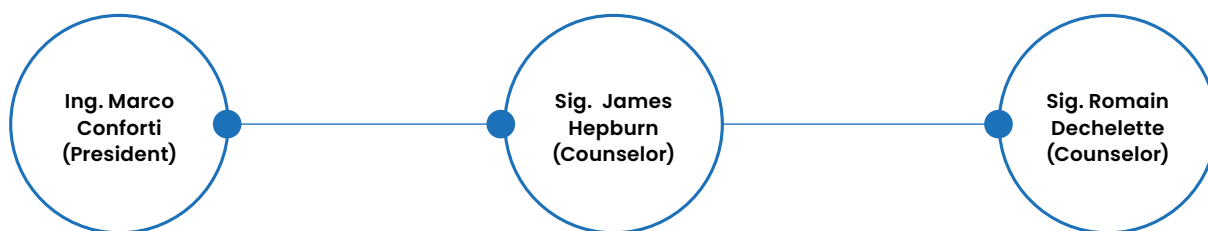
## 2.9 Governance structure and composition

The Shareholders' Meeting appoints the Board of Directors and the Board of Statutory Auditors, approves the financial statements every year and, if necessary, is convened in extraordinary session for the resolutions that fall within its competence according to the law and the Articles of Association.

The TDT Board of Directors defines the strategic directions of the group and assumes responsibility for corporate governance.



**As of 12.31.2022, the TDT Board of Directors is composed of 3 members:**



The Board of Directors appoints Engineer Marco Mignogna as General Director of TDT, determining his attributions and management powers through a specific proxy in accordance with the strategies and directives defined by the Board of Directors itself.

The Board of Statutory Auditors is made up of three members: the president Dr. Giancarlo Strada and the auditors Dr. Giorgio Costella and Dr. Torracca Paolo.

The company's financial statements for the year 2022 are certified by the auditing firm Price Waterhouse-Coopers S.p.A.

Alongside these bodies, in compliance with the establishment of the Management, Organization and Control Model pursuant to Legislative Decree 231/2001 established by resolution of the TDT Board of Directors on 12.12.2009, the Supervisory Body composed of two members: Dr. Guido Leonardi (acting as President) and Dr. Valerio Liperini.

## 2-10 Nomination and selection of the highest governance body

The members of the Board of Directors were appointed by the Shareholders' Meeting considering the representativeness of the shareholders, independence and competence with respect to economic, social and environmental issues as the founding criteria.

## 2-11 Chair of the highest governance body

No Directors or Managing Directors have been appointed within the TDT Board of Directors; no committees have been established to which the Board of Directors has delegated its powers.





## 2.12 Role of the highest governing body in overseeing the management of impact

The TDT Board of Directors approves the values expressed in the TDT Code of Ethics and confirms the commitment towards achieving the strategic corporate objectives relating to economic, environmental and social sustainability and also expressed in the Quality, Safety and Health at Work, Environment, Anti-Corruption prepared by the General Management.

The goals, approved by the Board of Directors, are pursued according to specific plans developed taking into account material environmental, economic and social issues.

TDT identifies and manages its economic, environmental and social issues and the related impacts, risks and opportunities with contextual analyzes 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.

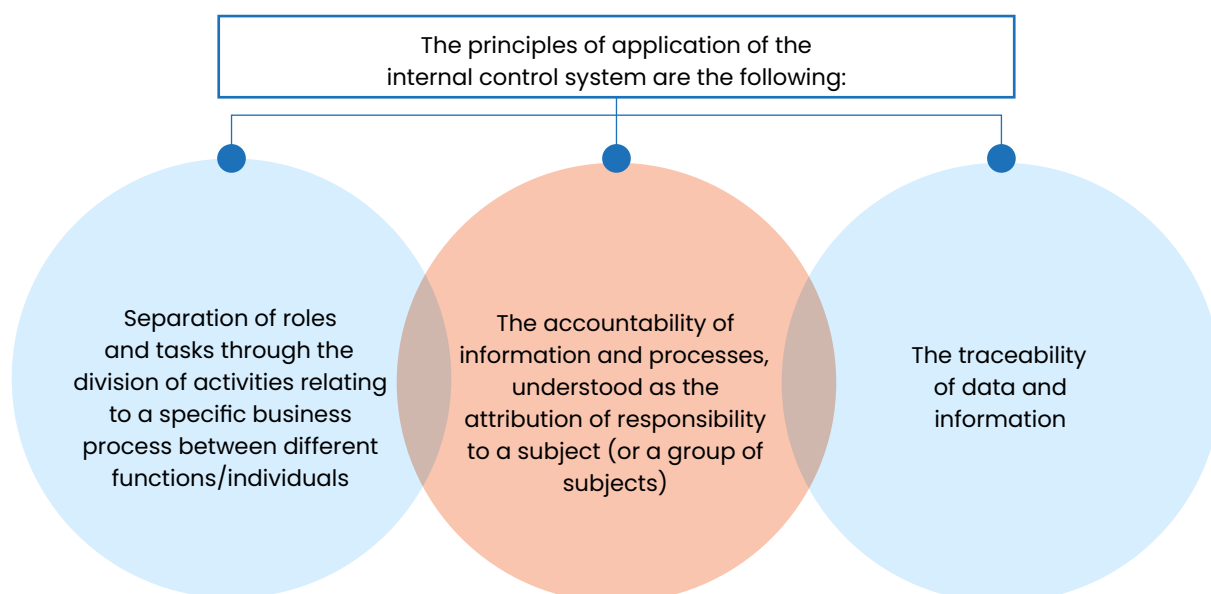
To identify these issues, TDT, and in particular the General Management, consults with its stakeholders, be they Customers, Investors, Suppliers or Authorities.

In conducting its business, TDT identifies, addresses and manages numerous types of risk that can potentially generate significant economic-financial, patrimonial, social, environmental and reputational impacts.

TDT adopts strategic and management objectives and plans capable of recognising, preventing and containing the impacts of all risks inherent in carrying out activities, ensuring the effectiveness of the actions undertaken, as well as compliance with mandatory regulations.

The responsibility for the implementation of these plans lies with the General Management supported by the management team, i.e. the responsible function managers.

Furthermore, TDT has adopted a system of internal controls, consisting of a set of principles, rules and procedures aimed at allowing healthy, correct and consistent management of the company with the objectives established in compliance with economic, environmental and social sustainability.



Furthermore, TDT has long maintained its strategy of implementing and certifying management systems in accordance with international standards to ensure both continuous reference to best practices and the verification of their implementation by independent third-party bodies.

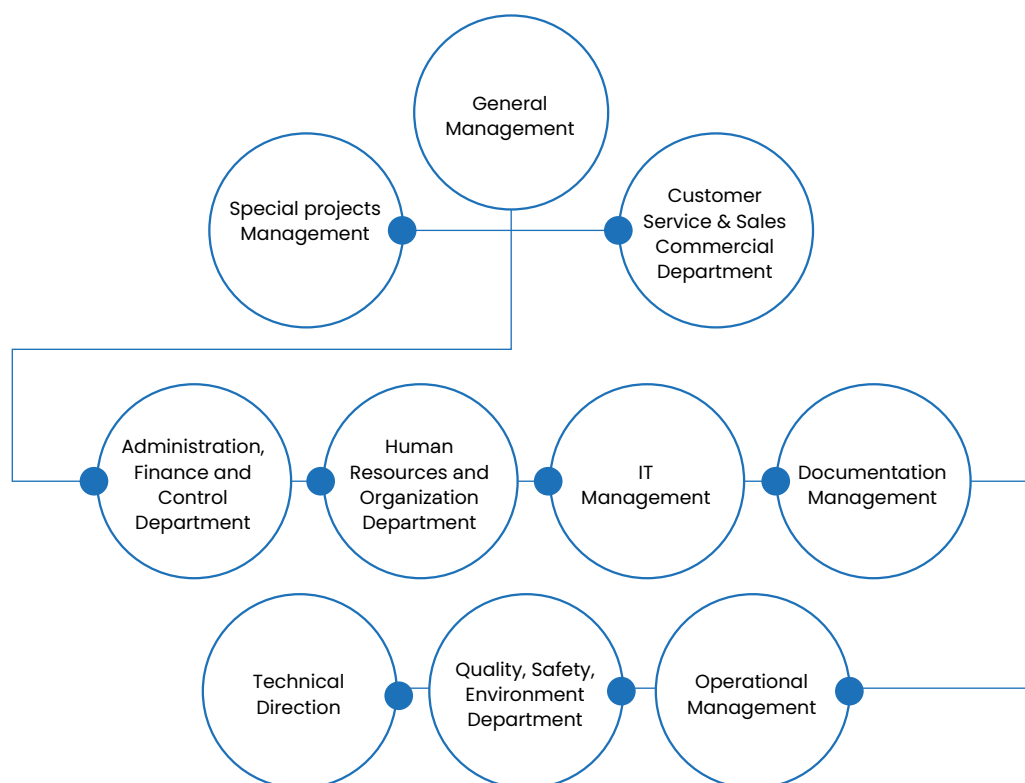
TDT provides its services through an Integrated Management System compliant with Standards ISO 9001:2015 (Quality Management System), ISO 14001:2015 (Environmental Management System), ISO 45001:2018 (Health and Safety Management System) and ISO 37001:2016 (Anti-Corruption Management System).

## 2.13 Delegation of responsibility for managing impacts

The General Manager, through the powers delegated to him, has the responsibility of managing economic, environmental and social issues and the related impacts and of implementing the strategies making use of the company management.

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

**Graph 3:**  
TDT ORGANIZATIONAL CHART



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

## 2.14 Role of the highest Governance body in sustainability reporting

The Top Management of TDT supported by the Board of Directors verifies and approves the Sustainability Report drawn up by the Working Group, ensuring the adequacy of the internal controls implemented so that the contents and material topics relating to the Economic, Environmental and Social impacts resulting from the analysis of the context and from communication with stakeholders are reported according to principles of integrity and credibility.

## 2.15 Conflicts of interest

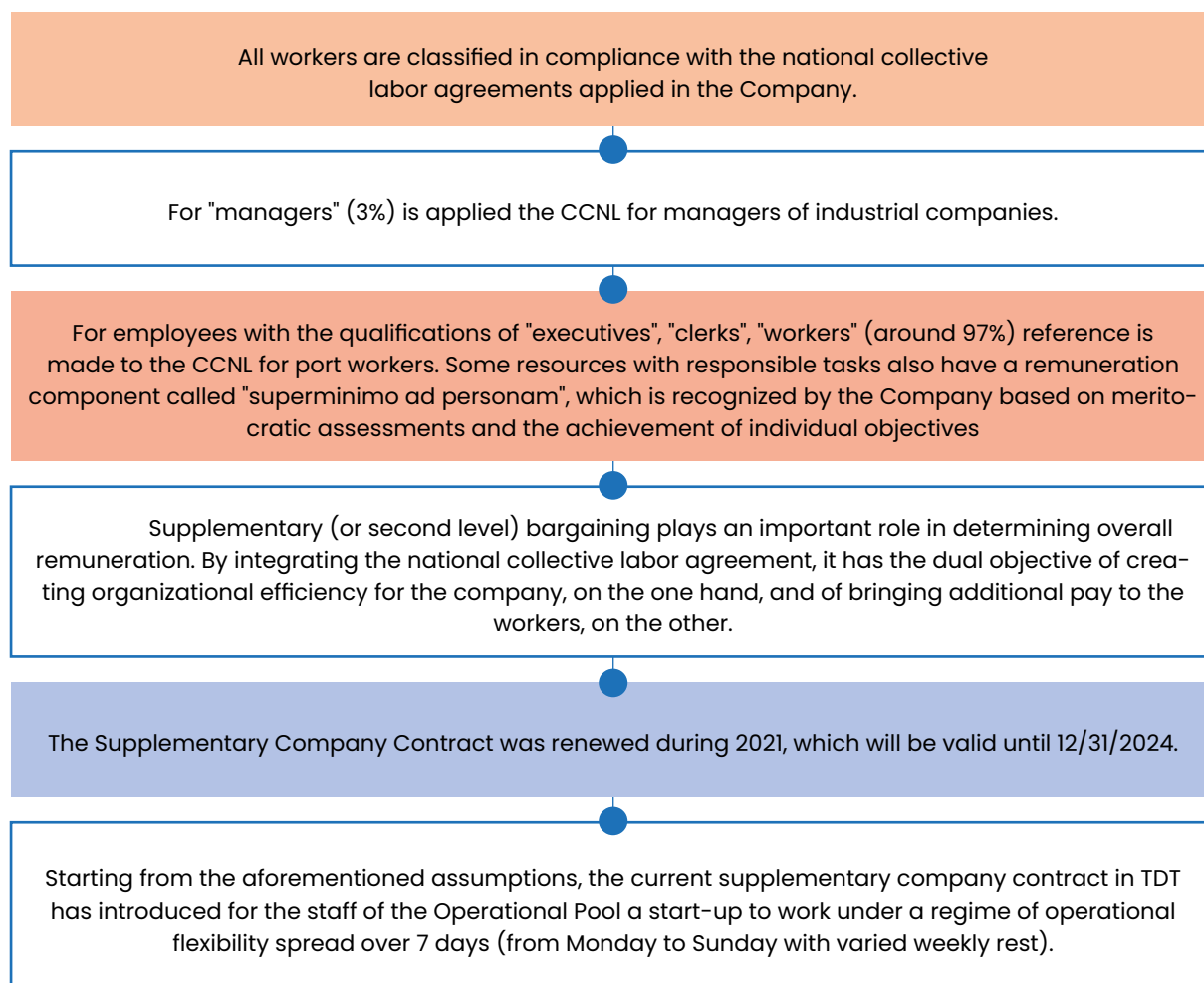
*During the year, no situations of conflict of interest were identified or communicated.*

## 2-16 Communication of critical concerns

The information and critical issues that arise from the reviews of the Management Systems with reference to environmental and social aspects are integrated by the Top Management with the economic-financial information that emerges during the drafting of the annual budget and are brought to the attention of the Board of Directors on the occasion of specific meetings.

During the year, no significant critical issues or controversies were identified relating to economic, environmental and social issues which required the adoption of legal actions or changes to the organization or activities.

## 2-20 Process to determine remuneration



## 2-21 Annual total compensation ratio

The ratio between the highest salary and the median values of employee compensation are shown below.

**TABLE 5:**  
RATIO BETWEEN THE HIGHEST SALARY AND THE AVERAGE SALARY

RATIO BETWEEN THE HIGHEST SALARY AND THE AVERAGE SALARY	2020	2021	2022
	2,1	2,0	1,74



**Table 6:**

RATIO BETWEEN THE CHANGE IN THE HIGHEST SALARY AND THE CHANGE IN THE AVERAGE SALARY

RATIO BETWEEN THE CHANGE IN THE HIGHEST SALARY AND THE CHANGE IN THE AVERAGE SALARY	2020	2021	2022
Variation of the highest paid	-0,8%*	-0,2%*	1,3
Average Salary Change	-7,3%	2,7%	8,5
Difference	6,5%	2,9%	7,2

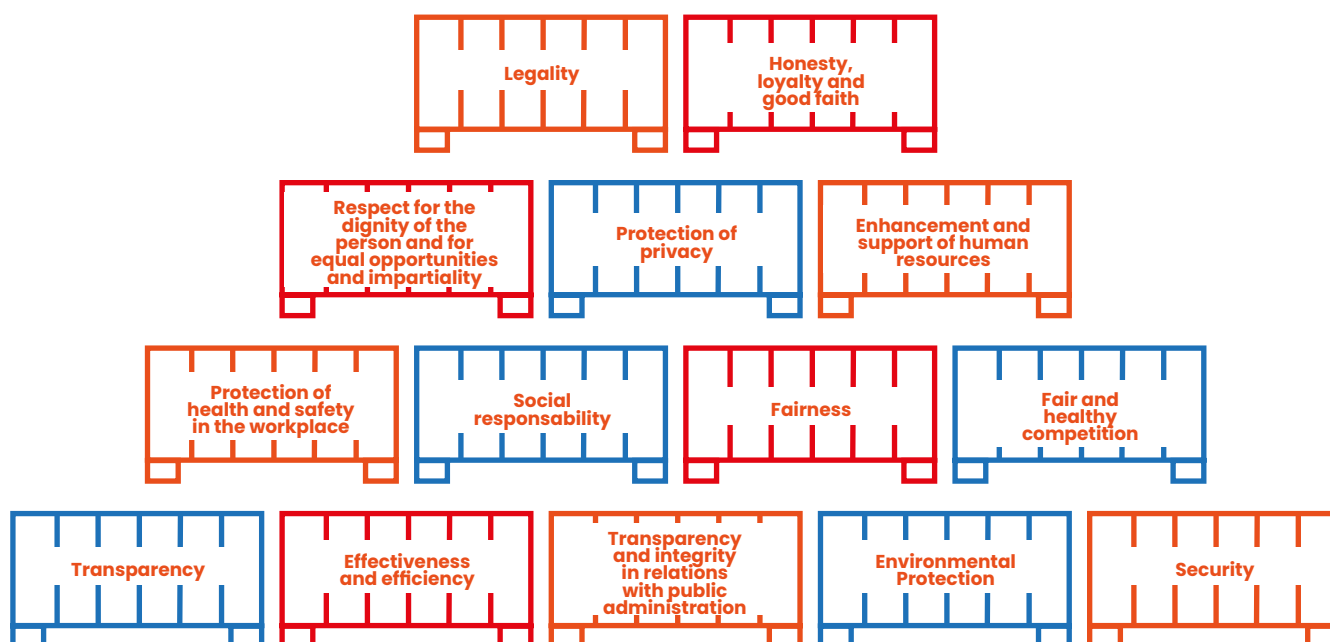
\*The Covid-19 redundancy fund has been used since 2020, ending in July 2021

## STRATEGY, POLICIES AND PRACTICES

### 2.23 Policy commitments

TDT has adopted its own Code of Ethics to illustrate the set of values and principles, commitments and ethical responsibilities which inspire it in the conduct of business and corporate activities and which all those who entertain, in any capacity, relations and relationships with the Company..

The commitment to respect the values and principles indicated in the Code of Ethics is aimed at ensuring responsible, sustainable and respectful business conduct of internationally recognized human rights aimed at achieving the Sustainable Development Goals (SDGs) expressed by the United Nations .



The Ethical Principles indicated in the Code are the bases and assumptions of reference and orientation of the behaviors and activities for the people who work and collaborate with Terminal Darsena Toscana, in terms of correctness, reliability, corporate image and reputation, protection of assets, compliance with current laws and rules.

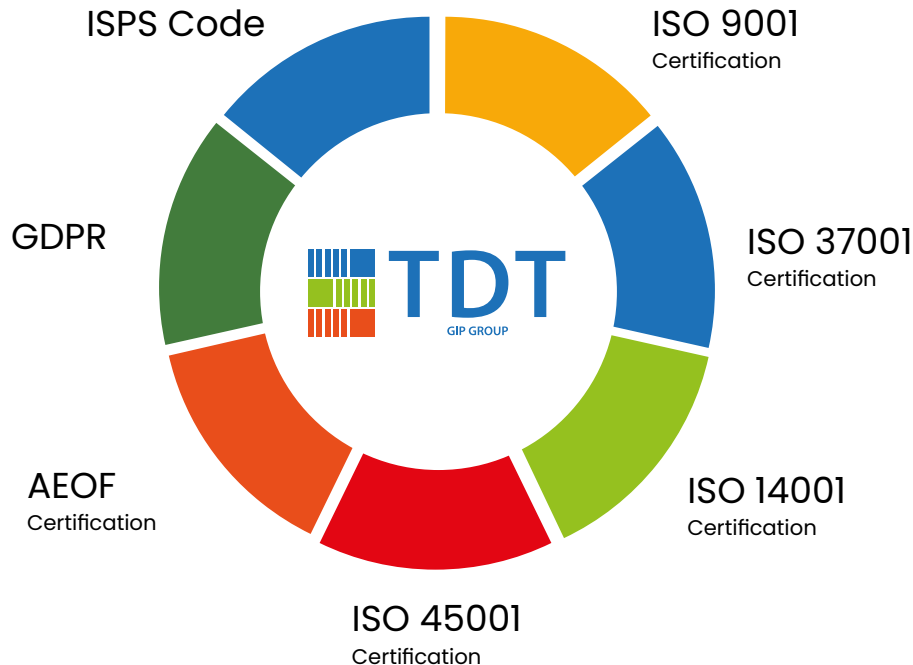
The Code of Ethics is available on the TDT website [www.tdt.it](http://www.tdt.it).

The Code of Ethics was approved by the TDT Board of Directors as part of the establishment of the organizational and management model (MoG) pursuant to D.lgs. 231/2001 and represents a further system of guarantee and control of compliance with current legislation.

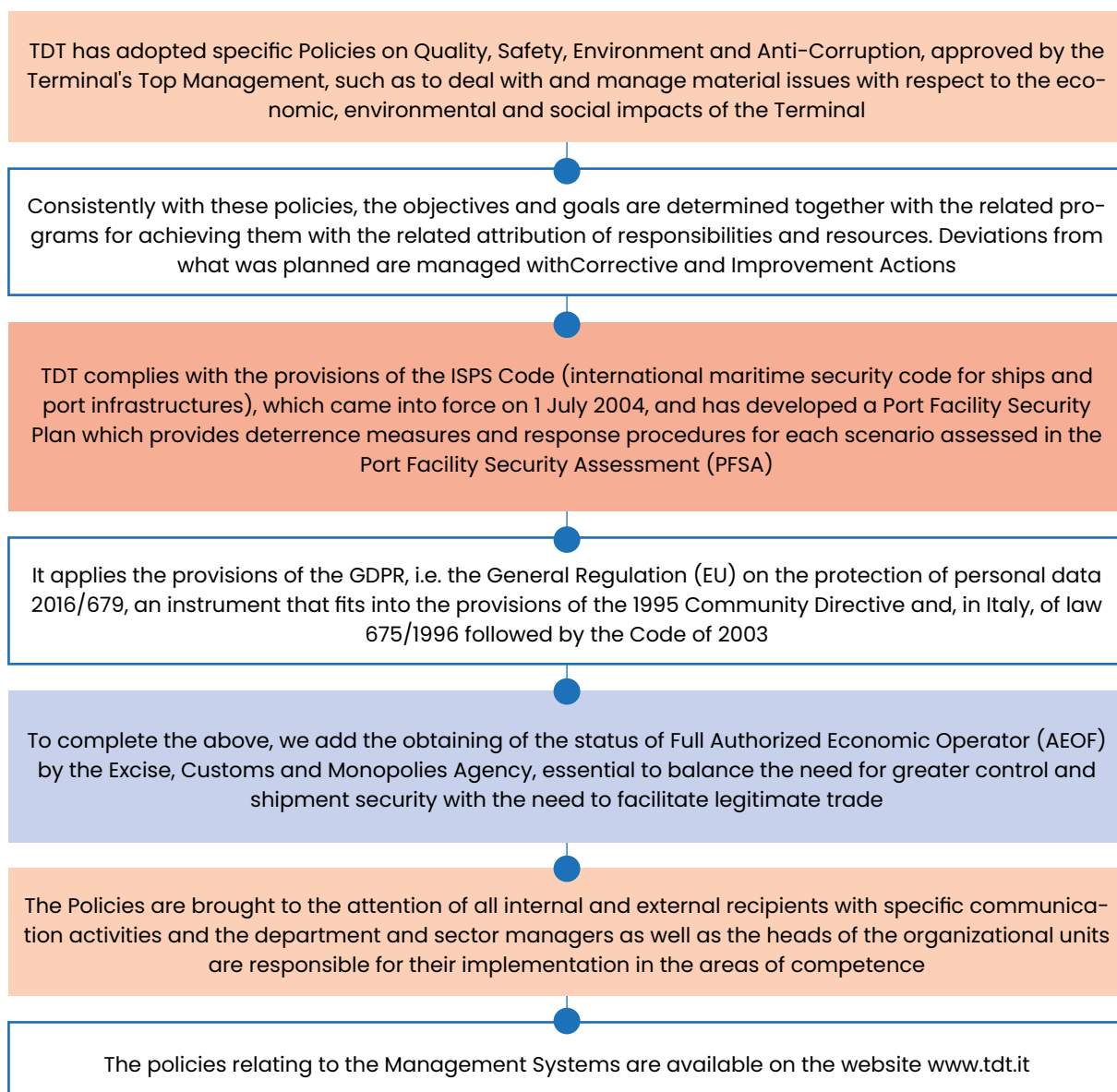
The Code of Ethics is brought to the attention of all internal and external recipients with specific communication activities; the function and sector managers as well as the heads of the organizational units are responsible for its implementation together with the related procedures and regulations, in their areas of competence.

## 2.24 Embedding policy commitments

TDT integrates commitments and responsibilities towards sustainability and respect for human rights by implementing and maintaining its Management Systems active and extending the approaches required by these Standards to other company aspects and dimensions.



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



## 2-25 Processes to remediate negative impacts

As part of the systemic approach to the Management of Material Issues, TDT gives space to the reports of its Stakeholders by implementing specific procedures for the Management of Complaints and Reports with the aim of remedying the event of negative events or expressions of concerns, and identifying proactively any negative impacts.

