

SECH • TDT
SUSTAINABILITY
REPORT

2019

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Foreword: SECH and TDT's sustainable footprint

FOREWORD

“A strategic approach to 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 relations, human resource management and innovation capacity”.¹”



1. Source: EU document, COM(2011) 681 final "A renewed EU strategy 2011-14 for Corporate Social Responsibility"



A sustainable approach in business management, such as that put in place by SECH and TDT, guarantees advantages to the two companies from different points of view.

ECONOMIC SUSTAINABILITY, as the ability of an economic system to generate lasting growth in economic indicators. In particular, the ability to generate income and work for the livelihood of the populations, as among other things deepened through the new standard GRI 207, "Taxes". Within a territorial system such as SECH- and TDT's, economic sustainability means the ability to produce and maintain the maximum added value within the territory by effectively combining resources, in order to enhance the specificity of products and territorial services.

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ENVIRONMENTAL SUSTAINABILITY, as a choice for low environmental impact practices, has positive effects on costs. The efficiency of processes, as well as the adoption of energy efficiency measures, are able to lead to significant monetary savings.

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SOCIAL SUSTAINABILITY, as a guarantee and respect for internal and external Stakeholders (workers, suppliers, customers, investors and *alii*), has positive impacts on the trust they have towards the two organisations. In the case of employees, greater attachment to the corporate organisation for which they work and a reduction in turn-over lead to less loss of know-how and talent, less expenditure of resources and time in selection and training. A similar loyalty speech can concern customers and investors.

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Adopting sustainability practices has become fundamental over time for SECH and TDT, as it also affects the supplier chain. Working with principles and rules of sustainability and with subjects who respect them provides more guarantees and minimizes risks. In this sense, choosing only those suppliers who have undergone a certification process means lowering the dangers of default and having more guarantees of seriousness and compliance with the contracts. With obvious advantages on business continuity, which is more unlikely to suffer interruptions related to failure to comply with the rules.

All with an increasing focus on the United Nations Sustainable Development Goals (SDGs), which are substantial for the two terminals. Through various sustainability initiatives, of which you can read in depth in the report, over the years steps have been taken to address these objectives in various ways.



01

A word from our Chairman



It is now a year on from issuing our first Sustainability Report for SECH and TDT, and I write this introduction to the second report in the knowledge that the world is now a very different place. The Covid-19 crisis has shown us many things, perhaps for the first time in the lives of many.

On the downside, we have seen how fragile our public health can be when faced by an invisible, and deadly, threat. Not only has the physical health of communities worldwide been threatened, but mental health has also become a widespread issue. And of course, the economic impact of the pandemic has been devastating.

However, there have also been upsides to the crisis. Communities, and even whole populations, have come together in lockdown. Pollution has reduced and the environment has benefited. Even politicians have worked together! And it is now more clear than ever that we depend on a whole class of "key workers" – those who work in healthcare, those who keep our public services running, and those who work in businesses considered essential to the economy.

I am proud to say that both SECH and TDT are considered amongst those businesses that are essential to the regional and national economy. And they have operated throughout the crisis thanks to the commitment of many people. In particular, it has been good to see how well the business teams have managed to create safe and healthy working conditions for everyone.

The health and safety record for the business reflects the wider initiatives and objectives that are the subject of this second Sustainability Report. Managing the impact on our environment is also rapidly becoming a major cultural issue for all of us, as is the importance of diversity. I know that these remain priorities for your Board of Directors and I thank you for all your efforts to make SECH and TDT safe, clean and fair places to work. I would also like to acknowledge the continued efforts of Giulio Schenone, our CEO, and in particular the commitments made by those who lead the sustainability teams: Paola Cavassa (SECH), Tiziana Gianuzzi (SECH) and Federica Tommasi (TDT). Your investors consider the first Sustainability Report to be "best in class" and we would like to keep it that way.

*The Chairman of the Board of Directors
Mr. Stephen Nelson*

A handwritten signature in blue ink that reads "Stephen Nelson".



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02

Company profiles

THE COMPANIES

2.1 GIP MISSION

GIP is a holding company founded in 1993 by four Genoese families, with the aim of becoming an active part of the logistics chain for containerised cargo.

Over the years, GIP has grown, focusing on its core business to become one of the first terminal operators in Italy, thanks to its majority stake in SECH, Genoa and TDT, Leghorn.

Furthermore, GIP holds minority shares in other important Italian container terminals (VTE - VECON).

In February 2017, Infracapital and Infravia, specialised infrastructure funds, acquired 95% of GIP from the previous owners, aiming to further develop it through an ambitious expansion programme.

» GRUPPO INVESTIMENTI PORTUALI (GIP)

Gruppo Investimenti Portuali (GIP) strives to develop and consolidate its presence in the competitive scenario of the Mediterranean terminal operators.

The companies under GIP carry out their activities with the aim of ensuring and increasing the satisfaction of their customers, in the respect and in the interest of their partners, collaborators, suppliers and port communities.

They operate according to the principles of transparency, efficiency, fairness and sense of responsibility, having the primary objective of safeguarding the health and safety of workers, always with a glimpse to protecting the environment.

2.2 THE COMPANIES



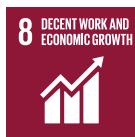
SECH and TDT manage numerous types of risk, connected to the conduct of their business, which, if not properly monitored, can potentially generate significant economic, financial, equity, social, environmental and reputational impacts, deteriorating the corporate image towards the Stakeholders.



It is therefore essential for the two companies to have internal control and management systems capable of recognising, preventing and in any case minimising the impacts of all the risks inherent in carrying out their activities, ensuring the effectiveness of the actions taken, as well as compliance with the mandatory regulations.



Gruppo Investimenti Portuali has therefore adopted a set of rules, procedures and organisational structures aimed at allowing the identification, measurement, management and monitoring of the main risks, also determining their degree of acceptability through a management consistent with the strategic objectives identified.



The architecture of the internal control and management system of SECH and TDT is based on the following principles:

- Separation of roles and duties, the aim of which is to reduce the risk of fraud and errors, and is achieved through the division of the activities/responsibilities relating to a specific business process between different functions/individuals;
- the accountability of information and processes, understood as the attribution of responsibility to a subject (or group of subjects);
- traceability of data and information.



All this has been translated into an integrated management system compliant with the UNI EN ISO 9001:2015 (quality management system), UNI ISO 45001:2018 (health and safety management system) and UNI ISO 37001:2016 standards (anti-corruption management system).



In 2019, in particular, the terminals adopted the management system on a voluntary basis, compliant with the international standard UNI ISO 45001:2018. Adherence to this standard allows, with a view to continuous improvement, to identify, adopt, monitor and possibly modify the measures necessary to organise and prepare healthy and safe workplaces, prevent work-related injuries and diseases and continuously improve health and safety benefits.



Following to the transition from BS OHSAS 18001:2007 to UNI ISO 45001:2018, SECH and TDT have implemented a new risk and opportunity assessment based on Stakeholders, for all related health and safety aspects and impacts. During 2019 SECH and TDT obtained the UNI ISO 45001:2018 certification.



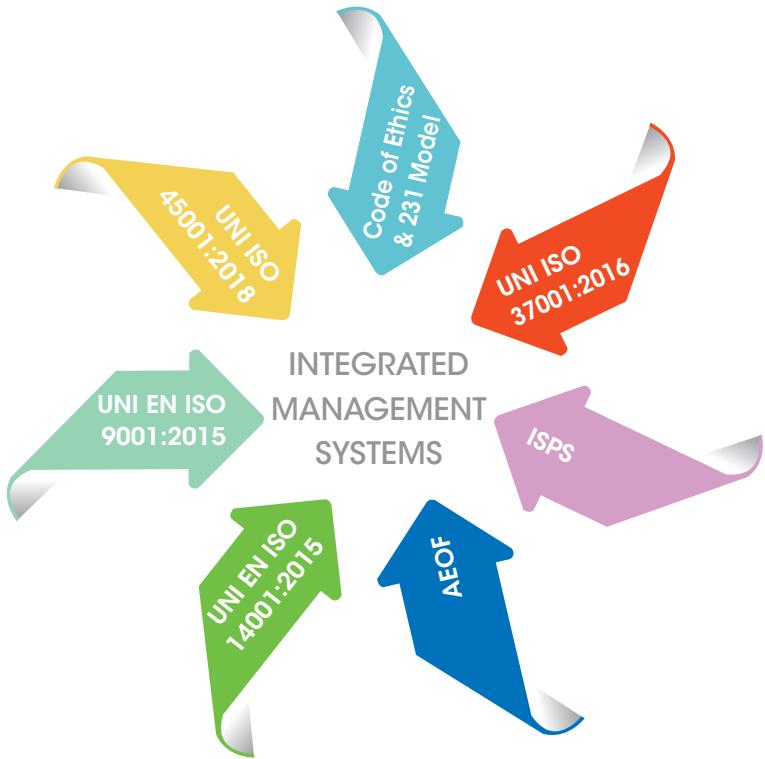


Figure 1: Integrated management systems at the terminals

TDT has also adhered to the voluntary ISO 14001:2015 standard (environmental management system), while SECH has initiated all the activities necessary to implement the enactment of this system, periodically assessing its degree of compliance.

The group has also adopted the organisation, management and control model pursuant to Legislative Decree 231/01 and management of the security of sensitive and personal data pursuant to law 196/2003, integrated with the changes introduced by Legislative Decree dated 10th August 2018, n. 101.

The ethical code that both SECH (since 2011) and TDT (since 2012) have adopted is the testimony of a daily work consistent with the principles of correctness, honesty and legality, which are some of the guiding values of those who work and collaborate with both organisations, aimed at avoiding any action dictated by improper or personal reasons.

Furthermore, in compliance with the provisions of the ISPS code (International Maritime Safety Code for Ships and Port infrastructures), which entered into force on 1st July 2004, SECH and TDT have developed a security plan which provides for the preparation, prevention and response procedures for each scenario evaluated in the PFSP (Port Facility Security Assessment).

In addition to the above, both companies obtained the AEOF (Authorised Economic Operator Full) certification, indispensable to balance the need for greater control and security of shipments with the need to facilitate legitimate trade.

This system is periodically subjected to evaluation and review, in relation to the evolution of business operations and the context of reference.

The supervisory bodies in both terminals also carry out periodic assessments on the companies' work, so that the applicable mandatory and voluntary rules are always respected, such as the code of ethics and the management systems adopted.

As already indicated, the terminals and the parent company have implemented a system compliant with ISO 37001:2016 (anti-corruption management system) in order to pursue the following objectives:

- Demonstrate to all Stakeholders (employees, suppliers, partners, subsidiaries, local community and public bodies) the constant commitment to preventing the risk of corruption;
- ensure business management in compliance with transparency, ethics and, above all, legality;
- ensure the best degree of reputation by carrying out the owed, necessary and appropriate due diligence activity, which allows to identify the reliability and integrity of the subjects with whom the company operates.

In 2019, no cases of corruption related to or attributable to the two companies were ascertained or reported.

Besides, in the period considered, no legal actions were taken, nor are there pending and concluded legal actions relating to anti-competitive behaviour, violations of the anti-trust and of the legislation on monopolies in which the companies have been identified as participants.

On the websites of SECH and TDT (www.sech.it and www.tdt.it) the documents relating to the company certifications achieved, the integrated quality, safety and environment policies and the anti-corruption policies, the organisational models pursuant to Legislative Decree 231/01, the ethical codes and the previous sustainability report are downloadable.





2.2.1 SECH

Terminal Contenitori Porto di Genova S.p.A., with the brand SECH, since 1993 manages the Calata Sanità container terminal. With a maximum annual capacity of 550,000 TEUs, it ranks among the main import/export terminals across the country.

The terminal is in a favourable position both in terms of access by sea (vessels moor in less than an hour after entering the port) and by land, being effectively connected to the main road and rail transport networks. This strategic position, together with investments in human, instrumental and IT resources, makes the terminal an avant-garde structure, which represents a key access point with respect to the production areas located in northern Italy and southern Europe, which are its main catchment area.

The investments of the company, together with those of the port of Genoa, have allowed in recent years to raise the quality level, in order to allow a faster and safer transit of the goods, consenting the terminal to consolidate its position in the North Tyrrhenian port market. In this context, an important investment programme concentrated on the quay area, with the extension of the boom of four of the five cranes has for some years now enabled the containers stowed in the twentieth row sea side to be easily operated on the ship, so that large vessels can be accommodated (14,000-TEU class). In addition, dredging operations have been completed, which have restored the quay depth at -15 metres; furthermore a new structure for the inspection of goods for human and non-human consumption, the only one existing within the port east side basin, is being completed. The new building has a room for office use, completed with spaces intended for the reception of goods and for carrying out inspection activities. The works for the actual construction have been completed and the necessary authorisations for the commissioning of the structure are awaited.

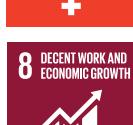
2.2.1.1 OWNERSHIP AND CORPORATE GOVERNANCE



SECH is 100% owned by Se.Be.R. S.r.l., a company belonging to the corporate group, whose holding company is GIP S.p.A.



In the area of governance, PSA and GIP signed an agreement on September 24th, 2019 aimed at restructuring port operations in the port of Genoa.



The proposed transaction, subject to formal approval by the competent authorities, will cause PSA to become majority shareholder and take control of both PSA Genova Prà and SECH.



The transaction aims at optimising the container handling capacity in the port of Genoa, creating a single platform capable of responding in the best possible way to the requests of shipping companies and, ultimately, to the growing demand for logistics services by importers and exporters in the immediate hinterland and beyond.

All this will also allow the terminals to take full advantage of their managerial and operational synergies, while simultaneously taking advantage of new technological resources, capable of transforming operational proficiencies.

Until the necessary formal approvals are confirmed, PSA and SECH will continue to operate as separate entities, each with its own management.

The Board of Directors in office in 2019 is made up of five members: the Chairman, Mr. Steven Nelson and four Directors, Mr. Giulio Schenone, Mr. Jan Van Mossevelde, Mr. Olivier Laroche and Mr. Ng Hak Sen Vincent.

The Board of Statutory Auditors is made up of three standing members: the Chairman, Mr. Fabio Avenale and the Mayors Ms. Piera Penna and Mr. Claudio Valz.

The supervisory body on the application of the management model for the prevention of crimes pursuant to Legislative Decree 231/2001 is made up of two members: the Chairman, Mr. Guido Leonardi and Ms. Silvia Previdi.

The 2019 financial statements of the company are certified by the auditing company Price WaterhouseCoopers S.p.A.

The articulation of the top functions and the main reporting lines are represented in the following figure:

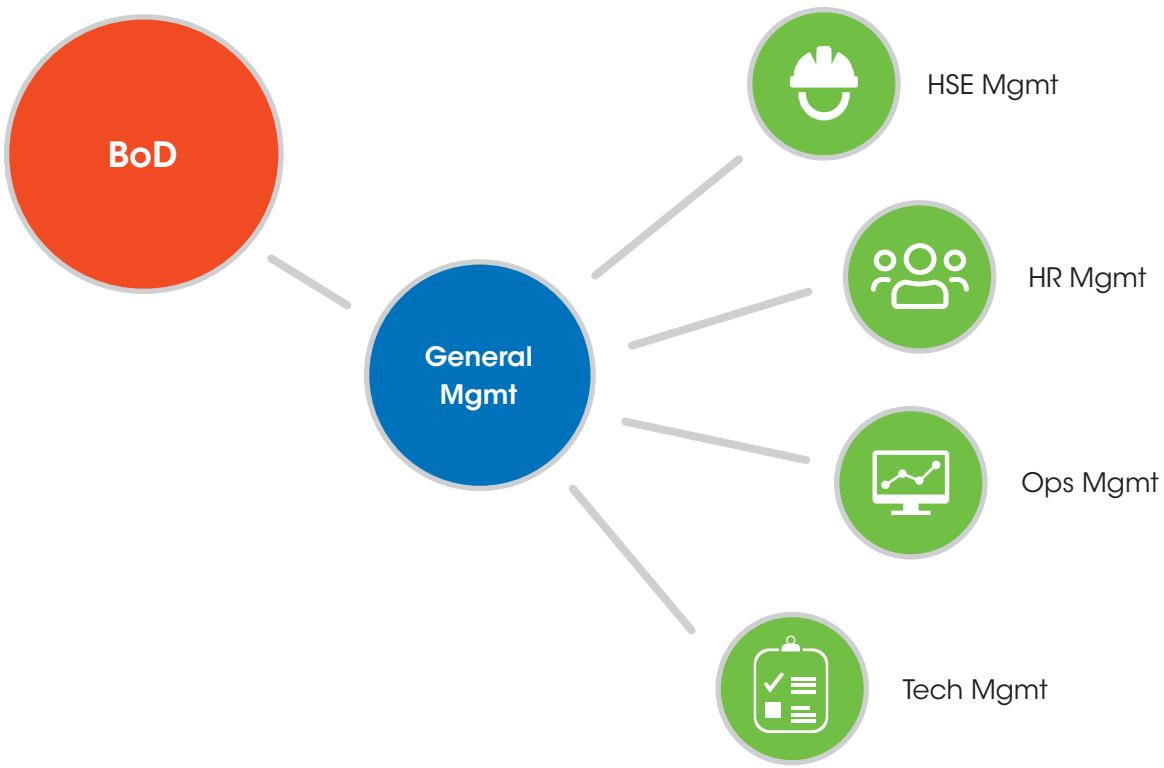


Figure 2: SECH organisational chart

There is a system of powers of attorney and delegated powers in place among the General Manager (Mr. Roberto Ferrari) and the other Directors of the Board, based on the value of the transactions, as well as the Executives.

Today, SECH employs 236 direct employees, most of whom work in container handling operations and ordinary and extraordinary maintenance of the yard and quay equipment of the terminal. The collaboration relationship with the Dockers company (*Compagnia Unica*) allows the company to have the flexibility required by the type of activity.

The participation in institutions and associations is represented as per the below table:

Table 1: Participation in institutions and associations

ORGANISATION	NAME	CHARGE
Assiterminal	Giulio Schenone	Member of the Board (Director)
	Roberto Ferrari	Member of the National and European Standards Commission
	Massimo Lavezzini	Committee Member for Industrial Relations and Labour Law
	Francesco Parodi	Committee Member for Operational and Safety/Security issues
	Enrico Rossi Ferrari	Committee Member for IT and Digitisation
Confetra	Massimo Lavezzini	Committee Member - Port Commission
	Fausto Ferrera	Committee Member - Infrastructures
	Massimiliano Cozzani	Committee Member - Internationalisation
Confindustria Genova T.O. section	Giulio Schenone	Vice President - Terminal Operator Section
Genoa Chamber of Commerce	Giulio Schenone	Member of the Council (Business service sector)
	Giulio Schenone	Member of the Board (Business service sector)

2.2.1.2 PROCESSES AND ORGANISATION

The company operates under a concession granted by the Port Authority System, which was recently renewed until 2045, and carries out its activity in accordance with the following general lines: acquisition of production factors to allow the obtaining, production and sale of the instrumental transport service, allowing the transit of the goods from a vessel to a land vehicle, be it truck or rail, and vice versa or from a vessel onto another vessel following different routes.

The process through which the service is carried out involves the performance of activities related to the receipt of goods in the storage areas or warehouses and to the relevant operations of handling of the goods for loading and unloading them to and from the means of transport concerned. This process may also include other activities to support the former ones, such as the storage of containers, their positioning for inspections of various types and the document production which must escort the aforementioned operations. Usually the process is divided into three sub-systems: Import via truck/rail, export by truck/rail and transhipment.

The inputs of the process are represented by the human, technical and IT as well as financial resources which, combined in various ways, contribute to obtaining the output, that is to the rendering of the service.

The terminal defined, planned and activated the processes necessary to fulfill the services object of its activity. The company guarantees, through the use of appropriate procedures, rules and protocols, that these processes are implemented under controlled conditions, such as to ensure that the services are provided in compliance with the requirements established and/or agreed with the customer and the legal requirements applicable.





2.2.2 TDT

TDT started its activity on January 1st, 1997 and since 2012 it became part of GIP, Gruppo Investimenti Portuali S.p.A.

The strategic position from a logistical point of view, with easy access by road and rail and the annual operational capacity of 900.000 TEUs make TDT the main container terminal in the port of Leghorn.

In addition to being the port of call for the central and north-east Italian markets, or the ideal outlet of a large hinterland formed mainly by Tuscany, Emilia Romagna and upper Lazio, TDT is the key point for access to European markets, also playing an important role for the American (US in particular) and West African markets.

In recent years, TDT has also taken on a significant role as a transhipment port for cargoes from the Americas to East Med and vice versa.

Located in the heart of the industrial port, close to the logistic centre and the Pisa International Airport, TDT is directly connected to the main motorways and major road networks in the area.

In December 2016, the inauguration of the direct rail link between the terminal and the national line, the first case in Italy, made it possible to abolish the transfer of goods in the sorting station, thus ensuring reduced transit times and greater timetables reliability.

Leghorn is the largest Italian port for refrigerated cargo and one of the main ones for project cargo coming from the areas of north-east and central Italy. The terminal has therefore been equipped with facilities and areas dedicated to reefer containers, with 889 reefer plugs (80 of which are located in the inspection area) and various cargo operations, managed by specialised personnel.

2.2.2.1 OWNERSHIP AND CORPORATE GOVERNANCE



Terminal Darsena Toscana, a limited liability company with a sole shareholder, is 100% controlled by GIP, Gruppo Investimenti Portuali S.p.A.



The Board of Directors of TDT is composed of three members: Mr. Giulio Schenone (Chairman of the Board), Mr. Olivier Laroche (Director), Mr. Nikolaus Roessner (Director).



The Board of Statutory Auditors is composed of three effective members: The Chairman, Mr. Simone Guidi and the Statutory Auditors, Mr. Claudio Valz e Ms. Barbara Ferri.



The Supervisory Body set up as part of the application of the organisation and control model pursuant to legislative decree 231/2001 is composed of two members: The Chairman, Mr. Guido Leonardi and Mr. Valerio Liperini.

The company's 2019 financial statements are certified by the independent auditors Price WaterhouseCoopers S.p.A.

Terminal Darsena Toscana is a member of Assiterminal and Luca Becce, TDT special attorney, holds the position of president of this association.

Currently, no member of the Board holds positions or offices in national or regional sector associations.