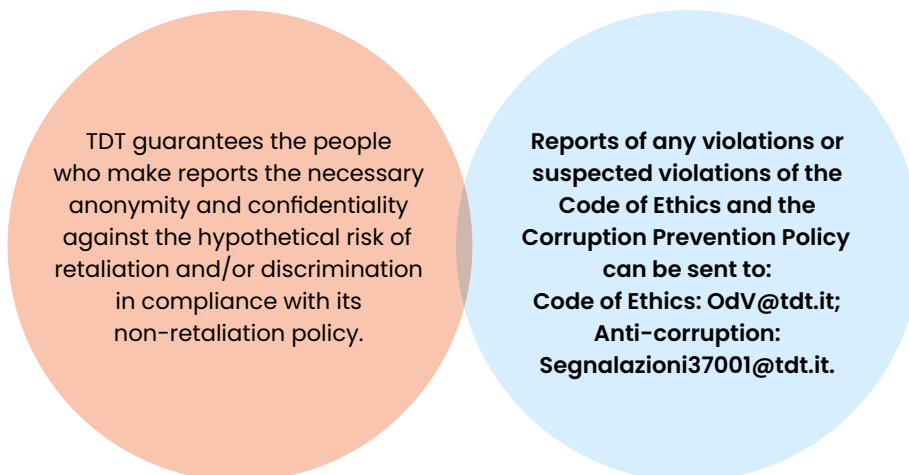
## 2-26 Mechanisms for seeking advice and raising concerns

TDT has established, by resolution of the Board of Directors, 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 the d.lgs. 231.

Reports relating to unethical or illegal behavior inherent to compliance with the principles and values described in the Code of Ethics can be addressed to this body.



Furthermore, as part of the Management System for the Prevention of Corruption, created in accordance with the UNI ISO 37001 standard, the Compliance Function has been established to which acts or suspected acts of corruption relating to the activities carried out by TDT can be reported.



## 2.27 Compliance with laws and regulations

During the 2020-2022 period of time, no significant financial penalties and non-monetary sanctions were imposed for non-compliance with laws and/or regulations on social, environmental and economic matters.

TDT manages its own socio-economic and environmental compliance, i.e. the overall degree of compliance with applicable laws, as well as compliance with specific laws or regulations on social and economic matters through its own Organization and Control Model pursuant to ex D.Lgs 231/2001 and its own Management Systems.

The methods of monitoring compliance with legal requirements are defined and described in a dedicated procedure.

## 2.28 Membership associations

TDT is a member of Assiterminal, the Italian Association of Port Terminal Operators, the main associative expression of the Italian port industry which promotes the development of terminals and port operators.

Currently, no member of the TDT Board of Directors holds roles or positions in national or regional industry associations.

# STAKEHOLDER

## 2.29 Approach to stakeholder engagement

During its activities, TDT interacts with numerous stakeholders in order to identify possible impacts and determine any prevention and mitigation responses.

The analysis of the interaction methods and their frequency made it possible to collect useful informations for reporting and which were analyzed and combined with the results of the context analysis developed to comply with the requirements of the ISO 9001, 14001, 37001 and 45001 standards ; on the basis of the results of this processing, the Stakeholders were identified and selected.

The Stakeholders towards whom TDT is primarily considered responsible are:

CUSTOMERS,  
FREIGHT FORWARDERS  
AND CONVEYORS



INVESTORS



WORKERS AND  
TRADE UNIONS



AUTHORITIES AND  
CONTROL BODIES



SUPPLIERS



TDT maintains active communication with its Stakeholders on economic, environmental and social issues and among the methods of contact and involvement the following are highlighted:

- meetings with Investors such as Management Meetings, Steering Committee etc.,
- Customer Satisfaction surveys,
- discussions with the Authorities and Control Bodies at the institutional tables for the renewals of concessions and authorisations, including the Port System Authority of the Northern Tyrrhenian Sea, the Port Authority and the Excise, Customs and Monopolies Agency, as expected by the Regulations and Ordinances of the Port of Livorno,
- periodic meetings with the RLS,
- periodic meetings with the Workers as part of the management of collective bargaining agreements, meetings with suppliers for the definition of contractual relationships and the management of the related activities for safety and environmental aspects.

#### TDT MEETS STAKEHOLDER NEEDS

*Terminal Darsena Toscana, like every year, participated in the annual FRUIT LOGISTICA fair in Berlin which exceptionally was held from 5 to 7 April 2022. TDT in collaboration with the Port System Authority of the Northern Tyrrhenian Sea, the Interporto TO. Vespucci and the "Livorno Reefer" of the "CPL" group were once again present under the slogan of "Livorno Cold Chain" in Hall 25 with the joint stand A-01. For the "Livorno Cold Chain", the logistics chain linked to the transport, handling and distribution activities of refrigerated agri-food products passing through the port of Livorno was an opportunity to approach the world market and highlight once again the efficiency and system excellence..*

**Table 7:**

LIST OF STAKEHOLDERS, EXPECTATIONS, METHODS AND FREQUENCY OF INVOLVEMENT

STAKEHOLDER	METHODS OF INVOLVEMENT	FREQUENCY OF INVOLVEMENT
Trade Associations	<ul style="list-style-type: none"> <li>• Collaboration and partnership initiatives</li> <li>• Institutional roundtables</li> <li>• Direct participation in technical committees and steering bodies</li> <li>• Organization of seminars, workshops, targeted investigations</li> <li>• Sending the latest Sustainability Report and requesting feedback</li> </ul>	More than once a year
Authorities and Control Bodies	<ul style="list-style-type: none"> <li>• Daily reports</li> <li>• Periodic meetings</li> <li>• Institutional roundtables</li> <li>• Information flows</li> </ul>	More than once a year
Neighboring Companies	<ul style="list-style-type: none"> <li>• Information flows</li> </ul>	More than once a year
Banks/Insurance	<ul style="list-style-type: none"> <li>• Dedicated meetings</li> </ul>	At least once a year
Customers	<ul style="list-style-type: none"> <li>• Customer Satisfaction surveys</li> <li>• Performance Indicators (VPR)</li> <li>• Periodic meetings</li> <li>• Litigation analysis</li> <li>• Sending the latest Sustainability Report</li> </ul>	More than once a year

Collectivity	<ul style="list-style-type: none"> <li>Participation in meeting opportunities such as expo and conferences</li> <li>Opening days of the Terminal for visits</li> </ul>	At least once a year
Enti Previdenziali e Assistenziali	<ul style="list-style-type: none"> <li>Daily reports</li> <li>Periodic meetings</li> <li>Institutional roundtables</li> </ul>	More than once a year
Suppliers	<ul style="list-style-type: none"> <li>Visits to suppliers</li> <li>Dedicated negotiation meetings</li> <li>Coordination meetings for Safety/Environment also regarding the behavior to be observed inside the Terminal</li> <li>Participation in meeting opportunities such as meetings, expo and conferences</li> </ul>	More than once a year
Investors	<ul style="list-style-type: none"> <li>Dedicated meetings (management meeting, steering committee)</li> <li>Evaluation and approval of the Sustainability Report</li> </ul>	More than once a year
Training institutes and bodies	<ul style="list-style-type: none"> <li>Daily reports</li> <li>Dedicated meetings</li> </ul>	More than once a year
Workers	<ul style="list-style-type: none"> <li>Survey on organizational well-being</li> <li>Communications through the company intranet</li> <li>Focus groups on specific topics</li> <li>Discussion with OOSS territorial secretariats stipulating the CCNL, RSU and RLS</li> <li>Any Newsletters</li> <li>Publication of the Sustainability Report on the intranet and internet.</li> </ul>	More than once a year
Assistance Information Media	<ul style="list-style-type: none"> <li>Newspaper articles</li> <li>Press conferences</li> <li>Terminal visits for articles and television reports</li> </ul>	At least once a year
Rescue Services	<ul style="list-style-type: none"> <li>Information flows</li> </ul>	More than once a year
Technical - Nautical Services	<ul style="list-style-type: none"> <li>Daily reports</li> <li>Dedicated meetings</li> </ul>	More than once a year
Labor unions	<ul style="list-style-type: none"> <li>Daily reports</li> <li>Institutional tables</li> <li>Direct participation in technical committees and steering bodies</li> </ul>	More than once a year
Freight forwarders	<ul style="list-style-type: none"> <li>Daily reports.</li> <li>Periodic meetings/institutional roundtables</li> </ul>	More than once a year
Transporters	<ul style="list-style-type: none"> <li>Daily reports.</li> <li>Periodic meetings/institutional roundtables</li> </ul>	More than once a year





# 3



## MATERIAL TOPICS

## REPORTING OF MATERIAL TOPICS

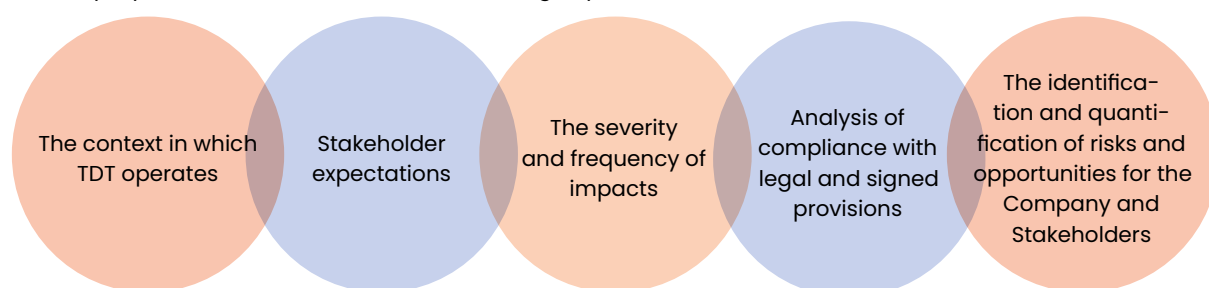
### 3.1 Process to determine material topics

The determination of the material topics was carried out by identifying the actual and potential impacts of an economic, social and environmental nature, and for these by evaluating their scope.

The information regarding the impacts and influence on the Stakeholders was collected during the various formal and informal meetings between the Stakeholders and TDT, and evaluated by the Working Group based on the potential for TDT to manage and improve these impacts.

The assessment of the extent of the impacts is typically conducted within the Management Systems in compliance with the applicable standards, as well as the assessments carried out during the meetings of the Board of Directors and the Management Team.

For the purposes of this evaluation the following aspects are taken into consideration:



The materiality analysis was updated in 2022 based on the combination of the impacts caused by the TDT activity and the interactions with Commercial, Supply Chain and Institutional partners, as well as the ability to influence them; TDT determined the topics to be considered material and defined the reference perimeter.

This perimeter differs from the commercial catchment area of Terminal Darsena Toscana, the Northern Tyrrhenian Shipping market and the routes connected to it with regards to partner customers, and refers mainly to the Port of Livorno and the stakeholders who are involved in the operations carried out by TDT in this geographical area.

### 3.2 List of material topics and related SDGs

**Table 8:**  
LIST OF MATERIAL TOPICS

TOPICS	INDICATOR DESCRIPTION	MATERIALITY	BOUNDARIES OF APPEARANCE (EXTERNAL-INTERNAL)	SDGs
201	Economic performance	Material	both	8-9-13
202	Market Presence	Material	both	
203	Indirect economic impacts	Material	both	8-9
204	Procurement practices	Material	external	

TOPICS	INDICATOR DESCRIPTION	MATERIALITY	BOUNDARIES OF APPEARANCE (EXTERNAL-INTERNAL)	SDGs
205	Anti-corruption	Material	internal	
206	Anti-competitive behavior	Material	both	
207	Tax	Material	both	
301	Materials	Material	both	12
302	Energy	Material	both	13
303	Water and effluents	Material	external	
304	Biodiversity	Material	n.a.	15
305	Emissions	Material	both	13
306	Waste	Material	external	12
308	Supplier Environmental Assessment	Material	both	
401	Employment	Material	both	10
402	Labor/Management Relations	Material	internal	8
403	Occupational Health and Safety	Material	both	8
404	Training and education	Material	internal	8-10
405	Diversity and equal opportunity	Material	internal	5-10
406	Non-discrimination	Material	internal	8
407	Freedom of Association and Collective Bargaining	Material	both	8
408	Child Labor	Material	both	8-10
409	Forced or Compulsory Labor	Material	both	8-10
410	Security Practices	Material	internal	
411	Rights of indigenous peoples	Not Material	external	
413	Local communities	Material	external	
414	Supplier Social Assessment	Material	external	8
415	Public policy	Material	external	
416	Customer Health and Safety	Material	external	
417	Marketing and labeling	Material	n.a.	
418	Customer Privacy	Material	external	



### 3.3 Management of Material Topics



**From an economic point of view**, the effects concerning internal stakeholders such as investors and staff (economic performance and presence in the area where the activities are carried out), those concerning suppliers and the local community (purchasing practices, indirect effects) as well as those caused by governance and referable to sound and correct management in terms of anti-corruption, fair competition and compliance with tax legislation



**For the environmental aspect**, the impacts linked to energy consumption (especially those from non-renewable sources) and materials, to emissions into air, water, soil, sound and light, and to the production of waste are relevant. These impacts are managed by ensuring compliance with the regulations in force and with corrective and improvement actions aimed at their prevention and reduction. TDT also manages the negative impacts generated by suppliers' activities, in a manner directly proportional to the influence it has on them



**With reference to the social aspect**, TDT pays attention to inclusive, non-discriminatory management that respects the civil rights of direct and indirect collaborators, working conditions, the management of relations with workers, and the Health and Safety aspects relating to its activities, the growth of the skills and competences of collaborators, as well as the collaboration with the Port Community and the City of Livorno

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

TDT evaluates its methods of managing activities, material topics and related impacts by implementing specific monitoring and measurement tools for both performance and impacts as required by the application of management systems: Performance Measurement, Conduction of Internal Audits, carrying out of Performance Reviews by Top Company Management.

As a consequence of these controls and assessments, measures and actions are adopted aimed at both improving performance and positive Economic, Environmental and Social impacts and reducing or eliminating negative Economic, Environmental and Social impacts.





# ECONOMIC SUSTAINABILITY



4





Pursuing economic sustainability for TDT means committing to consolidate over time the competitive position acquired in the upper Tyrrhenian market, improving the efficiency of processes, and creating value for the benefit of Investors, Customers, Workers in collaboration with Suppliers and Institutions present in the territory in which it operates; in this sense the economic-financial results must also be read considering aspects such as the creation of employment in the reference area, from which almost all of the company's employees come, the remuneration of employees, the selection of suppliers located in the Livorno context and the contributions allocated from TDT to the community.

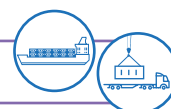
## 201 Economic performance

### 201-1 Direct economic value generated and distributed

During the year the Company continued to carry out the main activity of loading and unloading containers within the port area under concession in the port of Livorno.

In numerical terms, the volumes handled are in line with the previous year, with a slight reduction of 1.9% in units. If the volumes remain unchanged in absolute terms, it should be underlined how the mix, i.e. the composition of the traffic managed, has substantially improved.

**Table 9: SHIP DATA**



SHIP DATA	2020	2021	2022
Ships landed	538	495	479
Total Units (disembarkation/embarkation/transshipment) of which:	291.872	283.644	278.342
- Full (%)	39,4%	45,3%	58,5%
- Empty (%)	15,9%	16,1%	24,5%
- Transshipments (%)	44,7%	38,6%	17,0%
TEU (disembarkation/embarkation/transshipment)	469.498	468.942	467.938

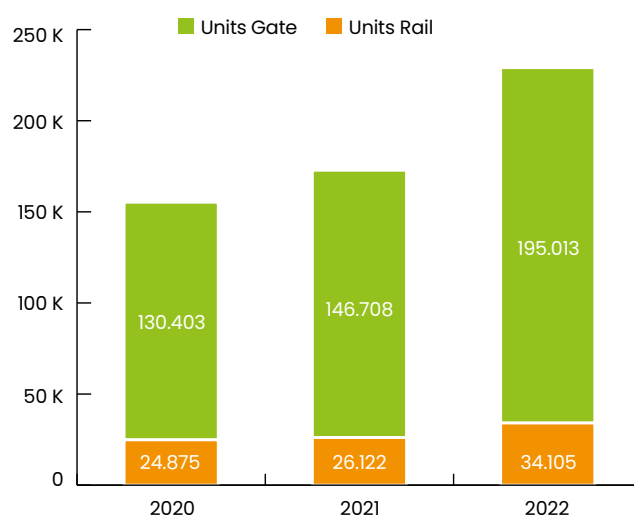
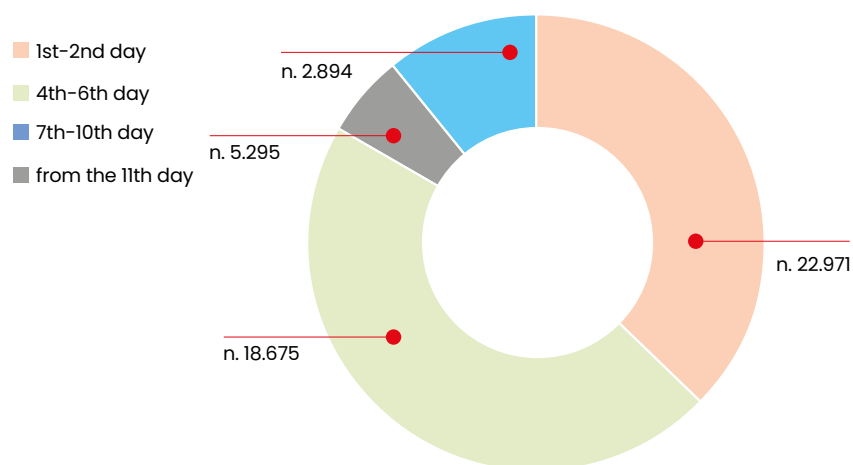
**Table 10: GATE AND RAIL DATA**



GATE AND RAIL DATA	2020	2021	2022
Trucks served at the gate	135.836	113.575	142.357
Average truck turnaround time - full containers (min)	23	25	23
TEUs unloaded/reloaded by train	39.800	41.795	57.336
Dwell time containers in import	4,5	5,4	5,9
Total Hinterland Volumes	155.278	172.830	229.118
- Units via Rail (%)	16,0%	15,1%	14,9%
- Units via Gate n(%)	84,0%	84,9%	85,1%

**Table 11: HINTERLAND TRAFFIC**

HINTERLAND TRAFFIC	U.M.	2020	%	2021	%	2022	%
Hinterland volumes (Transshipment unit, Shifting-Restow)	[num]	155.278	100,0%	172.830	100,0%	229.118	100,0%
Units Rail	[num]	24.875	16,0%	26.122	15,1%	34.105	14,9%
Units Gate	[num]	130.403	84,0%	146.708	84,9%	195.013	85,1%

**Graph 4:**  
HINTERLAND TRAFFIC**Graph 5:**  
STOCK OF FULL IMPORT CONTAINERS (NUMBER OF CONTAINERS PER DAYS SPENT)

Total revenues show an increase compared to the previous year of 16.2%. In terms of revenue per box, there was a substantial increase largely attributable to the better traffic composition described above. There was also a significant increase in ancillary revenues (+29.8%) largely attributable to ground stops, reefer containers and rail traffic.

**Table 12:**  
INCOME STATEMENT

INCOME STATEMENT (€/000)	2020	2021	2022
<b>Operating Revenues</b>	38.787 €	48.417 €	56.267 €
- External operating costs	-19.065 €	-19.475 €	-21.105 €
<b>= Added Value</b>	19.722 €	28.942 €	35.162 €
- Cost of labor	-18.000 €	-17.808 €	-18.824 €
<b>=Gross Operating Margin</b>	1.722 €	11.135 €	16.338 €
- Depreciation and losses in value (including provision for risks)	-2.623 €	-2.649 €	-2.585 €
<b>=Operating Income</b>	-900 €	8.486 €	13.753 €
+/- Balance of financial assets	-137 €	-162 €	304 €
<b>+/- Balance of ancillary activities</b>	0 €	0 €	0 €
+/- Balance of extraordinary activities	76 €	61 €	518 €
- Taxes	94 €	-2.044 €	-3.896 €
<b>=Economic residual</b>	-867 €	6.342 €	10.678 €

**Table 13:**  
BALANCE SHEET

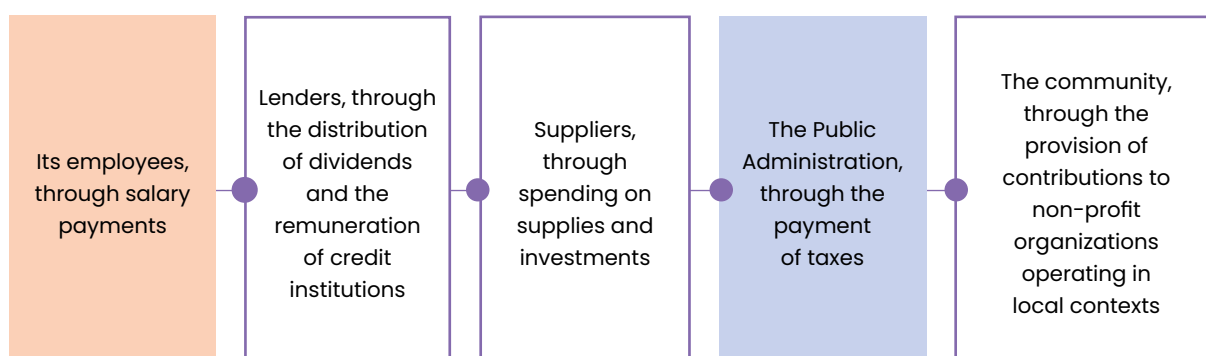
BALANCE SHEET (€/000)	2020	2021	2022
<b>ACTIVE</b>			
<b>Fixed capital</b>	13.379 €	12.896 €	13.044 €
Intangible assets	4.417 €	3.728 €	3.528 €
Tangible fixed assets	8.880 €	9.086 €	9.455 €
Financial fixed assets	82 €	82 €	60 €
<b>Working capital</b>	14.733 €	19.279 €	21.784 €
Warehouse	738 €	713 €	839 €
Deferred liquidity	12.230 €	14.450 €	16.292 €
Immediate liquidity	1.765 €	4.116 €	4.653 €
<b>TOTAL Employment</b>	28.112 €	32.175 €	34.828 €
<b>PASSIVE</b>			
Net capital	13.959 €	9.892 €	7.193 €
Consolidated liabilities	5.744 €	4.333 €	3.036 €
Current liabilities	9.276 €	11.608 €	13.920 €
<b>TOTAL Sources</b>	28.979 €	25.833 €	24.149 €
<b>OPERATING RESULT</b>	-867 €	6.342 €	10.678 €



The policy of rationalizing external operating costs continued during the year. The situation of international tension due to the Russian-Ukraine conflict is causing significant impacts on the company's costs determined by the increase in the cost of energy products (electricity and diesel) and the marked increase in the increase (increase in the concession fee) and increase in the cost of spare and consumable parts.

The cost of energy in absolute terms has practically doubled and the cost relating to fuel shows an increase of 57.5% compared to 2021. The Company has suffered the effects of this global phenomenon, while still trying to deal with the disproportionate increase of the cost per MWh by activating energy efficiency policies.

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



**Table 14:**  
DISTRIBUTION OF ADDED VALUE TO STAKEHOLDERS

DISTRIBUTION OF ADDED VALUE TO STAKEHOLDERS (€)	2020	2021	2022
<b>Economic value generated</b>	<b>€ 39.535.957</b>	<b>€ 48.860.002</b>	<b>€ 57.787.059</b>
Revenues	€ 39.535.213	€ 48.859.668	€ 57.286.673
Income (financial-extraordinary-from investments)	€ 744	€ 335	€ 500.386
<b>Distributed economic value</b>	<b>€ 36.961.200</b>	<b>€ 39.096.310</b>	<b>€ 43.641.306</b>
Operating costs	€ 20.377.590	€ 20.014.352	€ 21.771.337
Employee compensation	€ 16.499.026	€ 16.779.461	€ 17.708.838
Remuneration of financiers	€ 59.018	€ 84.230	€ 82.529
Remuneration of the Public Administration	-€ 94.141	€ 2.043.654	€ 3.896.327
Remuneration of the local community	€ 119.705	€ 174.613	€ 182.276
<b>Economic value retained in the company</b>	<b>€ 2.574.757</b>	<b>€ 9.763.692</b>	<b>€ 14.145.753</b>
Depreciation and depreciation	€ 2.582.096	€ 2.594.801	€ 2.602.551
Provisions and reserves	-€ 7.339	€ 7.168.891	€ 11.543.202

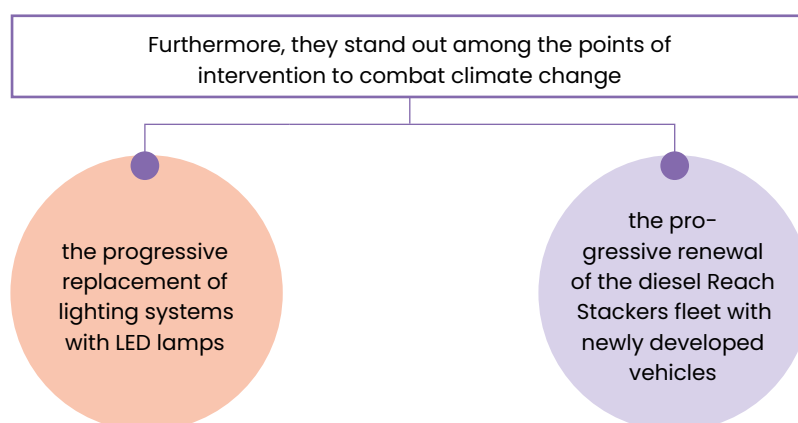
## 201-2 Financial implications and other risks and opportunities due to climate change

TDT evaluates its risks and opportunities related to climate change as a specific activity within the Environmental Management System certified in accordance with the ISO 14001:2015 standard and with its Quality, Safety and Environment Policy, and declares the its strategy to reduce resource consumption and increase the use of low-emission infrastructure and equipment.

TDT has identified and assessed among the risks related to climate change the physical risks due to extreme climatic events, i.e. the fall of Customer containers stored in storage at the terminal during adverse weather conditions in the presence of 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 compensation for damages.

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



## 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 provided for in the relevant national collective agreements for which employees have the freedom to join.

## 201-4 Financial assistance received from the government

For the first half of 2021 TDT benefited from the CIGO Redundancy Fund due to the Covid-19 pandemic in compliance with the emergency provisions for supporting the economy issued by the Government. There were no contributions in 2022.

# 202 Market Presence

## 202-1 Ratios of standard entry level wage by gender compared to local minimum wage

TDT's employees are hired solely on the basis of regular employment contracts, based on the National Collective Agreement for Port Workers and on the 2nd Level Supplementary Company Contract, on the basis of which the minimum salary scales are also defined for the staff new hire.

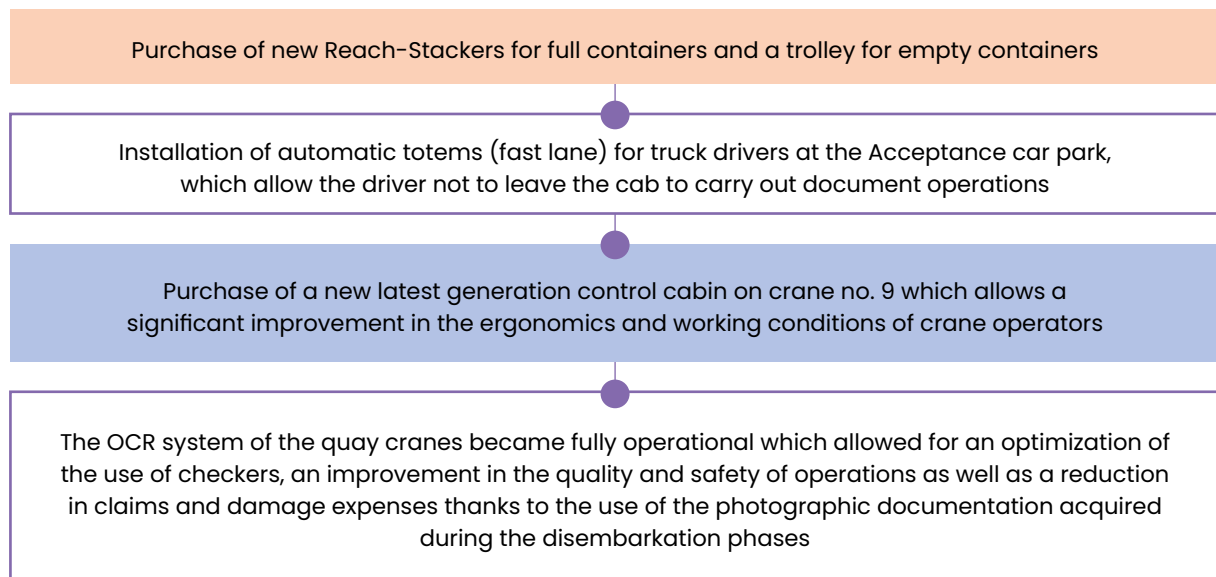
## 203 Indirect economic impacts

### 203.1 Infrastructure investments and services supported

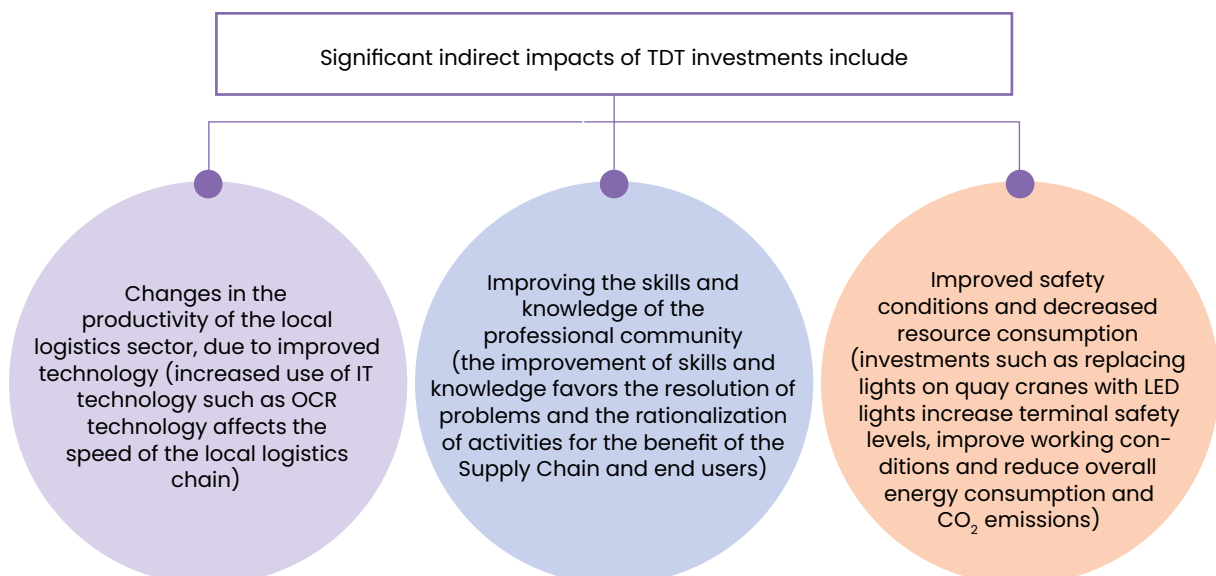
The economic impact of TDT does not end with the production and distribution of added value; The company's objective is, in fact, not only to produce profits for the members, but also to create job opportunities and economic growth for the local community.

As regards infrastructure, 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 2022 by TDT are also summarized below:



### 203.2 Significant indirect economic impacts



## 204 Procurement practices

### 204-1 Proportion of spending on local suppliers

As regards supplies, in 2022 the overall expenditure on services and consumables was 22.5 million euros. The analysis by geographical area of origin highlights a clear prevalence of suppliers located in Italy (over 97% of the total purchases made).

Below is the detail of the percentage expenditure shares on the total purchases made.

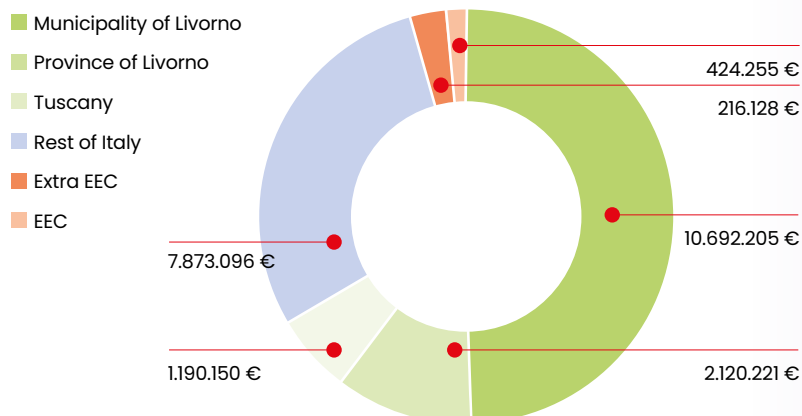
**Table 15:**  
DISTRIBUTION OF EXPENSES FOR SUPPLIES

DISTRIBUTION OF EXPENSES FOR SUPPLIES	2020		2021		2022	
	Amounts (€)	%	Amounts (€)	%	Amounts (€)	%
Italy	€ 17.986.747	96,6%	€ 18.863.108	95,7%	€ 21.875.673	97,2%
EEC	€ 484.951	2,6%	€ 548.943	2,8%	€ 216.128	1,0%
Extra EEC	€ 154.892	0,8%	€ 305.114	1,5%	€ 424.255	1,9%
TOTAL	€ 18.626.590	100,0%	€ 19.717.165	100,0%	€ 22.516.056	100,0%





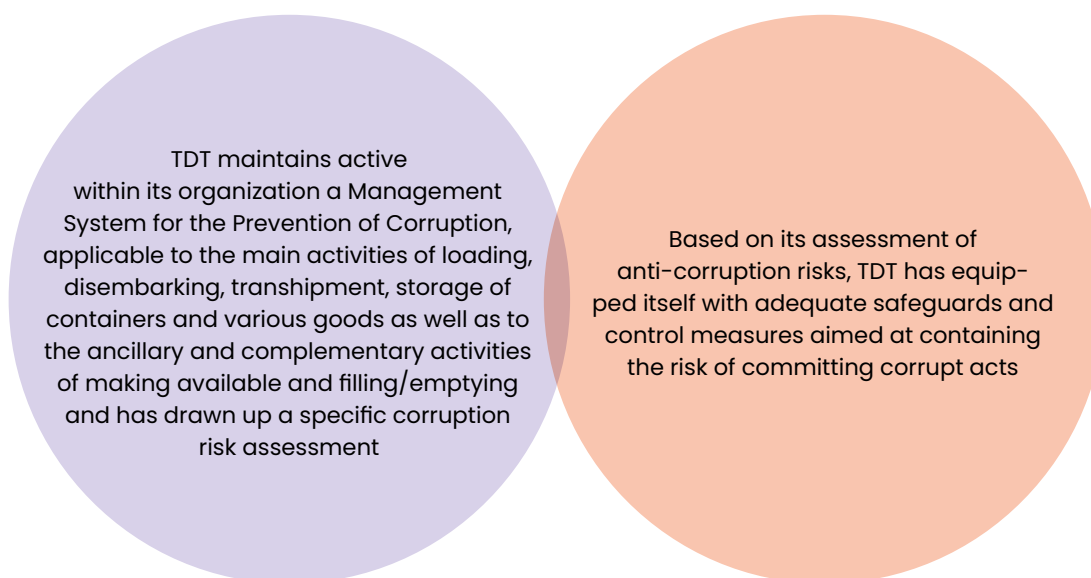
**Graph 6:**  
DISTRIBUTION OF EXPENSES FOR SUPPLIES



As evidence of the strong roots in the territory, the graph highlights how purchases from suppliers located in the province of Livorno represent 56.9% of supplies made in Italy, for a value of 12.8 million euros.

## 205 Anti-corruption

### 205.1 Operations assessed for risks related to corruption



### 205.2 Communication and training about anti-corruption policies and procedures

The General Management of the Terminal has issued a Policy for the Prevention of Corruption; this policy is approved and supported by the Board of Directors. Furthermore, the Board of Directors expressed its adherence to the contents of this policy.

The Policy has been communicated to the Management Team and employees of the terminal, as well as to its Business Partners.

On the TDT website ([www.tdt.it](http://www.tdt.it)) the documents relating to the company certifications achieved, the integrated quality, safety and environmental policies and the anti-corruption policies, organizational models pursuant to ex D.lgs. 231/01, codes of ethics and previous Sustainability Reports can be consulted.

All TDT managers have been trained on the methods of implementing the System and those responsible for sensitive processes have been trained on the controls and reporting methods envisaged.

## 205-3 Confirmed incidents of corruption and actions taken

In 2022, no cases of corruption relating to or attributable to the company have been confirmed or reported, no legal actions have been taken, nor are there any pending and concluded legal actions relating to anti-competitive behavior, violations of anti-trust and monopolies legislation in which companies have been identified as participants.

## 206 Anti-competitive behavior

### 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

In 2022, TDT was not involved in legal actions brought under statutory or international regulations aimed at regulating anticompetitive behavior, antitrust or monopolistic practices.

## 207 Tax

### 207-1 Approach to tax

### 207-2 Tax governance, control and risk management

### 207-3 Stakeholder engagement and management of concerns related to tax

### 207-4 Country by country reporting

TDT promotes the culture of legality as the basis of both the way of doing business and to prevent the risk of tax non-compliance in all forms, operating in compliance with current tax legislation and ensuring conditions of correctness and transparency in the conduct of business and in corporate activities to protect of its position and image, the work of its employees and the activities of its customers.

TDT adheres to and conforms to the indications on regulatory and fiscal issues of Assiterminal, the Italian Association of Port Terminal Operators whose mission is to guarantee the direct representation of the associated port entrepreneurs and contribute to the formation of guidelines regarding policy and development of terminal activities ports in particular and the national logistics system more generally. Assiterminal, as a representative in relations with the administrative and political authorities, therefore aims to protect the interests of the category and provides consultancy and information on topics and problems of relevance to the sector. From this aspect, the management of fiscal issues is highlighted, such as the ART contribution and the IMU municipal tax.

TDT's capital structure and economic health are essential for sustainability. Companies are created to create profit and there can be no sustainable development without the creation of value and economic solidity.

In this regard, it is useful to highlight that, on 4 December 2017, TDT joined the national tax consolidation pursuant to articles. 117/129 of the Consolidated Law on Income Taxes (T.U.I.R.) with the parent company Gruppo Investimenti Portuali S.p.A., which acts as a consolidating company and determines a single tax base for the group of companies adhering to the national tax consolidation and which thus benefits from the possibility of offsetting taxable income with tax losses in a single return. Each company participating in the national tax consolidation transfers the tax income (taxable income or tax loss) to the consolidating company. Gruppo Investimenti Portuali S.p.A. recognizes a credit towards companies that contribute taxable income, equal to the IRES to be paid. On the other hand, towards companies that contribute tax losses Gruppo Investimenti Portuali S.p.A. records a debt equal to the IRES on the part of the loss actually compensated at group level.

The group of companies adhering to the tax consolidation is made up of the following companies based only in Italy:

SE.BE.R. S.r.l.  
with registered office in  
Genoa (GE), Calata Sanità  
Palazzina, Uffici, 16126

Terminal Darsena  
Toscana S.r.l. (TDT)  
with registered office in  
Livorno (LI), Via Mogadiscio  
23, Darsena Toscana  
sponda Ovest, 57123





Current taxes include all taxes calculated on the company's taxable income by applying the tax rates in force at the balance sheet reference date. Current income taxes and deferred taxes are accounted for in the income statement, with the exception of taxes that arise from transactions charged directly to equity or from business combinations.

Deferred tax assets and liabilities are determined with the tax rates established by the tax legislation in force at the balance sheet closing date. Deferred taxes are allocated according to the global liability allocation method applied on the temporary differences at the balance sheet date between the tax value of assets and liabilities and the book value at which they are recorded in the balance sheet. Deferred tax assets on tax losses and unused tax credits that can be carried forward, as well as on deductible temporary differences, are recognized to the extent that it is probable that future taxable income will be available such as to allow the realization of such deferred tax assets. The deferred tax asset is reviewed on the balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable income will be achievable to allow the recorded asset to be recovered in whole or in part.





# ENVIRONMENTAL SUSTAINABILITY



5



TDT identifies, describes and analyzes within the environmental analysis, updated annually, all direct and indirect environmental aspects by analyzing them along all the processes and activities carried out by TDT and by the suppliers who perform their activities within the company boundaries, both in normal, anomalous or emergency conditions, also analyzing the risks and opportunities based on the objectives and results achieved annually, as required by the UNI EN ISO 14001:2015 standard.

The analysis is signed by the QSA Function Director and the General Director, who also receives the results of the Review of the effectiveness of the QSA Management Systems drawn up according to ISO requirements, in which the objectives achieved, non-conformities, effectiveness are evaluated of improvement actions, the results of first, second and third party audits, the effectiveness of risk management processes. The Management System is then verified by an accredited external Certification Body.

Legislative compliance is guaranteed and controlled for every aspect, the procedures provide for the management of ordinary and emergency situations, in such a way as to avoid environmental degradation and pollution. Accidents and non-compliances are managed through treatments and corrective actions aimed at managing the emergency and removing the cause of the event, while the major improvement activities are concentrated on the significant aspects.

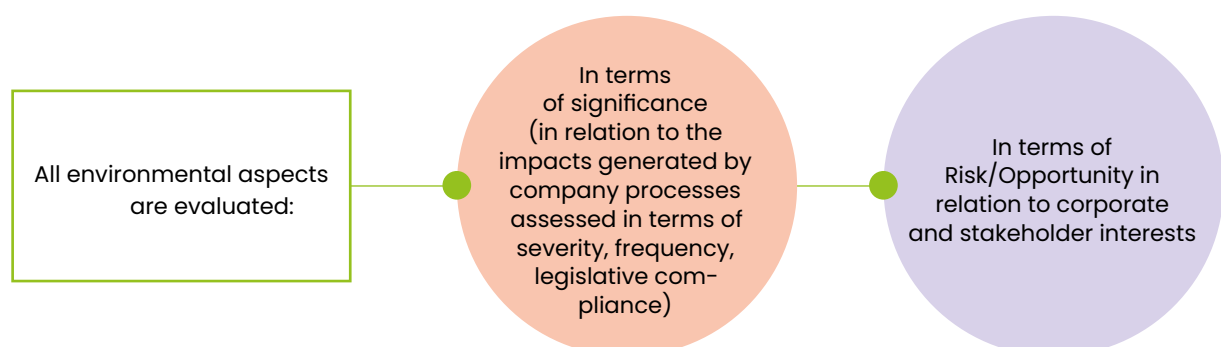
The direct impacts are accompanied by indirect environmental impacts, linked to contracted activities. The activities entrusted to third parties and carried out within the terminal are analysed, like the direct aspects, in terms of legislative compliance and relevance of the related impacts, then managed both through contractual clauses and periodic audits in some cases. Any critical issues related to suppliers are managed with non-conformities and corrective actions or with recall and awareness communications.

All the actions implemented are evaluated in terms of efficiency and effectiveness, both through the Management's review of the outcomes of environmental management, and by the Certification Body during the annual verification carried out pursuant to the UNI EN ISO 14001 standard, whose certificate is available on the website [www.tdt.it/documenti](http://www.tdt.it/documenti).

The outcome of the review and third-party verification are sent to the Supervisory Body and the Top Management, in order to verify the certified effectiveness of the organization's risk management processes for environmental issues, the related impacts, risks and opportunities; from this arise the decisions and improvement objectives for the following year thanks also to the allocation of economic resources.

Over time, there has been a progressive reduction in non-conformities and corrective actions in favor of improvement actions, demonstrating the effectiveness of the risk management processes implemented with the Environmental Management System.

There are no constraints on the terminal deriving from the Kyoto Protocol or from Emission Trading schemes.



**Table 16:**  
RISK OPPORTUNITY ANALYSIS

ENVIRONMENTAL ASPECTS	RISK RELEVANCE	OPPORTUNITY RELEVANCE
Waste production	Very significant	Very significant
Emissions (dust)	Medium significant	Very significant
Discharges onto the ground	Medium significant	Slightly significant
Energy consumption	Medium significant	Very significant
Water discharges	Medium significant	Slightly significant
Release of dangerous substances	Slightly significant	Medium significant
Emissions (gas)	Slightly significant	Very significant
Acoustic emissions	Slightly significant	Very significant
Consumption of raw materials	Slightly significant	Slightly significant
Light pollution	Slightly significant	Slightly significant
Emissions (cfc)	Not significant	Not significant
EM emissions	Not significant	Not significant

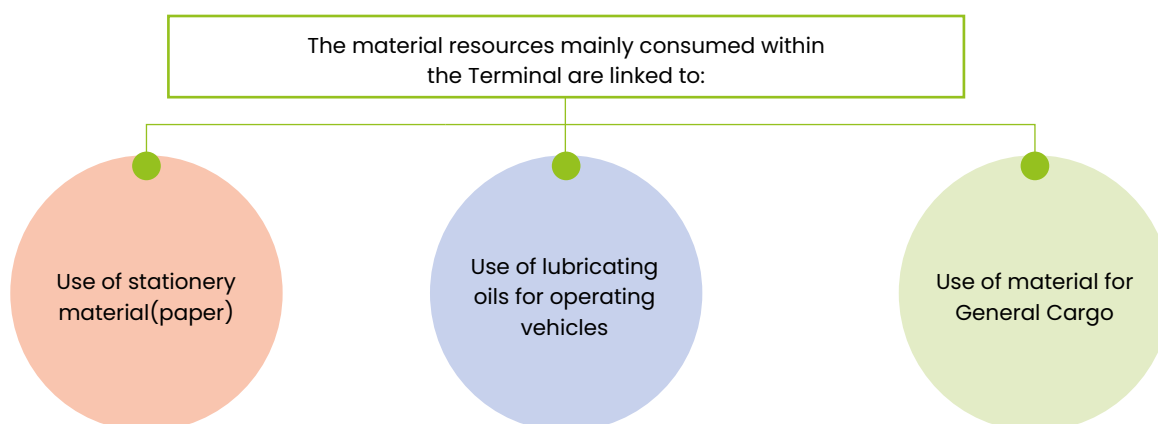
The outcome of the Risk Opportunity analysis was then crossed with the significance analysis and from this matrix analysis the global significance of the various processes and impacts emerged.

The following table shows the aspects with medium-high priority for intervention and the related improvement actions carried out to reduce the impacts (those with zero and low residual priority are omitted, subject to improvement actions in the past, which are no longer necessary or not today further applicable). These aspects will remain the subject of improvement actions in the years to come.



ENVIRONMENTAL ASPECTS	UTILITIES ACTIVITY/SERVICE PLANT/STRUCTURE	OPERATING CONDITIONS	IMPACTS	AM MADE BEFORE 2022	AM/AC 2022 / PRIORITY RISK ACCEPTANCE	RESIDUAL PRIORITY 2022	AM/AC 2023 / RISK ACCEPTANCE
Use of energy sources	Storage and handling containers on the yard	Normal	Air pollution: gas and dust emissions	<ul style="list-style-type: none"> <li>• Purchase of electric Porter</li> <li>• Replacement of older operating vehicles</li> <li>• Replacement of lights for the square and CRANE light towers with LEDs</li> </ul>	<ul style="list-style-type: none"> <li>• Replacement of 3 Reach Stacker vehicles</li> <li>• Replacement RTG lights with LEDs</li> </ul>	Average	Replacing 3 more Reach Stackers
	REEFER power supply	Normal	Depletion of mineral and fossil resources	Energy supply from FER	Energy supply from FER	Average	Replacing office lights with LEDs
			Depletion of mineral and fossil resources				Energy supply from FER
Releases of dangerous substances into the soil	Emergency management of dangerous containers	Emergency	Water/soil contamination	<ul style="list-style-type: none"> <li>• Emergency plan</li> <li>• Fire prevention equipment</li> <li>• Dangerous goods monitoring software</li> </ul>	No other measures available	Average	No other measures available
Waste Production	All	Normal	Soil pollution, atmospheric emissions, discharges into the ground	<ul style="list-style-type: none"> <li>• Training of employees and suppliers</li> <li>• Raising awareness against waste abandonment</li> </ul>	<ul style="list-style-type: none"> <li>• Reorganization of an ecological island</li> <li>• Training meeting with suppliers and internal offices</li> </ul>	Average	Maintenance management and control

## 301 Materials



In addition to the purchase of recycled paper to replace virgin paper, the use of paper was progressively reduced, dematerializing the processes, and the decision was made to reduce the number of paper printouts of EIR (Exchange Interchange Receipt) receipts from 3 to 1 for IMPORT/Export containers.

For other sources of consumption there are no measures to reduce material consumption currently implemented.