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

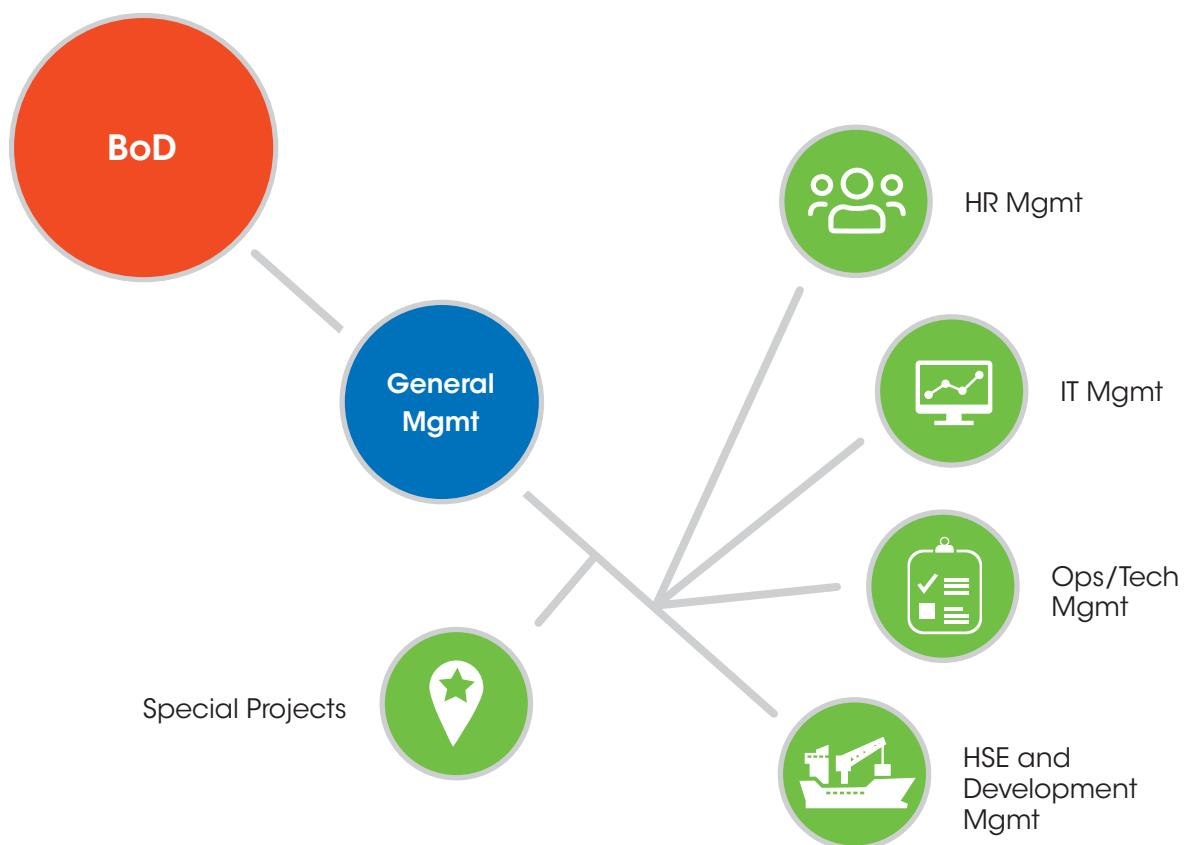


Figure 3:TDT organisational chart

There is a system of proxies and powers of attorney shared between the General Manager (Mr. Marco Mignogna) and the other directors of the Board of Directors and managers.

2.2.2.2 PROCESSES AND ORGANISATION

Terminal Darsena Toscana works as a terminal operator at the port of Leghorn and carries out commercial, administrative, planning, executive and control activities related to loading and unloading, transhipment, storage, custody, movement of full and empty containers, as well as of various break bulk goods, from/to truck/ship/rail through the use of owned lifting equipment of various types and capacity, as well as quay cranes.

The services provided by the terminal are aimed at handling goods, both in containers and in bulk, in the port area.

2.3 REFERENCE FRAMEWORK AND BENCHMARK



The traffic trend in 2019 demonstrates a high sensitivity of the sector to protectionist activities, duties and trade wars.

Shipowners found themselves faced with a series of challenges, one of which represented by the entry into force of the new international legislation wanted by the IMO (International Maritime Organisation), which imposes a limit of 0.5% on the sulfur emissions generated by maritime transport. The low availability and high prices of low sulfur fuel has prompted companies to focus on the best alternative choice, namely the exhaust fumes purifiers, the so-called scrubbers, both expensive and not very in line with the trend towards sustainability of the last times. It has been and will still be very difficult for shipping companies to be able to move all the extra costs associated with the sulfur cap to their customers. This is because, in the extremely competitive environment in which the carriers operate, the composition of the maritime freight (and land freight, with door-door prices) becomes a lump sum, in which the additional ones disappear or are subject to commercial negotiation.

This has led once again to favour first the processes of horizontal concentration between lines of similar dimensions, subsequently - once the benefits of scale for this type of operations have been exhausted - the carriers have aimed to generate new cash flows, making vertical integrations in land and port logistics, which is believed to have higher margins.

In 2019, then, the ongoing vessel upsizing is yet another aspect that one can't help focussing on. It is a fact that from a double error of shipowners evaluation an unnecessary race to build ever larger ships was born. The first fault was an economic one. Simplifying, it was believed that China would maintain high growth rates for a long time on exports. On the contrary, the slowdown was significant, with the country's repositioning on internal consumption. The second mistake was commercial. Those who started building the first 18-20,000-TEU ships believed that competition would not follow suit, but it did.

The result was unsustainable for the individual companies, nonetheless the investments were maintained through the creation of operational alliances, which ended up exerting enormous infrastructural pressure not only on ports, but also on the public entities in charge of the tasks of port and control activities.¹

In 2019 the three largest alliances (2M, Ocean Alliance and THE Alliance) continue to control 91% of the capacity on the Far East - North Atlantic trade and 99% on the Far East - Europe trade.

1. Source: Port News, 13/1/2020.

Table 2: Top 10 world ports for containerised traffic, year 2019 (preliminary data)²

RANK	PORT NAME ³	COUNTRY	TEUs (M)	Δ '19/ '18 (%)
1	Shanghai	China	43,30	2,9
2	Singapore	Singapore	37,19	1,7
3	Ningbo	China	27,53	4,4
4	Shenzhen	China	25,76	0,3
5	Guangzhou	China	23,22	6,3
6	Busan	South Korea	21,99	1,6
7	Qingdao	China	21,01	8,1
8	Hong Kong	China	18,30	-7,0
9	Tianjin	China	17,30	7,5
10	Rotterdam	The Netherlands	14,81	2,1

Table 3: Top 15 EU ports for containerised traffic, year 2019 (preliminary data)⁴

RANK	PORT NAME ⁵	COUNTRY	TEUs (M)	Δ '19/ '18 (%)
1	Rotterdam	The Netherlands	14,81	2,1
2	Antwerp	Belgium	11,86	6,8
3	Hamburg	Germany	9,25	6,1
4	<i>Piraeus</i>	Greece	5,65	15,1
5	<i>Valencia</i>	Spain	5,44	5,0
6	<i>Algeciras</i>	Spain	5,12	7,3
7	Bremerhaven	Germany	4,87	-10,6
8	Felixstowe	UK	3,77	-10,3
9	<i>Barcelona</i>	Spain	3,32	-2,9
10	Le Havre	France	2,78	-3,4
11	<i>Marsaxlokk</i>	Malta	2,72	-17,8
12	<i>Genoa</i>	Italy	2,61	0,2
13	<i>Gioia Tauro</i>	Italy	2,52	8,4
14	Saint Petersburg	Russia	2,22	4,3
15	Gdansk	Poland	2,07	6,4

2. Source: https://www.mardep.gov.hk/en/publication/pdf/portstat_2_y_b5.pdf

3. Source: Alphaliner weekly newsletter - volume 2019, issue 15

4. Source: <https://www.porteconomics.eu/2020/02/21/top-15-container-ports-in-europe-in-2019-teu-volumes-and-growth-rates/>

5. Transshipment ports in italics

Furthermore, at an European level, Genoa and Gioia Tauro are among the first fifteen ports, with Genoa in seventh position, behind Le Havre between the ports of final destination and in twelfth position if we also consider the transshipment ports.

In Italy container traffic in ports remained stable at 10.6 million TEUs in 2019, but highlighting two different trends. The ports of final destination saw their numbers slightly increase (around 8 million TEUs), while the transhipment ports experienced another year of decline.

Genoa, considering the preliminary data, closed the year with over 2.6 million TEUs, an increase of 0.2% compared to the previous year, despite the constant flaws in the road system and the still living consequences that arise from the aftermath of the collapse of Ponte Morandi.⁶

The numbers of Leghorn also grew, going from 748.024 TEUs to about 790.000 TEUs, considering that together the two major terminals in the port moved 789.833 TEUs.⁷

Table 4: Main Italian ports container handling, years 2013-2019 (preliminary data, in TEUs)⁷

	2013	2014	2015	2016	2017	2018	2019
Genoa	1.988.013	2.172.944	2.242.902	2.297.917	2.621.242	2.609.138	2.615.375
Gioia Tauro	3.087.000	2.970.000	2.547.000	2.794.175	2.448.569	2.328.218	2.522.874
La Spezia	1.300.432	1.303.017	1.312.000	1.272.425	1.433.559	1.485.623	1.409.381
Leghorn	559.180	577.471	780.874	800.475	734.085	748.024	789.833
Trieste	458.497	506.007	501.276	486.507	616.153	725.426	789.594
Venice	446.591	456.068	555.000	607.311	611.383	632.250	593.070
Naples	477.020	485.523	443.000	483.481	509.877	583.361	681.929
Salerno	263.406	320.000	359.328	388.572	454.686	453.187	413.227
Cagliari	686.000	656.000	737.217	671.000	463.939	288.794	151.405
Ravenna	226.879	222.548	249.000	234.511	223.369	216.320	218.138
Ancona	152.394	160.622	180.000	185.846	168.372	159.061	176.193
Civitavecchia	54.019	64.387	66.731	69.000	94.401	108.402	112.249
Savona-Vado	77.859	81.755	98.033	49.127	44.057	65.266	54.542

6. Source: MF Shipping & Logistica, 17/1/2020

7. Source: Port Authority and Assiterminal data (loading/discharge/transhipment)

SECH

VERA D

2.3.1 SECH reference market

Focussing on Genoa, SECH did not enjoy the same growth that the port system recorded overall, totaling 311,749 TEUs, with around 3,000 TEUs less than in 2018 (-0.9%), the result of which had not already been reassuring. The terminal once again found itself to pay a pledge to the extreme volatility of the market, with acquisitions and losses of services that permeated the whole year being analysed, thus preventing a stable growth.

Table 5: SECH in the port of Genoa - Years 2018/2019⁸

TML	TEU 2018	TEU 2019	Δ 2019/2018	MARKET SHARE 2018 (%)	MARKET SHARE 2019 (%)
PSA GP	1.582.589	1.604.305	1,4%	61%	61%
GPT	394.358	411.868	4,4%	15%	16%
SECH	314.494	311.749	-0,9%	12%	12%
IMT	221.194	199.679	-9,7%	8%	8%
TSG	96.121	86.965	-9,5%	4%	3%
GMT	382	809	111,8%	0%	0%
TOTALE	2.609.138	2.615.375	0,2%	100%	100%

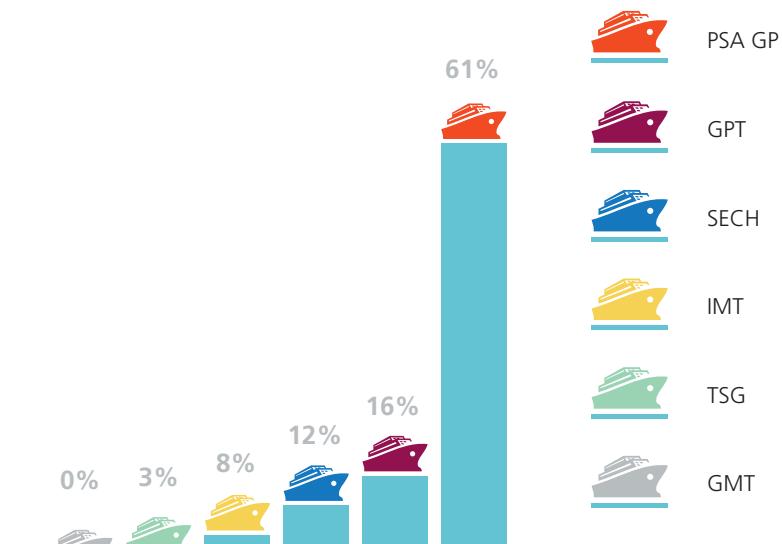


Chart 1: SECH in the port of Genoa - Years 2018/2019

8. Source: AdSPMLO data.

In fact, instability pervaded the first quarter of the year: if January ended with an at least encouraging result, the signs on the volume trend were, on the contrary, discouraging in February, closed with just over 13,500 movements.

It must be said that in January, with 16,347 movements recorded, the last vessel of the MGX service was operated before its migration to another Genoese terminal; in addition, the MD1 service increased its volume contribution, recording around 4,000 movements during the month in the new configuration, whereas in its old structure, the maximum monthly peak scored around 2,300 containers.

Also in the second half of the year the trend remained almost unchanged: THE Alliance kept the volumes of the MD1 service operated at the terminal practically unchanged, compared to the previous three months and significantly at lower rates than the levels declared by the lines belonging to the alliance and this despite the increase in capacity through the renewed use of larger vessels (14,000 TEUs), as well as the consequent increase in allocations. Furthermore, the persistent difficulties encountered in the previous ports have continued to contribute to making the service less punctual and reliable.

In fact, there have been several omissions and cancellations at Genoa, both for this service as well as for the western leg (IMW) of the IMEX service: after a March on hold - with a cancellation on the IMW service and a total movement of just under 16,000 units - and a dramatic April - with four calls canceled (3 IMW, 1 MD1) and a total of just 12,800 movements - only in May the volumes lost in the previous months were partially recovered and, despite two other cancellations (1 IMW, 1 MD1), the ceiling of 21,000 movements was reached and exceeded, i.e. the highest level of movement achieved by the terminal in 2019.

However, these volumes were not destined to be replicated in the third quarter: after the months of June and July, where more than 17,000 and 19,000 movements were



achieved respectively, also thanks to the calls of two spot vessels of the former AL6 service, there was a sudden drop in August, the month in which two cancellations and even two blank sailings occurred, on the IMEX and MD1 services. These losses were in fact only partially offset by a call from the IME service, which made both loading and discharge operations, as well as a spot call from a vessel of the MGX service operated by Hapag Lloyd, normally operated at another Genoese terminal. The final result for the month of August reached therefore just 14,000 movements.

Besides, in the last quarter of the year there were other changes following to the migration of the MD1 service to another Genoese terminal, implemented with only one week's notice and with the last vessel of the service operated at SECH at the beginning of the month of October.

Despite the situation in which THEA left the terminal - that is, in the total impossibility of timely designing a new action plan, given the absolutely incongruous times with which the notice concerning the cancellation of the service was received - the months of October and November were closed with approximately 15,200 and 13,000 movements respectively.

These are not comforting numbers when viewed in absolute terms, however it must be taken into account that the terminal is operating only two ocean services (IMEX and ME2), in addition to the feeder and the irregular MedCan service operated by Melfi Marine; in addition, the loss of the MD1 service alone led to a decrease in volumes in the order of approximately 4,000 movements per month, on average.

It should be mentioned that the numbers indicated above were also achieved thanks to the handling of five spot vessels in the months of October and November and four in the first half of December, allowing in part to offset the loss of the MD1 service: namely, one MGX vessel, four of MSC's Turkey-Canada service for which the reference terminal had difficulty managing the reefer load, two of the Bossanova service operated by Maersk and CMA and two, ironically, of the MD1 service, which served, however, to compensate for the cancellation of the ME2 service operated by Maersk in week 50 for delays accumulated in previous ports.

The latter ships were worked at our terminal due to the difficulties encountered in the city's west side terminals in the management of traffic, after the total closure of the two main motorways, which add to some difficulties already existing on another big artery; this following the tragic and unfortunately well-known events creating hydrogeological instability that occurred during the red alert at the end of November 2019.

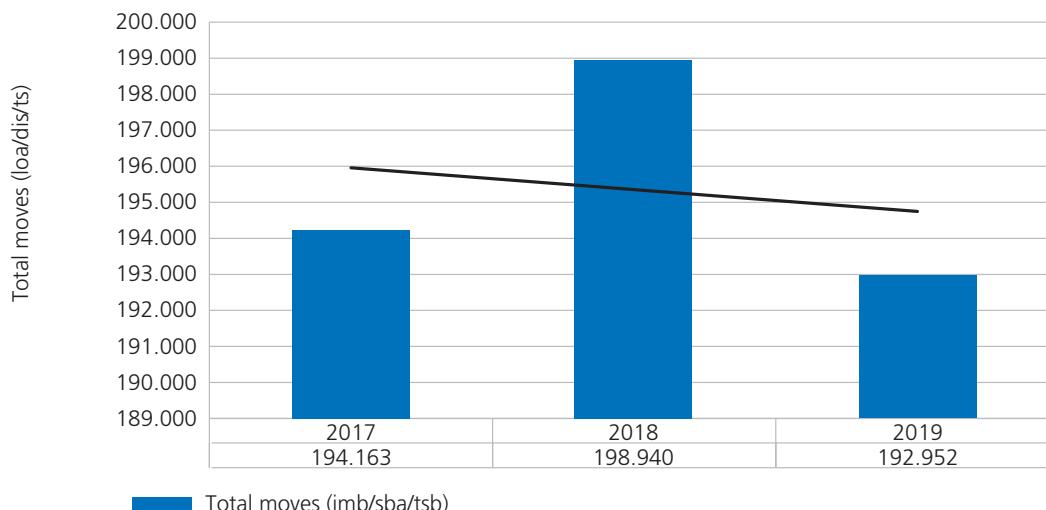


Chart 2: SECH total moves, trend 2017-2019 (loading/discharge/transhipment)

2.3.2 TDT reference market

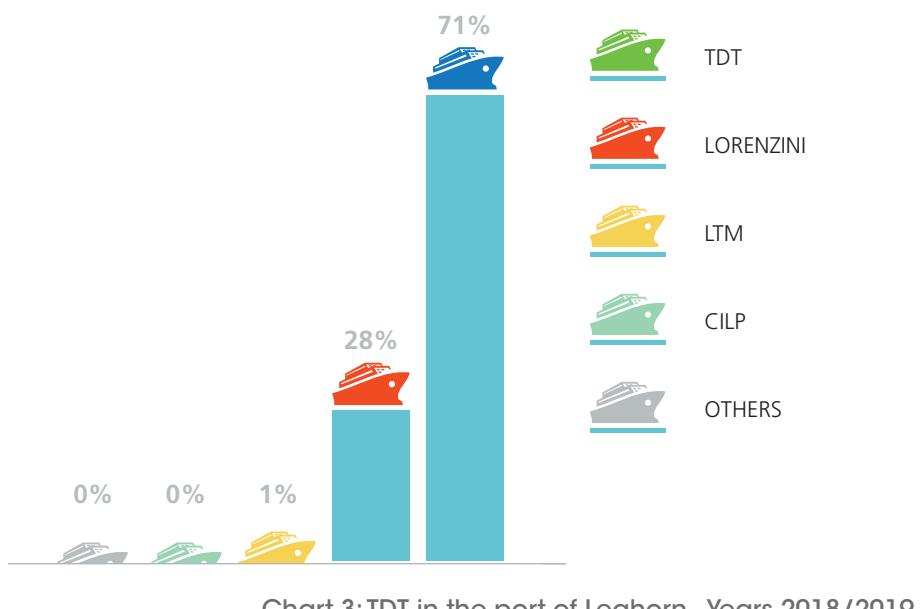
In the panorama of the main Italian ports, Leghorn closes 2019 with 789,833 TEUs, or 5.6% compared to the previous year, maintaining the fourth position in the ranking of national ports.

TDT container terminal and the MSC multipurpose terminal (Lorenzini), which represent 99% of the total volumes, continue to maintain the same market share of 2018, respectively of 71% and 28%.

Table 6:TDT in the port of Leghorn - Years 2018/2019⁹

	TEU 2018	TEU 2019	△ TEU 2019/2018	MARKET SHARE 2018 (%)	MARKET SHARE 2019 (%)
TDT	533.010	560.339	5,1%	71%	71%
LORENZINI	208.308	223.949	7,5%	28%	28%
CILP	6.180	5.288	-14,4%	0%	1%
LTM	253	30	-88,1%	1%	0%
ALTRI	273	227	-16,8%	0%	0%
TOTALE	748.024	789.833	5,6%	100%	100%

In particular TDT, i.e. the main container terminal in the port of Leghorn, closed 2019 handling at around 350,000 units. A decidedly positive result, which represents the third best outcome of the last 10 years, despite the radical change in cargo composition.



9. Source: AdSP data.

The transshipment was, in fact, in the last year, the pre-eminent cycle (42.25% vs. 29.10% of the export cycle and 28.65% of the import cycle), thanks to the transfer of Hapag Lloyd volumes from Cagliari to Leghorn (for instance, on Med Gulf Express, Med Pacific Express and Levante Express services) and to ZIM's ZCA/AL7 service again operated at TDT, which allowed the reinstatement of part of the transshipment volumes lost in December 2018 due to insufficient draft (Ocean Alliance and THE Alliance had joined the AL6 and Amerigo services by introducing larger ships, 9,000 TEUs, thus unable to enter Leghorn and thence moved to La Spezia).

The year therefore began to score a growth, recording a rise of 28.18% compared to the first quarter of 2018, thanks to an increase in volumes for consolidated services at the terminal and the acquisition, in March 2019, of the MedCan service operated by Melfi Marine. This service, then, underwent a reorganisation during the year, first extending its service to Mexico with a fourth ship to maintain a fair navigation average, then returning to serve Mexican ports through transhipment at Cuba.

The second quarter also continued with the same positive trend, recording the peak in volumes handled during the year in May (35,000 units).

During this period Unimed Feeder Services (UFS) changed the coverage between Malta and western Italy, Sicily and Sardinia by replacing the Malta-Tyrrhenian service with a service dedicated to Italy, called New Tyrrhenian, and with the connection for Malta offered through slots on the Tyrrhenian Express Service operated by CMA CGM. This led to an increase in the average volumes per call for both the services involved.