## 301-1 Materials used by weight or volume

**Table 17:**  
CONSUMPTION OF RENEWABLE RAW MATERIALS

RESOURCE TYPE	INTENDED USE	DESCRIPTION	U.M.	2020	2021 <sup>13</sup>	2022
Renewable	Stationery and toilets	Recycled paper	kg	4.613	3.397	2.342
Renewable	Stationery and toilets	Blank paper	kg	476	545	565
Renewable	Stationery and toilets	FSC virgin paper	kg	445	1.053	598
<b>Renewable</b>	<b>Stationery and toilets</b>	<b>Sub total<sup>14</sup> Paper</b>	<b>kg</b>	<b>5.534</b>	<b>4.995</b>	<b>3.504</b>
<b>Renewable</b>	<b>Stationery and toilets</b>	<b>% recycled paper</b>	<b>%</b>	<b>83%</b>	<b>68%</b>	<b>67%</b>
Renewable	General Cargo	Timber	kg	126	1.046	984

**Table 18:**  
CONSUMPTION OF NON-RENEWABLE RAW MATERIALS

RESOURCE TYPE	DESTINAZIONE D'USO	DESCRIPTION	U.M.	2020	2021 <sup>15</sup>	2022
Not renewable	General Cargo	Steel	kg	x	x	1.921
Not renewable	General Cargo	Polyester	kg	x	x	4.130
Not renewable	General Cargo	Polyethylene	kg	x	x	362
Not renewable	General Cargo	PVC	kg	x	x	70
Not renewable	Vehicle maintenance	Oils (hydraulic/engine/transmission)	liters	2.884	19.572	19.424
Not renewable	Vehicle maintenance	Grease	kg	162	864	180
Not renewable	Vehicle maintenance	lubricant	liters	1.780	2.340	4.340

<sup>13</sup> Changes to 2020-2021 card details: corrected

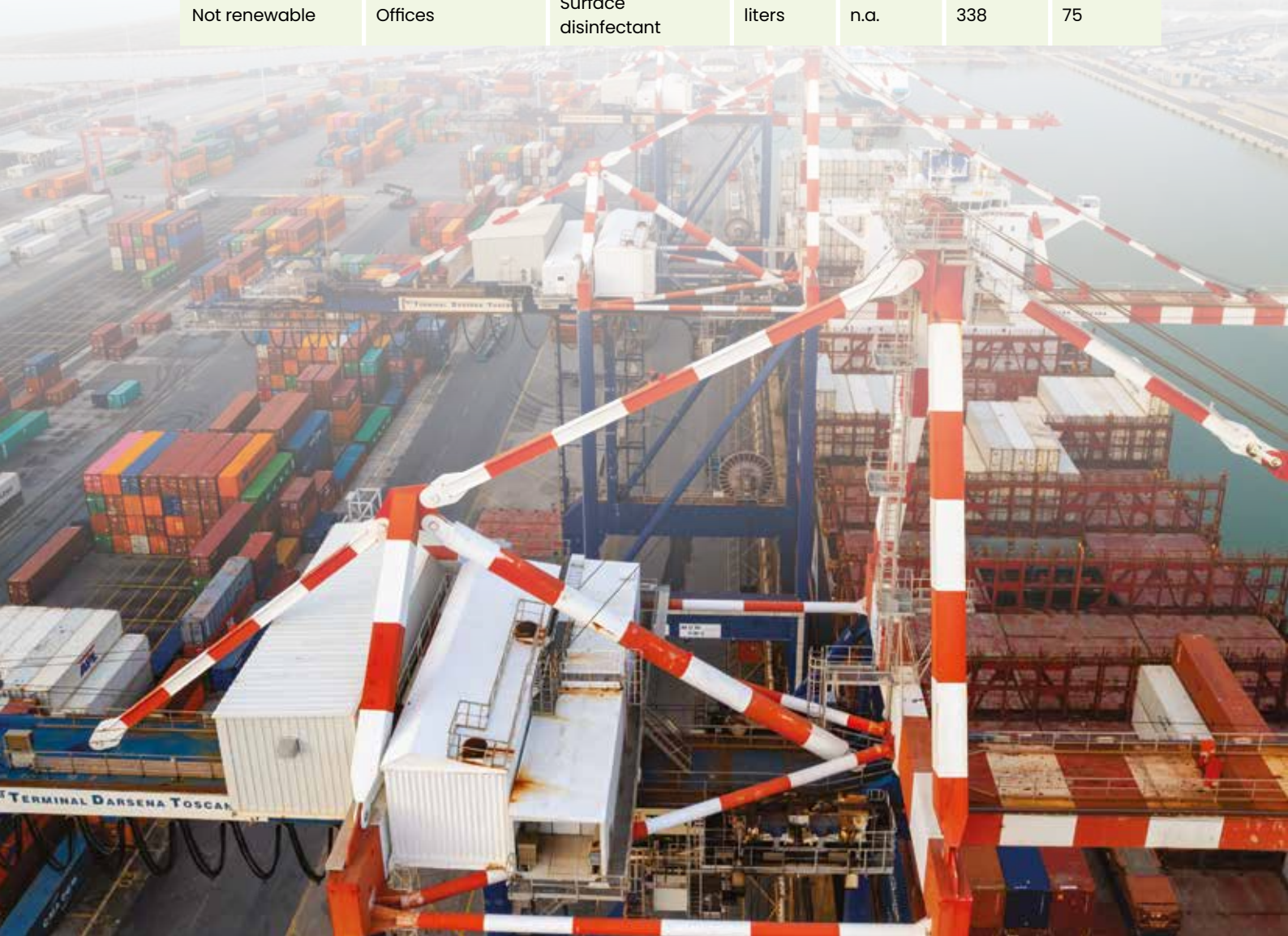
<sup>14</sup> The paper consumption reported refers to A3/A4 printing paper and tissue paper.

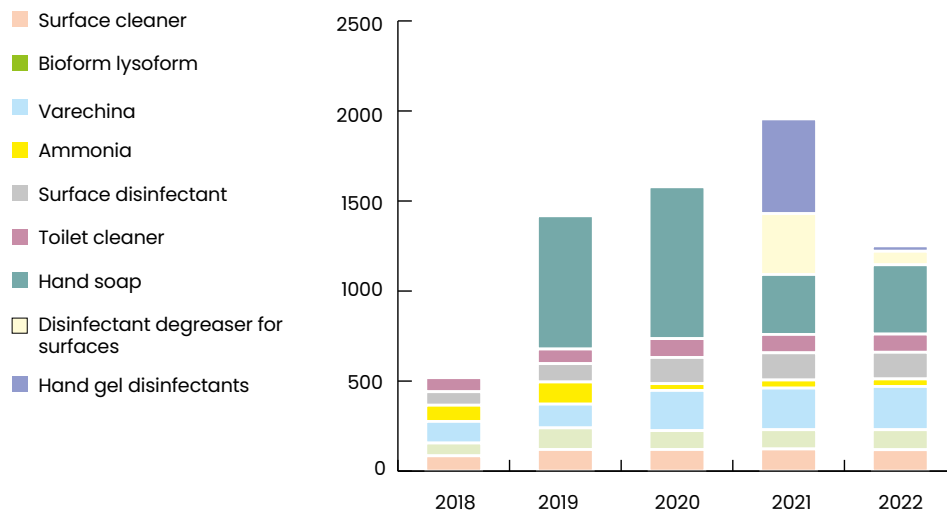
<sup>15</sup> Changes to 2021 data for steel, polyester, polyethylene, PVC: deleted because incorrect

Since 2021 there has been an increase in materials for vehicle maintenance due to the reacquisition of the procurement process for hydraulic oils and lubricating greases.

**Table 19:**  
CONSUMPTION OF NON-RENEWABLE CLEANING AND SANITIZING PRODUCTS

RESOURCE TYPE	INTENDED USE	DESCRIPTION	U.M.	2020	2021	2022
Not renewable	Offices	Cleaner detergent	liters	120	123	119
Not renewable	Offices	Bioform lysoform	liters	105	107	111
Not renewable	Offices	Varechina	liters	223	231	240
Not renewable	Offices	Ammonia	liters	38	45	42
Not renewable	Offices	Puligredas Disinfectant	liters	145	151	148
Not renewable	Offices	Toilet cleaner	liters	105	102	101
Not renewable	Offices	Hand soap	liters	843	333	385
Not renewable	Offices	Hand sanitizer gel	liters	n.a.	526	30
Not renewable	Offices	Surface disinfectant	liters	n.a.	338	75





## 302 Energy

Port terminal activities are characterized by high energy consumption mainly due to the activities of:

Loading/unloading containers from/to ship with quay crane

Container movement in the yard with operational vehicles

Temperature-controlled container connection (reefer)

Yard lighting

Office activities

Auxiliary activities



**Table 20:**  
SOURCES OF ENERGY CONSUMPTION PER CARRIER

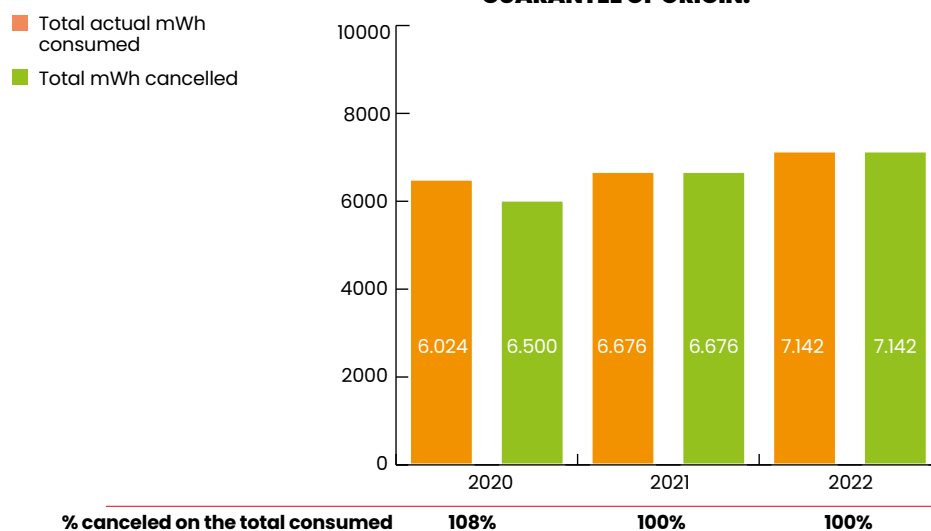
DIESEL POWERED		POWER SUPPLY	
Internal cars	13	quay crane	6
Supply truck	1	forklift	2
Fork lift >6t	3	porter	11
Fork lift <6t	3	light towers	33
Generating sets	6	offices	-
Self-propelled aerial platforms	1		
Reach stacker	14		
RTG <sup>16</sup>	13		
Truck	6		
Vehicle washing	1		
DHW boiler	2		

To reduce the impacts of resorting to non-renewable energy sources, the entire supply of E.E. has been certified with Guarantee of Origin by the GSE for several years and divided as follows by source:

**Table 21:**  
RENEWABLE ENERGIES USED FOR THE SUPPLY OF ELECTRICITY

RENEWABLE SOURCE	2020		2021		2022	
	mWh	%	mWh	%	mWh	%
Hydraulics and Oceanics	3.566	55%	/	/	1280	18%
Wind power	/	/	4.081	61 %	/	/
Bioliquids	2.934	45%	2.595	39 %	/	/
Solar	/	/	/	/	5862	82%

**% USE OF RENEWABLE ENERGY CERTIFIED BY  
GUARANTEE OF ORIGIN.**



<sup>16</sup> RTG: Rubber – Tyred gantry.



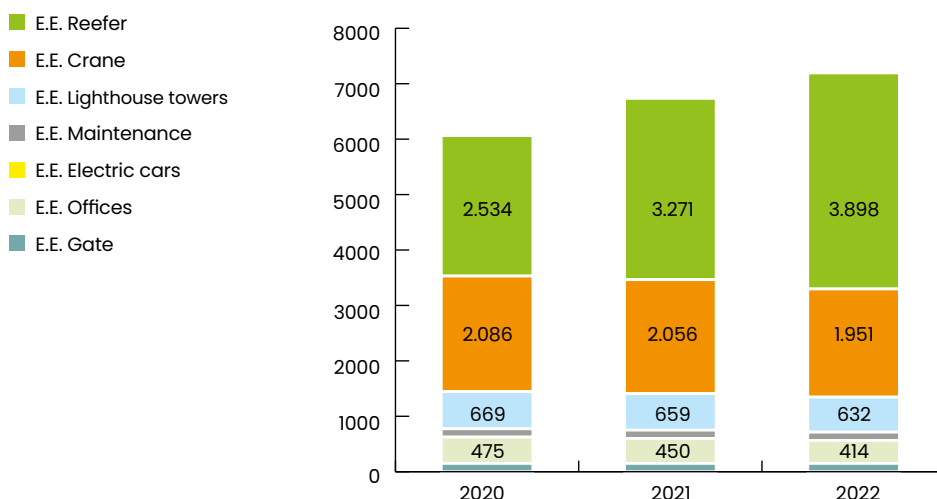
All consumption is monitored continuously: for E.E. through internal meters divided and readable remotely, while for diesel consumption a daily reading is carried out.

By analyzing the consumption of E.E. we see that, although increased in total, they decrease for all consumption items except for the connections of reefer containers: this consumption has no bearing on the performance of the terminal as it concerns a connection service to the electricity grid of containers owned by the shipping/shipping lines; we can therefore say that the performances relating to E.E. consumption, thanks to the Energy Management actions carried out, have improved, as highlighted by the graph and the subsequent KPIs.

#### Graph 7:

#### ELECTRICITY CONSUMPTION DISTRIBUTION TREND

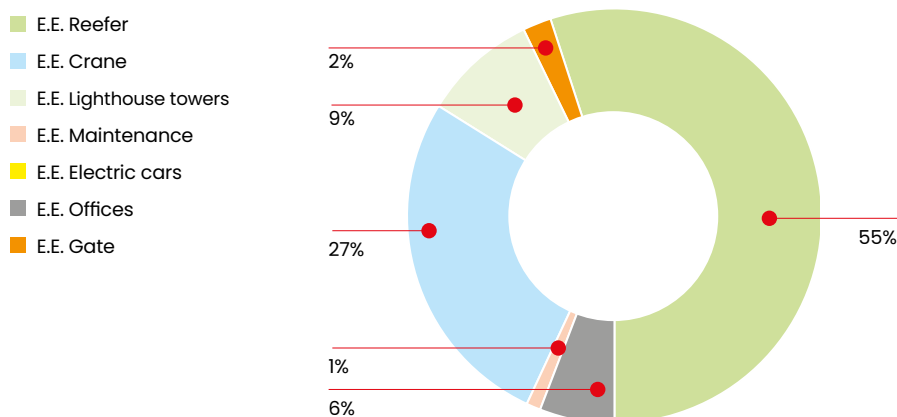
#### E.E. CONSUMPTION TREND AND COMPOSITION



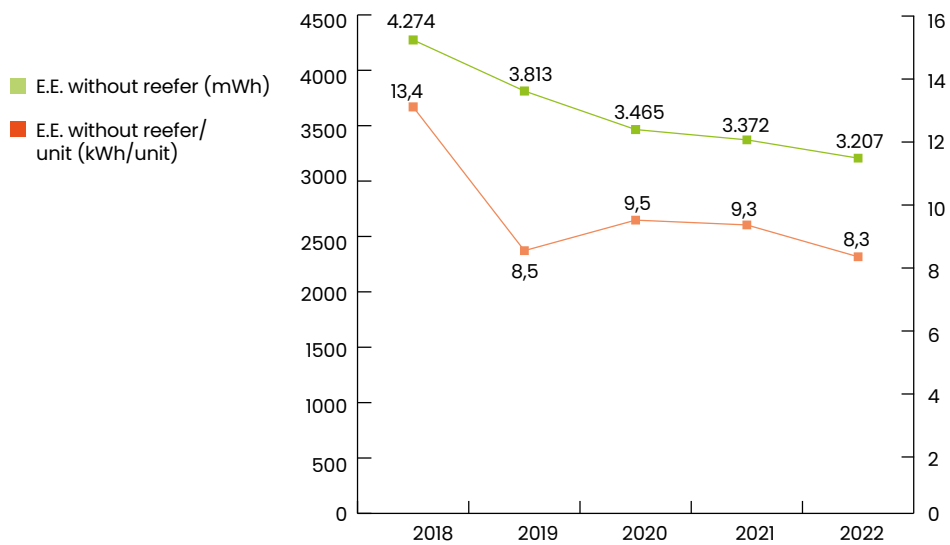
#### Graph 8:

#### BREAKDOWN OF ELECTRICITY CONSUMPTION 2022

#### E.E. CONSUMPTION DISTRIBUTION 2022

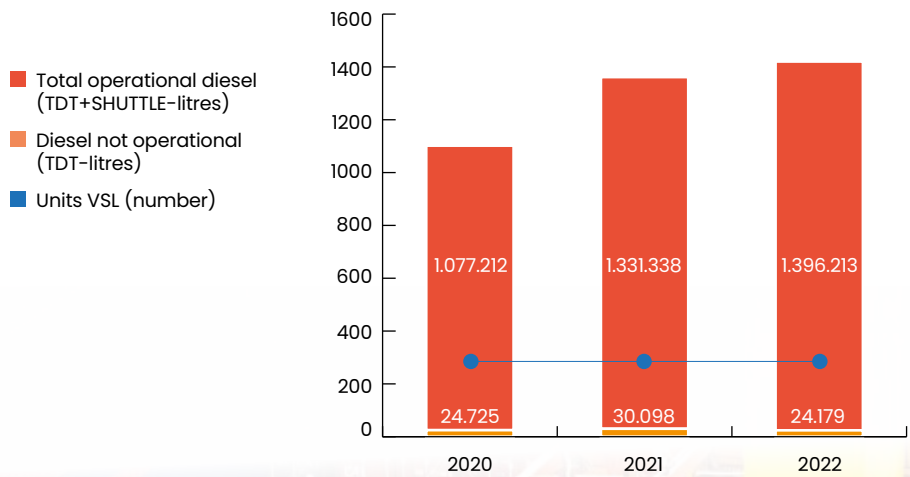


E.E. CONSUMPTION PERFORMANCE

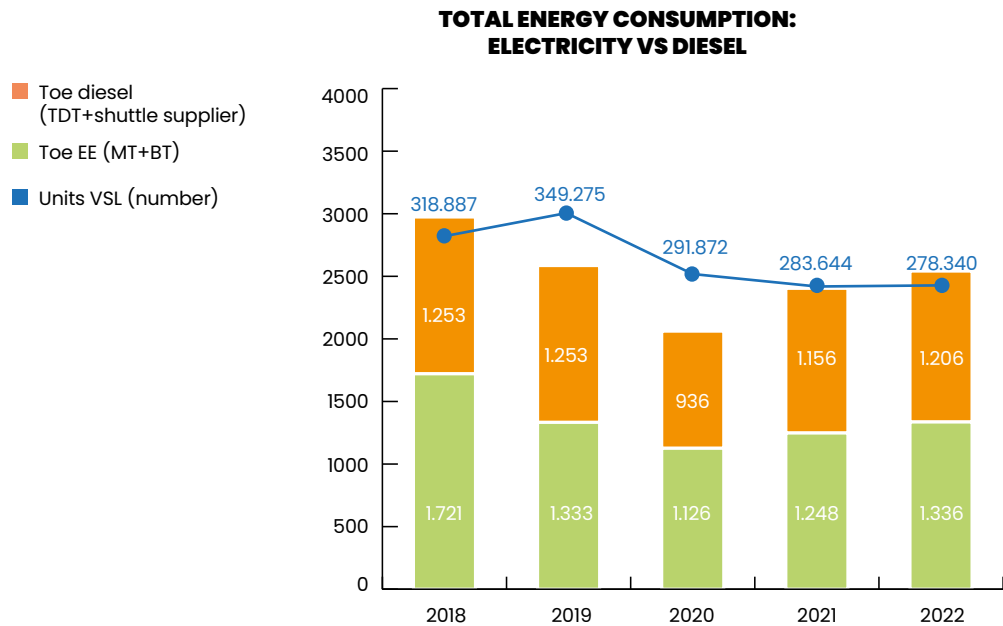


**Analyzing diesel consumption**, which similarly denotes a total increase, if analyzed they show that with the renewal of the vehicle fleet (replacement of 3 Reach Stackers/year) consumption per hour and per movement has decreased, but the greater number of movements carried out per single container due to logistical issues (congestion, rollover and cuts from ship boarding, handling in holds with RTG) led to an overall increase.

**Graph 9:**  
DIESEL CONSUMPTION TREND



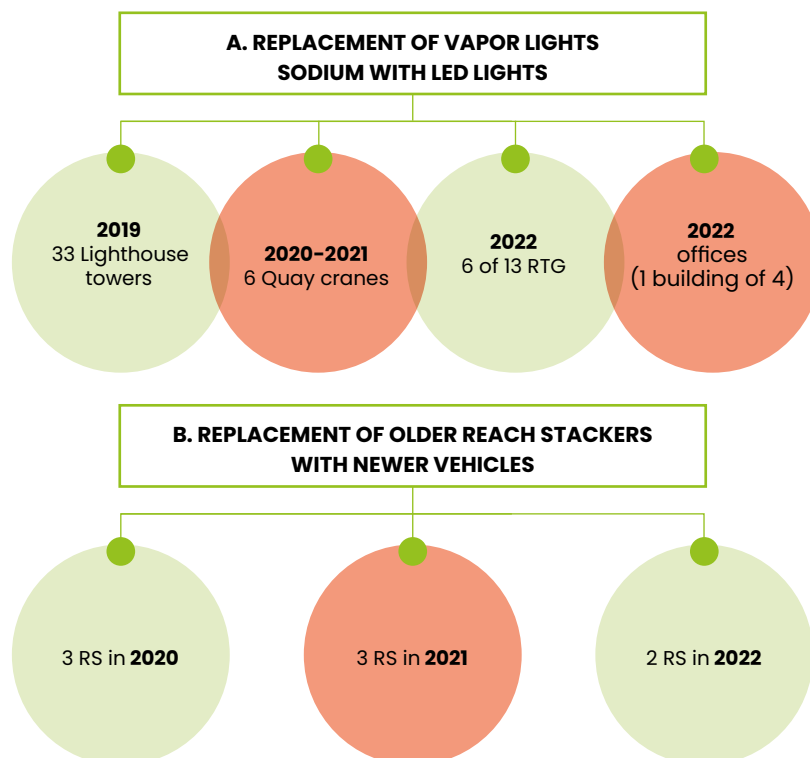
**Graph 10:**  
DIESEL CONSUMPTION TREND

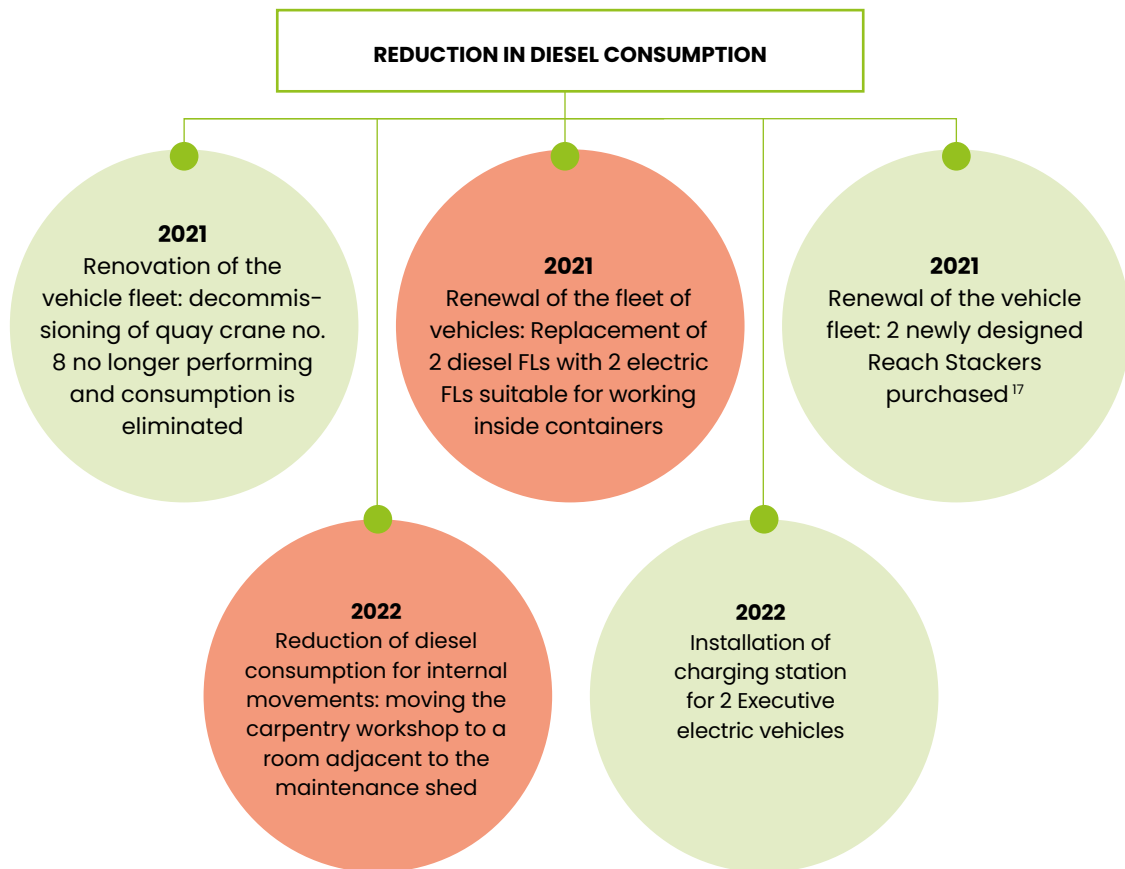


Higher energy consumption obviously also translates into higher CO<sub>2</sub>eq emissions, both absolute and per unit, as we will see in information 305-5.

The reduction of energy consumption is and therefore remains one of the improvement objectives pursued by TDT for several years.

The **Energy management** actions of the last three years have consisted of:





#### REDUCTION IN ELECTRICITY CONSUMPTION 2022: LED OFFICES

*The projectors installed in the offices of building 4 are accompanied by an Environmental Product Declaration (EPD), compliant with EN ISO 14025 and EN 15804, and which is based on the Product Category Rules document of Institut Bauen und Umwelt e.V.*

*The 4000K LED projectors are equipped with a presence detector and daylight sensor for dimming control, in order to exploit natural light and consequently reduce the intensity of the light provided.*



<sup>17</sup> New Reach Stackers compatible with the new European Directives regarding: "electromagnetic compatibility" (2014/30/EU), "polluting emissions produced by non-road mobile machinery" (2016/1628/EU); "environmental noise emission of machines and equipment intended to operate outdoors" (2005/88/EC)



### 302.1 Energy consumption within the organization

**Table 22:**  
TOTAL ENERGY CONSUMPTION

SOURCES OF ENERGY CONSUMPTION	U.M.	2020	2021	2022
<b>A) E.E. consumption tot (BT)</b>	<b>GJ</b>	<b>89</b>	<b>117</b>	<b>131</b>
<b>B) E.E. consumption tot (MT)</b>	<b>GJ</b>	<b>21.596</b>	<b>23.915</b>	<b>25.578</b>
E.E. light towers	GJ	2.407	2.373	2.277
E.E. gate	GJ	417	405	417
E.E. fridge	GJ	9.123	11.777	14.033
E.E. offices	GJ	1.709	1.620	1.489
E.E. electric cars	GJ	11	7	7
E.E. GENERAL CARGO AND MAINTENANCE	GJ	416	330	334
E.E. crane	GJ	7.509	7.403	7.022
<b>C) total consumption of TDT diesel fuel</b>	<b>GJ</b>	<b>30.693</b>	<b>33.752</b>	<b>36.497</b>
Diesel not operational	GJ	468	794	568
Operational diesel	GJ	29.811	32.679	35.634
Water heater	GJ	414	279	294
Diesel shuttle <sup>18</sup>	GJ	12.677	12.195	8.601
<b>Total energy (A+B+C)</b>	<b>GJ</b>	<b>85.770</b>	<b>77.722</b>	<b>60.979</b>

### 302.2 Energy consumption outside the organization

**Table 23:**  
DIESEL CONSUMPTION FOR INTERNAL TRANSPORT CARRIED OUT BY SUPPLIERS (ALREADY INCLUDED IN CONSUMPTION IN TDT AND TOTAL CO<sub>2</sub>EQ EMISSIONS)

INDIRECT CONSUMPTION OF RAW MATERIALS	U.M.	2020	2021	2022
Shuttle diesel	litri	241.200	414.900	396.900

### 302.3 Energy Intensity

**Table 24:**  
TDT ENERGY INTENSITY

ENERGY INTENSITY	U.M.	2020	2021	2022
Total consumption (heating plant excluded)	GJ <sup>19</sup>	67.048	72.589	76.995
Containers moved	Unit	291.872	283.644	278.340
<b>Energy intensity</b>	<b>GJ/unit</b>	<b>0,230</b>	<b>0,256</b>	<b>0,277</b>
	<b>tep/unit</b>	<b>0,0071</b>	<b>0,0085</b>	<b>0,0091</b>

<sup>18</sup> Correction: 2018-2019 shuttle consumption was reduced by 10%

<sup>19</sup> 1kWh = 3.6 GJ, 1l diesel = 35.65 GJ. Source of the conversion factors used: "National Energy Balance 2007".

## 302-4 Reduction of energy consumption

**Table 25:**  
REDUCTION OF ELECTRICITY CONSUMPTION

LED RELAMPING	%	SOURCE	U.M.	2020	2021	2022
replacement of office lights + presence sensors	-29%	estimated	kWh	0	0	-5.188
Replacement of light tower lights	-46%	measured	kWh	-512.285	-521.964	-548.560
Replacement of crane lights	-59%		kWh	-64.775	-129.550	-129.550
RTG lights replacement	-65%	estimated	kWh	0	0	-75.140
Replacement of reefer tower lights+ presence sensors	n.d.	estimated	kWh	-3	-3	-3
Total saved E.E.	/	estimated	kWh	-577.063	-651.517	-758.441
<b>Costs avoided</b>	<b>/</b>		<b>euro</b>	<b>-77.580 €</b>	<b>-128.619 €</b>	<b>-278.227 €</b>

**Table 26:**  
REDUCTION OF DIESEL CONSUMPTION OF OPERATIONAL VEHICLES

SOURCE OF DIESEL CONSUMPTION	U.M.	2020	2021	2022
RS	liters/mt	14,62	11,32	12,55
RTG	liters/mt	15,11	15,02	14,53

A notable saving, which unfortunately is counterbalanced by the greater consumption of E.E. of reefers and by an increase in diesel consumption due to greater movements per unit, with a consequent increase in total TOE (see information 302-1).

## 302-5 Reduction in energy requirements of products and services

Below is an analysis of reduced and increased consumption items:

E.E. CONSUMPTION SOURCES	U.M.	2022 VS 2021	SOURCES OF DIESEL CONSUMPTION	U.M.	2022 VS 2021
Lighthouse towers	mWh	-4%	TDT Non-operational diesel	litri	-20%
Gate offices	mWh	+3%	Reach stacker	litri	+6%
Reefer feeding	mWh	+19%	RTG	litri	+15%
Central offices	mWh	-8%	Tractors	litri	+6%
Electric cars	mWh	-10%	TDT Operational diesel	litri	+9%
General cargo and maintenance	mWh	1%	Shuttle (ctpr)	litri	-4%
Crane power supply	mWh	-5%	Total operating diesel (tdt+shuttle)	litri	5%
<b>Total consumption E.E.</b>	<b>mWh</b>	<b>+7%</b>	<b>Total diesel consumption</b>	<b>litri</b>	<b>4%</b>

By eliminating reefer consumption, we can see the change in some performance KPI:

**Table 27:**

REDUCTION OF ENERGY CONSUMPTION REQUIRED FOR TDT PRODUCTS AND SERVICES  
(EXPRESSED IN JOULES OR MULTIPLES)

PERFORMANCE INDICATORS	U.M.	2020	2021	2022
Total E.E./unit (excluding reefers)	GJ/unit	0,043	0,043	0,042
Operating diesel/unit	GJ/unit	0,154	0,168	0,182
Operational diesel/vehicles	GJ/move	0,075	0,075	0,073

Electricity consumption costs have also increased, both due to the overall increase in consumption and, above all, due to unpredictable increases in market prices.

**Table 28:**

E.E. COST TREND

COST OF E.E.	U.M.	2020	2021	2022
Total consumption	Mwh	5.999	6.643	7.141
	Euro/Mwh	135,00	198,38	366,84
Cost of E.E. from renewable sources	Euro	5.200	5.201	3.973
	Euro/Mwh	0,87	0,78	0,56



## 303 Water and effluents

### 303-1 Interaction with water as a shared resource

The water supply is guaranteed by the port aqueduct whose manager guarantees the ordinary and extraordinary maintenance of the water supply and distribution systems in the port area. The supply is exclusively drinkable, as there is no availability/connection to the industrial water network. The water withdrawn is used for civil purposes such as toilets and operational showers, feeding the fire prevention system and washing vehicles.

### 303-2 Management of water discharge-related impacts

The Company is required to guarantee the correct functioning of the waste water discharge systems and to communicate any changes: in order to achieve this goal, it stipulates a contract every year for the ordinary/extraordinary maintenance of the purification plants and waste analysis on a quarterly basis. Any malfunctions and deviations from the quality objectives required by law are managed with extraordinary maintenance, external emptying, washing and adjustments, and when not resolvable in this way, with the replacement of the system.

Spills and flows of polluting substances onto the ground are managed and limited promptly, in order to prevent them from flowing into the sea.

In 2015 all authorizations were included in the Single Environmental Authorization (AUA) with a fortnightly expiry, updated in 2020 for the replacement of the "TER FER" biological plant.

### 303-3 Water withdrawal

There is no water withdrawal from surface water, groundwater or sea water but only supply from pipelines.

### 303-4 Water discharge

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) and into the ground (1).

The drains do not have a flow meter, so it is assumed that all the water consumed is discharged even if it is obviously less.

**Table 29:**  
TOTAL WATER DISCHARGED BY DESTINATION

WATER DISCHARGES	U.M.	2020	2021	2022
Delivered at sea	mc	9.258	10.581	7.902
Conferred on land	mc	91	12	31
<b>Total</b>	<b>mc</b>	<b>9.349</b>	<b>10.593</b>	<b>7.963</b>

### 303-5 Water consumption

Water consumption is monitored by reading the meters, compared with the consumption reported on the invoice. Over the years, consumption anomalies have been analyzed and managed from broken meters, extra withdrawals (e.g. extraordinary supply of water to the Port System Authority, construction sites, etc.), network losses, sporadic services such as washing cold rooms.



Sometimes consumption is affected by hidden losses or supply services to the AdSP which increase the average statistical consumption.

The most impactful consumption is the one relating to office showers and bathrooms: in 2022, with the installation of 16 timed push-button thermostatic mixers, to reduce, periodically interrupt the supply, and avoid the unattended flow in the showers, there was a reduction appreciable.

**Table 30:**  
WATER CONSUMPTION

WATER CONSUMPTION PER METER	U.M.	2020	2021	2022
Office area	mc	7.726	8.304	6.354
Gate acceptance area	mc	382	214	303
General cargo/washing area	mc	1.071	1.885	655
Visitor area/pif	mc	79	178	590
Terfer area	mc	91	12	31
Fire prevention	mc	0	0	0
<b>Total water consumption</b>	<b>mc</b>	<b>9.349</b>	<b>10.593</b>	<b>7.933</b>
<b>Water consumption/total hours worked</b>	<b>mc/h</b>	<b>0,0256</b>	<b>0,0291</b>	<b>0,0206</b>

## 304 Biodiversity

### 304.1 Operational sites owned, leased, managed in (or adjacent to) protected areas and areas of high biodiversity value outside protected areas

The area occupied by the terminal is located in a Site of Regional Interest (**SIR**) (since 2014, Livorno's first Site of National Interest) in the vast industrial and port area of northern Livorno, within the territorial system called "Port territorial system and activities" subsystem "n° 5A Port" as indicated in the articles 23 and 24 of the "Technical standards for the implementation of the Urban Planning Regulation" approved by Resolution of the C.C. n° 19 of 01/25/1999, 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, to the west by the railway terminal

By consulting the current General Regulatory Plan (P.R.G.) of the Municipality of Livorno, the area where the Terminal is located is **classified as area B and D pursuant to the D.M. 2/4/1968 n° 1444**

In similar areas it is possible to construct buildings intended for port, production and storage activities, car parks, it is also possible to create ecological hub plants such as: treatment of solid and liquid waste, incineration plants, waste-to-energy plants

Therefore we can say that in the vicinity/vicinity there are no protected areas and areas with high biodiversity value

## 305 Emissions

The entire terminal area is affected by the presence of gaseous, acoustic and luminous emissions.

As regards gas and dust emissions, we can distinguish them into:

DIFFUSE EMISSIONS	PIPED EMISSIONS	EMISSIONS FROM ACTIVITIES UNDER CONTRACT
From diffuse dust coming from the tanks filled with dredging sludge	From exhaust gases from ships, trucks and trains in transit	From welding activities for mechanical maintenance, regulated by the provisions of the art. 272 d.lgs 152/2006
From methane, sulphide and other emissions from purification plants	From exhaust gases from diesel fueled handling vehicles	From mechanical metal processing activities and/or surface treatments and/or other metal processing, regulated by the provisions of the art. 272 d.lgs 152/2006
From refrigerant gas leaks from air conditioners that are not hermetically sealed	From boiler exhaust gas	

Substances classified as ODS20 are not used in the provision of services<sup>20</sup>

Over time, various environmental investigations have been conducted aimed at characterizing the air quality in terms of concentration of dust, volatile organic substances and combustion fumes, conducted during activities, with the aim of evaluating the exposure of workers to the various chemical compounds resulting from the emissions produced by the combustion exhaust of operating vehicles, from the consumption of the road surface and tyres, from the fumes of the ships present at the quay and from the reclaimed tanks being filled

The analyzes carried out and repeated over the years, starting from 2004 until 2021, also linked to the preparation activities of the second filling tank, which involved the transport of sludge towards the aforementioned tank, did not reveal exceeding the limits of breathable gas and dust

We proceeded to verify the deviation from the TLV (Threshold Limit Value or threshold limit value<sup>21</sup>) of the various substances subject to the evaluation and, as regards gases, to verify 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 respirable dust)

The investigation revealed concentration values lower than the reference limits for all the parameters observed

### 305-1 Direct (Scope 1) GHG emissions

Emissions related to direct diffuse emissions due to diesel consumption can be calculated in terms of emissions of tonnes of CO<sub>2</sub> equivalent (CO<sub>2</sub>EQ) and greenhouse gases. As consumption has increased, emissions have increased.

<sup>20</sup> ODS: Ozone Depletion Substances.

<sup>21</sup> They refer to the environmental concentrations of airborne chemicals and indicate the concentrations below which it is believed that most workers can be repeatedly exposed day after day, for a working lifetime, without adverse health effects.

**Table 31:**  
GAS EMISSIONS FROM DIESEL COMBUSTION<sup>22</sup>

EMISSION SOURCE: DIESEL COMBUSTION	U.M.	Q.TÀ	U.M.	2020	2021	2022
Substance emitted						
CO	g/kg fuel	7,58	kg	7.144	8.909	9.269
TSP	g/kg fuel	0,94	kg	886	1.105	1.149
CO <sub>2</sub>	kg/kg fuel	3,14	kg	2.959.436	3.690.419	3.839.752
Benzo(a)pyrene	g/kg fuel	0,00	kg	0	0	0
NMVOC	g/kg fuel	1,92	kg	1.810	2.257	2.348
NH <sub>3</sub>	g/kg fuel	0,01	kg	12	15	16
Pb	g/kg fuel	0,00	kg	0	0	0
N <sub>2</sub> O	g/kg fuel	0,05	kg	48	60	62
Indeno(1,2,3-cd)pyrene	g/kg fuel	0,00	kg	0	0	0
Benzo(b)fluoranthene	g/kg fuel	0,00	kg	0	0	0
Benzo(k)fluoranthene	g/kg fuel	0,00	kg	0	0	0
NO <sub>x</sub>	g/kg fuel	33,37	kg	31.451	39.220	40.807
CH <sub>4</sub>	g/kg fuel	0,04	kg	38	47	49

SUBSTANCE EMITTED	U.M.	CO <sub>2</sub> eq EMISSION FACTORS	U.M.	2020	2021	2022
Carbon dioxide - CO <sub>2</sub>	kg CO <sub>2</sub> eq/kg sost x/	1	tCO <sub>2</sub> eq	2.959	3.690	3.840
Nitrous oxide - N <sub>2</sub> O	kg CO <sub>2</sub> eq/kg sost x/	265	tCO <sub>2</sub> eq	13	16	17
Methane - CH <sub>4</sub>	kg CO <sub>2</sub> eq/kg sost x/	28	tCO <sub>2</sub> eq	1	1	1
<b>GHG</b>			<b>[tCO<sub>2</sub>eq]</b>	<b>2.973</b>	<b>3.707</b>	<b>3.858</b>

22 2019 EEA GHG emission from heavy transport emission by ISPRA

## 305-2 Energy indirect (Scope 2) GHG emissions

**Table 32:**

ISPRA: GREENHOUSE GAS EMISSION FACTORS FROM THE ELECTRICITY SECTOR FOR THE GROSS PRODUCTION OF ELECTRICITY AND HEAT.

GHG EMISSIONS FROM ELECTRIC ENERGY	U.M.	CO <sub>2</sub> eq EMISSION FACTORS	U.M.	2020	2021	2022
Total E.E.	mWh/year			6.024	6.676	7.141
<b>Substance emitted</b>						
Carbon dioxide - CO <sub>2</sub>	tCO <sub>2</sub> eq/kWh	272,79	tCO <sub>2</sub> eq	1.643	1.821	1.948
Methane - CH <sub>4</sub>	tCO <sub>2</sub> eq/kWh	0,62	tCO <sub>2</sub> eq	4	5	5
Nitrous oxide - N <sub>2</sub> O	tCO <sub>2</sub> eq/kWh	1,41	tCO <sub>2</sub> eq	8	9	10
<b>Total GHG</b>	<b>tCO<sub>2</sub>eq</b>	<b>274,82</b>	<b>tCO<sub>2</sub>eq</b>	<b>1.655</b>	<b>1.834</b>	<b>1.963</b>

Since 2009, to reduce CO<sub>2</sub>EQ emissions, the entire supply of E.E. it is from certified renewable sources (as already reported in section 302).

## 305-3 Other Indirect (Scope 3) GHG emissions

Energy consumption data relating to the activities carried out by them are available for habitually resident suppliers, while the logistics activities upstream and downstream of the process (from ship, truck and train activities) are outside the organisation's management control: they they have the flows but not the data on origin, mileage, consumption and therefore not even the emissions, nor is there any way to estimate them.

**Table 33:**

INDIRECT EMISSIONS (SCOPE 3)

MEANS IN/OUT	U.M.	2020	2021	2022
Ships	num	538	495	479
Truck	num	176.400	113.575	157.656
Trains	num	719	891	1.101

Emissions deriving from employee home-work travel using owned vehicles (scope 3) are estimated based on the length of the route traveled to get to work.

**Table 34:**

EMISSIONS FROM COMMUTING (SCOPE 3)

COMMUTING	U.M.	2020	2021	2022
Employees	num	281	268	269
Average da route	km	13.5	13.5	13.5
Shifts worked	num	46.966	61.765	64.033
<b>Total emissions</b>	<b>tCO<sub>2</sub>eq<sup>23</sup></b>	<b>201</b>	<b>279</b>	<b>289</b>

The other emissions are not currently quantifiable with reliable methods.

23 Considering an emission factor of 0.16843 kg/km



## 305-4 GHG emissions intensity

All emission data (Scope 1 and 2, emission intensity) reveal an increase linked to the increase in reefer and operational diesel consumption:

**Table 35:**  
GHG EMISSIONS

GHG EMISSIONS <sup>22</sup>	U.M.	2020	2021	2022
Scope 1: diesel consumption <sup>24</sup>	tCO <sub>2</sub> EQ	2.973	3.708	3.741
Scope 2: electricity consumption	tCO <sub>2</sub> EQ	1.655	1.835	1.963
Scope 3: employee commuting	tCO <sub>2</sub> EQ	201	279	289
<b>Total GHG emissions</b>	<b>tCO<sub>2</sub>EQ</b>	<b>4.829</b>	<b>5.822</b>	<b>5.993</b>

**Table 36:**  
INTENSITY OF GHG EMISSIONS<sup>25</sup>

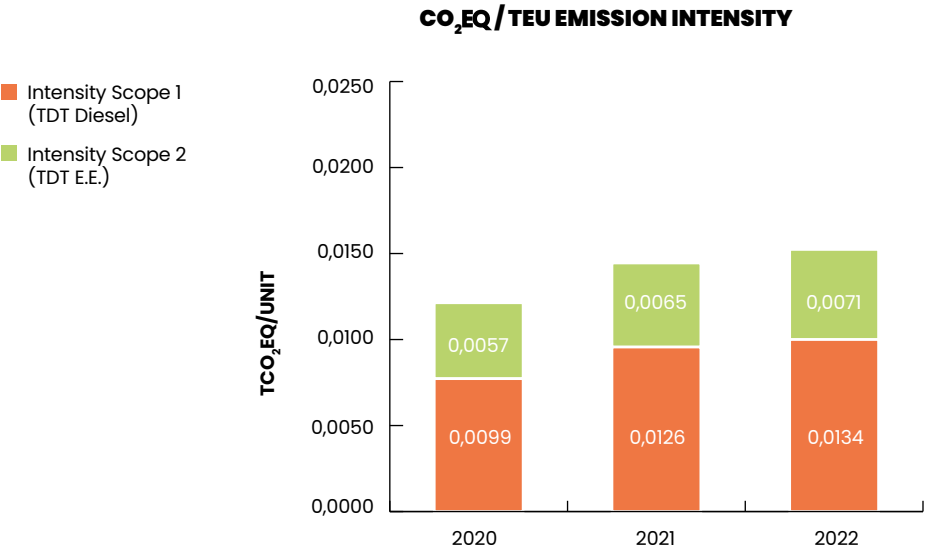
EMISSION INTENSITY	U.M.	2020	2021	2022
Intensity (Scope 1) Diesel	tCO <sub>2</sub> EQ /unit	0,0102	0,0131	0,0134
Intensity (Scope 2) E.E <sup>26</sup>	tCO <sub>2</sub> EQ /unit	0,0057	0,0065	0,0071
<b>Total intensity</b>	<b>tCO<sub>2</sub>EQ /unit</b>	<b>0,0159</b>	<b>0,0195</b>	<b>0,0205</b>
Total units Denominator	[Unit	291.872	283.644	278.340
Intensity (Scope 1) Diesel	tCO <sub>2</sub> EQ /TEU	0,00633	0,00791	0,00800
Intensity (Scope 2) E.E.	tCO <sub>2</sub> EQ /TEU	0,00353	0,00391	0,00419
<b>Total intensity</b>	<b>tCO<sub>2</sub>EQ /TEU</b>	<b>0,0099</b>	<b>0,0118</b>	<b>0,0122</b>
Total TEU Denominator	TEU	469.498	468.942	467.938

<sup>24</sup> fdc CO2 in CO2eq 3140 instead of 3186 used until 2020 (ISPRA value of 2017)

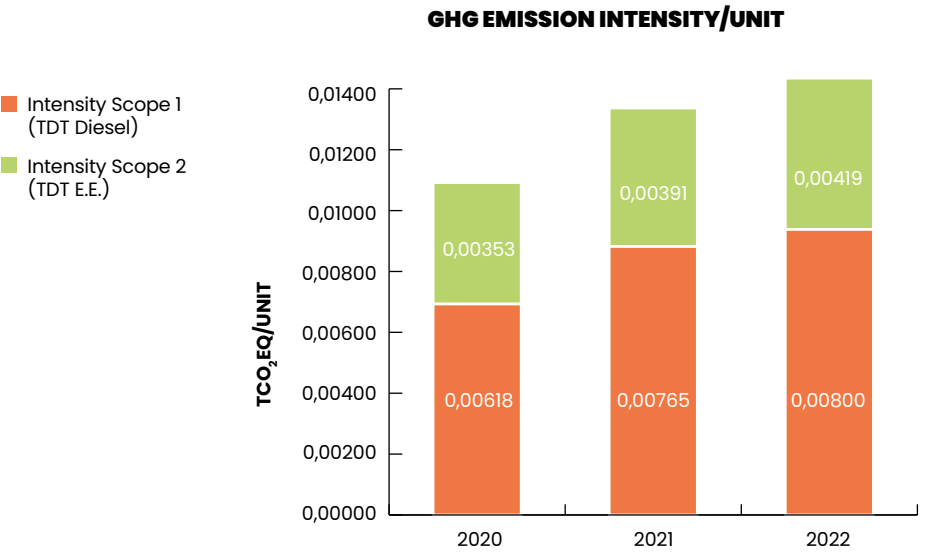
<sup>25</sup> Diesel consumption from shuttle transport carried out by an external company included

<sup>26</sup> Please note that emissions from E.E. are calculated with the ISPRA database for GHG factors and the composition of the national energy mix, even if the E.E. of TDT comes 100% from renewable sources.

**Graph 11:**  
CO<sub>2</sub>EQ/TEU EMISSION INTENSITY



**Graph 12:**  
GHG EMISSION INTENSITY/UNIT



## 305-5 Reduction of GHG emissions

E.M.'s actions achieved have led to a reduction in consumption and emissions which is however covered by the increases in consumption mentioned in paragraph 3.2.

**Table 37:**  
REDUCTION OF GREENHOUSE GAS EMISSIONS (GHG)

CO <sub>2</sub> EQ EMISSIONS	U.M.	2020	2021	2022
CO <sub>2</sub> eq saved by E.M. on EE	tons CO <sub>2</sub> eq	-159	-179	-186
CO <sub>2</sub> eq tot from EE (FER)	tons CO <sub>2</sub> eq	-1.655	-1.835	-1.963
Delta CO <sub>2</sub> eq (absolute)	tons CO <sub>2</sub> eq	-1.317	+914	+283
<b>Delta CO<sub>2</sub>eq (normalized to Teus)</b>	<b>tons CO<sub>2</sub>eq</b>	<b>-353</b>	<b>+919</b>	<b>+295</b>
	<b>%</b>	<b>-7%</b>	<b>+20%</b>	<b>+5%</b>

The savings generated by E.M. shares it is unfortunately lower than the plus generated by the greater consumption of E.E., determined by the reefer containers and of diesel, provoked by greater movements of containers in the yard.

## 305-6 Emissions of ozone-depleting substances (ODS)

**The emissions conveyed** are due to the heating systems used to heat domestic water for the changing rooms and to losses in abnormal or emergency conditions of the air conditioners used in offices and cabins of lifting vehicles.

Any leaks and disposals of gas are communicated electronically, by the air conditioning maintenance supplier, to the database established by D.P.R. n. 146/2018.

**Table 38:**  
LIST OF AIR CONDITIONERS<sup>27</sup> AND RELATED TONS OF CO<sub>2</sub>EQ

YEAR	N. AIR CONDI- TIONERS	TOTAL KG OF GAS CONTAIN- ED	TONS OF CO2 EQUIVA- LENT	DECOM- MISSIO- NED AIR CONDI- TIONERS	OF WHICH REPLA- CED	AIR CONDI- TIONERS ADDED	AIR CON- DITIONERS REPLACED WITH EXI- STING ONES	ALIENATED R22 GAS (KG)	RESIDUAL R22 GAS (KG)
2020	208	265	471	3	3	3	0	R32=2,1 kg	0
2021	208	264	468	28	3	1	0	R410A=25,75 kg R32=3,02 kg	0
2022	181	237	407	30	0	2	0	R410A= 25 kg R32=3,02 kg	0

**A)** From 2020, replacements of air conditioners with R410A requiring refill/replacement only involve the use of new refrigerant gases with lower environmental impact (R32) as required by the Kindall protocol;

**B)** In 2022, 30 air conditioners were eliminated and 2 were added in a new warehouse.

<sup>27</sup> Located in internal/external offices and lifting equipment

# 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions

## NOx emissions

Reported in par. 3.5 indicator 305-1 and 305-2. However, we have no data on SOx emissions

## Acoustic emissions

The noise emissions of the terminal must respect the limits in the acoustic zoning plan of the territory, drawn up by the municipality of Livorno on the basis of L. 447/95 and L.R. 89/98, "Class VI Exclusively industrial areas". In fact, there are no sensitive and/or vulnerable settlements in the immediate vicinity of the DTT activity: there are only and exclusively other industrial structures attributable to the typical activities of the port sector. The closest sensitive receptors are located several hundred meters from the settlement area and all involve the interposition of other activities that are also part of the port area. All surrounding areas are classified as Class V or Class VI.