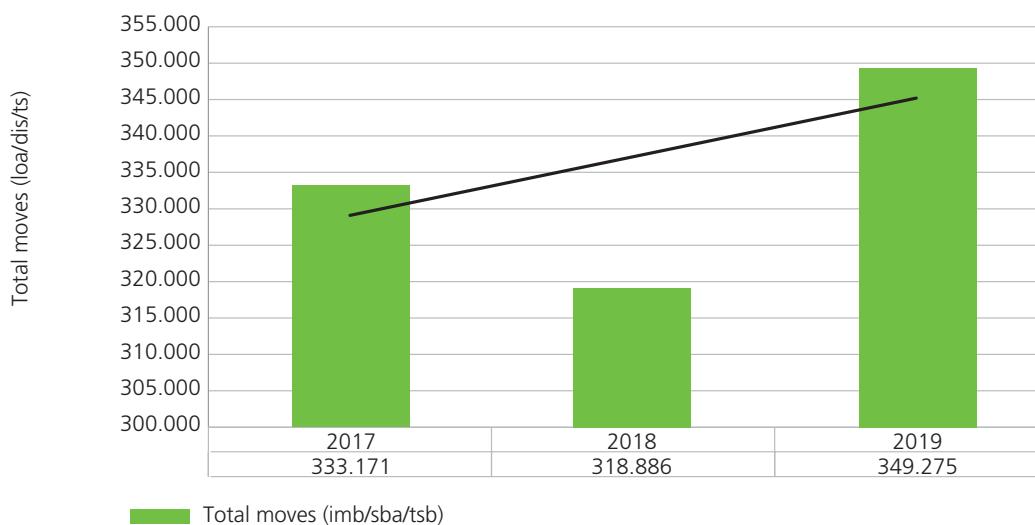


Chart 4:TDT total moves, trend 2017-2019 (loading/discharge/transhipment)

In the third quarter, a reorganisation of the service linking the Mediterranean to the Caribbean was jointly operated by CMA CGM and Marfret, extending its coverage to the Gulf of Mexico area. This service, renamed New MedCaribe, also saw the gradual introduction of ships with a capacity of 6,900 TEUs, replacing the previous 2,500-2,800 TEUs: an element that, added to the loss of the AL6 and Amerigo services at the end of 2018, pushed the terminal to start an important dredging work on the access channel, whose works ended in July 2019. This is the completion of a significant project, which, starting from the last months of the year, has allowed the terminal to fully compete on the Mediterranean-United States trade, in which the capacity of the vessels reached 9,000 TEUs.

During the third quarter, the service connecting the Mediterranean and the west coast of Latin America also underwent a reorganisation, as the direct service to this area was suspended, thus affecting the volumes operated by the terminal.

The fourth quarter of 2019 ended on this note, which, albeit with its contradictions, represented for TDT a year strongly characterised by significant structural investments, in order to allow the facility to be able to guarantee a continuous future growth.



03

Sustainability Report: a recap

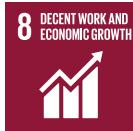
3.1 SUSTAINABILITY AT THE TERMINALS



The commitment to sustainability is aimed at ensuring the continuity of the attainment of the terminals over time, with the improvement of the economic impact, the progressive reduction of the environmental impact and a concrete contribution to the improvement of social impacts, also in terms of quality of life in the communities of reference.



For this reason, in the face of growing challenges in terms of sustainability, a series of priority activities have been identified for the business and for the Stakeholders.



SECH and TDT undertake to operate with competence, responsiveness and reliability, with the aim of ensuring and increasing the satisfaction of their customers, in the respect and interest of the members, collaborators, suppliers and the port community of the cities of Genoa and Leghorn.



Therefore the activities are carried out in compliance with all national, community and international legislation, applicable to terminals, mandatory and voluntary in nature, relating to the protection of the health and safety of workers, the protection of the environment and the prevention of administrative offences. Company decisions are made based on an approach linked to the analysis of the risks and opportunities defined in the quality, safety and environment management systems, taking into account the context and expectations of the interested





economic, environmental and social parties. For further information, please refer to paragraph 2.2 "The companies", which better describe the methods of monitoring the above aspects.

The details of the terminals approaches to economic, environmental and social sustainability are shown below.

TDT



3.1.1 Economic sustainability approach



Pursuing economic sustainability for SECH and TDT means striving to consolidate the competitive position acquired in the upper Tyrrhenian market, to improve process efficiency, ensuring sustainable development not only for companies, but also for the region in which they operate.

Success in service delivery and market competitiveness translate into the creation and fair distribution of value to the Stakeholders: for this reason, the economic and financial results must be reassessed also by analysing aspects, such as employee remuneration and the contributions destined by SECH and TDT to the community.

In this sense, SECH and TDT have started all the necessary activities to promote a culture respectful of legality and to prevent the risk of tax defaults in any form, as well as to involve all interested parties (Stakeholders such as consultants and institutions), so that they can actively participate, together with the administrative function, to the management of tax issues.

SECH and TDT are also associated with Assiterminal, the Italian Port Terminal Association, which has the primary objective of guaranteeing the direct representation of the associated port entrepreneurship, as well as of contributing to the formation of policies regarding the procedures and development of port terminal activities and, more generally, of the national logistics system. In particular, it pursues, among its purposes, the representation in relations with the administrative and political authorities to protect the category interests and provides advice and information on issues and problems of relevance for the sector.

Assiterminal has followed and managed some tax issues, such as the ART contribution and the IMU municipal tax.

The economic effects of SECH- and TDT's activities do not anyway end in the production of added value: in fact, aspects such as job creation in the reference territory - from which almost all company employees come from - and the selection of suppliers located in the Genoa and Leghorn contexts must be considered.



3.1.2 Environmental sustainability approach

» RIO DECLARATION

“ IN ORDER TO PROTECT THE ENVIRONMENT, THE PRECAUTIONARY APPROACH SHALL BE WIDELY APPLIED BY STATES ACCORDING TO THEIR CAPABILITIES. WHERE THERE ARE THREATS OF SERIOUS OR IRREVERSIBLE DAMAGE, LACK OF FULL SCIENTIFIC CERTAINTY SHALL NOT BE USED AS A REASON FOR POSTPONING COST-EFFECTIVE MEASURES TO PREVENT ENVIRONMENTAL DEGRADATION ”

United Nations – Principle number 15 from
“The Rio Declaration on Environment and Development”



Pursuing environmental sustainability means for both terminals to implement policies, define objectives and undertake actions that allow to mitigate the environmental impacts deriving from the exercise of the activities, in compliance with the applicable legal and voluntary prescriptions, preventing the pollution of the environmental matrices (water, soil, air) and reducing the consumption of resources (energy, raw and secondary materials).

The implementation of these purposes passes through the definition and implementation of specific management procedures, the provision of training to personnel, the daily control of compliance with the provisions, the definition and monitoring of improvement objectives, the use of tools that allow the control of legislative compliance and the management, also through the use of specific software, of non-compliance with the respective corrective and improvement actions.

Furthermore, the qualification and awareness of suppliers and contractors, who operate within the terminals, are bearers of indirect impacts. They are therefore requested, also through environmental requirements included in contracts, compliance with current legislation and internal procedures, as well as the adoption of working standards.

Since 2011, the adoption of the organisational and management model (MoG) pursuant to Legislative Decree 231/2001, which includes in its field of application the prevention of certain types of environmental crimes, represents for SECH and TDT an additional guarantee and control system for compliance with the current legislation.

In particular, since 2009, TDT guarantees the controlled management of environmental aspects and the improvement of its performance through the adoption of an environmental management system certified according to the UNI EN ISO 14001:2015 standard and annually verified by an external accredited certification body. The environmental analysis of TDT also analyses the aspects along all the processes and activities carried out in the terminal (whether they are carried out by TDT or by suppliers operating within the company boundaries), both in normal

and abnormal conditions or emergency, as well as the objectives and results achieved annually.

SECH has prepared an analysis and an assessment of the environmental aspects and impacts, preparatory for the implementation of the environmental management system and the definition of adequate procedures for the control and prevention of environmental crimes, pursuant to Legislative Decree 231/2001; SECH periodically assesses the degree of compliance achieved with the medium-term objective of obtaining the certification, according to the UNI EN ISO 14001:2015 standard.

SECH and TDT have identified, described and assessed all direct and indirect environmental aspects. The two terminals, although operating in different contexts, in fact carry out very similar activities and, therefore, have largely assimilable environmental aspects and impacts, thoroughly described in the subsequent chapter 5 of this report.

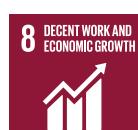
3.1.3 Social sustainability approach



The commitment to social sustainability is an aspect of great importance for SECH and TDT, according to an approach focussed:



- On the design and implementation of management systems aimed at improving corporate performance and developing individual skills;
- on investments in training, to ensure the companies and their people the opportunity to maintain and develop the company know-how through teaching and training activities, so that both professional growth of workers and maximum customer satisfaction are guaranteed;
- the continuous involvement of company trade union representatives and all SECH and TDT personnel on issues of common interest;
- on the promotion of corporate welfare measures, to promote the well-being of the personnel and the families, through a better reconciliation of life and work times;
- the safeguarding of health and safety in the workplace, both for employees and for external operators who access the terminals, in a context that guarantees the prevention of accidents and full respect for all human and legal rights;



- on the adoption of all the consequent and necessary measures and provisions, to prevent or eliminate the causes of risk to human health and safety in general;



- on the offer to all external interlocutors (suppliers, public institutions, unions, communities, etc.) of a transparent image of the companies;



- on ensuring that the fundamental values of organisations, namely ethics and transparency, are clearly defined and constitute the basic element of corporate culture;



- on involving all company resources in the processes of the organisations for continuous improvement of performance, also through the definition of specific objectives and the drafting of the relative implementation programmes reported in the annual improvement plan.



3.2 STAKEHOLDERS' ENGAGEMENT



The following table summarises, for each of the Stakeholders' macro-groups identified by SECH and TDT, the commitment established by the companies towards them and the related engagement methods.

Table 7: Stakeholders' identifications and engagement

STAKEHOLDER (MACRO-GROUPS)	SECH AND TDT COMMITMENTS TOWARDS THE STAKEHOLDERS	STAKEHOLDERS' ENGAGEMENT METHODS	STAKEHOLDERS' ENGAGEMENT FREQUENCY
 INVESTORS	<ul style="list-style-type: none"> Dissemination of culture and values in economic, social and environmental matters. Legislative compliance with mandatory and voluntary standards. Creation of economic, social and environmental value. Corporate governance aligned with best practices. Listening and timely and symmetrical information to shareholders. Absence of accidents with penalties and reputational damage. Adoption of risk anticipation and control systems. Ability to attract new customers. 	<ul style="list-style-type: none"> Dedicated meetings. Evaluation and approval of the Sustainability Report. 	More than once a year.
 WORKERS	<ul style="list-style-type: none"> Economic solidity, good business climate and work organisation. Protection of physical integrity, health, employee safety and the dignity of the person. Absence of conflicts and claims. Non-discrimination and equal opportunities. Investment in professional growth, training. Participation, communication and consultation. Recognition of individual role, skills and merit. Strict application of the national bargaining agreement (hereinafter CCNL) and the supplementary company contracting for the parties delegated to it by the CCNL. Management of trade union relations with RSU and territorial secretariats in accordance with the provisions of the CCNL. Accessibility to the terminals. Legislative compliance with mandatory and voluntary standards. Dissemination of culture and values in economic, social and environmental matters. Benchmarking activities. 	<ul style="list-style-type: none"> Survey on organisational well-being. Communications through the corporate intranet. Focus group on specific topics. Comparison with OOSS territorial secretariats stipulating the CCNL, RSU and RLS1. Newsletter. Publication of the Sustainability Report on the intranet and the internet. 	More than once a year.



1.RLS: the workers' representative for health and safety (RLS) is the figure, elected or appointed, who has the task in a company to represent workers with regard to health and safety in the workplace (source: Wikipedia).



STAKEHOLDER (MACRO-GROUPS)	SECH AND TDT COMMITMENTS TO- WARDS THE STAKEHOLDERS	STAKEHOLDERS' ENGAGEMENT METHODS	STAKEHOLDERS' ENGAGEMENT FREQUENCY
 SUPPLIERS	<ul style="list-style-type: none"> Opportunity to compete based on quality and price. Transparent purchasing processes and compliance with contractual commitments. Qualification of suppliers also with quality, environmental and social certifications. Anti-mafia and anti-money laundering prevention towards suppliers. Efficient and quality service, aimed at continuous improvement. Effectiveness of emergency plans. Legislative compliance with mandatory and voluntary standards. Training, information and protection of health and safety. Timely, clear, complete and effective communication. 	<ul style="list-style-type: none"> Visits to suppliers. Dedicated meetings for negotiation or regarding the behaviours to be held inside the terminals. Participation in meeting opportunities, such as meetings, expo and conferences. 	More than once a year.
 FREIGHT FORWARDERS	<ul style="list-style-type: none"> Operational efficiency and quality of response service. Completeness and reliability of information. Location and accessibility of the terminals. Timely, clear, complete and effective communication. Protection of health and safety. Effectiveness of emergency plans. 	<ul style="list-style-type: none"> Daily relationships. Periodic meetings/institutional tables. 	More than once a year.
 HAULIERS	<ul style="list-style-type: none"> Operational efficiency and quality of response service. Timely, clear, complete and effective communication. Training and information. Location and accessibility of the terminals. Dissemination of culture and values in economic, social and environmental matters. Effectiveness of emergency plans. 	<ul style="list-style-type: none"> Daily relationships. Periodic meetings/institutional tables. 	More than once a year.
 CUSTOMERS	<ul style="list-style-type: none"> Efficient and quality service, aimed at continuous improvement. Reliability with respect to contractual commitments. Dissemination of culture and values in economic, social and environmental matters. Timely, clear, complete and effective communication. 	<ul style="list-style-type: none"> Performance indicators (VPR). Periodic meetings. Customer satisfaction analysis. Litigation analysis Sending of the latest Sustainability Report. 	More than once a year.

STAKEHOLDER (MACRO-GROUPS)	SECH AND TDT COMMITMENTS TO- WARDS THE STAKEHOLDERS	STAKEHOLDERS' ENGAGEMENT METHODS	STAKEHOLDERS' ENGAGEMENT FREQUENCY
 CONTROL AUTHORITIES AND BODIES	<ul style="list-style-type: none"> Legislative compliance with mandatory and voluntary standards. Collaborative approach, also through participation in institutional tables, to facilitate the regulatory task. Absence of accidents with penalties and reputational damage. Collaboration and initiatives of common interest. Timely, clear, complete and effective communication. 	<ul style="list-style-type: none"> Daily relationships. Periodic meetings. Institutional tables. Information flows. 	More than once a year.
 TECH-NAUTICAL SERVICES	<ul style="list-style-type: none"> Timely, clear, complete and effective communication. Location and accessibility of the terminals from the outside. Training and information. Control of adverse weather processes. Collaborative approach to facilitate the performance of work. 	<ul style="list-style-type: none"> Daily relationships. Dedicated meetings. 	More than once a year.
 TRAINING INSTITUTES AND BODIES	<ul style="list-style-type: none"> Information exchanges for a better school education of pupils. Collaboration with universities for the elaboration of specific projects related to the reality of the terminal. Frontal lessons by terminal staff. Visits to the terminals. Alternating school work at the terminal. Collaboration and participation in training programmes. Protection of health and safety. Effectiveness of emergency plans. 	<ul style="list-style-type: none"> Daily relationships. Dedicated meetings. 	More than once a year.
 SOCIAL SECURITY AND ASSISTANCE BODIES	<ul style="list-style-type: none"> Reduction of the accident phenomenon. Continuous monitoring of the progress of accidents and occupational diseases. Ensure compliance with social security and insurance rights. Timely, clear, complete and effective communication. 	<ul style="list-style-type: none"> Daily relationships. Periodic meetings. Institutional tables. 	More than once a year.





STAKEHOLDER (MACRO-GROUPS)	SECH AND TDT COMMITMENTS TO- WARDS THE STAKEHOLDERS	STAKEHOLDERS' ENGAGEMENT METHODS	STAKEHOLDERS' ENGAGEMENT FREQUENCY
	<ul style="list-style-type: none"> Representation of own interests and positions in a transparent, rigorous and coherent way. Collaboration and initiatives of common interest. Guarantee of maximum clarity in relationships. Diffusion of culture, values and attention in the organisations to economic, environmental and social matters. 	<ul style="list-style-type: none"> Collaborative and partnership initiatives. Institutional tables. Direct participation in technical committees and management bodies. Organisation of seminars, work shops, targeted investigations. Sending the latest Sustainability Report and requesting feedback. 	More than once a year.
	<ul style="list-style-type: none"> Support for initiatives of social, humanitarian and cultural value. 	<ul style="list-style-type: none"> Collaborative and partnership initiatives. 	More than once a year.
	<ul style="list-style-type: none"> Bringing the results achieved by the terminals to the community. Public and truthful dissemination of information. 	<ul style="list-style-type: none"> Newspaper articles. Press conferences Visits to the terminal for articles and television services Social media 	At least once a year.
	<ul style="list-style-type: none"> Ensure good working conditions and compliance with all regulations relating to health and safety at work. Training and information. Respect for contractual commitments. Encourage the participation of lenders in corporate life. Legislative compliance with mandatory standards. Effectiveness of emergency plans. Location and accessibility of the terminals. Timely, clear, complete and effective communication. Dissemination of culture and values in economic, social and environmental matters. 	<ul style="list-style-type: none"> Daily relationships. Collaborative and partnership initiatives. Institutional tables Direct participation in technical committees and management bodies. 	More than once a year.

STAKEHOLDER (MACRO-GROUPS)	SECH AND TDT COMMITMENTS TO- WARDS THE STAKEHOLDERS	STAKEHOLDERS' ENGAGEMENT METHODS	STAKEHOLDERS' ENGAGEMENT FREQUENCY
 TRADE UNIONS	<ul style="list-style-type: none"> • Collaboration and maintenance of union relations in full compliance with contractual regulations. • Absence of conflicts and claims. • Absence of accidents, accidents and occupational diseases. • Legislative compliance with mandatory provisions. • Definition of working hours and shifts (work organization). • Timely, clear, complete and effective communication. • Protection of health and safety. 	<ul style="list-style-type: none"> • Daily relationships. • Institutional tables • Direct participation in technical committees and management bodies. 	More than once a year.
 COMMUNITY	<ul style="list-style-type: none"> • Contributing to obtaining economic, social and environmental well-being in the reference context. • Strengthening the link with the port • Protection of health and safety. • Effectiveness of emergency plans. • Absence of entries from SECH. • Location and accessibility of the terminals. 	<ul style="list-style-type: none"> • Participation in meeting opportunities such as expo and conferences. • Terminal opening days for visits. 	At least once a year.
 BANKS	<ul style="list-style-type: none"> • Reliability and compliance with contractual / financial obligations. 	<ul style="list-style-type: none"> • Dedicated meetings. 	At least once a year.
 INSURANCE BODIES	<ul style="list-style-type: none"> • Reliability and compliance with contractual / insurance obligations. 	<ul style="list-style-type: none"> • Dedicated meetings. 	At least once a year.
 EMERGENCY VEHICLES AND BODIES	<ul style="list-style-type: none"> • Location and accessibility of the terminals. • Effectiveness of emergency plans. • Timely, clear, complete and effective communication. 	<ul style="list-style-type: none"> • Information flows. 	More than once a year.
 NEIGHBOURING COMPANIES	<ul style="list-style-type: none"> • Absence of accidents with penalties and reputational damage. • Effectiveness of emergency plans. 	<ul style="list-style-type: none"> • Information flows. 	More than once a year.

SECH AND TDT MEET THE EXPECTATIONS OF THE STAKEHOLDERS

» FRUIT LOGISTICA 2019 AND TOC EUROPE 2019

In 2019 SECH and TDT were present with their own booth at the Fruit Logistica event, held in Berlin from February 6th to 8th, and at the TOC Europe event, held in Munich from June 4th to 8th.

Fruit Logistica is the world's leading platform for innovations in the fruit and vegetable sector, with over 3,200 exhibitors and 78,000 visitors from over 130 countries. The two terminals promoted the services linked to the sea transport logistics of the fruit and vegetable sector and hosted various shipping companies and port operators in their booth, providing spaces reserved for B2B meetings and presentations.

TOC Europe, on the other hand, in which the two terminals took part for the first time, is the only global commercial and network event that has brought together the port and terminal industry for over 40 years, offering suppliers of port equipment and technologies a platform to sell products and services to terminal operators around the world.

**FRUIT
LOGIS
TICA**
2019

6|7|8 FEBRUARY BERLIN

TOC
EUROPE



» SECH AND TDT'S NEWSLETTERS

Working groups made up of employees from the two terminals draw the company newsletters quarterly which, in a clear and transparent way, inform all workers about the ongoing initiatives and their progress. The intent is to share company projects and results, increase the sense of belonging of workers and encourage collaboration between departments, as organisations believe that the contribution of employees is essential in order to achieve a better corporate performance. Furthermore, specific communication channels have been created, i.e. shared e-mail addresses and network folders, with a view to encouraging the participation and involvement of workers, to whom employees can send feedback with suggestions aimed at the continuous improvement of the services rendered by the terminals.

IN QUESTO NUMERO

...iner con farina di pesce: misuriamo la temperatura, donazione uove attrezzature per TDT, la nuova certificazione UNI ISO 45001, ...

a – articolo tratto dal Messaggero Marittimo nei sistemi di gestione estività natalizie, la normativa pensionistica, brindisi di Natale,

2015	2016	2017	2018	2019 (30/11)
791	827	750	669	563
372.530	400.882	333.171	318.886	324.619
588.471	640.850	535.807	512.863	520.619

In questo numero:

1. SECH in numeri.
2. Ambiente, sicurezza e qualità.
3. Lavori in corso e investimenti.
4. Gruppi di miglioramento.
5. Notizie utili

1. SECH in numeri.

SECH IN NUMERI	2016	2017	2018	2019 al 30/11
Numero navi approdate	226	214	280	247
Totale movimenti (imb/sba/tsb)	183.376	194.163	198.940	174.889
TEU (Movimenti – imb/sba/tsb)	294.252	308.919	314.494	281.814

In generale, a livello di servizi operati, nell'ultimo trimestre dell'anno vi sono stati dei cambiamenti in seguito alla migrazione del servizio MD1 ad altro terminal genovese, messo in atto con preavviso di una sola settimana e con l'ultima nave del servizio lavorata presso SECH all'inizio del mese di ottobre.

Nonostante la situazione in cui THEA ha lasciato il terminal – ossia nella totale impossibilità di programmare tempestivamente un nuovo piano di azione, dati i tempi assolutamente incongrui con cui è stato ricevuto il notice relativo alla cancellazione del servizio – i mesi di ottobre e di novembre si sono chiusi rispettivamente con circa 15.200 e 13.000 movimenti.

Non sono numeri confortanti se visti in assoluto, tuttavia bisogna tenere conto che il terminal al momento opera due soli servizi oceanici (IMEX e ME2), oltre ai feeder e al servizio irregolare MEDCANCUB di Melfi; inoltre la perdita del servizio MD1 comporta da sola un decremento di volumi nell'ordine di circa 4.000 movimenti in media al mese.

Bisogna menzionare che i numeri sopra indicati sono stati raggiunti anche grazie alla lavorazione di cinque navi spot nei mesi di ottobre e novembre e quattro nella prima metà di dicembre, permettendo in parte di controbilanciare la perdita del servizio MD1: si tratta di una nave del servizio MGX, quattro del servizio Turkey-Canada di MSC per il quale il terminal di riferimento aveva difficoltà a gestire il carico reefer, due del servizio Bossanova di Maersk e CMA e due, ironia della sorte, proprio del servizio MD1, che serviranno tuttavia a compensare l'omessa toccata del servizio ME2 operato da Maersk nella settimana 50 per ritardi accumulati nei porti precedenti.

Queste ultime navi sono state lavorate presso il nostro terminal a causa delle difficoltà incontrate a ponente nella gestione dei traffici, dopo la chiusura totale delle autostrade A6 (aperta con una corsia per senso di marcia) e A26 (poi parzialmente riaperta, con una corsia per senso di marcia), che vanno a sommarsi ad alcune difficoltà già presenti sulla A10; ciò in seguito ai tragici e purtroppo noti eventi per dissesto idrogeologico che si sono verificati durante l'allerta rossa di fine novembre, al quale sono andati ad aggiungersi lo sciopero di due giorni dei lavoratori del terminal di Prà ed il controllo-sciopero dell'autotrasporto, sempre a inizio novembre, che nelle prossime settimane le difficoltà ancora presenti nel ponente genovese non hanno fatto, inoltre, che peggiorare ulteriormente il proprio carico. Permettendo al terminal di incrementare i lavori di scarico, i quali di novembre, ferma restando la

Completata la fase 2

da GIP partita a fine 2018, che ha visto il coinvolgimento e la realizzazione di filmati, manifesti e adesivi a tema, è importante step. I lavoratori TDT e la realizzazione di filmati, manifesti e adesivi a tema, è stato di compilare un questionario (anonimo), seguito poi da una campagna, attraverso i quali è stato possibile raccogliere il feedback in termini di miglioramento dell'atteggiamento individuale e di merce sicurezza. E' stato in relazione di follow-up e verifica finale dell'intero intervento per valutare i successivi importanti passi da compiere in una materia, quella comune è il costante e progressivo miglioramento.



ESCE: misuriamo la temperatura

pesce stabilizzata, classificabili come merce IMO, esportato, al fine di approvare la sosta in Terminal, ha della temperatura superficiale dei contenitori";

di merce può provocare.

quanto richiesto, ha:

Termocoppia FLIR modello TG56 IR;



del Fuoco

titolo gratuito n. 2 container da 20' al Comando Provinciale dei Vigili del Fuoco, servizio istituzionale svolto dal Corpo Nazionale dei Vigili del Fuoco.

2019 presso il deposito

3.3 TERMINALS' SUSTAINABILITY OBJECTIVES

2019

Companies and shippers were hosted for GUIDED TOURS OF THE TERMINALS and visits at their premises were organised.

1

An EDITORIAL PLAN TO IMPROVE THE Group and company COMMUNICATION towards the external Stakeholders was carried out

2

TV STATIONS were welcomed for filming and reporting

3

Participation in INTERNATIONAL FAIRS AND in EVENTS at various trade associations

4

TRAINING INTERNSHIPS (activated by employment centers and/or Universities)

1

INTERNSHIP following the activation of post-diploma and/or post-graduate courses
(intended for the unemployed people)

2

WORK EXPERIENCE
(intended for high school students)

3

GDPR (General Data Protection Regulation) integration, aiming at the development of digitized systems for safety and privacy, through compliance with the EU regulations on privacy policy, which came into force in May 2018

1

The TRANSITION TOWARDS the new standard for health and safety was completed and the CERTIFICATION UNI ISO 45001:2018 was obtained

2

**SECH
AND TDT
COMMON
SUSTAINABILITY
OBJECTIVES**

2020

FURTHER
STRENGTHENING THE
DIALOGUE WITH THE
STAKEHOLDER, IMPROVING
COMMUNICATION OF
GROUP AND COMPANY
BOTH INTERNALLY AND
EXTERNALLY

OFFERING
TO STUDENTS OR
NEOGRADUATES THE
POSSIBILITY TO INTEGRATE
OR COMPLETE THEIR OWN
STUDIES PATH WITH A TRAINING
PERIOD TO BE CARRIED
OUT IN THE COMPANIES
INCENTIVISING WELFARE
PROGRAMMES

TO PROMOTE WELLNESS
OF THE INDIVIDUAL
RESOURCES AND THEIR
FAMILIES



3.3.1 SECH sustainability objectives

» FOR 2020 SECH ALSO PROPOSES TO PURSUE THE FOLLOWING SUSTAINABILITY OBJECTIVES:

- Updating and development of new functionalities of the company management software for the management of the integrated systems;
- achievement of the UNI EN ISO 14001:2015 environmental certification;
- carrying out of an internal analysis, aimed at adopting a BBS (behaviour based safety) model;
- making videos, to be projected on company monitors, to make operators aware of the use of seat belts and mobile phones when driving vehicles;
- installation of a system that allows the recovery in person on the quay cranes;
- construction of a vehicle washing plant;
- creation of booklets for workers with group safety instructions by job and which can be also available on the company website;
- completion of a border inspection post (PIF); once the bureaucratic fulfilments and the stacking charges have been fulfilled, the building will be inaugurated and used for the verification of specific types of goods and products inside the containers coming from third countries;
- construction of a new security gate at the S. Benigno (customs) access;
- installation of new cameras, in order to improve the security service;
- digitalisation of the supplier evaluation process.

» DURING 2019 SECH ACHIEVED THE FOLLOWING ADDITIONAL OBJECTIVES:

- Further strengthened the dialogue with the Stakeholders through some specific initiatives:
 - » By sending customer satisfaction questionnaires to collect the approval index and feedback on the services offered;
 - » teaching at training institutions and schools;
 - » by participating, with *Porto dei Piccoli Onlus*, in the purchase and distribution of solidarity Easter eggs and panettone to hospitalised children.
- Incentivised corporate welfare programmes, aimed at promoting the well-being of the individuals and the family through a better reconciliation of life and work times:
 - » Due to the tragedy of the collapse of the Genoa west highway bridge (Ponte Morandi) and also taking into account the absence of a public transport service inside the port of Genoa that allows the movement of the personnel operating

there in safe conditions, the company established, since 2018, a temporary shuttle bus service that runs from Monday to Friday, so as to help employees get to work;

- » the company has started a second flexible working project in telecommuting mode, according to the discipline of agile work, with evident benefits in terms of reconciling the life and work times of the beneficiary employees and reducing environmental impacts (acoustic, atmospheric pollution and containment of energy consumption);
- » on the basis of the agreement "Measures for the promotion of the reconciliation between professional and private life of the employees of the Terminal Contenitori Porto di Genova S.p.A.", signed in 2018 between union representatives and the company, the following was also achieved:
 - › Incentives for the transformation of full-time employment contracts into part-time contracts, in favour of female workers who are in particular conditions of disability or serious illness, female workers with children up to 3 years of age and female workers who are over 60 years of age;
 - › the possibility for the joint transfer of holidays in favour of workers in difficulty, because they are sick or because they have to assist children and members of the family who are in particularly delicate health conditions;
 - › the company is also always committed to entering into agreements with companies that provide certain types of services, typically related to health prevention.
- The "improvement groups" project, fully described in paragraph 6.6.1 "SECH approach", was maintained, which made it possible to create synergies between the various departments that proposed corporate improvement actions; this initiative allowed the communication, participation and involvement of workers. A working group is currently following the various proposed projects, whose results are communicated to the workers through various information channels, i.e. company monitors, newsletters and e-mails;
- completion of a mural in the second wall of the underpass connecting the two buildings of the terminal. This project focuses on the importance of health and safety in the workplace and has seen the involvement of a team made up of SECH workers, CULMV staff and students of the Ligurian Academy of Fine Arts (*Accademia Ligustica delle Belle Arti*). The theme of the project was inspired by Art. 20, paragraph 1: "Every worker must take care of their own health and safety and that of other people present in the workplace, on which the effects of their actions or omissions fall in accordance with their training, instructions and tools provided by the employer";
- the process of the replacing the vehicles continued, as detailed in paragraph 4.5. "Distribution of value - Economic impacts";
- the reassessment of the risk from manual handling of loads for the maintenance department was completed, after which it was necessary to purchase some tools to facilitate the handling of heavy loads and the delivery to all employees of an explanatory statement on the correct ones handling mode.

3.3.2 TDT sustainability objectives



» IN ADDITION, FOR 2020 TDT AIMS AT PURSUING THE FOLLOWING SUSTAINABILITY OBJECTIVES:

- Continuing to support the activity of the Social Promotion Association "TDT Employee Solidarity Fund", with the aim of promoting activities and participating in events, in order to find funds that may help people, voluntary associations or public bodies, if serious economic difficulties arise from natural catastrophic events or serious clinical pathologies;
- improving energy consumption performance;
- improving the quality of water discharges, also by approving the replacement of the oldest of the five purifiers;
- reducing the events of unauthorized waste abandonment;
- reducing the consumption of plastic in offices;
- maintaining the consumption of recycled paper by further reducing the use of virgin paper;
- maintaining control of non-conformities without affecting the environmental matrices.



» DURING 2019, IN ORDER TO STRENGTHEN PROXIMITY WITH ITS INTERLOCUTORS, THE TERMINAL UNDERTOOK THE FOLLOWING ADDITIONAL INITIATIVES:

- Hosted the participants in the training courses of the L.I.S.T. Project, financed by the Tuscany Region, with the aim of creating training courses for the job insertion/reintegration of unemployed, unemployed and inactive subjects;
- hosted shooting crews for transmissions, reports, films, in collaboration with the Municipality of "Livorno Film Commission" and with the Port Authority System, in order to spread knowledge about port work and the City of Leghorn;
- hosted visits organised by the "Porto Aperto" Association project, so as to open the port to the city, with which the Authority sought to promote a concrete integration between the port and the territory, endorsing initiatives aimed at making citizens and students aware of such reality;
- participated in the "Italian ports day" event, a project concerning the opening of ports to communities in the surrounding territories, on the initiative of the Port Authority, in coordination with Assoporti;
- collaborated in the creation of the "Granducato TV" service dedicated to women workers on vehicles; the workers were filmed and interviewed while driving RTG trucks and cranes.

With regard to environmental aspects, TDT carried out the following activities:

- Elimination of the use of disposable plastic, replacing the bottles with dispensing jars, providing all employees with TDT transparent bottles in order to eliminate the consumption of plastic cups, replacing the disposable plastic cups and cutlery plates used during business lunches with PLA/bamboo material and food grade paper;
- improvement of energy consumption performance;
- retained the purchase of 100% energy from certified renewable sources "Guarantee of Origin" by the GSE;
- fighting of the phenomena of abandoning waste through surveillance actions;
- raising the consumption of recycled paper by further reducing the use of virgin paper;
- supported the activities of the Social Promotion Association "TDT Employee Solidarity Fund".

3.4 MATERIALITY ASSESSMENT AND MATRIX

In 2019, the process to identify the most important issues for SECH and TDT on which to focus attention and efforts was consolidated, in accordance with the provisions of the 2016 GRI Guidelines (latest edition, with amendments 2018 and 2019). This activity allowed us to define the materiality matrix for the year being analysed, which identifies the relevant topics understood as those aspects that can generate significant economic, social and environmental impacts on the activities of the two terminals and which, by influencing expectations, decisions and Stakeholder actions, are perceived by them as relevant.

Through the materiality assessment, carried out by the editorial staff of SECH and TDT with the support of part of the management of the two companies directly involved in the project, some relevant issues were identified, on which the terminals undertake to develop concrete actions and coherent initiatives. The themes identified are the result of the analysis of the global context, of the dialogue with the management part of the two terminals, as well as with some external interlocutors.

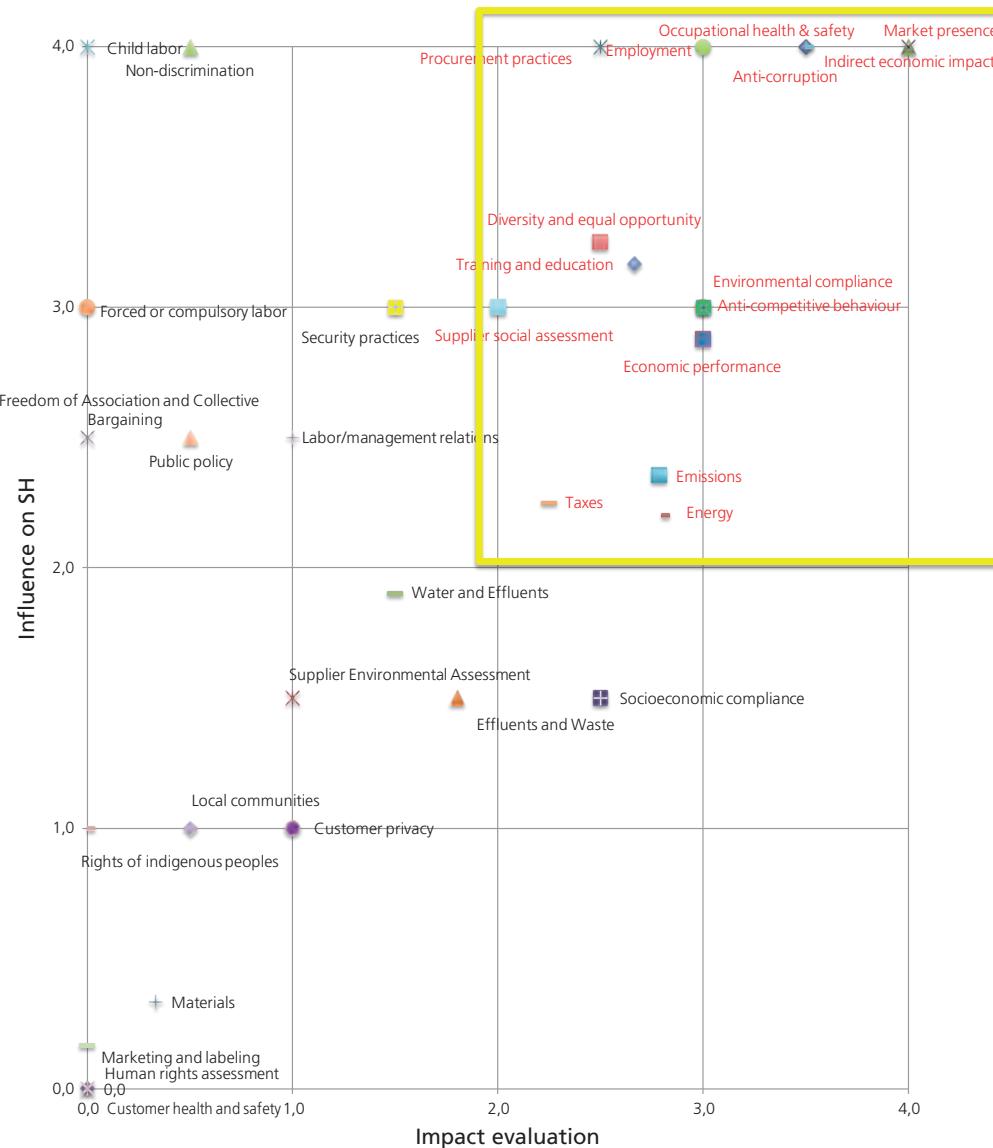
In particular, below the main changes compared to the previous edition of the document are listed, due to the aggregation of SECH and TDT data. Not to be forgotten is the use of the official GRI translation into Italian of the standards, published in the summer of 2019, which was fundamental to verify the correctness of the interpretation of what was required by each indicator in the English version and possibly align the indicators reported in the past with the values actually required by the Guidelines. In light of the translation, however, there were no significant deviations such as to invalidate the values reported in the previous reports.

The most significant variations therefore concern the following topics:

- **306 Effluents and waste:** in 2018 it was reported by both SECH and TDT and was not material; also for this year there was no material and furthermore the disclosure **306-5 Water basins affected by water discharges and/or runoff** is reported only by TDT, thanks to the clarifications obtained through the Italian version of the standards.
- **415 Public policy:** in 2018 it was not reported, in 2019 it is reported by both SECH and TDT and is not material. It is also linked to the newly introduced standard GRI 207 Taxes, which we will discuss below.
- **416 Customer Health and Safety:** in 2018 it was reported and not material, in 2019 it is not reported, in light of the new details that emerged thanks to the official translation into Italian of the standards.

As anticipated, we highlight the introduction of a new indicator within the 2016 GRI Guidelines, which took place in September 2019, i.e. the **GRI 207 Tax** indicator, whose reporting will be mandatory starting from the report prepared in 2021; although in advance, it was deemed useful to deal with the issues of this standard as of now by inserting some notes already starting from this document, in order to have ample scope for further study for next year's work. This standard was reported at macro level by both SECH and TDT and is material.

SECH AND TDT MATERIALITY MATRIX



- Economic performance
 - ▲ Market presence
 - ✗ Indirect economic impacts
 - ✗ Procurement practices
 - ◆ Anti-corruption
 - Anti-competitive behaviour
 - + Materials
 - Energy
 - Water and Effluents
 - ◆ Biodiversity
 - Emissions
 - ▲ Effluents and Waste
 - Environmental compliance
 - ✗ Supplier Environmental Assessment
 - Employment
 - + Labor/management relations
 - Occupational health & safety
 - ◆ Training and education
 - Diversity and equal opportunity
 - ▲ Non-discrimination
 - ✗ Freedom of Association and Collective Bargaining
 - ✗ Child labor
 - Forced or compulsory labor
 - Security practices
 - Rights of indigenous peoples
 - Human rights assessment
 - ◆ Local communities
 - Supplier social assessment
 - ▲ Public policy
 - ✗ Customer health and safety
 - ✗ Marketing and labeling
 - Customer privacy
 - Socioeconomic compliance
 - Taxes

Figure 3: SECH and TDT materiality matrix



04

Economic Sustainability



The equity structures of SECH and TDT and their economic health are essential for their sustainability. Companies are born to create profit and there can be no sustainable development without creating value and economic solidity.

In this regard, it is useful to highlight that, on December 4th, 2017, SECH and TDT joined the national tax consolidation pursuant to articles 117/129 of the Consolidated Income Tax Act (TUIR) 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 participating in the national tax consolidation and which thus benefits from the possibility to offset taxable income with tax losses in a single declaration. 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 provide taxable income, equal to the IRES (i.e. corporation tax) to be paid. On the other hand, towards companies that make tax losses, Gruppo Investimenti Portuali S.p.A. records a debt equal to IRES on the part of the loss actually offset at group level.

The group of companies participating in the tax consolidation consists of:

- SE.BE.R. Srl with registered office in Genoa (GE), Calata Sanità Palazzina Uffici, 16126;
- Terminal Contenitori Porto di Genova S.p.A. (SECH) with registered office in Genoa (GE), Calata Sanità Palazzina Uffici, 16126;
- Terminal Darsena Toscana S.r.l.s.u. (TDT) with registered office in Leghorn (LI), Via Mogadiscio 23, Darsena Toscana, 57123.

Current taxes include all taxes calculated on the company's taxable income by applying the tax rates in force on the balance sheet date. Current income taxes and deferred taxes are recorded in the income statement, with the exception of taxes that derive 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 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 entered in the balance sheet. Deferred tax assets on unused tax losses and tax credits that can be carried forward, as well as on deductible temporary differences, are recognised to the extent that it is probable that future taxable income will be available such as to allow the realisation 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.

In greater detail of the above, this part highlights the economic performance of the companies, providing the main balance sheet and economic data of the financial statements for the 2017, 2018 and 2019 financial years.



4.1 TERMINALS' BALANCE SHEETS

Table 8: SECH Balance sheet

SECH BALANCE SHEET							
ASSETS (€)	2017	2018	2019	LIABILITIES (€)	2017	2018	2019
INTANGIBLE ASSETS	4.034	5.015	5.897	EQUITY	10.757	9.925	10.120
FIXED ASSETS	21.200	20.055	18.845	CONSOLIDATED LIABILITIES	4.295	3.482	3.270
FINANCIAL FIXED ASSETS	20	19	9	CURRENT LIABILITIES	19.700	22.936	23.262
INVENTORIES	728	729	739	TOTAL LIABILITIES	34.752	36.343	36.651
TRADE AND OTHER RECEIVABLES	8.662	10.501	11.096				
CASH ON HAND	108	24	65				
TOTAL ASSETS	34.752	36.343	36.651				

Table 9: TDT Balance sheet

TDT BALANCE SHEET							
ASSETS (€)	2017	2018	2019	LIABILITIES (€)	2017	2018	2019
INTANGIBLE ASSETS	5.504	5.199	5.533	EQUITY	10.607	12.044	13.959
FIXED ASSETS	8.421	10.927	9.369	CONSOLIDATED LIABILITIES	4.088	4.884	3.797
FINANCIAL FIXED ASSETS	27	64	94	CURRENT LIABILITIES	16.743	15.081	12.480
INVENTORIES	641	697	753	TOTAL LIABILITIES	31.439	32.010	30.236
TRADE AND OTHER RECEIVABLES	13.289	11.956	11.033				
CASH ON HAND	3.557	3.166	3.454				
TOTAL ASSETS	31.439	32.010	30.236				

4.2 TERMINALS' OPERATING PROFITS



SECH and TDT are two terminals with different infrastructural and operational features operating in very different geographical contexts.

For SECH, the apparent continuity of the final volumes compared to 2018 actually hides a great volatility, made of blank sailings on the Med/Middle East line, of spot vessels, especially in the second half of the year, and services that left the terminal (e.g. MD1) on short notice.

The excess of terminal offers in the Genoese area, combined with aggressive commercial policies of competitors, penalised the terminal, whose service in any case continues to be considered of excellent quality, as evidenced by the high number of spot vessels calling at the terminal for issues generated in other structures.

During 2019, various operations were then completed, including those of the maintenance dredging in the area in front of the quay, so that the 14,000-TEU vessels can therefore be operated with even greater safety. In addition, at the end of the year, the construction of the new PIF (Border Inspection Point) was completed, a cutting-edge construction for the old port basin, which will be operational in the second half of 2020.

Table 10: Terminals at a glance

TERMINALS AT A GLANCE	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
Operated vessels	214	749	280	669	214	601
Total moves (loa/dis/ts)	194.163	333.171	198.940	318.886	192.952	349.275
TEUs (loa/dis/ts)	308.919	515.792	314.494	502.108	311.749	560.339
Trucks served ¹	140.593	149.932	139.678	155.095	145.162	124.994
Average trucks turnaround time (mins)	31	35	21	36	31	25
TEUs discharged/loaded from/onto trains	20.295	72.496	29.748	69.033	33.084	55.598
Import containers dwell time	5,9	5,0	6,8	4,8	6,8	5,3

1. As far as TDT is concerned, the moves considered are the ones regarding containers in and out only.

As for TDT, the dredging project of the access channel to the Darsena Toscana to allow a greater draft to ships from 8-9,000 TEU was carried out at the expense of the terminal and concluded in July 2019. This is a fundamental point for the defence, as well as for the acquisition, of services that reach such a size, now featured in the main trades calling at the terminal, namely Med-USEC, Med-Middle East, Med-Caribbean.

2019 also saw a significant increase in the transhipment percentage of the total volume, with the completion of the transfer of Hapag Lloyd volumes previously managed in Cagliari.