**Table 39:**  
VALUES OF THE MAXIMUM LIMITS OF THE EQUIVALENT SOUND LEVEL (LEQ A) RELATING TO THE CLASSES OF INTENDED USE OF THE REFERENCE TERRITORY

D.P.C.M. 15/11/97	REFERENCE TIMES	
I Particularly 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 acoustic impact produced by the activities taking place inside the Terminal were evaluated in accordance with the provisions of law 447/95, in relation to the acoustic classification of the territory. The last assessment carried out by the Port Authority throughout the state-owned area was in 2018, while at the terminal it was carried out in 2019, 10 years after the previous one, as some sound sources had changed: the investigation did not reveal values of emissions, input and noise differential (in classes where applicable) beyond the limit levels.

Assessments relating to workers' exposure to noise are instead carried out at least every four years or following changes in activities.

## ELECTROMAGNETIC RADIATION EMISSIONS





Emissions of electromagnetic radiation 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 find themselves working in the yard and between the internal planning and management offices operational

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

From the reconnaissance and measurements carried out, with the active sources analysed, it does not appear that the workers exceeded the action limits established by law

### Light emissions

The sources of light emission, intended to guarantee safe work during the night hours, are represented by:

**33 LED light towers (TF),**

**LED lighting of cranes and RTGs.**

The intensity was adjusted according to the minimum lighting requirements on land in port areas foreseen by the various UNI standards (for example UNI EN 12464, while the orientation was kept downwards, with a protection structure above each crown of headlights, in order to avoid dispersion and therefore light pollution. During routine maintenance, the maintenance of the correct orientation of the lamps is verified. The saving has been quantified as being equal to 47% of previous consumption

### Ionizing radiations

There are no sources of ionizing radiation, except those emitted by the X-ray scanner machines, both fixed and mobile, of the Customs Agencies during the container scanning activity, which is in any case carried out in the absence of personnel inside and through the application of specific procedures

### Odor emissions

The activity carried out indoors does not generate significant olfactory impacts, as they are limited to emissions from motor vehicles and heavy transport vehicles. More significant odor emissions may instead be due to the simultaneous presence of ships at the dock and railway locomotives

**Figure 1:**

ODOR-GENERATING AREA IN THE BELT SURROUNDING TDT



## 306 Waste

### 306-1 Waste generation and significant waste-related impacts



### 306-2 Management of significant waste-related impacts

In 2022, the share of waste sent for recovery operations reached 96%; to be compared to 9% in 2009, the year the EMS was established.

The management of leaks from containers and spills from operational vehicles determines the production of waste that cannot be predicted, except statistically, in anomalous or emergency conditions. These events are managed by following instructions which include the confinement of the area, the cleaning and sometimes the reclamation of the area, and the transfer of the resulting material to the waste area.

### 306-3 Waste generated

Below is a list and quantities of waste produced.

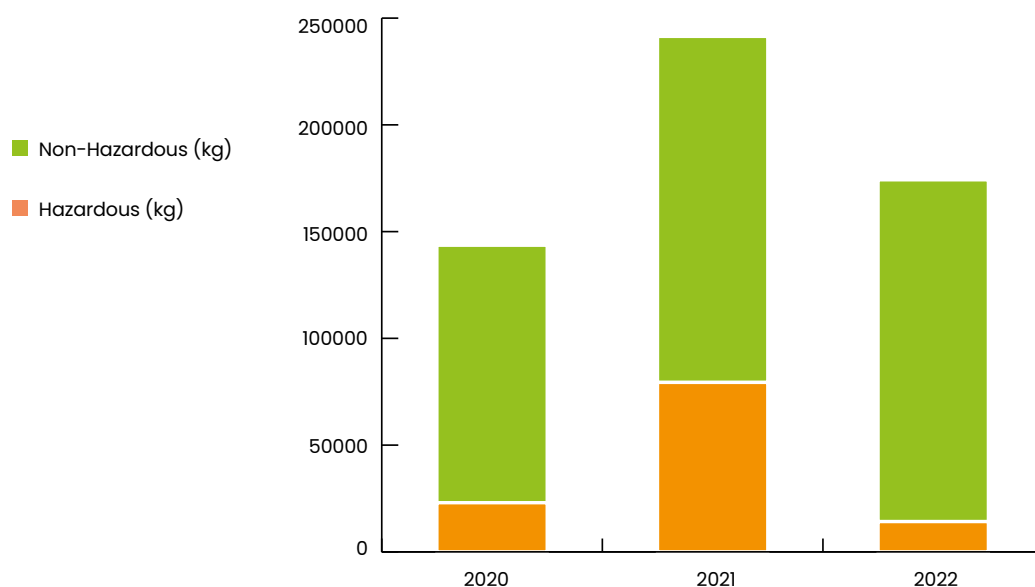
**Table 40:**  
ANNUAL WASTE PRODUCTION

CER	DESCRIPTION/ TYPE OF WASTE	P/NP	R/D	2020	2021	2022
02 03 04	Waste unusable for consumption or processing	NP	R		17.100	0
07 02 13	Plastic waste	NP	R		315	0
07 06 11*	Sludge produced by on-site treatment of effluents, containing dangerous substances	P	D	8.500	5.700	280
07 06 12	Sludge removed from on-site effluent treatment	NP	D			5.900
08 01 11*	Waste paints and varnishes	P	R			342
08 03 18	Spent printing toners, other than those mentioned in 08 03 17	NP	R		32	0
13 02 08*	Other engine, gear and lubrication oils	P	R	500	11.200	15.400
15 01 01	Paper packaging	NP	R			4.510
15 01 03	Wooden packaging	NP	R	10.140	10.850	8.120
15 01 06	Mixed packaging	NP	R		3.200	7.130
15 01 10*	Packaging containing residues of dangerous substances or contaminated	P	R	164	343	196
15 02 02*	Absorbents, filter materials, rags and protective clothing, contaminated with dangerous substances	P	R	2.071	5.078	3.010
16 01 03	End of life tyres	NP	R		4.392	0
16 01 04*	End of life vehicles	P	R	2.500	53.200	0
16 01 07*	Oil filters	P	R		436	978
16 01 20	Glass	NP	R			400
16 01 21*	Hazardous components other than those mentioned in items 16 01 07 to 16 01 11, 16 01 13 and 16 01 14	P	R	120	302	408
16 02 11*	End-of-life equipment, containing chlorofluorocarbons, hcfc, hfc	P	D	55		100

CER	DESCRIPTION/ TYPE OF WASTE	P/NP	R/D	2020	2021	2022
16 02 13*	Discarded equipment containing hazardous components other than 16 02 09	P	R	40	265	0
16 02 14	Discarded equipment other than those mentioned in 16 02 09 -16 02 13	NP	R	855	1.435	1.136
16 02 15*	Hazardous components removed from out-of-use equipment	P	R	237		0
16 02 16	Components removed from end-of-life equipment other than heading 160215 (toner)	NP	R	170		0
16 05 04	Gases in pressure containers (including halons), containing dangerous substances	NP	R	4		0
16 06 01*	Lead acid batteries	P	R		1.094	2.137
16 06 02*	Nickel-cadmium batteries	P	R			3
16 06 04	Alkaline batteries	NP	R			0
16 06 05	Other batteries and accumulators	NP	R			14
16 10 01*	Aqueous liquid waste, containing dangerous substances	P	R		1.752	0
17 01 01	Cement	NP	R			0
17 02 01	Wood	NP	R			4.460
17 02 02	Glass	NP	R	72		648
17 02 03	Plastic	NP	R	529	220	2.687
17 04 05	Iron and steel	NP	R	4.915	5.700	23.270
17 04 11	Cables, other than those mentioned in 17 04 10	NP	R	276	205	0
17 06 03*	Other insulating materials containing or made up of dangerous substances	P	D			40
17 08 02	Gypsum-based building materials other than those mentioned in 17 08 01	NP	R			80
17 09 03*	Other waste from Constr/Dml activities (incl. mixed waste) containing dangerous substances	P	D			0

CER	DESCRIPTION/ TYPE OF WASTE	P/NP	R/D	2020	2021	2022
17 09 04	Mixed waste from Constr/Dml activities, other than those referred to in items 17 09 01, 17 09 02 and 17 09 03	NP	R			6.120
20 01 21*	Fluorescent tubes and other waste containing mercury	NP	R		10	118
20 01 36	End-of-life electrical and electronic equipment, other than those referred to in 20 01 21, 20 01 23 and 20 01 35	NP	R	2.400		
20 03 01	Unsorted municipal waste	NP	D	26.380	15.560	0
20 03 03	Residues from street cleaning (sweeping)	NP	R	112.330	102.550	56.130
20 03 04	Septic tank sludge	NP	D	2.000	500	
	<b>Total per year (kg)</b>			<b>174.258</b>	<b>241.439</b>	<b>143.617</b>
	<b>Total Hazardous(kg)</b>	<b>P</b>		<b>14.187</b>	<b>79.370</b>	<b>23.012</b>
	<b>Total Non-Hazardous(kg)</b>	<b>NP</b>		<b>160.071</b>	<b>162.069</b>	<b>120.605</b>

**Graph 13:**  
WASTE COMPOSITION





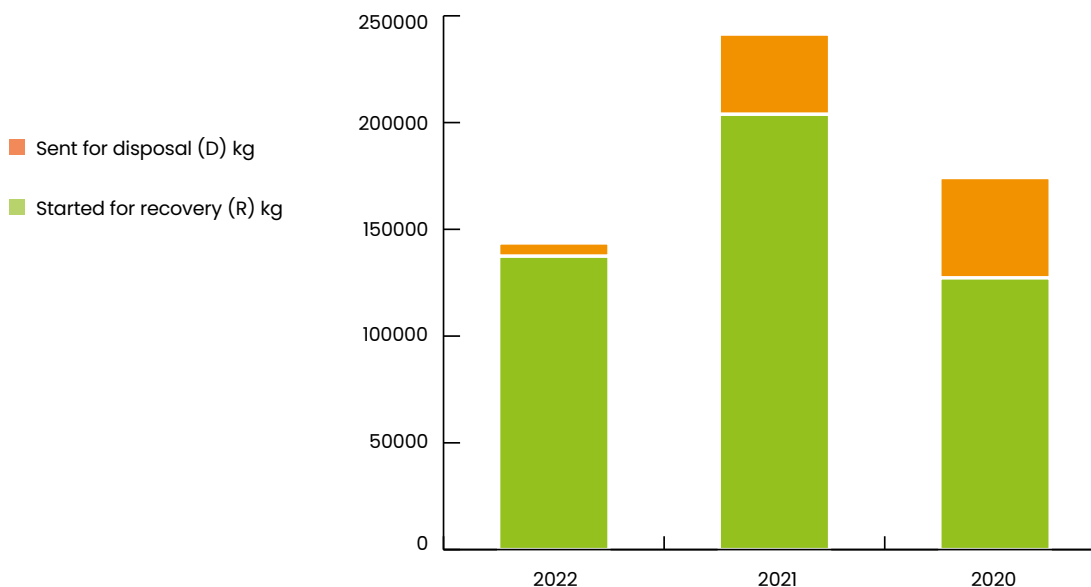
### 306-4 Waste diverted from disposal

### 305-5 Waste directed to disposal

**Table 41:**  
WASTE DESTINED FOR DISPOSAL

WASTE PRODUCTION	U.M.	2020	2021	2022
Started for recovery (R)	kg	127.238	203.877	137.397
Sent for disposal (D)	kg	47.020	37.562	6.220
<b>Total</b>	<b>kg</b>	<b>174.258</b>	<b>241.439</b>	<b>143.617</b>
<b>% WASTE SENT FOR RECOVERY</b>	<b>%</b>	<b>73%</b>	<b>84%</b>	<b>96%</b>

**Graph 14:**  
WASTE DESTINATION



## 308 SUPPLIER ENVIRONMENTAL ASSESSMENT

The indirect environmental impacts are due to activities related to those of the terminal and delegated to third parties or linked to subjects upstream and downstream of the main process, along the production chain. The Terminal's level of management control over these activities is indirect and depends on the ability to influence the individual process or supplier.

All suppliers must be previously qualified and periodically evaluated, in compliance with the procedures of the Integrated Quality, Safety, Environment and Anti-corruption Management System. These procedures

are integrated with environmental controls and the Organizational and Management Model pursuant to Legislative Decree 231/2001.

Among the usual suppliers, particular attention is paid to maintenance workers of vehicles/equipment/systems, whose activities generate maintenance waste generally defined as their property by specific contractual clauses. TDT controls the correct management of the same through yard monitoring activities and/or supplier audits. Any abandoned or poorly delivered waste is managed with non-compliance or recall to the supplier.

The significant environmental aspects linked to the activities relating to the supplier chain are analyzed within the environmental analysis and evaluated as direct ones based on criteria of severity, probability of occurrence, legislative compliance, risks/opportunities, human rights: the results of the analysis are the processes and related environmental aspects reported in the following table are significant, on which it was possible to partially activate improvement actions to reduce impacts.

In 2021, a Code of Conduct was drawn up for suppliers with specific provisions for environmental actions, emissions, waste management, diversity & inclusion (D&I), data and cybersecurity, health and safety.

No engagement percentage data is available.

### 308-1 New suppliers that were screened using environmental criteria

All new suppliers carrying out any of the activities listed below have been assessed using environmental criteria before their use.

### 308-2 Negative environmental impacts in the supply chain and actions taken

SUPPLY	ENVIRONMENTAL ASPECT	IMPACTS	IMPROVEMENT ACTIONS (IA) IMPLEMENTED	IA 2022	IA 2023 OR RISK ACCEPTANCE CRITERION
Vehicle maintenance	Discharges onto the ground	Soil contamination	Management training, meetings, NC spill management;	/	No additional IA applicable at this time
External transport	Waste Production	Abandonment of waste	Abandoned waste management; communication prohibiting abandonment, signs, cameras, delimited TDT waste area, post-check recalls	/	No additional IA applicable at this time
Office cleaning services	Use of raw materials and natural resources	Consumption of raw materials	Information, policy, supplier control; coordination of office cleaning supplier for the purchase of less aggressive detergents	/	No additional IA applicable at this time

Office cleaning services	Waste Production	Waste Production	Information, policy, supplier control	/	No additional IA applicable at this time
E.E. supply	Use of energy sources	Depletion of mineral and fossil resources	E.E. selection certified by FER	/	No additional IA applicable at this time
Diesel fuel supply	Use of energy sources	Depletion of mineral and fossil resources	/	/	No additional IA applicable at this time
Plant/equipment maintenance	Emissions in ATM	GWP, ODL	Replacement of systems in case of low performance, replacement of pre-expiry air conditioning gases	/	No additional IA applicable at this time
	Waste Production	Waste Production	Supplier control	Int. waste management from vehicle maintenance	No additional IA applicable at this time
Home-work employee mobility	Emissions in ATM	GWP	/	/	The road system, interrupted since 2018, no longer allows the use of public services or cycles, therefore to date no other solutions other than the use of one's own vehicle are permitted
	Use of energy sources	Depletion of mineral and fossil resources			





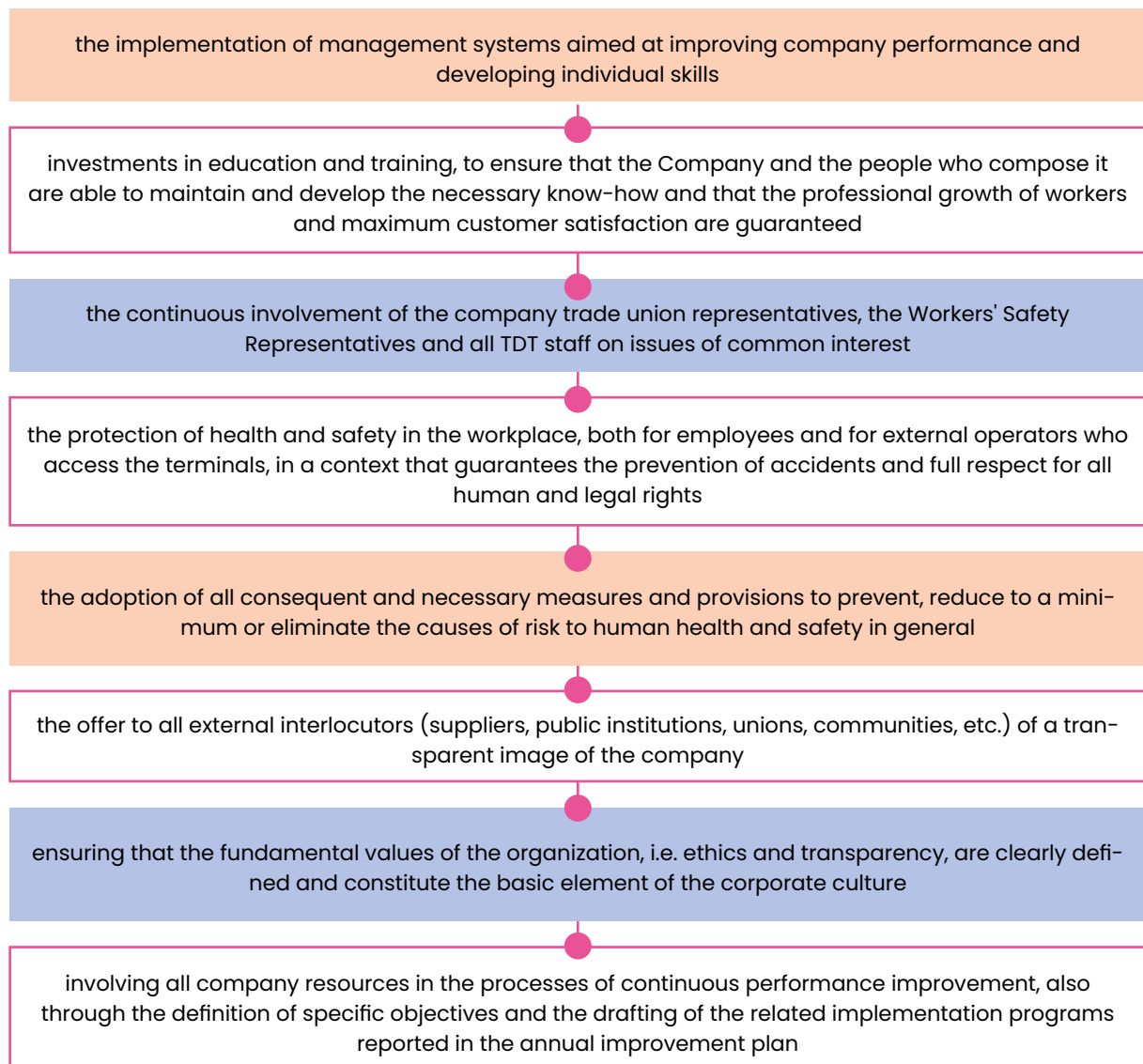
# SOCIAL SUSTAINABILITY

# 6





The commitment to social sustainability is an aspect of great importance for TDT, according to an approach focused on:



From the perspective of social sustainability, it is highlighted that TDT has always responsibly applied national and international regulations regarding 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 such inalienable rights.

This commitment is also set out in the Code of Ethics adopted by TDT.

Furthermore, TDT includes compliance with the indications reported both in the Code of Ethics, including those relating to respect for human rights, and in its Anti-Corruption Policy in contracts with its Suppliers, which it asks to review and adopt behaviors appropriate and compliant with these specifications.



## 401 Employment

### 401.1 New employee hires and employees turnover

Human resources constitute an important asset for TDT; their growth represents a fundamental and indispensable factor for the development of the terminal.

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 methods respond both to the principles of the Code of Ethics adopted in the Company, and to the legal provisions, and to the National Collective Labor Agreements (CCNL Ports and CCNL Managers of industrial companies).

The company policy guarantees equal opportunities for men and women in accessing employment, without any discrimination for reasons of sex, ethnic origin, nationality, language, religion, political opinions, sexual orientation, personal and social conditions in line with applicable legislation and, in particular, with the equal opportunities code (D.Lgs. 198/06).

The staff is hired solely on the basis of regular employment contracts, as no form of irregular work is tolerated, neither for Italian citizens nor foreigners. The candidate must be made aware of all the characteristics relating to the employment relationship.

The recognition of salary increases or other incentive tools and access to higher roles and assignments (promotions) are based on merit-based assessments, in compliance with the rules established by law and the sector's collective labor agreement, and on management assessments.

**Table 42:**  
EMPLOYEE JOIN AND LEAVE

YEAR	2020	2021	2022
Employees who joined during the year	3	1	9
Men	3	1	9
Women	0	0	0
Under the age of 30	0	0	3
Between 30 and 50 years old	1	0	6
Over 50 years old	1	1	0
Employees leaving during the year	14	14	8
Men	12	14	6
Women	2	0	2
Under the age of 30	0	0	0
Between 30 and 50 years old	3	4	3
Over 50 years old	11	10	5

Over the last three years, TDT's workforce has suffered a slight decline (approximately - 2.81%), mainly due to exits to achieve retirement requirements (16 out of 36 exits), in addition to 9 voluntary resignations, 9 layoffs and 2 deaths.

Permanent contracts represent the most used contractual form, accounting for 98.14% of the total contracts in force.

Below is the overall turnover rate, i.e. the staff who joined and left during the period based on the average workforce for the period.

**Table 43:**  
OVERALL TURNOVER RATE

OVERALL TURNOVER RATE (%)	2020	2021	2022
<b>Total</b>	<b>5,98</b>	<b>5,50</b>	<b>6,35</b>
Men	5,28	5,50	5,60
Women	0,70	0,00	0,75
Under the age of 30	0,00	0,00	1,12
Between 30 and 50 years old	1,41	1,47	3,36
Over 50 years old	4,57	4,03	1,87

Below is the positive turnover rate, i.e. those who entered the period/staff at the beginning of the period.

**Table 44:**  
POSITIVE TURNOVER RATE

POSITIVE TURNOVER RATE (%)	2020	2021	2022
<b>Total</b>	<b>1,04</b>	<b>0,36</b>	<b>3,37</b>
Men	1,04	0,36	3,37
Women	0,00	0,00	0,00
Under the age of 30	0,00	0,00	1,12
Between 30 and 50 years old	0,35	0,00	2,25
Over 50 years old	0,69	0,36	0,00

Below is the negative turnover rate, i.e. those leaving during the period/staff at the beginning of the period.

**Table 45:**  
NEGATIVE TURNOVER RATE

NEGATIVE TURNOVER RATE (%)	2020	2021	2022
<b>Total</b>	<b>4,86</b>	<b>5,02</b>	<b>3,00</b>
Men	4,17	5,02	2,25
Women	0,69	0,00	0,75
Under the age of 30	0,00	0,00	0,00
Between 30 and 50 years old	1,04	1,43	1,12
Over 50 years old	3,82	3,58	1,87

Below is the turnover compensation rate, i.e. those entering the period/leaving the period.

**Table 46:**  
TURNOVER COMPENSATION RATE

TURNOVER COMPENSATION RATE (%)	2020	2021	2022
<b>Total</b>	<b>21,43</b>	<b>7,14</b>	<b>112,5</b>
Men	25,00	7,14	150,0
Women	0,00	0,00	0,00
Under the age of 30	0,00	0,00	300,00
Between 30 and 50 years old	33,33	25,00	200,00
Over 50 years old	18,18	10,00	0,00

During the three-year period 2020–2022, managerial figures were hired in TDT (2 managers and 1 middle manager, male). Furthermore, 2 office workers and 6 workers were hired.

The negative turnover rate for the three-year period had a slight increase in 2022 (+0.42 percentage points) also due to the continuation of a policy to incentivize the departure of workers who met the 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 defined benefit company plans, nor does the company offer employees specific supplementary pension coverage, in addition to that provided for in the relevant national collective agreements.

Since 2005, the Priamo Social Security Fund has existed for managers, employees and workers, to which all employees can join by combining the severance pay accrued with an additional equal employee-company contribution of 1% of the remuneration elements valid for the calculation of the severance pay.

In addition to the legal pension plans guaranteed by the payment of compulsory INPS contributions, employees are entitled, upon termination of the employment relationship, to severance pay for those who have not joined the supplementary pension scheme, while those who have joined the supplementary they have the possibility of receiving a lifetime annuity and/or redemption of the accrued social security position from the Priamo Fund and for managers from the Previndai Fund.

In the cases provided for by the CCNL, the employee is also entitled to compensation in lieu of notice.

The composition and movement of severance pay and other personnel funds as of 31 December 2022 is detailed below:

**Table 47:**  
BENEFITS DUE UPON TERMINATION OF THE EMPLOYMENT RELATIONSHIP

BENEFITS FROM TERMINATION OF EMPLOYMENT €	2020	2021	2022
Severance pay	829.690	816.798	864.847
Other (replacement allowances, IMA, etc.)	-	-	-

### 401-3 Parental leave

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

PARENTAL LEAVE	2020		2021		2022*	
GENDER	M	F	M	F	M	F
No. of workers entitled to parental leave	86	18	218	50	221	48
No. of workers who took advantage of parental leave	5	4	6	5	10	5
Number of workers returning from parental leave in the reference year	5	4	6	5	10	5
Number of workers who returned to work at the end of parental leave and were still employed in the following 12 months	5	4	6	5	0	0
Percentage (%) of workers who returned to work at the end of p.l. and were still employed in the following 12 months	100	100	100	100	100	100

\*From 2021 the criterion for determining staff entitled to parental leave has changed

## 402 Labor/management Relations

### 402.1 Minimum notice periods regarding operational changes

TDT adopts appropriate consultation practices with employees and their representatives with reference to communications of significant changes in the operation of the activities.