Two of the main characteristics of TDT, namely the direct railway connection and the traffic of refrigerated containers, have given further results. TDT confirmed 18% of export traffic and an increase of 17% on import traffic. This is a good result, considering the conspicuous drop in the percentage of full containers compared to 2018. In the second semester, the terminal confirmed a significant volume flow at national level, especially on the handling of full import containers.

Table 11: SECH and TDT profit and loss accounts

SECH AND TDT PROFIT AND LOSS ACCOUNTS	2017		2018		2019	
	ITEMS (€)	SECH	TDT	SECH	TDT	SECH
Earnings	31.761.643	46.627.872	33.210.531	47.893.309	34.611.316	46.538.351
Other operating earnings	508.178	1.327.055	782.826	938.487	1.090.562	3.413.814
Raw materials and consumables	-860.167	-1.844.315	-778.127	-2.016.974	-1.072.175	-1.861.115
Costs for services	-9.264.932	-18.380.299	-10.725.319	-18.107.468	-11.946.630	-18.447.363
Other operating costs	-2.679.015	-4.337.158	-2.679.840	-4.139.920	-2.032.315	-2.879.739
Personnel costs	-16.217.321	-19.104.849	-16.734.796	-19.304.626	-16.880.557	-18.989.948
EBITDA	3.248.386	4.288.307	3.075.275	5.262.808	3.770.201	7.774.000
Amortisations and reserves	-3.739.745	-3.687.316	-3.898.412	-3.550.789	-3.710.425	-3.508.124
OPERATING PROFIT	-491.359	600.992	-823.137	1.712.019	59.776	4.265.876
Financial management	-193.126	-132.543	-170.069	-81.013	-159.551	-99.296
Non-managerial entries	-	-	-	-	-	-
EBIT	-684.485	468.448	-993.206	1.631.006	-99.775	4.166.580
Taxes	124.348	-348.817	161.742	-194.453	292.149	-851.901
NET PROFIT/LOSS FOR BUSINESS YEAR	-560.137	119.631	-831.464	1.436.553	192.374	3.314.679

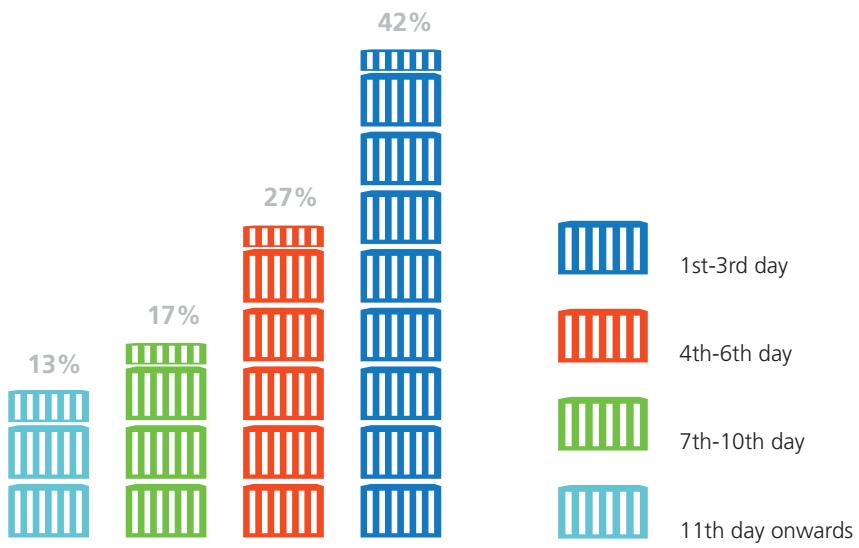


Chart 5: SECH import full containers storage - as at 31/12/2019

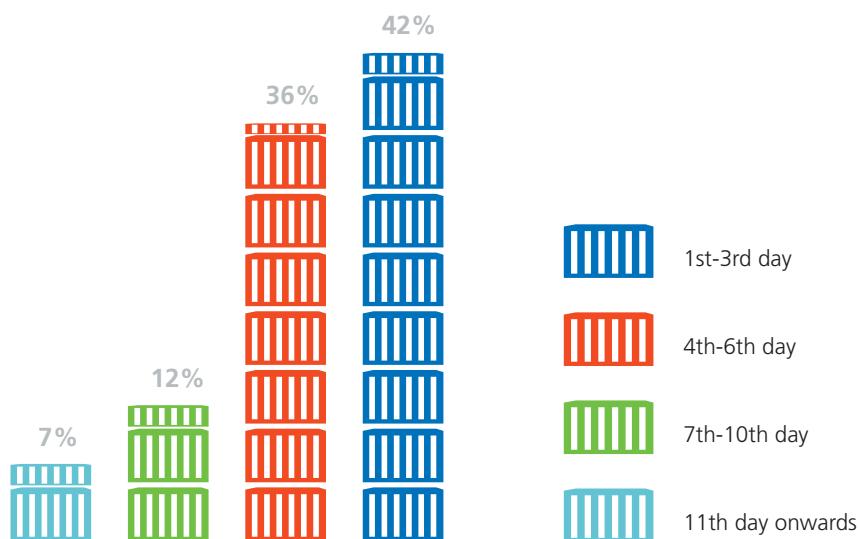
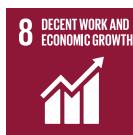


Chart 6: TDT import full containers storage - as at 31/12/2019

4.3 DIRECT ECONOMIC GENERATED AND DISTRIBUTED VALUE



The reclassification of the economic value generated and distributed below shows the economic effect that the activity of SECH and TDT produces on the main categories of Stakeholders, namely:

- Its employees, through wage remunerations;
- the shareholders, through the distribution of dividends and the remuneration of credit institutions;
- the suppliers, through procurement and investment expenses;
- the Public Administration, through the payment of taxes;
- the community, through the provision of contributions to non-profit organisations operating in the local context.

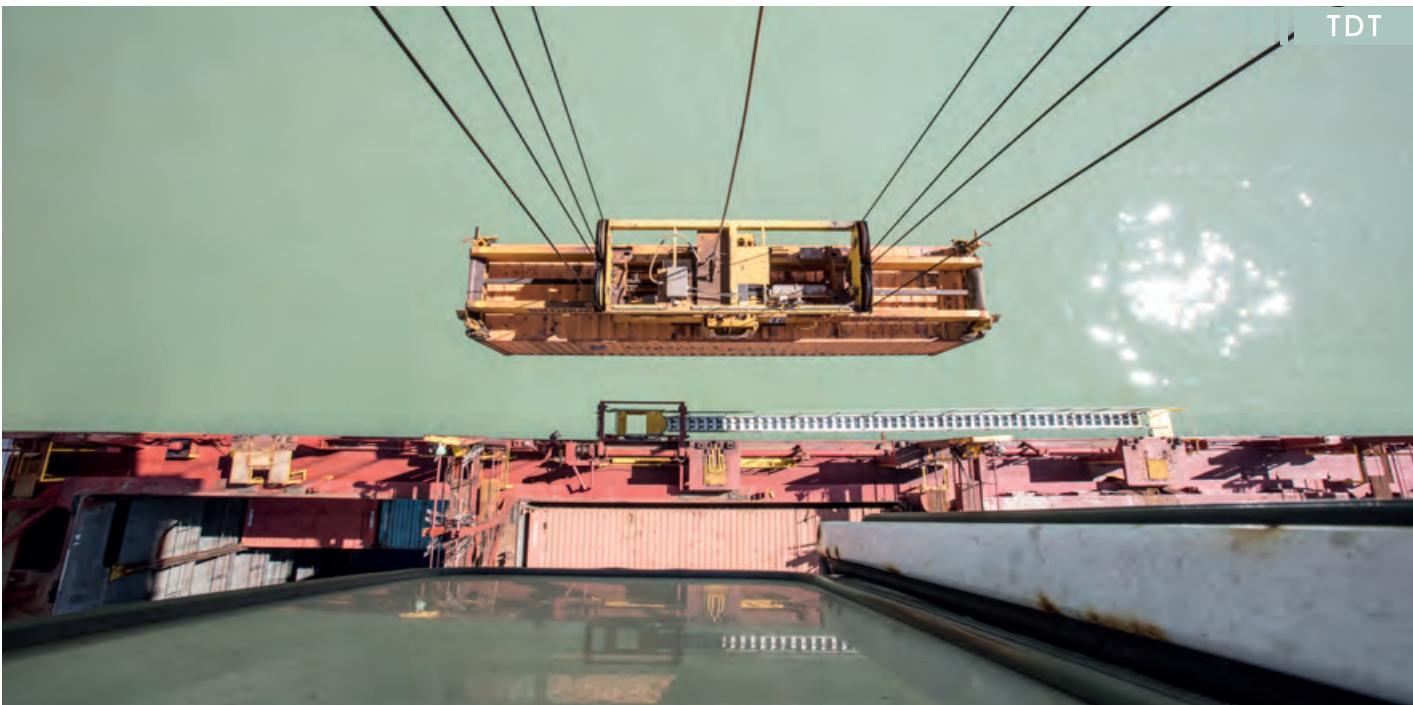


Table 12: Distribution of added value to the Stakeholders

DISTRIBUTION OF ADDED VALUE TO THE STAKEHOLDERS	2017		2018		2019	
	STAKEHOLDERS (€)	SECH	TDT	SECH	TDT	SECH
Economic generated value	32.271.939	47.958.493	33.993.440	48.843.880	35.738.000	49.953.850
Earnings	32.269.821	47.954.927	33.993.357	48.831.796	35.701.878	49.952.165
Proceeds (financial and extraordinary ones)	2.118	3.565	83	12.084	36.122	1.685
Economic distributed value	29.057.383	43.659.682	30.834.578	43.359.160	31.459.442	42.704.523
Operating costs	13.317.872	24.860.097	14.658.178	24.561.672	15.213.201	23.603.866
Remuneration of employees	15.597.896	18.181.608	16.104.795	18.380.910	16.268.478	18.081.173
Remuneration of shareholders	195.244	136.109	170.152	93.097	195.673	100.981
Remuneration of the Public Administration	-124.348	348.817	-161.742	194.453	-292.149	851.901
Remuneration of the local community	70.719	133.052	63.195	129.028	74.239	66.602
Economic value kept within the companies	3.214.556	4.298.810	3.158.862	5.484.720	4.278.558	7.249.327
Amortisations and depreciations	2.956.921	3.112.547	3.061.455	3.124.451	3.161.825	3.025.873
Reserves	257.635	1.186.263	97.407	2.360.269	1.116.733	4.223.454

SECH



4.4 REMUNERATION AND INCENTIVES



The workers of the two companies are classified in national collective labour agreements: for employees with the qualification of "middle managers", "clerks" and "blue-collar workers" (about 98%), reference is made to the National Bargaining Agreement (hereinafter CCNL) of port workers, for the "executives" (the remaining 2%) to the CCNL for executives of industrial companies.

90% of the remuneration is based on the first-level national contract and the supplementary company contract, while the remaining 10% is established on the basis of the responsibility and the role covered by the management, which reports directly to the General Manager.

In particular, supplementary (or second-level) bargaining plays an important role in determining the overall remuneration. By integrating the national collective bargaining agreement, it has the dual objective of creating organisational efficiency for the company, on the one hand, and of bringing additional remuneration to workers, on the other.

Starting from the aforementioned assumptions, the current supplementary company contract in TDT focuses mainly on institutions supporting productivity, promoting greater flexibility of human resources, compatibly with a greater sustainability of work-life balance.

SECH, for its part, has agreed on an additional contract based basically on two factors: the increase in productivity and the decrease in effective absenteeism.

Table 13: Effective absentee rate

EMPLOYEES	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
Effective absentee rate	6,42	7,43	6,13	7,94	7,12	7,22

In this sense, it is confirmed that the goal for the years to come remains to consolidate the target achieved both in terms of effective absenteeism and accident performance.

Please also find the contents of SECH supplementary company agreement, which provides:

- A productivity bonus, paid only for the hours of effective attendance at work;
- a professionalism award, granted only to those who work at least 50% of the hours that may be worked;
- a premium linked to effective presence, which provides for the payment of an additional amount with respect to normal wage, for each shift/day of effective presence at work;
- the recognition of additional leave permits, in the case of zero incidence of injuries during the year.

Following the tragedy of the collapse of the Morandi bridge and the consequent serious difficulties for many commuters in being able to reach their workplace, and taking into account the absence of a public service inside the east side port that could allow the movement of staff operating there in safety conditions, the company has set up a shuttle bus service (from Monday to Friday) to help employees who, being unable to use their own car anymore, must reach their workplace by public transportation.

With the intention of concretely adopting measures aimed at promoting flexible articulation in times and places of subordinate work (according to the dictates of law 81 dated May 2017), for the first time in its history, SECH in 2018 has introduced the possibility of carrying out one's own work performance according to the modality called "telecommuting" (smart working), thus formalising an agreement with a worker, with another worker joining in 2019.

In terms of total remuneration, i.e. including all the elements of value (salary, benefits, bonuses etc.) that the employees receive in exchange for their work in the company, the ratio between the remuneration of the highest paid individual in the organisation (excluding the managers) compared to the average remuneration of all employees (the highest paid excluded) is 1.53 for SECH and 1.9 for TDT.

To a ratio such as the one mentioned above, the value, although high in Leghorn, denotes the sensitivity of the organisation to individual enhancement, as there is a relationship between the accrued and the amount due which, as in 2018, also in 2019 maintains the gap between the two genders with a rather low differential.

2. Absentee Rate: (Absence hours - Paid permits / Workable hours)*100

Table 14: Ratio between entry remuneration and minimum wage level established locally

RATIO BETWEEN ENTRY REMUNERATION AND MINIMUM WAGE LEVEL ESTABLISHED LOCALLY (%)	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
Men	1,32	1,23	1,31	1,22	1,31	1,22
Women	1,24	1,19	1,24	1,20	1,24	1,19

As regards the coverage of retirement costs, there are no defined benefit company plans, nor do the companies offer their employees specific supplementary pension coverage, in addition to that provided for by the national collective agreement, introduced starting from 2005, and currently identified in the Priamo pension fund, to which all employees can adhere by including the severance indemnity accrued, with an additional employee-company equal contribution of 1% of the remuneration elements, valid for the calculation of the severance pay (TFR).

In addition to the statutory retirement plans guaranteed by the payment of the mandatory national social welfare institution (INPS) contributions, upon termination of the employment relationship the severance indemnity is therefore recognised to those who have not joined the supplementary pension scheme, whereas the possibility of receiving a life annuity and/or a redemption of the accrued pension position from the Priamo fund is granted to those who have adhered to it.

Furthermore, in some particular cases, the advance notice of indemnity is paid to the employee.

The composition and movements of employee severance indemnities and other personnel funds at December 31st, 2019 are detailed below:

Table 15: Benefits payable at the time of employment termination

RATIO BETWEEN ENTRY REMUNERATION AND MINIMUM WAGE LEVEL ESTABLISHED LOCALLY (%)	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
Severance pay	619.425	923.241	630.001	923.716	612.079	908.775
Others (in-lieu indemnities, etc.)	-	-	-	-	-	-

4.5 DISTRIBUTION OF VALUE - ECONOMIC IMPACTS

The economic impact of SECH and TDT does not end with the production and distribution of added value; the focus of the two companies is not, in fact, only to produce profits for the shareholders, nonetheless also to create job opportunities and economic growth for the local community.

As regards infrastructures, the two organisations concentrated, in particular, on interventions aimed at improving productivity and raising safety levels within the terminals, improving the working conditions of the personnel.

➤ BRIEF DESCRIPTION OF THE MAIN INVESTMENTS MADE BY SECH DURING 2019

- 1 Update in the electrical substation switches: modernisation with latest generation switches for a better reliability and continuity of service.
- 2 Replacement of the projectors of the lighting towers of the container trolleys with high efficiency LED lamps, both to obtain energy savings and for greater safety in the area.
- 3 Revamping of the RTG called F02 for the modernisation of trolley, lifting and cabin translation, in order to improve the reliability and continuity of railway operations.
- 4 Purchase of a new automatic fixed OOG spreader.
- 5 Purchase of two new reachstackers to enhance the vehicle fleet.
- 6 Purchase and installation of operating cameras and systems to improve WiFi coverage and, consequently, the operational efficiency of the control room office.
- 7 New video system for RTGs with installation of four 2 Moixel IP cameras with dedicated IR, that provide better visibility to operators during handling and therefore greater efficiency and safety.
- 8 A building was created for the border inspection station (PIF), for goods of animal origin and designated entry point (PED) for the verification of goods of vegetal origin, by the peripheral structures of the Ministry of Health.

» BRIEF DESCRIPTION OF THE MAIN INVESTMENTS MADE BY TDT DURING 2019

- 1 Dredging work carried out on the access channel to the Darsena Toscana.
- 2 Implemented a new radio system based on digital technology (TETRA), replacing the previous one, which is now obsolete.
- 3 The test phase of the SCADA project was completed (upgrading of the electricity grid, distribution, automation of the electrical substations, redundancy and selectivity of the lines, research and selective isolation in the event of faults).
- 4 Replaced the oil transformer in the electrical substation with another resin one, with the definition of a specific sectioning procedure and adjustments for access, signaling and safety distances.
- 5 New equipment purchased: two 36-T goosenecks with safety hooks, a device for automatic OOG handling and a 60-foot roll trailer.
- 6 Made changes to the layout of the terminal for the inspections on goods, with the adaptation of the separating fence of the terminal from the public road and by tracing a roundabout to allow maneuvers to enter and exit to the vehicles.
- 7 Layout improvement of module 1, with an increase in space for maneuvering the vehicles, as well as identifying and tracing a single block of ten storage areas for empty containers.
- 8 New layout for modules 5 and 6 defined following the configuration for container cycles of the area, previously destined for rolling stock traffic.
- 9 Pedestrian paths for truck drivers at the gate area were redeveloped and added and the deteriorated yard areas were rehabilitated.
- 10 The signs for the external car parking lot were restored and integrated and special safety signs were installed, in Italian and English, in various areas of the terminal.





As far as the investments in training activities of the two companies are concerned, they continuously embrace the entire professional life and are aimed at creating value for people, through the growth and diversification of skills (i.e. employability), and for companies, through the growth of their own resources, in line with both mission and business strategy.

The detail of the investments in the last three years is shown in the following table, which excludes all the financed training, as not assigned to the two companies (which is therefore included in the training hours carried out, but not in the "investments in training" section).

Table 16: Investments in funded and not funded training

	2017		2018		2019	
INVESTMENTS IN TRAINING (€)	SECH	TDT	SECH	TDT	SECH	TDT
FUNDED TRAINING	434	49.249	56.366	44.488	19.285	28.550
Of which:						
Private funds	434	49.250	50.367	44.488	19.285	28.550
Public funds	0	0	6.000	0	0	0
NOT FUNDED TRAINING	47.922	18.593	34.193	22.938	34.823	10.511
TOTAL TRAINING	48.356	67.843	90.559	67.426	54.108	39.061

The following table shows the costs related to the training provided, broken down by subject area of the investment.

Table 17: Costs by training typology

	2017		2018		2019	
COSTS BY TRAINING TYPOLOGY (€)	SECH	TDT	SECH	TDT	SECH	TDT
Management training	7.500	34.914	16.473	30.742	2.546	13.383
Training on security	11.225	8.552	19.717	7.334	17.239	9.620
Professional development	29.631	24.376	54.369	29.350	34.323	16.058
TOTAL	48.356	67.843	90.559	67.426	54.108	39.061

SECH employs a total of 236 employees, almost totally from the province of Genoa, (95,34%), as shown in the following chart. The item "other provinces" (4,66%) includes the provinces of Alessandria, Cuneo, La Spezia e Savona.

TDT employs a total of 292 employees, almost totally from the province of Leghorn (93,8%). The item "other provinces" (6,2%) includes the provinces of Firenze, La Spezia, Lucca and Pisa.

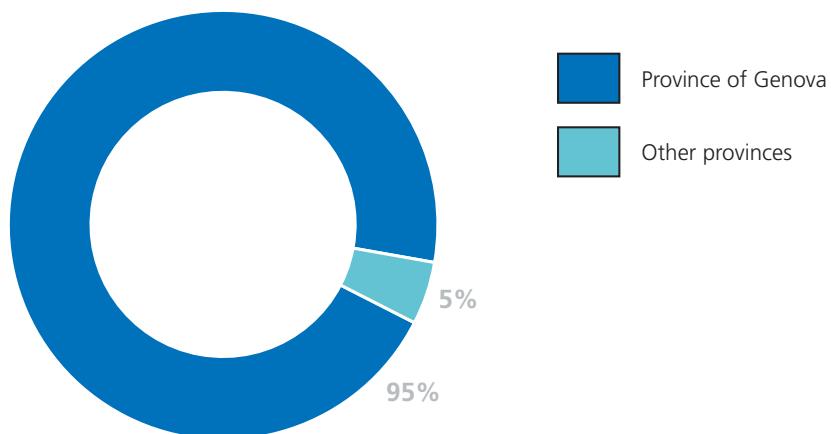


Chart 7: Distribution of SECH workers based on their residence

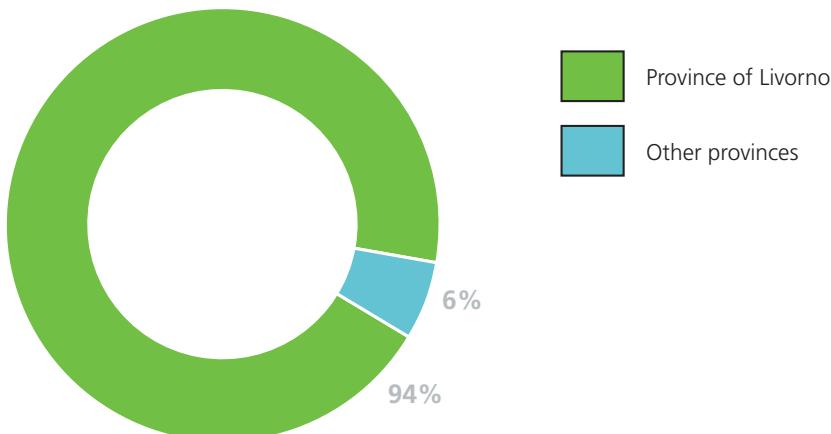


Chart 8: Distribution of SECH workers based on their residence

With particular reference to the figures of the first management line, it is evident that these come entirely from the local context for both companies.

For both terminals, taking on positions of responsibility represents the natural passage for an internal professional path, thanks to which the employee develops a strong sense of identity and belonging to the company. Great importance is attached to this aspect, defining individual career paths and targeted ad hoc development plans, allowing people to be able to fill roles of ever greater responsibility.

Besides its employees, SECH avails itself of the services of the Dockers company (CULMV) and TDT of the Leghorn Port Employment Agency (CILP), i.e. the only subjects authorised to supply labour pursuant to art. 17 law 84/94.

The skills mainly provided to TDT concern workers in the operating pool - operators in charge of the lifting and handling equipment at yard - and general cargo operators, skills that in 2020 will be integrated by gantry crane operators, whose needs are growing, following to changes underway in loading, unloading and yard handling operating procedures.

As regards procurement, in 2019 the expenditure for services and consumables was €16.71 million for SECH and €22.63 million for TDT. The analysis by geographical area of origin shows a clear prevalence of suppliers located on the Italian territory (over 98% of the total purchases made).

Below is the detail of the percentage shares of expenditure on the total of purchases made in 2019 for SECH and TDT.

Table 18: Breakdown of the expenses for supplies

2019	SECH		TDT	
	AMOUNT (€)	%	AMOUNT (€)	%
BREAKDOWN OF THE EXPENSES FOR SUPPLIES				
Italy	16.448.459	98,43	22.368.902	98,82
EEC	72.293	0,43	110.387	0,49
Extra EEC	191.261	1,14	156.297	0,69
TOTAL	16.712.012	100	22.635.586	100



SECH

As evidence of the strong roots of SECH and TDT in the territory, the below charts highlight how purchases from suppliers located in the provinces of Genoa and Leghorn represent 67% and 63% respectively of supplies purchased in Italy, for a value of € 11.119.736 and € 14.107.395 individually.

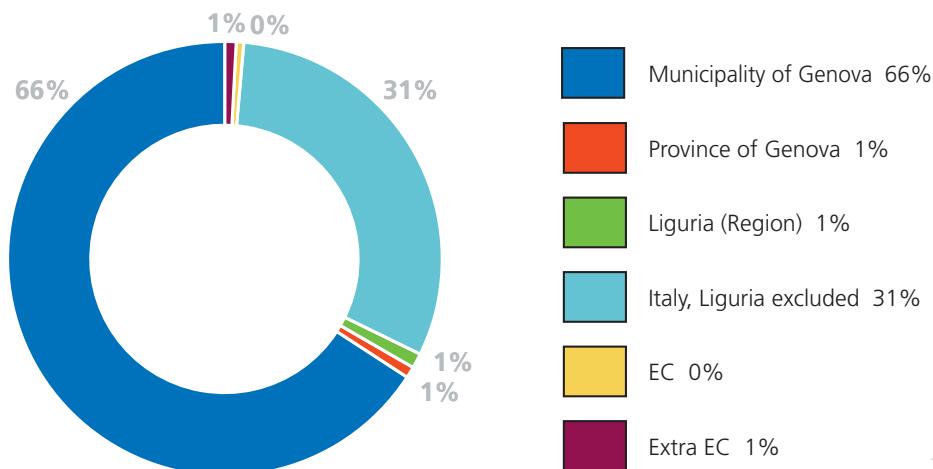


Chart 9: SECH value of supplies with a breakdown by geographical area

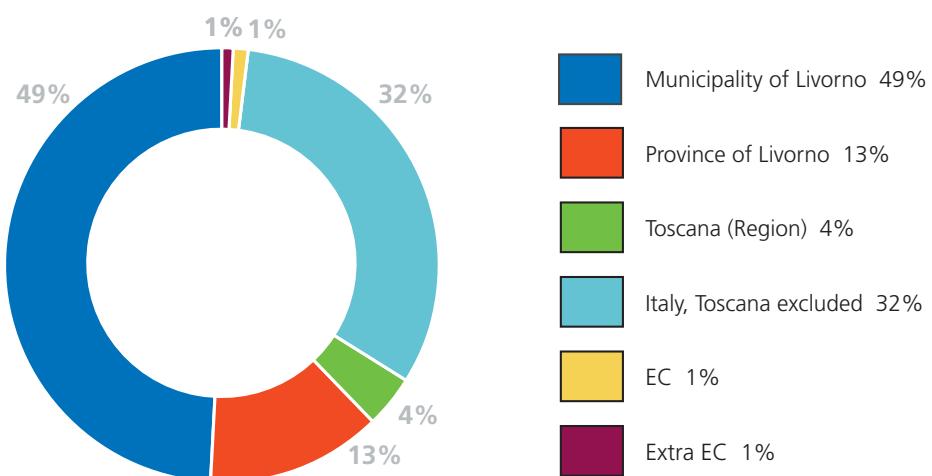


Chart 10: TDT value of supplies with a breakdown by geographical area

The new corporate structure of the two terminals also brought about synergies in the choice of qualified suppliers; the set of expenses generated by common supplies is in fact equal to 29% in the reference year and the goal is to reach 30-32% in 2020.

The strong link between SECH and TDT with the local area and their proximity to citizens are also reflected in the choices to support non-profit organisations operating in local contexts.

The following tables show the details of the amounts invested in the three-year period by both companies.

Table 19: SECH sponsorships and donations

SECH SPONSORSHIPS AND DONATIONS (€)	2017	2018	2019
Il Porto dei Piccoli ONLUS	10.000	-	5.000
Music for peace	2.500	4.508	4.500
Gruppo ciclistico (cycling group)	-	600	608
Shipbrokers and Shipagents Dinner	5.000	-	5.000
CRAL SECH (recreation)	32.369	33.964	32.526
Other	600	605	754
TOTAL	50.469	39.677	48.389

The donations incurred represent the will of both companies to support the world of children and young people.

As shown in the table above, SECH supports - among others - the work of the Association "Music for Peace - Creativi della Notte" Onlus, which since 1994 has been committed to organising fun events and creating a communication network for young people. The objective is to use music and leisure as moments of reflection and concrete commitment, for example through the collection of basic necessities, destined, among others, to Bosnia, Kosovo and Afghanistan.



TDT supports, among other associations, "Il Porto dei Piccoli" Onlus, which brings hospitalised children and their families closer to the culture of the sea, ports and nature, through games and paths guided by trained operators and volunteers, with the goal of distracting them from illness, creating opportunities for socialisation and education.

Table 20: TDT sponsorships and donations

TDT SPONSORSHIPS AND DONATIONS (€)	2017	2018	2019
Il Porto dei Piccoli ONLUS	2.250	8.080	5.000
Coppa Barontini	3.000	3.000	3.000
Associazioni sportive varie (various sport associations)	2.964	550	605
Associazione Cure Palliative Livorno (medical association)	20.000	-	20.000
Nautica Venezia (nautical association)	6.100	6.100	6.100
Gare remiere Livornesi (Livorno rowing races)	2.081	3.044	1.293
CRAL TDT (recreation)	11.000	6.000	2.000
Other	2.604	1.757	2.396
TOTAL	49.999	28.531	40.394



05

Environmental Sustainability

Terminal Contenitori Porto di Genova S.p.A., originally under the so-called Consorzio Autonomo del Porto (Autonomous Consortium of the Port) and then privatised in 1993, is based in Calata Sanità, in a strategic position within the Genoa Sampierdarena port basin; the first centre of the west side of the city, outside the circle of the seventeenth-century Mura Nuove, Sampierdarena includes the stretch of coast, now entirely occupied by port infrastructures, between the promontory of Capo di Faro (where the Lanterna – i.e. Genoa's middle ages Lighthouse – stands) to the east and the mouth of the Polcevera stream to the west.

The location of the company within the basin allows for strategic proximity to access by sea, rail and land and allows for unloading, loading and terrestrial connection with the main logistics hubs. To ensure the flow of reloading carriers, there are five gate driveways, two of which are automated for the exit of trucks, that can be used alternatively as entrance or exit, and three 370-metre long railway tracks.

The area in which SECH operates amounts to 205,000 square metres, with a 526-metre quay, which allows the simultaneous berthing of two ships, compatibly with their length, while the depth at berth is equal to -15 m. The area is bordered to the north by the ferry terminal, to the south by the railway junction and the landfilling of Calata Bettolo, to the west with the road networks, the Lanterna promenade and some buildings pertaining to port activities, to the east with the area of Genoa Sampierdarena. There is a dangerous goods stacking area with a capacity of 549 TEUs. The covered area amounts to approximately 4,000 square metres, used for offices, changing rooms and workshops.

In the acoustic zoning plan of the municipality of Genoa, the area in which SECH operates falls into class VI "transport infrastructure areas", with the highest emission and release limits, both day and night. The neighbouring areas belong to Class V (Lanterna) and Class IV (ferry terminal). Being a port area, there are no residential receptors.

Terminal Darsena Toscana, on the other hand, carries out its activity as terminal operator in the areas of the Darsena Toscana west bank of the port of Leghorn, assigned under concession by the local Port Authority System of the Northern Tyrrhenian Sea.

The area falls within the northern industrial area, in the municipality of Leghorn, on the border with the Pisa territory, and is delimited by the Arno stream channel to the north, beyond which there is the Calambrone seaside touristic area with its WWF protected dunes, to the east by the inhabited area of Stagno, to the south by the Ugione torrent as well as the built coastline and to the west by the sea. The part of the maritime area is delimited to the north by the mouth of the Arno stream channel and to the south by the Leghorn Lighthouse, for a total length of approximately 4,250 km.

The industrial area is classified as a site of regional interest declared "critical area with a high concentration of industrial activities", defined by Ministerial Decree 25/05/2003 and as redefined by the Ministerial Decree dated 22/05/2014, which demarcated the transfer of competences from the Ministry of the Environment and the Protection of the Territory and the Sea (MATTM) to the Tuscany Region (art.2).

Further to this transfer of competences, the measures were set to deal with the procedures for ascertaining and/or reclaiming the land as efficiently and effectively as possible. The perimeter decree indicated as the main sources of pollution in the "site of regional interest" area the activities of the refinery and the port area.

In the acoustic zoning plan of the municipality of Leghorn, TDT area is classified as a "4-industrial" zone, that is, with higher emission and input limits. The last noise detection campaign was carried out in 2018 by the Port Authority in all its state-owned areas and by TDT in 2019 for the area of its competence: there is no detection of exceeding most of the emission, input and differential.



5.1 DIRECT ENVIRONMENTAL IMPACTS

The direct environmental impacts derive from ship/rail/truck unloading and loading activities and from upstream and downstream accessory ones.

They are flanked by indirect environmental impacts, connected to the activities of internal and external suppliers and customers and on which the terminals have an indirect and variable power of intervention.

In light of the above, we can consider the following significant direct environmental aspects related to the terminal activity:

- Resource consumption;
- water discharge;
- waste production;
- discharges to the ground;
- noise emissions;
- emissions in the atmosphere:
 - » diffuse emissions;
 - » conveyed emissions;
- electromagnetic emissions;
- light emissions;
- visual impacts;
- ionising radiations;
- odorous emissions.

It should be recalled in this regard that the terminals are not subject to the constraints deriving from the Kyoto Protocol or to emission trading schemes.

5.1.1 Resource consumption

The resources mainly consumed within the terminals are:

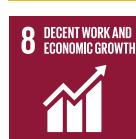
- Energy resources;
- water;
- material derived from raw materials of various kinds (e.g. paper, office equipment, installations, etc.).

5.1.1.1 ENERGY RESOURCES



Energy consumption is due to:

- Temperature-controlled containers (reefer) plugging;
- use of quay cranes/RMGs 1;
- use of rolling stock (RTGs 2, forklifts, prime movers, reachstackers);
- yard lighting;
- office activities;
- ancillary activities.



At the moment, internal metres are not installed at SECH, which allow for the reporting of electricity consumption divided by type of equipment; based on the nominal power, it is however possible to estimate the energy absorption of the different equipment. In TDT, on the other hand, there are partialised metres that have been made legible and remotely monitored since 2018 (SCADA project).

Below is the breakdown of energy consumption.

At SECH, 57% of energy needs are covered by diesel, 40% by electricity and 3% by methane (used only to heat sanitary waters). Compared to 2018, there was a slight increase in the supply of methane. The total committed electrical power grew by 8% compared to 2018, due to the addition/modernisation of the lighting towers and columns for the temperature-controlled containers' power supply. Shore cranes (41%) and RMGs (31%) are always the topmost users. Considerable, and growing compared to 2018, the electricity from reefer containers plugging (from 17% to 23%).

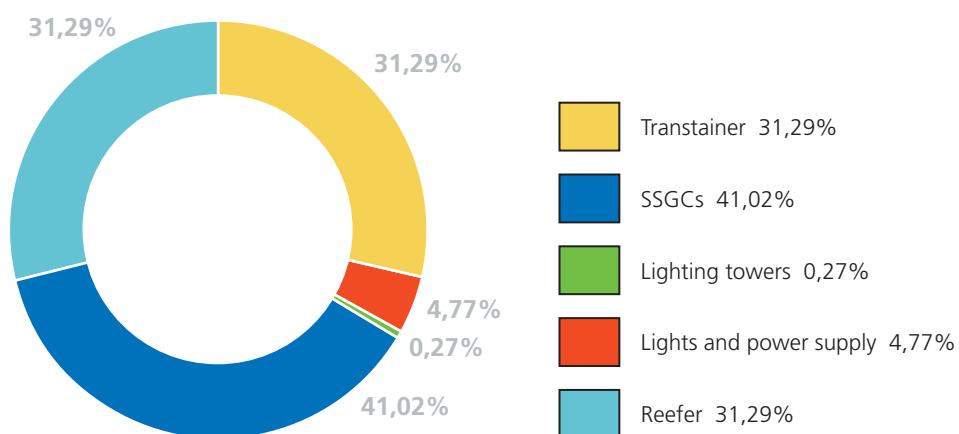


Chart 11: Breakdown of consumed power at SECH, year 2019

1. RMG: rail mounted gantry
2. RTG: rubber-tyred gantry

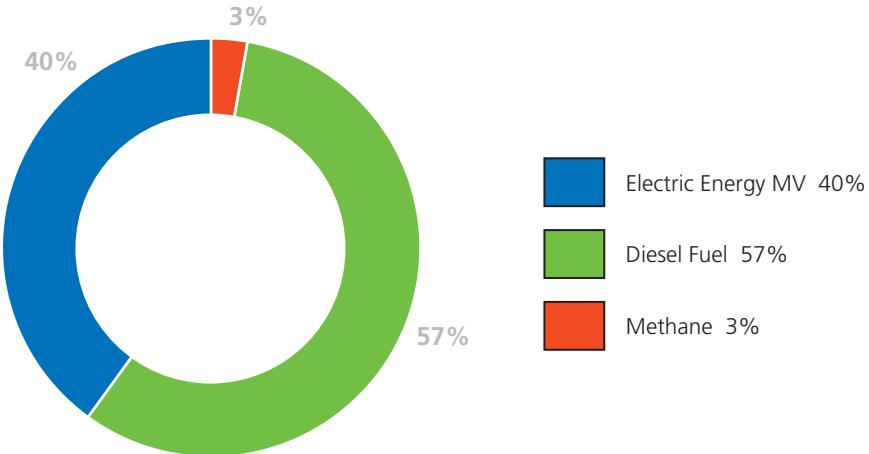


Chart 12: Breakdown of energy sources at SECH, year

At TDT, on the other hand, 60% of total energy needs are covered by electricity and the remaining 40% comes from diesel. Of the electricity consumption, 46% is due to the supply of temperature-controlled containers (stored at the terminal, awaiting loading or withdrawal), 33% from the quay cranes consumption and the remainder from the sum of the yard lighting and office activities, as shown in the graph below. In 2019, electricity consumption for lighting was reduced by 46%, thanks to the replacement of the sodium lights of the light towers with LED lights at the end of 2018.

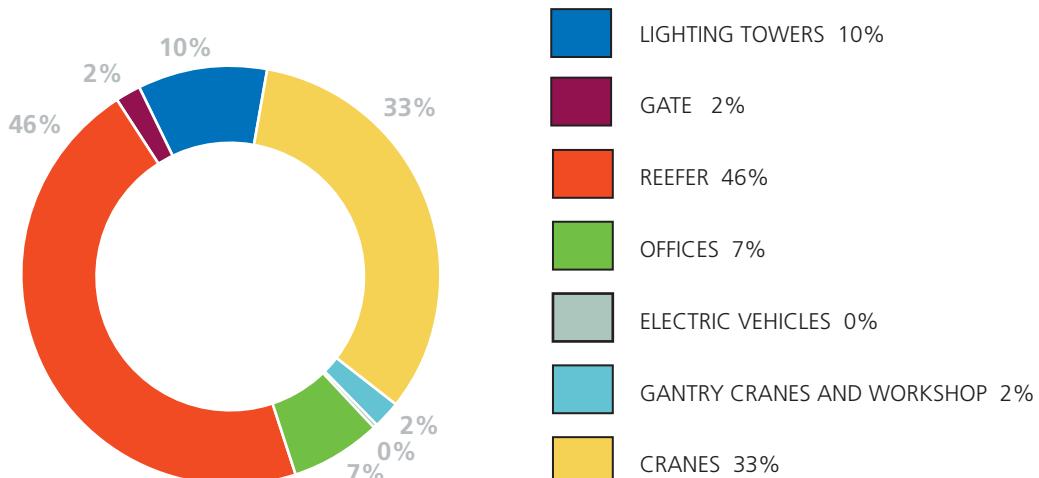


Chart 13: Breakdown of electricity consumption at TDT, year 2019

Below is the consistency of SECH and TDT's fleet broken down by energy carrier.

Table 21: SECH and TDT's fleet broken down by energy carrier

FLEET	DIESEL-FUELLED	ELECTRICAL POWER-SUPPLIED
SECH	<ul style="list-style-type: none"> • 6 RTGs³ • 4 company-owned vehicles • 16 leased vehicles • 23 prime movers (with the relevant 28 trailers), of which 12 are leased • 19 reachstackers, of which 2 are leased • 8 forklifts • 2 scissors lifts 	<ul style="list-style-type: none"> • 5 SSGCs • 6 RMGs • 4 forklifts
TDT	<ul style="list-style-type: none"> • 13 RTGs • 12 leased vehicles • 9 ops department vehicles • 6 prime movers • 16 reachstacker^{s4} • 5 forklifts • 1 scissor lift • 1 fire-fighting vehicle • 1 supply tank 	<ul style="list-style-type: none"> • 8 SSGCs⁵ • 2 forklifts • 12 yard vehicles

The figures for consumption and performance are shown below on a three-year basis.

Table 22: Energy consumption at SECH (expressed in MWh and Litres)

	ENERGY CONSUMPTION SOURCES	U.M.	2017	2018	2019
SECH	A) TOTAL ELECTRICITY CONSUMPTION (BT)	MWh	24,3	16,8	15,9
	B) TOTAL ELECTRICITY CONSUMPTION (MT)	MWh	5.171	5.568	6.081
	C) TOTAL DIESEL CONSUMPTION	[litres]	672.980	781.900	856.850
	NON-OPERATING DIESEL	[litres]	13.200	32.112	103.660
	OPERATING DIESEL	[litres]	659.780	749.788	753.190
	D) NATURAL GAS SUPPLY	[m ³]	23.604	33.526	43.149

The considerable increase in non-operating diesel is due to the large supply of generating sets serving the batteries of reefer generators.

3. With respect to 2019 2 RTGs were demolished.

4. Out of which 10 are owned and 6 in full rental.

5. Of which one is out of order and alienated in 2019.

6. 1kWh = 3,6 GJ, 1l diesel = 35,65 GJ. Factors source: "Bilancio Energetico Nazionale 2007".

Table 23: Energy consumption at SECH (expressed in Gjoule = 10^9 joule)

SECH ENERGY CONSUMPTION SOURCES		U.M.	2017	2018	2019
SECH	A) TOTAL ELECTRICITY CONSUMPTION (BT)	GJ	87	61	57
	B) TOTAL ELECTRICITY CONSUMPTION (MT)	GJ	18.614	20.043	21.891
	C) TOTAL DIESEL CONSUMPTION	GJ	23.998	27.882	30.554
	NON-OPERATING DIESEL	GJ	471	1.145	3.696
	OPERATING DIESEL	GJ	23.527	26.737	26.858
	D) NATURAL GAS SUPPLY	GJ	815	1.158	1.523
	TOTAL ENERGY (A+B+C+D)	GJ	43.515	49.144	54.025

At SECH, the intensity indicator is affected by the number of reefer containers stored, which has undergone an 80% increase in the three-year period (8.165 in 2017, 9.341 in 2018 and 14.834 in 2019), without having any connection with energy performance.