These consultations take place in compliance with the legal and contractual provisions that regulate relations between the employer and the 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 to both employees and their representatives and the relevant government authorities with reasonable advance notice, even if not specified in national and second-level contracts, 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

### 403.8 Workers covered by an occupational health and safety management system

The adoption by TDT of the International Standard for the health and safety of workers in compliance with the new UNI ISO 45001:2018 standard guarantees constant monitoring of performance and the desire for a progressive and continuous improvement of performance in the health and safety field.

TDT attaches great importance to this factor by dedicating a specialized internal structure (with its own employees), which constitutes the Prevention and Protection Service, composed of 1 Safety Director/RSPP, 1 Manager of the Health and Safety Management System/ASPP, 2 ASPPs and an operational control and support service for surveillance activities, operational 24 hours a day, through a private surveillance institute.





There are also 3 Workers' Representatives for Safety (RLS), 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 the Site Representative (covering the area of the entire Port of Livorno).

The Health and Safety Management System covers the entire scope of TDT and affects both direct workers (employees or temporary workers) and indirect workers (contractors and suppliers) who find themselves operating in the TDT area of competence, including visitors and users who access the Terminal for various reasons. To this end, TDT implements a health and safety risk reduction policy that impacts both its workers and all those who access the workplace controlled by TDT, providing, among other things, widespread information on the risks to users of the Terminal and the drafting of specific coordination documents (DUVRI, Coordination Protocols, Work Permits) with suppliers/contractors.

Annually, as part of the System Review, the state of implementation of the System is verified, the improvement actions undertaken are reported and the areas that require the greatest attention are defined, together with the actions to be undertaken to improve them and the indicators to measure their effects. performance.

## 403.2 Hazard identification, risk assessment and incident investigation

TDT, in compliance with the provisions of the new ISO 45001 Standard which requires 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 influence the achievement of its objectives, the expectations of interested parties and the risks and opportunities related to health and safety at work and by establishing a series of actions and activities 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 specialized structure dedicated to workplace safety, the constant monitoring of activities and the acceptance 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

Following any significant change (including personnel changes, replacement of equipment or machines, operational changes, etc.), TDT carries out a preventive analysis of the consequences and the resulting advantages or disadvantages, involving the sectors and workers from time to time interested parties, to guarantee maximum participation and sharing of the choices and prevention and protection measures identified in order to eliminate or reduce the consequent risks

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

## 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

The Company's attention to mitigating the impacts on health and safety at work in TDT is always high and extends not only to direct TDT workers but also to all those who gravitate there in various capacities.

Various initiatives are undertaken and, for 2022, 3 of particular relevance are specifically mentioned.

### NEW MANEUVERING CABINS FOR PORTAINERS

The improvement of working conditions is one of TDT's priority objectives. In fact, TDT has made numerous investments to improve the health and safety conditions of its workers. In this direction, in 2022 TDT began the campaign to replace the quay crane control cabins with latest generation cabins.

The new control cabin, designed by the very Italian Brieda Cabins of Pordenone, a leading company in the sector, was installed on the Pace-co n.9 towards the end of 2022 and features the new workstation called Dynamic Control Station, designed according to the highest international ergonomic standards and is equipped with adjustment devices to ensure maximum comfort for the crane operator. The scientific studies, lasting over 10 years, carried out by ErgoCert (International Accredited Body for the Certification of ergonomic characteristics in professional and consumer products, processes and services), are able to bring about a reduction of over 60% in muscular stress, particularly in the lumbar region. An innovative joystick allows you to rest and unload your entire forearm on the armrest which is adjustable in every direction, while only your fingers and fingertips move for more precise and safe control during operation. The cabin is also equipped with large glass surfaces, designed to guarantee the operator maximum visibility during operations, and an air treatment system to keep the cabin air-conditioned and pressurized in order to avoid the entry of any dust and fumes of the ship inside it.



### THE NEW LASHING CAGE

To ensure safer working conditions in access operations at heights and lashing/unlashing on board ships, TDT purchased a new model of lashing cage in 2022, which complies with the most advanced technical/regulatory framework on the subject, with which it intends to progressively replace the current lashing cage park. The new lashing cage chosen by TDT ensures a substantial increase in the level of safety of operations, thanks to the use of latest generation equipment, specifically created and certified for work at height activities using dock cranes. Designed and built according to the most recent EC Directives on product safety, the UNI EN standards on lifting equipment, the requirements of the Guidelines of the Ministry of Labour, ILO and INAIL, and the Lloyd's Register Code for lifting equipment in a marine environment, the new lashing cage has additional and more ergonomic safety systems. With this investment TDT has achieved, among others, the following significant objectives:

better and more immediate communication between operators thanks to the presence of a set of high visibility LED lights powered by batteries recharged by high efficiency solar panels;



better ergonomics for carrying out the activity thanks to the presence of a lifeline which guarantees operators greater mobility while significantly reducing the risk of being thrown out of the cage and to the rounded corners which facilitate access to the twist-lock containers and reduce interference generated by the edges of the cage during manoeuvres;

improvement in the management of emergencies for the possible recovery of injured people on board the ship or in the hold.

## EXOSKELETON TEST

At the end of 2022, TDT was pleased to host the first test session of the use of an exoskeleton capable of actively supporting lashing operations on land and on board ships.

The use of an exoskeleton in typical operations of port activity (such as the affixing and removal of twist locks, the positioning of rods, the opening of twists on board, etc.), significantly reduces the joint and muscular effort of the worker, preventing all pathologies that, in the long run, may occur.

The field test, organized in collaboration with the CPL company (to which the on-board lashing/unlashing service is contracted), was conducted by the engineers of the IUVO Company, who collaborate with the Scuola Superiore S. Anna of Pisa (public institute of university education based in Pisa, which works to encourage the development of culture and scientific and technological research, both nationally and internationally) and has had truly promising results.



## PERMANENT FIRST AID STATION

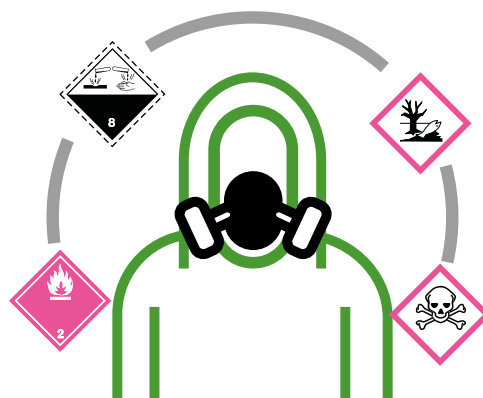
During 2022, the project of the Port System Authority of the Northern Tyrrhenian Sea was brought to a conclusion, which activated a permanent First Aid Unit to cover the area of the Darsena Toscana Ovest where a series of terminals and companies are located, including TDT, which supported the completion of this project.



The Unit is active every day from 8am to 8pm and is able to provide immediate assistance in case of need with 2 advanced level rescuers and to simultaneously activate the emergency call to the Single Number for Emergencies in Italy (112).

## MANAGEMENT OF DANGEROUS GOODS

The TDT dangerous goods (IMO) park, located in an internal area of the terminal authorized by the local Port System Authority, 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 special 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 and segregation distance) 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 openings and load checks required by the local authorities.



The procedures require that the layout of the IMO park, 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 dedicated software, Hacpack, used in many other Italian terminals, which allows the risk to be constantly assessed based on the type of goods, the danger class, the packaging, the weight of each individual package and the overall weight of the load of containers present in the park. Furthermore, the software is also able to provide real-time safety data sheets of the goods in the warehouse to allow any emergency interventions to be managed quickly and correctly to protect workers and users of the Terminal. In addition to Hacpack, TDT implemented, at the end of 2022, the "Expert Decking" function of Navis N4, which automatically assigns positions to IMO containers taking into consideration the segregation rules and distances permitted pursuant to the IMDG Code, highlighting any anomalies positioning to the yard planning operators.

TDT also ensures specific training for all employees, as well as information for all third-party personnel regarding the presence of risks, the behavior to be followed and the emergency procedures adopted.

To contain any spills, the Terminal has been equipped with mobile systems, more precisely three 45' MAFIs, equipped for the containment of spills of solid or liquid materials from containers.

To deal with any emergencies, 50 kg A-B-C approved wheeled dielectric powder fire extinguishers are provided to cover the area; Finally, an emergency management team is always present and has equipment available for intervention and for the containment of the area.

The following tables show the trends over the last three years:

**Table 48:**  
TOTALS IMO

IMO	2020	2021	2022
Import	1250	818	694
Export	1857	2.308	2673
<b>Total containers</b>	<b>3107</b>	<b>3.126</b>	<b>3367</b>
Transshipment	2459	1.368	1118
<b>Total</b>	<b>5566</b>	<b>4.494</b>	<b>4485</b>





**Table 49:**  
BREAKDOWN OF DANGEROUS GOODS BY HAZARD CLASSES (%)

Classes	Description	EXPORT (%)			Import (%)			Transshipment (%)		
		2020	2021	2022	2020	2021	2022	2020	2021	2022
2	Gas	0,17	0,12	-	-	-	-	-	-	
2.1	Flammable Gases	3,22	2,87	3,8	0,39	1,28	3,7	1,7	2,33	3,0
2.2	Non-flammable/ non-toxic gases	4,38	4,76	4,9	0,39	0,70	1,2	1,43	1,98	6,9
2.3	Toxic gases	-	-	-	-	0,12	-	0,15	0,35	
3	Flammable liquids	25,93	19,10	20,3	3,63	6,03	22,6	35,49	31,55	19,8
4.1	Flammable solids, self-reactive ma- terials and desen- sitized explosives	0,99	0,24	0,4	0,08	0,23	0,5	0,91	1,27	2,4
4.2	Materials subject to spontaneous ignition	-	-	-	0,08	0,12	0,4	0,19	1,34	0,8
4.3	Substances which, in contact with water, emit flam- mable gases	4,51	5,11	3,4	1,66	4,99	0,5	0,76	0,21	0,6
5.1	Oxidizing subst.	25,38	15,41	7,8	68,35	45,48	4,7	6,64	6,00	6,4
5.2	Organic peroxides	0,39	0,31	0,7	-	-	-	0,26	0,21	0,8
6.1	Toxic substances	1,33	1,02	1,1	4,1	10,56	15,4	3,59	3,74	1,1
8	Corrosive subst.	13,91	10,69	12,4	6,63	9,05	28,4	15,1	17,36	28,7
9	Various dangerous materials/objects	19,79	40,37	45,3	14,68	21,46	22,7	33,79	33,66	29,5

### 403-3 Occupational health services

All workers, in compliance with the obligation set out in the art. 41 D. Lgs 81/2008 and the National Collective Agreement, are subjected to health surveillance, the objective of which is to protect the health and safety status of workers based on the risks to which they are exposed, the environment in which they are placed and the type of activity carried out.

The health surveillance carried out by the Competent Doctor includes preventive medical visits, to evaluate the suitability of the worker to perform the specific task, aimed at checking the state of health of the workers and the persistence of suitability requirements for performing the specific job; in addition to this, medical visits are provided upon request of the worker and medical visits upon return from long periods of absence due to illness or injury (60 days).

Health checks and visits are carried out during working hours, in a special medical room that TDT has made available to the Competent Doctor appointed by the company, in possession of the necessary qualifications/requirements, and registered in the national list of Competent Doctors of the Ministry of Health.



The Competent Doctor plans the Health Surveillance based on the results of the Company Risk Assessments sent by the Employer and the Prevention and Protection Service, developing a specific Health Plan which includes the health protocols (visits and assessments) defined according to the risks and based on the most advanced scientific directions; this Plan is updated periodically as necessary and in any case of changes in the results of the Risk Assessment.

The Competent Doctor also provides specialized support for the assessment of all risks related to workers' health, participates in the periodic safety meeting where he reports the aggregate results of his assessments on risk situations in the workplace, visits the workplaces at least once a year to assess the absence of environmental risks, establishes and safeguards, under its own responsibility, the health records of individual workers and the related health documentation, with protection of professional secrecy and privacy.

The TDT Human resources office monitors the deadlines for periodic visits, plans with the diagnostic center and the Competent Doctor the dates for carrying out the tests so that the suitability judgment is issued before the expiry of the previous judgment, keeps an updated database with the results of the visits and the expiry dates of the assessments and future visits, communicates to the Commissioning Office, the Prevention and Protection Service and the Operations Management the temporary prescriptions defined by the Competent Doctor and/or any limitations of suitability/unsuitability, respecting privacy and limited to the information necessary to correctly manage the process. The Recruitment Office, by keeping the management software for staff recruitment updated with the relevant medical prescriptions, ensures that there are no discrepancies between existing medical prescriptions and the actual recruitment of staff.

#### COVID-19 EMERGENCY

*In relation to the management of the COVID-19 Pandemic Emergency, TDT maintained high attention during 2022 to prevent the spread of COVID-19 contagion in the company. To this end, it has developed a specific "Corporate Protocol for the response to the COVID-19 emergency", revised over time with respect to the progress of the pandemic and planned and implemented a periodic sanitization program for work environments and operational vehicles.*

### 403.6 Promotion of worker health

In order to improve the health and well-being conditions of all employees, in addition to health surveillance, in accordance with the provisions of the CCNL, all employees have supplementary insurance (CASSAGEST) which provides medical and health care services, specialist visits and tests at affiliated facilities, annual screening tests, provision of specialists to obtain specialized medical opinions.

This insurance can be extended to the family members of employees, on a voluntary basis.

### 403.5 Worker training on occupational health and safety

With regards to training on health and safety at work, it is planned based on a training program that takes into account both mandatory and company requirements.

The training process is described in a specific procedure which defines the requirements regarding: contents, teaching staff, student body, programming and methods of delivery of the interventions. The supervision of the process is carried out by the Human Resources Office assisted, as regards health and safety in the workplace, by the SPP. All safety training interventions are mandatory and are carried out within working hours or in any case provide for the recognition of remuneration for the hours carried out.

As regards in particular the planning of the interventions, compliance with the minimum contents foreseen by the regulatory provisions is required first and foremost, integrated with any specific topics, in order to illustrate the risks present and the related preventive and protective measures adopted, as well as to ensure the acquisition of the necessary theoretical and practical knowledge for the correct safe carrying out of activities.

The training is provided in multiple ways (frontal lessons, listening/watching audiovisual material, practical exercises, seminars, analysis of case studies and/or events that have occurred, etc.), with clear and understandable language, providing any teaching aids (handouts, copies of procedures, diagrams, etc.).

Each intervention carried out is formally recorded and includes a theoretical or practical test in order to evaluate its effectiveness (test, practical test, feedback with the teacher).

The evaluation of training interventions on health and safety is obtained through audit activity, the investigation of accidents and accidents that have occurred, safety checks in the field and periodic verification of qualification requirements.

## 403-9 Work related injuries – Accidents and near misses

Following the occurrence of any accident, including accidents and near misses (those accidents which only by chance did not turn into an accident at work), the Terminal reacts immediately by initiating in-depth investigation activities, necessary to ensure a timely reconstruction of the dynamics of the same. The analyzes of the data and testimonies collected allow us to identify the root causes underlying the occurrence of events and to determine the actions to be implemented to avoid 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 the Terminal with significant information regarding signs of malfunction or opportunities for improvement of the Occupational Health and Safety management system

For this purpose, the Prevention Protection Service maintains a database that collects all the accident events that have occurred over the years, also taking into consideration those involving external suppliers/users. It is customary for records to be systematic and for all events that cause damage to be recorded as an accident. The analysis carried out by the SPP is aimed at identifying any corrective or improvement actions, and is carried out with a methodology completely similar to that applied to the examination of accidents. If it is deemed that the events require immediate measures, we proceed, in accordance with what is established in the reference procedure, through dedicated meetings, to determine the causes and corrective measures to be prepared immediately.

Below is the data relating to the accident trend of TDT.

**Table 50:**  
ACCIDENTS AT WORK FOR EMPLOYEES

EMPLOYEES	2020	2021	2022
No. of accidents at work	1	0	1
- of which serious <sup>28</sup>	0	0	1
- of which fatal	0	0	0

<sup>28</sup> Serious injuries are those lasting more than 39 days of absence from work.

**Table 51:**  
ACCIDENTS AT WORK OF NON-EMPLOYEE WORKERS\*

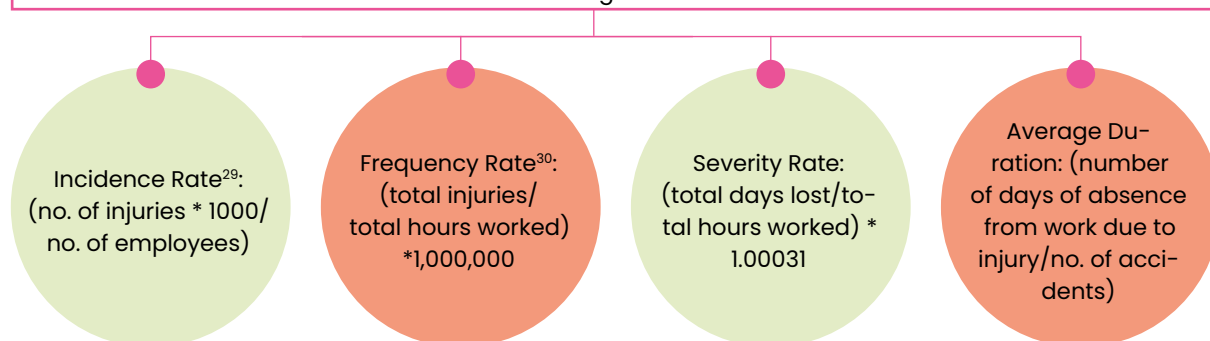
NON-EMPLOYEE WORKERS	2020	2021	2022
No. of accidents at work	4	10	6
- of which serious	0	3	1
- of which fatal	0	0	0

\* Data from the main companies (number 7) that work more or less permanently in TDT are included.

**Table 52:**  
KPI ACCIDENTS AT WORK FOR EMPLOYEES

ACCIDENTS AT WORK FOR EMPLOYEES	2020	2021	2022
Accidents at work for employees	3,52	0	3,72
Incidence Rate	2,74	0	2,61
Frequency Rate	0	0	0
Fatal Frequency Rate	0	0	2,61
High-consequence work-related injuries	2,75	0	0
Recordable work-related injuries	0,05	0	0,65
Injury Severity Rate	20	0	249

The accident KPIs are calculated with the following calculation methods, in line with what is indicated by the GRI guidelines:



In 2022, only 1 work accident was recorded. The data has significantly improved compared to the already positive trend recorded starting from 2012 (where an average of 9 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 just under 1 injury/year.

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

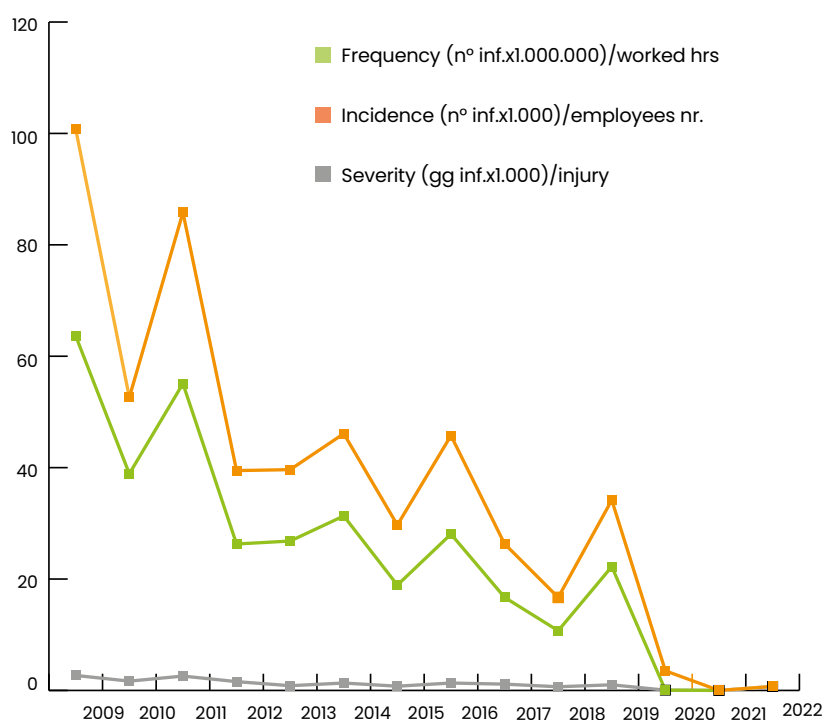
30 This index is calculated using a multiplier equal to 1,000,000 to obtain a value aligned with the legal parameters.

31 Compared to other indicators, this index is calculated using a multiplier of 1000 to obtain a representative value with respect to company size.

The number of days of absence from work resulting from this single injury, with a rather simple dynamic, is quite high (249 days); however, it should be considered that the long absence is attributable to the waiting times for medical treatment and the subsequent convalescence required for the worker's total recovery.

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

**Graph 15:**  
TDT ACCIDENT TREND



Below are the main causes of accidents distinguished between internal (I), i.e. employees (I) and external (E) i.e. workers who are not employees, but whose activity or workplace is controlled by TDT.

**Table 53:**  
REASONS FOR ACCIDENTS TDT

YEAR	2020		2021		2022	
Causes of injuries	I	E	I	E	I	E
Behavior	1	3	0	8	1	5
Technique	0	1	0	1	0	0
Organizational / management	0	0	0	0	0	0
Procedural	0	0	0	0	0	0
Other	0	0	0	1	0	1
Total	1	4	0	10	1	6

As regards TDT, the data from the last three years highlight how the 2 accidents that occurred in 2020 and 2022 are linked to behavioral aspects. This macro category includes events such as, for example, accidental falls, incorrect handling or misuse of equipment, procedures not followed, incorrect load handling, etc. However, during the analysis, especially in cases where the cause is attributable to "behavior", the conditions at the origin of the event are always considered, such as, for example, process factors and interfaces that can favor forgetfulness or confusions (work-related or otherwise). The identification of these elements is fundamental in order to have a significant impact and therefore bring about a concrete and effective improvement.

As regards non-employee staff working in the Terminal, 6 accident events were recorded. The analysis of the individual events made it possible to highlight how these are not attributable to critical issues detected in the workplace, but to the performance of the specific activity of the permanent supplier. The number of injuries concerns 7 different companies that deal with: maintenance of operational vehicles, fire extinguisher maintenance, monitoring of refrigerator containers, on-board work activities, security service for access control, cleaning service and internal container transport service. As regards 2022 in particular, 1 accident was borne by the maintenance company, 1 by the company that carries out access control activities, 1 by the company that carries out monitoring of refrigerated containers and 3 by the company to which the access control service is contracted. lashing/unlashing.

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

**Table 54:**  
TDT INJURY DYNAMICS

YEAR	2020		2021		2022	
Injury dynamics	I	E	I	E	I	E
Injury while going up/down	1	0	0	2	0	1
Fall to the ground/stumble	0	1	0	1	0	0
Fall from height	0	0	0	0	0	0
Impact	0	0	0	2	0	1
MLH* - material fall	0	0	0	0	0	0
MLH* - manipulation	0	1	0	3	1	2
MLH* - crushing	0	1	0	0	0	0
MLH* - efforts	0	0	0	0	0	0
Accident between vehicles	0	0	0	0	0	1
Aggression	0	0	0	0	0	0
Inappropriate movement	0	0	0	1	0	0
Previous pathology	0	0	0	0	0	0
Tire blowout	0	0	0	0	0	0
Other - Presence	0	0	0	0	0	1
Technique - mechanical breakage	0	1	0	1	0	0
Total	1	4	0	10	1	6

\*MLH = Manual Load Handling



## 403-10 Work-related ill health

**Table 55:**  
OCCUPATIONAL DISEASES OF EMPLOYEES

OCCUPATIONAL DISEASES – EMPLOYEES	2020	2021	2022
Number of occupational diseases	0	0	0
Number of deaths resulting from occupational disease	0	0	0
Occupational Diseases Rate: $\left[ \frac{\text{total occupational diseases}}{\text{total hours worked}} \right] * 100,000$	0	0	0

**Table 56:**  
TYPES OF OCCUPATIONAL DISEASES OF INTERNAL (I) AND EXTERNAL (E) EMPLOYEES

YEAR	2020		2021		2022	
Types of occupational disease TDT	I	E	I	E	I	E
Lumbosacral spondylodiscopathy	0	N.D.	0	N.D.	0	N.D.
Total	0	N.D.	0	N.D.	0	N.D.

During 2022, TDT received a request for an occupational disease, defined negatively (not recognised) by the competent body.

## 403-4 Worker participation, consultation and communication on occupational health and safety

TDT uses various tools to ensure that communication and worker participation and consultation are living and always active processes, both with regard to employees and stakeholders:

**Drafting of information on topics relevant to safety purposes**, which have the aim of informing staff or reminding/raising awareness of staff (including external ones) on important safety aspects. During 2022 in particular, 10 Information were drawn up including, for example, results on the periodic checks of lifting accessories, updates to the Covid 19 company protocol, temporary changes to internal roads, results of the new Emergency Plan and update of floor plans, activation of the new 118 (Emergency Room) station c/o Varco Darsena Toscana Ovest, etc.

**Collection and management of reports from employees/suppliers, impacting on safety aspects**: these reports reach the Safety Office both through the RLS (Workers' Safety Representatives) and through direct contacts with the workers themselves. These are collected, recorded and managed by the Prevention and Protection Service (Safety Office) which follows their evolution 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 SGSSL (e.g. participation, involvement, consultation of interested parties) and on Health and Safety (e.g. emergency management, control means, etc.).