Table 24: Energy consumption at TDT (expressed in MWh and Litres)

TDT ENERGY CONSUMPTION SOURCES		U.M.	2017	2018	2019
TDT	A) TOTAL ELECTRICITY CONSUMPTION (BT)	[MWh]	44,80	42,60	51,85
	B) TOTAL ELECTRICITY CONSUMPTION (MT)	[MWh]	8.693	9.629	7077
	TOTAL LIGHTING TOWERS POWER SUPPLY	[MWh]	1.027	1.013	679
	TOTAL GATE POWER SUPPLY	[MWh]	143	135	111
	TOTAL REEFER POWER SUPPLY	[MWh]	4.103	4.887	3.264
	TOTAL OFFICES POWER SUPPLY	[MWh]	527	559	528
	TOTAL ELECTRIC VEHICLES POWER SUPPLY	[MWh]	14	6	3
	GENERAL CARGO AND MAINTENANCE	[MWh]	136	142	126
	TOTAL CRANES POWER SUPPLY	[MWh]	2.743	2.887	2.365
	C) TOTAL DIESEL CONSUMPTION	[litres]	1.161.002	1.136.469	1.133.463
	NON-OPERATING DIESEL	[litres]	39.279	30.969	34.619
	OPERATING DIESEL	[litres]	1.107.460	1.090.657	1.082.487
	NATURAL GAS SUPPLY (ACS)	[litres]	14.263	14.843	16.357
TOTAL ENERGY (A+B+C)		[litres]	1.184.001	1.160.516	1.156.948

Table 25: Energy consumption at TDT (expressed in Gjoule⁷ = 10⁹ joule)

TDT ENERGY CONSUMPTION SOURCES		U.M.	2017	2018	2019
TDT	A) TOTAL ELECTRICITY CONSUMPTION (BT)	GJ	161	153	187
	B) TOTAL ELECTRICITY CONSUMPTION (MT)	GJ	31.289	32.981	25.476
	TOTAL LIGHTING TOWERS POWER SUPPLY	GJ	3.696	3.647	2.444
	TOTAL GATE POWER SUPPLY	GJ	514	487	401
	TOTAL REEFER POWER SUPPLY	GJ	14.770	17.595	11.750
	TOTAL OFFICES POWER SUPPLY	GJ	1.896	2.012	1.901
	TOTAL ELECTRIC VEHICLES POWER SUPPLY	GJ	50	23	12
	GENERAL CARGO AND MAINTENANCE	GJ	490	512	455
	TOTAL CRANES POWER SUPPLY	GJ	9.873	8.705	8.513
	C) TOTAL DIESEL CONSUMPTION	GJ	41.400	40.525	40.418
	NON-OPERATING DIESEL	GJ	1.943	1.398	1.234
	OPERATING DIESEL	GJ	39.457	39.128	38.600
	NATURAL GAS SUPPLY (ACS)	GJ	509	529	583
	TOTAL ENERGY (A+B+C)	GJ	73.360	74.189	66.664

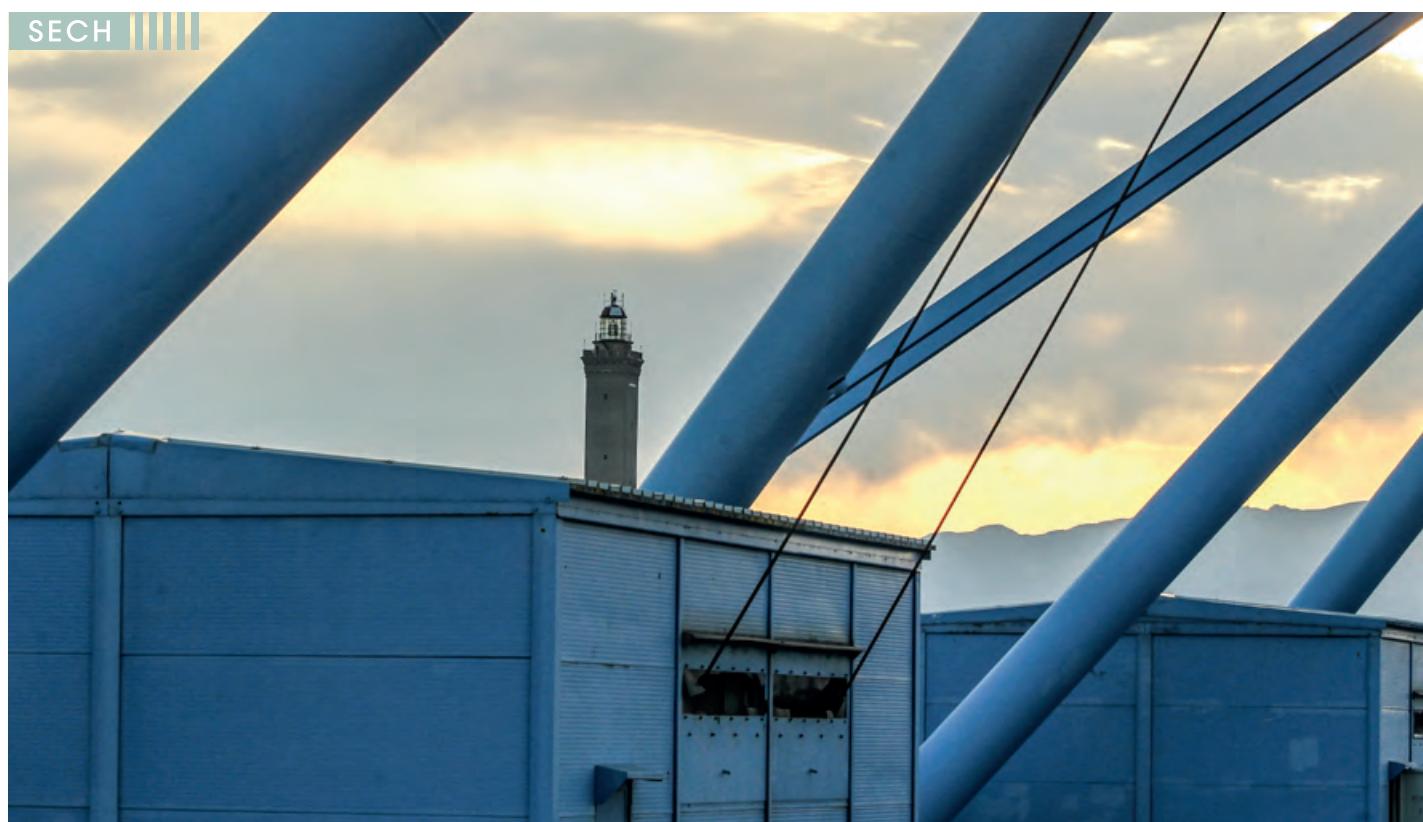
7. Source: "Bilancio Energetico Nazionale 2007".



Table 26: Energy intensity

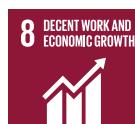
ENERGY INTENSITY		U.M.	2017	2018	2019
TDT	Total consumption (thermal power plant excluded, Gjoule) - TDT	GJ	72.342	73.130	66.080
	Denominator (total moves) ⁸ - TDT	move	1.135.435	1.210.749	1.233.409
	Energy intensity per move (Gj/move) - TDT	GJ/move	0,064	0,060	0,054
SECH	Total consumption (thermal power plant excluded, Gjoule) - SECH	GJ	42.700	47.986	52.502
	Denominator (total moves) - SECH	move	825.253	939.169	926.064
	Energy intensity per move (Gj/move) - SECH	GJ/move	0,052	0,051	0,057

At TDT, the intensity indicator is greatly affected by the significant consumption of the reefer containers (from 55% to 46% of the total electricity consumption, not linked to the terminal's performance); in any case, the performance is improved both including and, above all, excluding reefer consumption. Also for SECH, the progressive increase in the indicator is attributable to reefer containers, which, as already mentioned, grew by 80% in the three-year period. At SECH it is not possible to perform a more accurate analysis, as separate metres by type are not available.



8. Reported only by TDT.

5.1.1.2 CONSUMPTION OF RAW MATERIALS AND PACKAGING



The improvement actions on purchases led to an increase for TDT of the percentage of recycled paper on the total as desired. The reported paper consumption relates to A3/A4 and tissue printing paper.



Table 27: Percentage of recycled input materials used at TDT⁹

OFFICE PAPER CONSUMPTION		U.M.	2017	2018	2019
TDT	Total kg recycled paper	Kg	4.603	5.182	8.576
	Total kg not recycled paper	Kg	8.131	8.240	365
	% recycled	%	36%	39%	96%
	Cost	€	€ 12.960	€ 13.612	€ 23.705

For both terminals, the actions focused on the reduction of packaging at the moment: inside the offices the bottles of water were replaced by 20-liter bottles returned to the supplier for subsequent reuse, plus each employee received a "designer" bottle. For personnel working at yard and in the workshop, plastic water bottles at SECH have been replaced by biodegradable ecological plastic bottles. The action will make it possible to decrease the production of plastic waste by around 120.000 bottles per year.

5.1.1.3 WATER CONSUMPTION



As far as the water supply at SECH terminal is concerned, there is a contract, for industrial use, with the company running the ordinary and extraordinary maintenance of the supply network. The metres located in the SECH concession area are four, two for civil users and two for the firefighting network, one of which is dedicated to dangerous goods. The water withdrawn for civil use is utilised for toilets, showers and vehicle washing.



Water consumption is monitored at SECH since 2018 through a direct reading of the four metres, performed quarterly by the HSSE workers and compared with what invoiced from the supplier. Any anomaly or discrepancy is promptly reported to verify the cause.



The greatest water withdrawal refers to the two buildings, where the changing rooms also reside. Consumption during 2019 increased significantly following a hidden leak in the section of pipe that feeds the washbasins of a changing room. The underground line was intercepted upstream and bypassed externally in November 2019.

9. Reported only by TDT.

Table 28: SECH water consumption

WATER CONSUMPTION		U.M.	2017	2018	2019
SECH C	H ₂ O firefighting IMO storage area	[mc]	258	193	23
	H ₂ O firefighting office building	[mc]	58	14	21
	H ₂ O PIF/Inspections area	[mc]	1.292	1.274	1.293
	H ₂ O office buildings (Operations and Administrative Dept.)	[mc]	4.996	5.829	8.683
	TOTAL WATER CONSUMPTION	[mc]	6.604	7.310	10.020
	OFFICES AND TOILETS WATER CONSUMPTION/ TOT WORKED H	[mc/h]	0,017	0,019	0,026

At TDT the water supply is guaranteed by the port aqueduct, whose operator carries out the ordinary and extraordinary maintenance of the water supply and distribution systems in the port area. The supply is purely potable water, as there is no availability of, and connection to, the industrial water network. The water withdrawn is used for civil uses, such as toilets and showers, the power supply of the fire prevention system, the washing of vehicles.

Water consumption is monitored by reading the metres compared with the consumption reported on the invoice. Over the years, consumption anomalies have been analysed and managed by metre breakage, extra withdrawals (e.g. extraordinary supply of water to the Port Authority System), network leaks, sporadic services such as washing the cold rooms.

As per the table below, the most significant consumption is that relating to offices and bathrooms: over the years, efforts have been made to reduce consumption by applying flow reducers in the showers, with results that are not very appreciable as yet, as shown by the normalised indicator on the hours worked. In 2019, a repaired underground water leak was detected, bringing the piping overground for a faster identification of potential failures in the future.

Table 29: TDT water consumption

WATER CONSUMPTION		U.M.	2017	2018	2019
TDT	H ₂ O TDT offices and toilets (4 buildings)	[mc]	11.540	9.350	10.119
	H ₂ O gate and offices	[mc]	/	112	157
	H ₂ O GC and new washing plant	[mc]	1.242	1.147	1.085
	H ₂ O firefighting network	[mc]	25	0	43
	H ₂ O PIF/Reefer area	[mc]	290	277	118
	TOTAL WATER CONSUMPTION	[mc]	13.343	10.983	11.522
	OFFICES AND TOILETS WATER CONSUMPTION/ TOT WORKED H	[mc/h]	0,0278	0,0235	0,0256

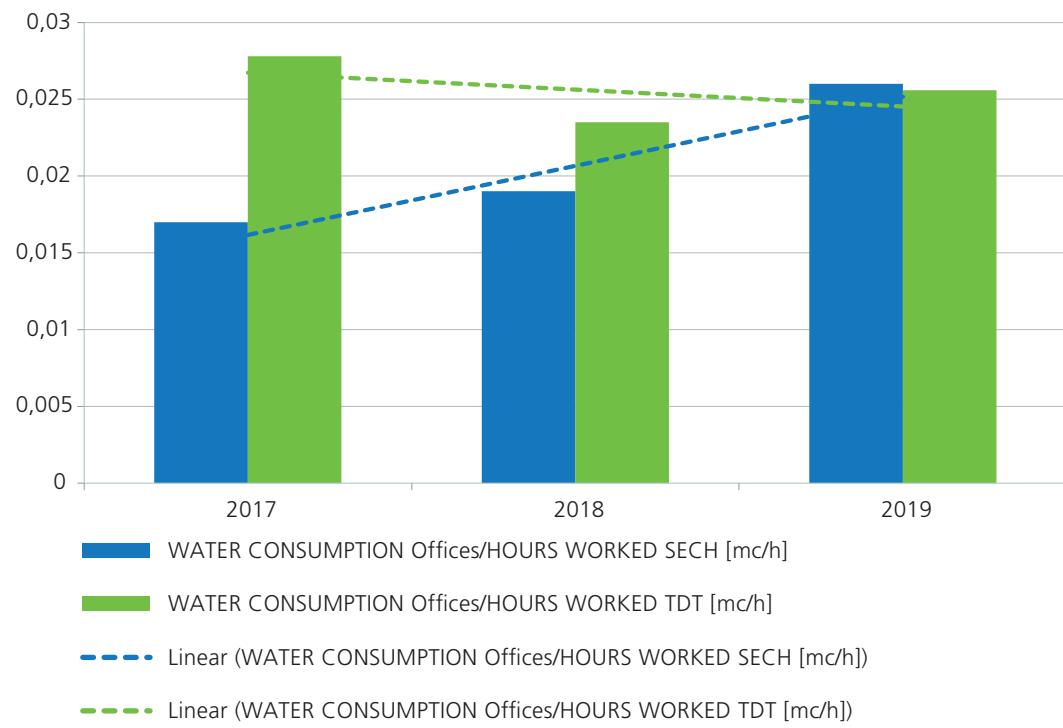
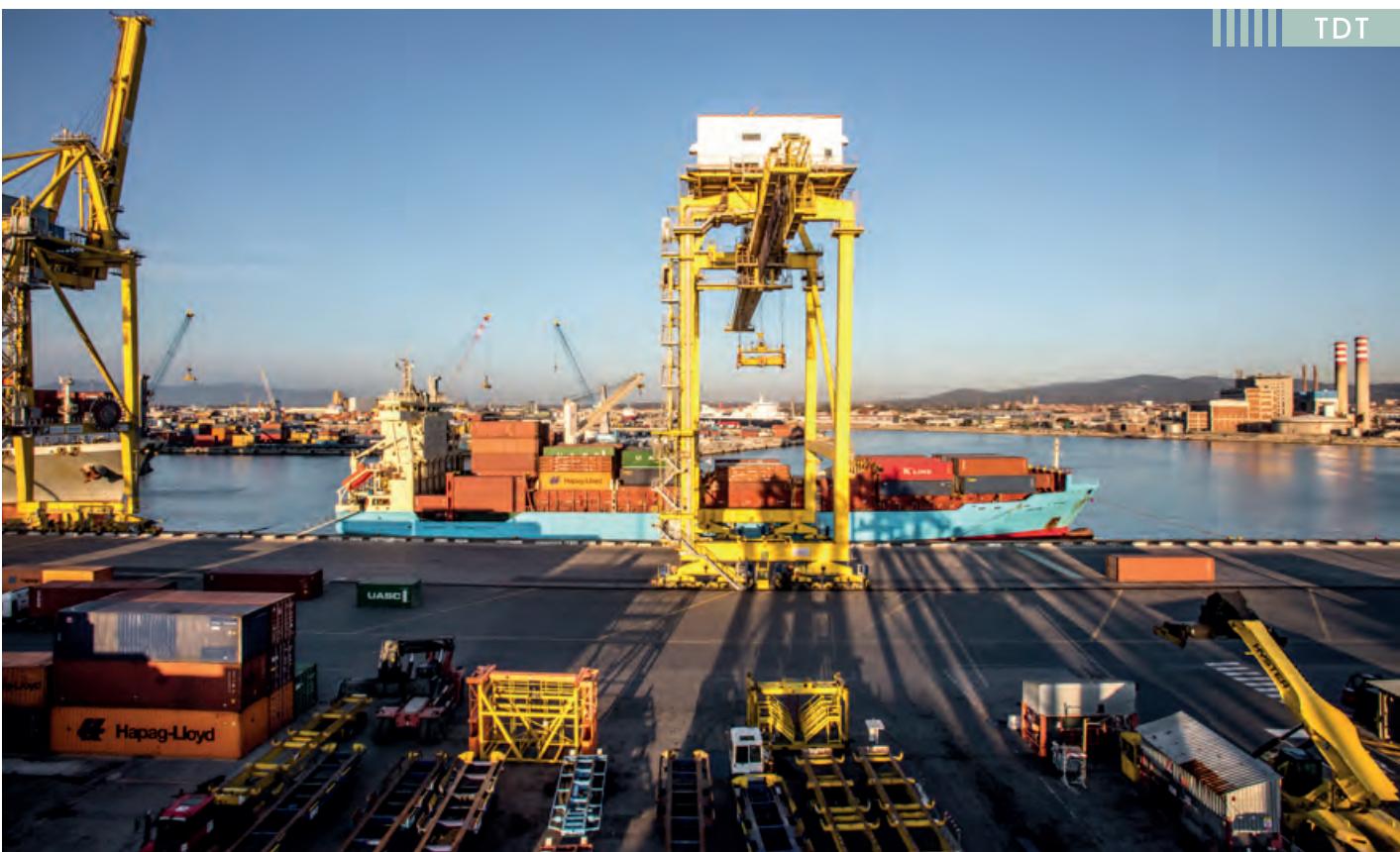


Chart 14: Water consumption trend



5.1.2 Water discharge

5.1.2.1 SECH WATER DISCHARGE



Water discharges originating from activities carried out within SECH terminal are similar to domestic and industrial waste water, as they are obtained by mixing water from toilets, including showers. The washing of the vehicles takes place in a dedicated area served by a closed-cycle treatment plant, which does not generate any discharge in the receptor bodies. SECH does not produce discharges to the sea: it uses four "Imhoff"¹⁰ type tanks downstream of the treatment process.

SECH uses the area on the basis of a concession stipulated with the Port Authority on April 29th, 1993 and subsequent amendments. At the time of signing the concession, two "Imhoff" pits were already in the area, serving the administrative and operational buildings and to date the Port Authority has not yet transmitted the required authorisations, despite the various reminders. To these the following two add up, of which evidence of the authoritative situation is provided.

Table 30: SECH discharges authorisation

	LOCATION	GENOA'S MUNICIPALITY AUTHORISATION	LAST RENEWAL
SECH	Inspections area	Prot. 530/ID del 3/10/2011	Prot. 109422/ID del 3/10/2019
	Workers lockroom	Prot. 875/ID del 16/11/2015	Prot. 13123/ID del 16/11/2019

All the pits are periodically inspected and the waste is disposed of at least once a year as CER 200304 waste, shown in the table in the waste section of this report (paragraph 5.1.3).

The washing system consists of an underground collection tank, which conveys the washing water to a first oil-removal tank. Through successive passages in other tanks, the material is increasingly purified, separating the solid components and neutralising the polluting substances. At the end of the purification cycle, the purified water is introduced into the circuit that feeds the vehicle washing system. The sludge deriving from water purification is automatically pumped into a special separate tank for the transfer as well as the purpose of their subsequent disposal. The area affected by the washing operations is subject to cleaning by specialised personnel from an external company. Maintenance and control over the operation of the plant are entrusted with a regular contract to a specialised company, which carries out the assessments monthly.

10. https://en.wikipedia.org/wiki/Imhoff_tank

Through note prot. 55541/2011 the province of Genoa - Environment Department, Water Office - expressed a technical opinion on the documentation presented by the terminal, communicating the exclusion from the field of application of the Regional Regulation 4/2009, thus eliminating SECH's activity from the regulatory discipline of run-off waters. SECH treats the spills and the leakages of the containers, preventing the outflow of wastewater into the receptor bodies, through the use of collection tanks and or the intervention of specialised companies to confine the area, apply absorbent substances and dispose of the waste product, in compliance with the current legislation.

5.1.2.2 TDT WATER DISCHARGE



The water discharges originating from the activities carried out inside TDT terminal are both domestic (toilets) and industrial (vehicle washing).

The wastewater, previously treated within the five purification plants, is released into the sea (surface water), except in one case, with the introduction into the soil.

In 2015 all the authorisations were included in the Single Environmental Authorisation (AUA) with a fortnightly expiry. The company is required to ensure the correct operation of the plants and, in order to communicate any changes and to this end, enters into a contract every year for the maintenance of the treatment plants and waste analysis, every four months, as well as for interventions in the event of malfunctions and extraordinary assessments.

Possible malfunctions and deviations from the quality objectives have been managed with extraordinary maintenance, outdoor emptying, washing and adjustments.

Roof (AMD) and yards' (AMPP) run-off waters are currently not collected, as the activities carried out by TDT are not included among those required by law. Spills and pouring of liquids to the ground are managed and quoted on time, in order not to allow their outflow to the sea, through the use of mobile containment tanks and/or the intervention of specialised companies to confine the area, apply the absorbent substance and dispose of the waste produced, in compliance with current legislation.

Table 31: TDT total water discharged by quality and destination

WATER DISCHARGE		U.M.	2017	2018	2019
TDT		[cm]			
	Water discharge into sea		13.053	10.706	11.404
	Water discharge into ground		290	277	118
	Total water discharges	[cm]	13.343	10.983	11.522

5.1.3 Waste production

All activities related to waste management and regulatory compliance (mandatory and voluntary) are regulated within specific procedures within both SECH and TDT management systems.

Outside of the waste listed in the below paragraphs, neither SECH nor TDT treat or transport, import, export hazardous waste. The internal staff was informed of the correct management, for the purpose of transferring them to the internal and road bins, both through periodic information and through training courses on the management system.

5.1.3.1 SECH WASTE PRODUCTION



The waste produced by SECH is generated mainly by the maintenance activity of the rolling stock and cranes, which is carried out by direct personnel (e.g. oils, batteries, spare parts, consumables), but also by office activities. Waste-handling personnel were addressees of specific courses.

The terminal avails itself of qualified suppliers for collection and recovery operations (R13 for putting waste into a reserve before subjecting them to one of the other recovery operations, R9 for regeneration or other reuse of oils), and disposal of the same (D1 “deposit on or in the ground”, for example landfill, and D15 “preliminary deposit before one of the disposal operations”), depending on the type of waste.

As shown in the table below, in 2019 the total waste produced grew by around 30% compared to the previous year, while there was an increase of 21% on the overall total of waste sent for recovery, to the detriment of those sent to disposal operations. Rapidly analysing the individual items, the growth is attributable to the significant production of end-of-life tyres, due to the disposal of the tyres of two RTGs, sold since they were not used. The same applies to CER 160120 (glass for end-of-life vehicles) and to CER 170405 and 170407 (metals), always coming from RTGs demolition. The other unusual data is related to the production of paper and cardboard, due to the disposal of a company archive carried out in the summer. On the other hand, the production of waste containing oil and the associated absorbent material is in line with the previous years, as spills at yard in 2019 were equal in number compared to 2018 (see paragraph 5.4.1).

Such quantities are added together with the percentages of urban waste that are collected inside the terminal in special bins and gathered by the assigned municipal company.

Specifically we refer to:

- Unsorted waste sent for disposal;
- paper and plastic packaging, sent for recovery.

The terminal is not required to keep accounts of these types of waste, therefore no quantitative data is available, in any case we can quantify a reduction of about 120,000 plastic bottles per year thanks to their elimination from supplies and positioning of fixed drinking water dispensers inside the offices.



SECH

Table 32: Total weight of waste produced at SECH broken down by type

CER CODE ¹¹	DESCRIPTION	2017 (Kg)	2018 (Kg)	2019 (Kg)	RECOVERY	DISPOSAL
010101	Metal ore mining waste	0	0	0		X
060102*	Hydrochloric acid	0	0	0		X
080111*	Waste paints and varnishes containing organic solvents or other dangerous substances	800	0	0	X	
080318	Out of print toners, other than those mentioned in 080317	0	55	35	X	
120112*	Waxes and exhausted fats	0	160	0		X
130110*	Mineral oils for non-chlorinated hydraulic circuits	6.080	4.650	8.300	X	
130205*	Waste mineral oil for engines, gears and lubrication, non-chlorinated	4.500	3.500	7.920	X	
130310*	Other insulating and thermo-conducting oils	0	0	2.610	X	
130701*	Fuel oil and diesel fuel	1.550	0	0	X	
130802*	Other emulsions	0	0	0		X
150101	Paper and cardboard	0	0	4.320	X	
150103	Wooden packaging	1.760	0	6.280	X	
150106	Mixed material packaging	0	0	0		X
150106	Mixed material packaging	0	0	0	X	
150110*	Packaging containing residues of dangerous substances or contaminated by these substances	630	787	273	X	
150111*	Gases in pressure containers (including halons) containing dangerous substances	50	20	93	X	
150202*	Absorbents, filter materials, rags and protective clothing, contaminated with dangerous substances	390	3.374	2.114	X	
150202*	Absorbents, filter materials, rags and protective clothing, contaminated with dangerous substances	0	0	0		X
150203	Absorbents, filter materials, rags and protective clothing, other than those mentioned in 150202	192	168	147	X	
150203	Absorbents, filter materials, rags and protective clothing, other than those mentioned in 150202	0	0	0		X
160103	End-of-life tyres	0	0	5.240	X	
160107*	Oil filters	761	636	725	X	
160112	Brake pads other than those mentioned in 160111	0	0	0		X
160114*	Anti-freeze liquids containing dangerous substances	0	0	0		X

11. * stands for hazardous cargo.