**Meetings with SUPPLIERS on common aspects with an impact on Safety and Health:** the periodic meetings with suppliers have made it possible to share information relevant to safety, as well as projects that can generate impacts on companies operating in DTT, sharing impressions, specific problems and solutions. Extraordinary meetings are also called as needed. The outcomes of these meetings are reported in the meeting minutes/meeting reports. The actions resulting from these meetings are recorded and followed within the SGSSL on a specific IT system.

**INTERNAL meetings between the Safety Office and Workers' Safety Representatives and/or sector managers** which are called 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 minuted and the resulting actions are recorded and followed within the Occupational Health and Safety Management System on a specific IT system.

**Electronic noticeboard on IT system:** with a view to continuous sharing of information with an impact on safety and health, TDT maintains a specific workstation (PC connected to the LAN) for the Competent Doctor to allow access to all data (Risk Assessments, Procedures, Instructions, etc.). With this in mind, the company electronic noticeboard is also available and kept updated and available to all employees.

#### INFORMATION CAMPAIGN FOR TRANSPORTERS

During 2022 TDT carried out a further and specific information campaign for the benefit of all transporters accessing the Terminal. The aim of this initiative was to:

- clarify the position of the holds and better direct the transporters, indicating, among other things, the correct direction of travel;
- make traffic more fluid, limiting transits and turning maneuvers;
- reduce the risks of accidents between vehicles and man-machine interference.



During the year, several surveillance visits were received from the local USL company, through the intervention of officials acting as P.G. officers. (ex art. 21 L. 833/78), from which no prescription for TDT arose.

Reports from external parties are tracked and recorded in a specific network folder. In 2022, 6 reports in particular from so-called "permanent" suppliers were traced and managed.

Furthermore, again for the purposes of monitoring and to encourage feedback from external parties on aspects relevant to safety purposes, SPP carries out:

- **meetings for continuous discussion with suppliers** on relevant aspects of safety issues, also for the purpose of illustrating and informing on the status of the Safety Management System, on the requirements required of external parties as well as to share objectives and results; these meetings are formalized and any actions recorded on the IT system (8 meetings in 2022);
- **continuous collaboration with the local AUSL and AdSP** regarding the monitoring of accident rates and the involvement in the implementation phase of projects with the greatest impact on safety;
- **continuous involvement of permanent and external suppliers** regarding the analysis of any accidents that may have repercussions on TDT; however, this activity also concerns the joint analysis, where necessary, of accidental or near miss events.

## 404 Training and education

### 404.1 Average hours of training per year per employee

### 404.2 Programs for upgrading employees skills and transition assistance program

### 404.3 Percentage of employees receiving regular performance and career development reviews

Staff education and company training have become an important element for achieving success in businesses and it is clear that, in any working and productive environment, to operate in a cohesive and efficient manner, it is necessary to be compact and ensure that everyone employees, from top to bottom, feel that they are taking part in a common project.

**Table 57:**  
COMPOSITION OF STAFF BY QUALIFICATION

COMPOSITION OF STAFF BY QUALIFICATION (%)	2020	2021	2022
Degree	9,6	9,5	10
High school Diploma	44,5	45,5	46,9
Professional qualification	0,7	0,7	0,7
Elementary/middle school	45,2	44,5	43,5

It is believed that, also from a psychological point of view, corporate training fulfills an indispensable task, in terms of utility and benefit, on a dual axis: for the worker because he feels valued and relevant for the progress of the company and for the company, because in this way the employee will work with greater commitment and motivation

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

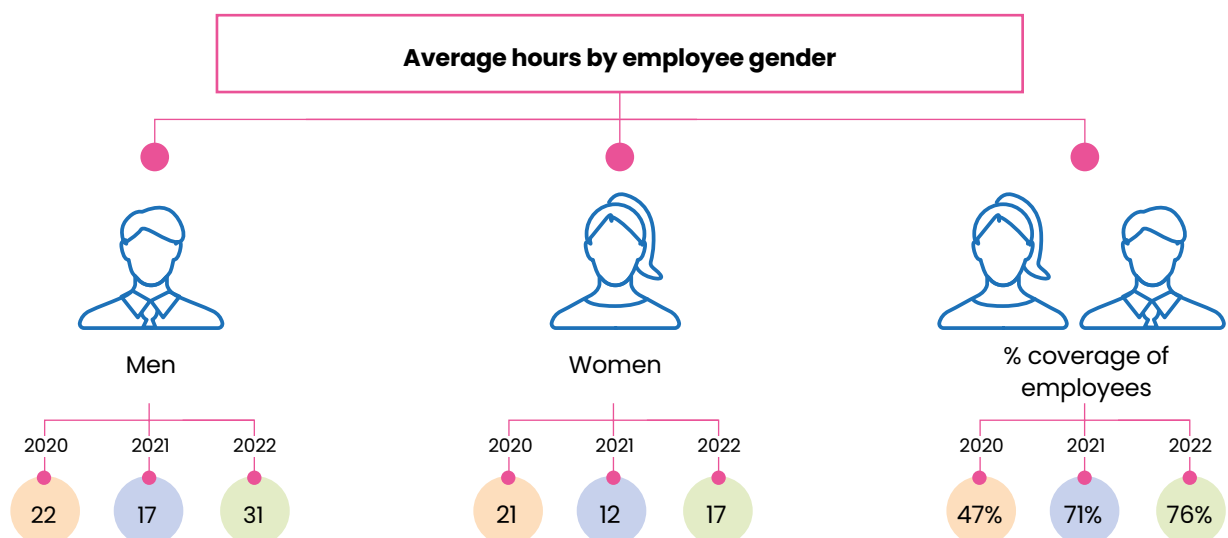
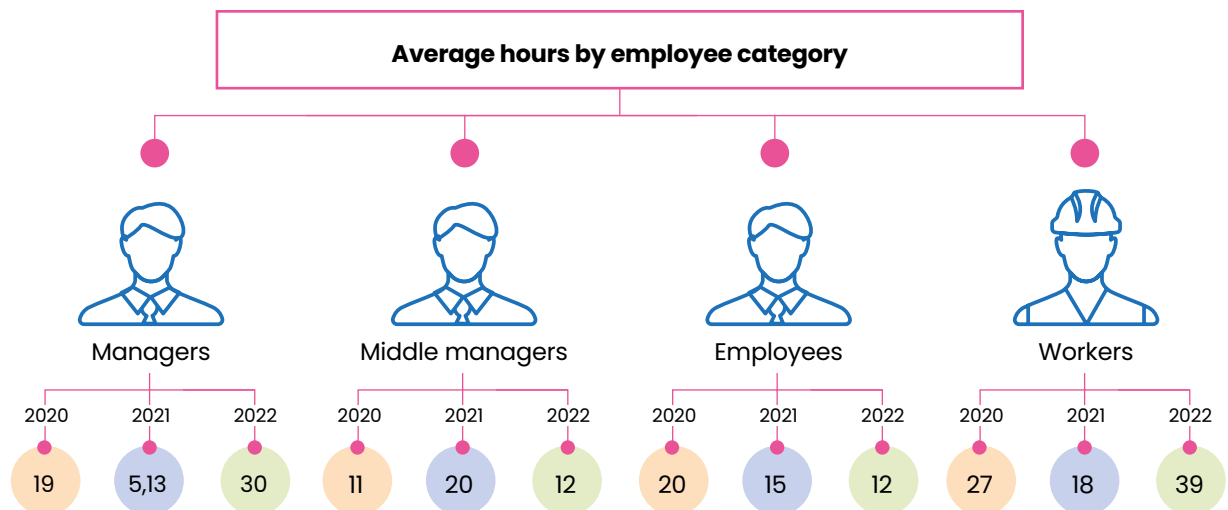
Following training activities, creativity and spirit of initiative benefit, the ability to find shared solutions increases and employees acquire greater awareness of the meaning and importance of their role in the company; Therefore, the importance of corporate training should not be underestimated,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

Below are some tables that represent an overview of the training carried out in the company:

**Table 58:**  
**AVERAGE HOURS OF TRAINING**

AVERAGE HOURS OF TRAINING (h)	2020	2021	2022
<b>Total hours provided</b>	<b>2.884</b>	<b>3.167</b>	<b>5.982</b>
Of which internal teaching	1.536	2.320	4.784
Average hours per employee*	11	17	29
Average hours per total employees	10	12	22

\*calculated on employees who have received training

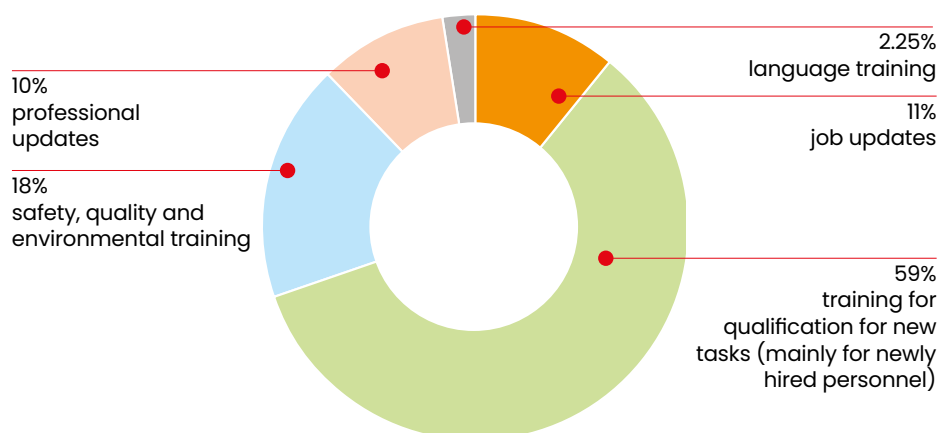


**Table 59:**  
HOURS PROVIDED BY TYPE OF COURSE

HOURS PROVIDED BY TYPE OF COURSE (h)	2020	2021	2022
Management training	432	112	0
Safety training	763	915	1.050
Professional update	1.689	2.141	4.932
<b>Total</b>	<b>2.884</b>	<b>3.167</b>	<b>5.982</b>

In 2022, 5982 hours of professional training were provided, of which:

**Graph 16:**  
TRAINING OF THE OPERATIONAL POOL



**Table 60:**  
TRAINING COSTS

TRAINING COSTS	2020		2021		2022	
U.M.	€	%	€	%	€	%
Cost of training financed	38.871	80	26.333	75	30.183	63
Unfunded training cost	9.512	20	8.743	25	17.363	37
<b>Total</b>	<b>48.383</b>	<b>100</b>	<b>35.076</b>	<b>100</b>	<b>47.546</b>	<b>100</b>

The economic investments made over the last three years in training have been covered for over 63% by the revenues received from private interprofessional funds, such as Fondimpresa and Fondirigenti, which the company has been a member of for several years.

The detail of investments in training in the last three years is shown in the following table.



**Table 61:**  
INVESTMENTS IN FUNDED AND UNFUNDED TRAINING

INVESTMENTS IN TRAINING (€)	2020	2021	2022
Funded training	38.871	26.333	30.183
<i>Of which:</i>			
Private funds	38.871	26.333	30.183
Public funds	0	0	0
Unfunded training	9.512	8.743	17.363
<b>Total training</b>	<b>48.383</b>	<b>35.076</b>	<b>47.546</b>

**Table 62:**  
AMOUNTS BY TYPE BY INVESTMENT THEMATIC AREA

AMOUNT USED PER TYPE OF COURSE (€)	2020	2021	2022
Management training	12.977	11.200	0
Safety training	5.126	2.346	9.118
Professional update	16.058	21.530	38.428
<b>Total</b>	<b>39.061</b>	<b>35.076</b>	<b>47.546</b>
<b>Delivery methods (100% TDT)</b>			
% Classroom	94%	89%	92%
% Online	6%	11%	8%

## 405 Diversity and equal opportunity

### 405.1 Diversity of governance bodies and employees

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

**Table 63:**  
COMPOSITION OF THE TDT BOARD OF DIRECTORS BY GENDER

Year	2020	2021	2022
Men	3	3	3
Women	0	0	0
Percentage Women	0%	0%	0%

## 405-2 Ratio of basic salary and remuneration of women to men

**Table 64:**

RATIO OF REMUNERATION FOR WOMEN COMPARED TO MEN DIVIDED BY SALARY LEVEL

Level	2020	2021	2022
1	-2,2%	-3,8%	-4,80%
2	3,7%	2,0%	1,20%
3	1,5%	1,5%	0,60%
4	-0,1%	-0,6%	0,90%
5	-2,4%	-2,4%	-2,90%



## 406 Non-discrimination

### 406-1 Incidents of discrimination and corrective actions taken

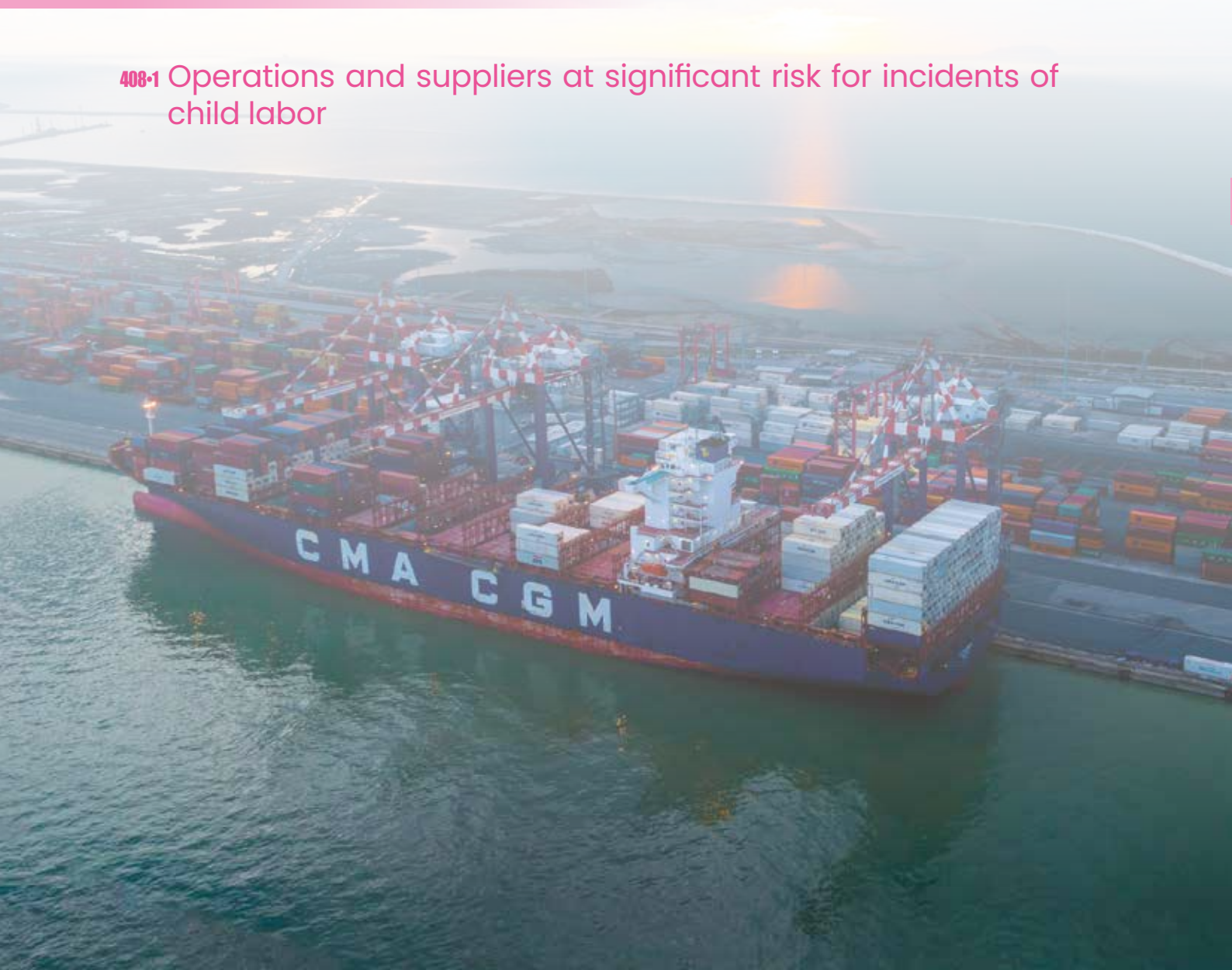
In the periods considered, no episodes of discrimination were reported, understood as acts and their consequences resulting from the unequal treatment of people through the imposition of unequal burdens or the denial of benefits, contrary to the treatment of each individual in an impartial manner according to subjective merits.

## 407 Freedom of association and collective bargaining

### 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

## 408 Child labor

### 408-1 Operations and suppliers at significant risk for incidents of child labor





## 409 Forced or Compulsory Labor

### 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour

TDT works to establish relationships with suppliers based on clear and transparent rules, explicitly defined in the contracts that are stipulated and in the documents attached to them such as the Code of Ethics, the Quality, Safety, Environment Policy and the Corruption Prevention Policy

TDT therefore wants the activities and operations carried out through its suppliers to be inspired and guided by the values expressed in its Code of Ethics, with particular attention to respect and enhancement of human resources

TDT does not tolerate any form of irregular work and requires that labor and employment laws and practices be respected within supplier organizations with particular attention to respecting freedom of association, the prohibition of the use of child labor and forced labor

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, use of child labor and use of forced or compulsory labor

## 410 Security practices

### 410-1 Security personnel trained in human rights policies or procedures

All security personnel operating in the Terminal, both employees and external, are trained in policies or procedures regarding human rights. In particular, during 2022, this training was aimed at:

TDT staff started in a new role, with specific security tasks

newly hired staff from external companies called upon to carry out security services on behalf of TDT

This staff therefore participated in the IMO Model Course 3.24, which, in the areas relating to inspections and checks on staff, 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 respecting privacy.

## 413 Local communities

### 413.1 Operations with local community engagement, impact assessments and development programs

#### ATTENTION TO THE LOCAL COMMUNITY

TDT is always available to support local education initiatives. For 2022 TDT hosted various initiatives including:

- as part of the AdSP Project "Ports and skills: compare vocational training systems to address the port work changes", TDT received a visit from the participants with the aim: "Visit to TDT port terminal: Digitalization and automation of container and refrigeration terminal activities. Focus on safety, health and environmental aspects."
- As part of the "marePORT-PCTO" pilot project, it welcomed the fifth year graduates of the A. Vespucci Institute, in Livorno, with the aim of introducing them to the Terminal, and more specifically the various cycles operations, the different types of vehicles, equipment, as well as the tasks of the operators.



TDT pays attention to the impacts that its activities can have on stakeholders.

However, TDT has maintained its strong connection with the territory and closeness to citizens which is also reflected in its choices of support for non-profit organizations operating in local contexts.

The following table shows the details of the amounts invested in the three-year period.

**Table 65:**  
TDT SPONSORSHIPS AND DONATIONS

TDT SPONSORSHIP AND DONATIONS (€)	2020	2021	2022
Various sports associations	€ 305	€ 0	€ 0
Palliative Care Association Livorno	€ 20.000	€ 20.000	€ 20.000
Other donations	€ 3.000	€ 500	€ 2.500
<b>TOTAL</b>	<b>€ 23.305</b>	<b>€ 20.500</b>	<b>€ 22.500</b>



## 413.2 Operations with significant actual and potential negative impacts on local communities

TDT is located within the industrial area of the Port of Livorno called Darsena Toscana; the significant environmental aspects related to the activities are managed by TDT within the perimeter of its Environmental Management System certified in compliance with the ISO 14001 standard as described in the chapter dedicated to the Environmental theme.

## 414 Supplier social assessment

### 414.1 New suppliers that were screened using social criteria

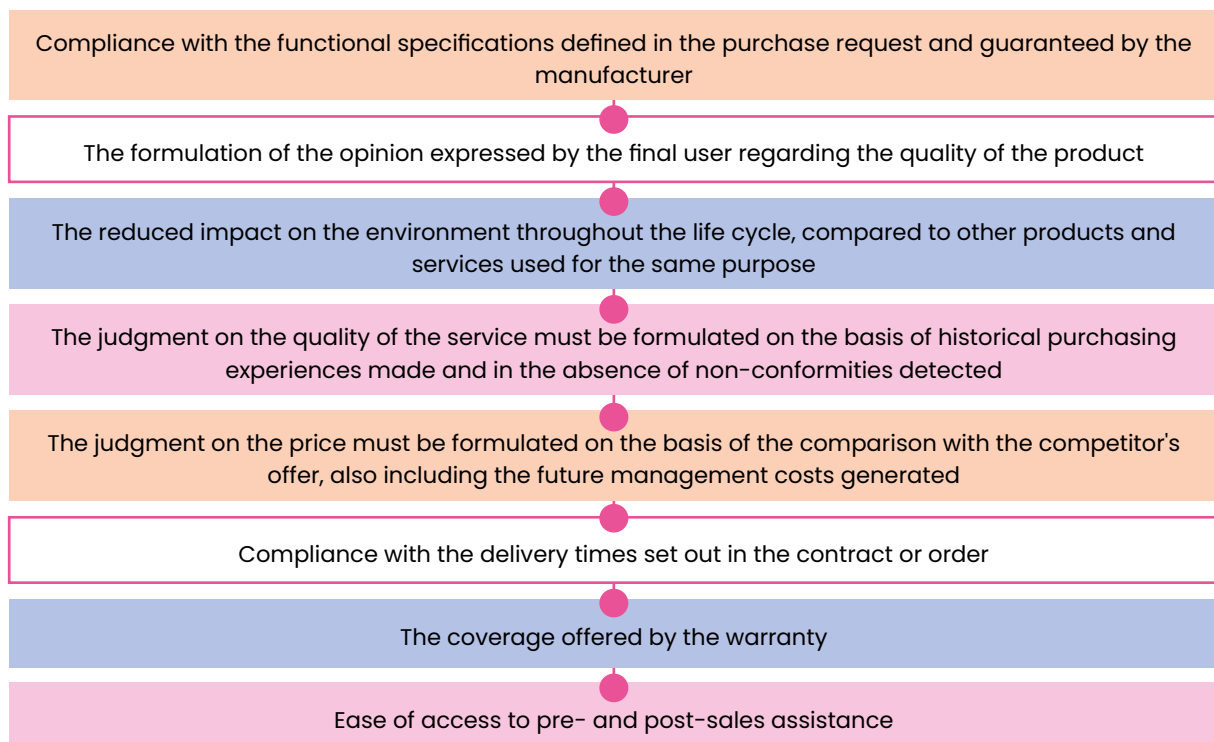
### 414.2 Negative social impacts on in the supply chain and actions taken

TDT has prepared and maintains active 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, with the aim of guaranteeing their ability to meet supply requirements.

Qualification allows you to verify that you have the basic requirements to operate with the terminal and this process takes place in compliance with the criteria of transparency, equal access opportunities, professionalism, reliability and cost-effectiveness, without prejudice to the prevalence of legality requirements. This qualification allows the maintenance of a list of suppliers approved by TDT to which purchase orders can be issued.

In addition to qualification, TDT maintains a surveillance activity on its suppliers, monitoring the quality of the supplies and services received, reevaluating them periodically.

The criteria for choosing supplies include an overall evaluation that considers the following parameters:



In the case of evaluation of consultancy services, the selection process takes into account the requirements of professionalism, reliability, integrity, confidentiality and diligence.





## 415 Public policy

### 415-1 Political contributions

During 2022, TDT did not directly or indirectly provide financial or in-kind political contributions to any person.

## 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

In the context of the Management System for Health and Safety at Work, the activity of evaluating the legal requirements regarding safety is of particular importance, being necessary the analysis of a considerable quantity of measures of various degrees and levels which, in some cases, present aspects of controversial applicability. Each analysis made and the results of this analysis are kept track of in the System through a specific register of legal and signed requirements. This activity also includes in-depth analysis on 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, rulings, ministerial and/or professional opinions are examined and evaluated, in a systematic and continuous manner, arriving, in some cases, to analyze the technical standards (UNI, CEI, EN) applicable to TDT suppliers, providers of services with the greatest impact on security.

Based on the provisions of the organization and control model pursuant to Legislative Decree 231/2001 adopted by TDT, the support activities for the Supervisory Body are continuous, which include, periodically, meetings to evaluate the application of the model and/or sending information flows relating to activities to the SB.

During the progress 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, implemented in compliance with legal requirements and the provisions of the Health Policy and Workplace Safety applicable from the connected Management System. Customers, Visitors and users of TDT services are therefore recipients of the Policy and the measures taken to implement the System.

During 2022, no non-compliance with the applicable regulations and policies relating to the protection of the Health and Safety of Customers, Visitors and Users were detected.

## 417 Marketing and labeling

### 417-1 Requirements for product and service information and labeling

TDT is committed to fair and responsible marketing communications, in order to guarantee access to information relating to the use of the services to help Customers and other Interested Parties to make informed choices.

## 417.2 Incidents of non-compliance concerning product and service information and labeling

During 2022, no non-compliances relating to information related to the economic, environmental and social impacts of the service provided by TDT were detected.

## 417.3 Incidents of non-compliance concerning marketing communications

In the year 2022, no non-compliances related to marketing communications were identified.

## 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 not to disclose or use Customers' personal information for any purpose other than that intended, communicating directly to Customers any changes relating to policies or measures regarding data protection

TDT maintains its 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 (d.lgs. 196/2003 e s.m.i. e d.lgs. 101/2018)

For the purposes of protecting its own data and that of its Customers, TDT has adopted, among others, specific organizational measures such as a procedure for the Management of Data Resident on IT Systems, a Regulation on the use of internal IT tools, a security procedure against cyber risks and a regulation to regulate the use of the Video Surveillance System

TDT did not detect any substantiated complaints during the year regarding violations of customer privacy and loss of customer data



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