CER CODE ¹¹	DESCRIPTION	2017 (Kg)	2018 (Kg)	2019 (Kg)	RECOVERY	DISPOSAL
160120	Glass from end-of-life vehicles	0	0	460		
160121*	Hazardous components other than those mentioned in items 160107 to 160111, 160113 and 160114	480	360	280	X	
160213*	Out-of-use equipment, containing dangerous components other than those referred to in items 160209 and 160212	160	30	46	X	
160214	Equipment out of use, other than those referred to in items 160209 to 160213	2.990	652	1.260	X	
160305*	Organic waste containing dangerous substances	0	0	2.200		X
160306	Organic waste other than those mentioned in 160305	0	140	0		X
160504*	Gases in pressure containers (including halons) containing dangerous substances	Nuovo CER: 150111*	0	0	X	
160601*	Lead-acid batteries	1.872	2.580	2.340	X	
160604	Lead-acid batteries	0	0	0	X	
160708*	Waste containing oil	0	5.120	5.200	X	
160708*	Waste containing oil	8.020	19.980	0		X
161002	Aqueous liquid waste, other than those mentioned in 161001	22.720	7.210	2.800		X
161003*	Aqueous concentrates containing dangerous substances	0	0	1.720		X
170107	Mixtures of cement, bricks, tiles other than those mentioned in 170106	0	0	140	X	
170202	Glass in plates	1.360	420	0	X	
170405	Iron and steel	10.360	32.630	47.890	X	
170407	Mixed metals	0	0	1.280	X	
170411	Cables other than those mentioned in 170410	1.450	2.632	2.510	X	
200101	Paper and cardboard	0	0	6.910	X	
200121*	Fluorescent tubes and other wastes containing mercury	63	0	34	X	
200123*	Discarded equipment containing CFCs	0	0	70	X	
200138	Wood, other than that mentioned in 200137	0	1.000	3.180	X	
200303	Street cleaning residues	4.100	0	0		X
200304	Sewage from septic tanks	8.220	15.940	20.680		X
200306	Products from the cleaning of waste water	1.120	0	0		X
200307	Bulky waste	4.340	2.700	2.160	X	
TOTAL		83.968	104.744	139.217		

Table 33: Total weight of waste produced at SECH broken down by disposal method

	U.M.	2017	2018	2019
Waste sent to recovery (R)	Kg %	39.788 (47,38%)	61.314 (58,54%)	111.817 (80,32%)
Waste sent to disposal (D)	Kg %	44.180 (52,62%)	43.430 (41,46%)	27.400 (19,68%)
TOTAL	Kg	83.968	104.744	139.217

5.1.3.2. TDT WASTE MANAGEMENT



The types of waste produced at TDT are attributable to the following activities:

- Cleaning of the yard (carried out by an external company);
- general cargo activities: plastic packaging, wood, cardboard, ferrous metals, etc.;
- technical maintenance: electrical equipment, aggregates, metals, lamps, condensers, transformers;
- office activities: urban-type waste, paper, batteries, WEEE¹², used toners;
- emergency management: absorbent material used for spills, material spilled from containers, material for fire management;
- housekeeping¹³: activity: Paints, neon lights, aggregates, sewage and drainage systems;
- disused goods: electrical and electronic equipment, fire extinguishers, proprietary printers, etc.;
- any abandonment (of scattered waste, of external waste improperly delivered in TDT containers);
- contract work:
 - » miscellaneous maintenance (purifiers, purges, others for which the person performing the activity is not a producer);
 - » cleaning the yard: mixed packaging and wood.

The different types and quantities of waste produced in the terminal are reported in the MUD¹⁴.

Any other types not attributable to TDT activities may occasionally be found at yard during the monitoring activities and may be traced back to:

- Abandoned waste connected to container transport;
- waste not attributable to internal activities or internal suppliers;

12. Waste Electrical and Electronic Equipment.

13. Approach aimed at keeping the workplace in order.

14. Single declaration form.

- waste from demolition/disposal of containers damaged or seized by the Customs along with its contents.

The waste produced by the contracted activities are not included in the waste produced by TDT, except when abandoned, or as a result of agreements; otherwise they remain property of the manufacturer.

- For suppliers/contractors waste, since these are indirect aspects, indirect control is envisaged through the inclusion in the contracts of environmental clauses, whose compliance is verified with periodic audits and on-the-field inspections;
- abandoned waste is collected and disposed of by TDT or internal service providers already producing that type of waste (e.g. tyre maintenance, vehicle maintenance);
- container waste damaged or seized by the Customs is not managed by TDT, which may however be a holder and in this case requires the suppliers to have the necessary authorisations and record the waste on its own loading/unloading register;
- waste from plant and vehicle maintenance activities is mostly borne by the subject performing the activity, as indicated in the contracts or agreements.

Below is the annual production of waste divided by destination and hazard.



Table 34: Total weight of waste produced at TDT broken down by type

CER CODE	WASTE DESCRIPTION/TYPOLOGY	H/ NH ¹⁴	2017	2018	2019	RECOVERY	DISPOSAL
070213	Plastic waste	NH		180		X	
070611*	Sludges from on-site effluent treatment containing dangerous substances	H			4.000		X
070612	Remaining sludge from on-site effluent treatment	NH	7.040	10.080			X
080111*	Paints and discarded paints	H			20		X
130208*	Other engine oils, gears and lubrication	H			2.080	X	
130310*	Other insulating oils and heat transfer oils	H		1.600		X	
150103	Wooden packaging	NH	8.780	12.180	24.880	X	X
150106	Mixed packaging	NH	31.870	28.580		X	X
150106	Mixed packaging (housekeeping)	NH	17.940	520	8.990		X
150110	Packaging containing residues of dangerous substances or contaminated by these substances	NH	340				X
150202*	Absorbents, filter materials, rags and protective clothing, contaminated with dangerous substances	H	1.240	1.705	2.115		X
150203	Absorbents, filter materials, rags and protective clothing, other than those mentioned in 150202	NH	758				X
160130	End-of-life tyres	NH			1.320	X	
160120	Glass	NH			1.000	X	
160211*	discarded equipment containing chlorofluorocarbons, HCFCs, HFCs	H			140		X
160213*	Equipment out of use containing dangerous components other than 160209	H	51	423	287	X	
160214	Equipment out of use other than those referred to in items 160209 -160213 (transformers)	NH	527	564	498	X	
160216	Components removed from the different end-of-life equipment mentioned in item 160215	NH	90	4.260	70	X	
160305*	Organic waste containing dangerous substances	H	680				X
160601*	Lead-acid batteries	H	7	40	101	X	
160602*	Nickel cadmium batteries	H			10	X	
160604	Alkaline batteries	NH	14			X	
160605	Other batteries and accumulators	NH		22	28	X	
170101	Concrete	NH			1.820	X	
170203	Plastic	NH	115		2.670	X	
170405	Iron and steel	NH	5.250	9.970	6.770	X	
200301	Unsorted municipal waste	NH			11.380		X
200303	Street cleaning residues	NH	71.560	62.170	83.240		X
200304	Sludge from septic tanks	NH	8.700	10.880	31.280		X
200306	Waste from the cleaning of sewers	NH	3.400				X
	TOTAL		158.362	143.174	182.699		
	TOTAL H	H	1.978	3.768	8.753		
	TOTAL NH	NH	156.384	139.406	173.946		

Table 35: Total weight of waste produced at TDT broken down by disposal method

DESTINATION	U.M.	2017	2018	2019
Sent to recovery (R)	Kg	13.814	108.149	105.229
Sent to disposal (D)	Kg	144.548	35.025	75.490
TOTAL	Kg	158.362	143.174	182.699
% WASTE SENT TO RECOVERY	%	9%	76%	58%

5.1.4 Discharges to the ground

The aspects of the business activities of SECH and TDT which may have an impact on the ground and subsoil are mainly related to:

- Possible oil/gas spills from tanks of vehicles or their components;
- leaking containers;
- spills of diesel fuel in the phase of fuelling from the tank (only for TDT);
- spills of additive for reachstackers (only for SECH);
- leakage of acidic liquids from batteries;
- spills of liquid waste stored on the waste separation area (only for SECH).

The management of these events is defined by instructions and system procedures and is aimed at avoiding contamination of the environmental matrices (soil and water). The spill and pouring source is signalled and segregated in various ways. Immediately a non-conformity and a remediation treatment is opened.

The operations staff is trained on the management of such aspects, both with training sessions and on the occasion of timely management of events and/or resolution of non-conformities.

Monitoring takes place through field inspections, management of spill and leakages reports and planned audits.

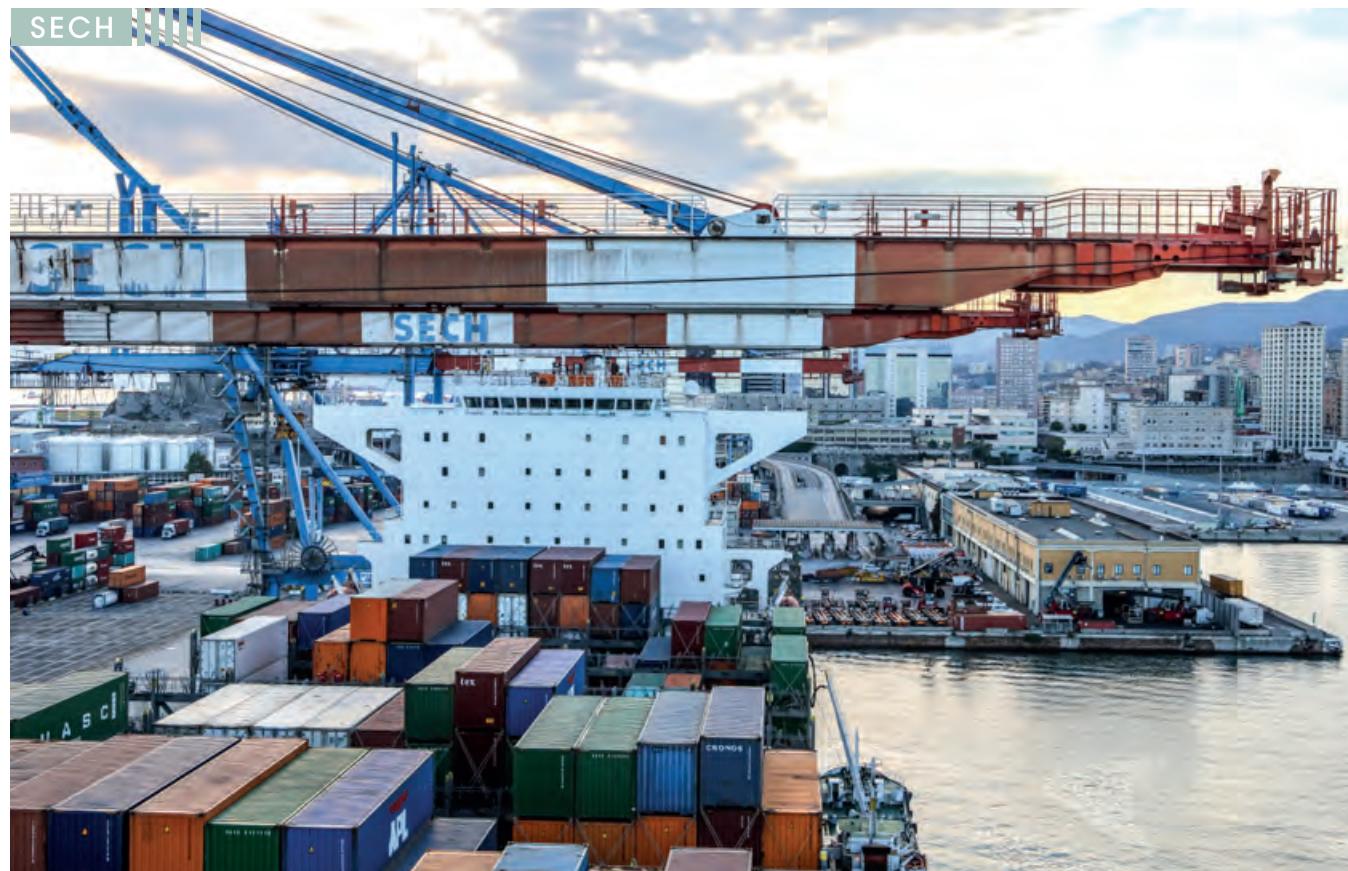
5.1.4.1 SPILLS



Table 36: Total number and volume of significant spills

YEAR	SECH			TDT		
	2017	2018	2019	2017	2018	2019
Number of spills (n)	7	13	10	33	23	22
Absorbent material (kg)	700	4.610	1.830	4.140	3.560	3240
Material and remediation costs (€)	1.329	5.566	6.069	5.122	4.668	4.166

Spills typically occur on tarred grounds, on which a special absorbent substance is applied, subsequently disposed of in compliance with the procedures and regulations in force. No pollution is therefore produced in the receptor bodies.



5.1.4.2 LEAKAGES



The leaking containers are immediately housed in containment tanks, which prevent the pouring of substances into the sensitive receptor bodies. At TDT, since 2010 management costs are charged to the owner of the goods, as often the causes are insufficient or incorrect packaging. This allowed a recovery of management costs and greater attention during the preparation of the load, with a significant reduction in the occurrence of such events, as shown in the table below. The starting incidence was 0.0148% against the current 0.0022%, going from about 20 cases per year to <10 today. Also at SECH the cost incurred for the management of any leaking containers is borne by the shipping company, without charges for the terminal. Obviously this does not apply in case of damaged containers during the handling phase, for which an internal cost is generated.

Table 37: Total number and volume of significant leakages

YEAR	SECH			TDT		
	2017	2018	2019	2017	2018	2019
UNITS	178.952	188.013	187.898	333.171	318.887	272.347
n. leaking containers	4	6	3	12	4	6
KPI ¹⁶ (incidence %)	0,0022	0,0032	0,0016	0,0036	0,0013	0,0022

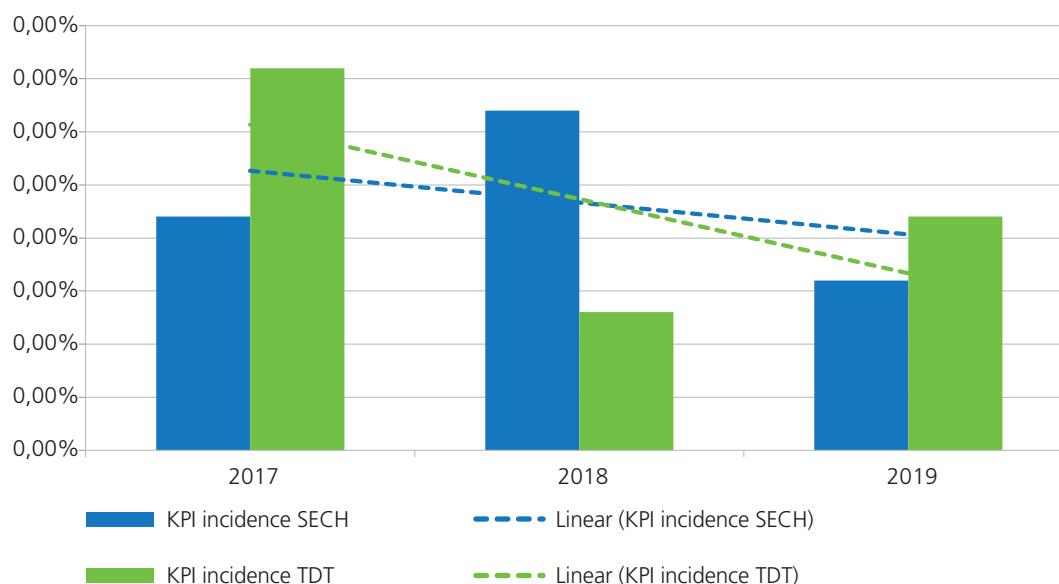


Chart 15: Leaking containers incidence

16. KPI: Key Performance Indicator

5.1.5 Noise emissions

5.1.5.1 SECH NOISE EMISSIONS



The acoustic emissions contribution of SECH activities is mainly due to the handling and storage operations of the containers, as well as the mechanical workshop. Loading and unloading activities are carried out both during the day and at night, while workshop activities take place mainly during the day. The municipality of Genoa classified the municipal territory according to the criteria set by art. 4, paragraph 1, letter a) of Law 26/10/1995, n. 447, and the same was approved by the province of Genoa on 21/11/2001. On the basis of the acoustic classification of the territory of the municipality of Genoa, the area concerned falls into class VI "zones belonging to transport infrastructures", with emission and input limits, provided for by the Ministerial Decree dated 14/11/1997, equal to 65 dB (A) for emissions and 70 dB (A) for inputs, both day and night. The neighbouring areas belong to Class V (Lanterna) and Class IV (ferry terminal). Since it is a port area, there are no residential receptors.

The auditing of daytime noise made by a specialised company during 2016 showed that the activity does not exceed the limit values set forth. Below are the location of the measurement points and the data collected.

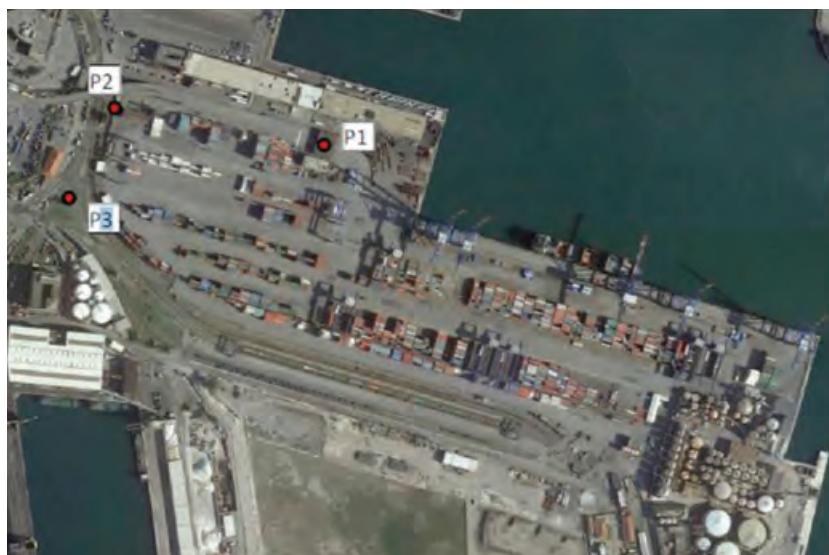
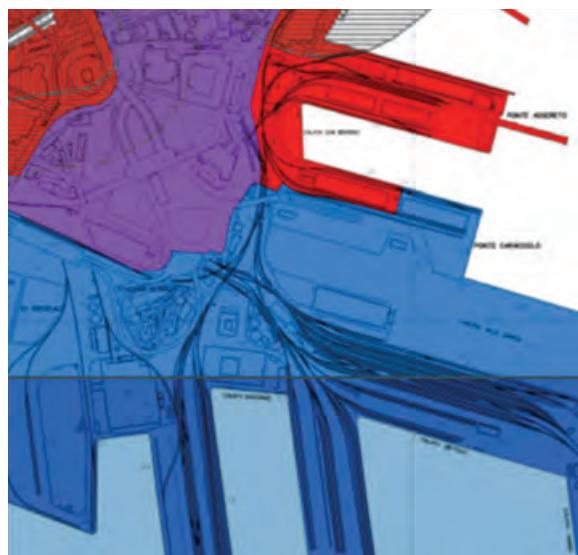


Table 38: SECH acoustic surveys

POINT	LOCATION	CLASS	START MEASUREMENT	DURATION OF MEASUREMENT	Leq,d	VL,d	Leq,n	VL,d
P1	Coverage of the operations office building	VI	28/06/2016 12:00	2 days	64,9	70	56,4	70
P2	Fence at the entrance ramp of the terminal at the emergency gate	VI	28/06/2016 14:00	2 days	61,5	70	54,4	70
P3	West side railway area	VI	28/06/2016	30 mins	59,0	70	-	70

The measured sound pressure levels, relevant to both day and night periods, are lower than Class VI limits. Since these are measurement stations which are located not far from the borders, respectively with Class IV (P1) and Class V (P2, P3), it is important to underline that the limits of the two lower classes are also respected. The verification will be repeated in 2020 in compliance with the four-year periodicity, on the occasion of safety measures relating to the exposure of workers to noise.



5.1.5.2 TDT NOISE EMISSIONS

Terminal Darsena Toscana site is located within the area of competence of the industrial port, classified in the acoustic zoning plan of the territory, drawn up by the municipality of Leghorn on the basis of Law 447/95 and L.R. 89/98, as "Class VI - exclusively industrial areas". In fact, there are no sensitive and/or vulnerable settlements in the immediate vicinity of TDT. Nearby are only and exclusively other industrial facilities, related to the typical activities of the port sector. The closest sensitive receptors are located several hundred metres from the settlement area and all see the interposition of other activities that are always part of the port area. All the neighbouring areas are classified as Class V or Class VI. Consequently, referring to the table and following map, the limits to be respected at the receptors are the following:

Table 39: Values of the maximum limits of the equivalent acoustic level (Leq A) relating to the classes of the reference territory

MINISTERIAL DECREE 15/11/97		REFERENCE TIMES	
CLASSES OF THE REFERENCE TERRITORY		DAY	NIGHT
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 Predominantly 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 according to the provisions of law 447/95, in relation to the acoustic classification of the territory. The last assessment carried out by the Port Authority in the whole state area was in 2018, while it was carried out by the terminal in 2019, having passed 10 years from the previous one, and some sound sources having changed: the investigation did not anyway detect values of emissions and acoustic differential (in classes where applicable) beyond the limit levels.

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



5.1.6 Emissions in the atmosphere

5.1.6.1 DIFFUSE EMISSIONS



The entire area of the terminals is affected by the presence of diffuse emissions, mainly attributable to:

- Exhaust gas emissions from handling equipment;
- methane, sulphates and other emissions from purification plants (only for TDT).

To such emissions the following ones add up from neighbouring activities upstream and downstream of the process (treated in the indirect aspects section, paragraph 5.2), like:

- Exhaust gas emissions from vessels, trucks and trains in transit;
- diffuse dust emissions from the filling operations of the reclaiming tank with dredging sludge (TDT only).

CO_2 emissions related to diffuse direct and indirect emissions due to diesel and electricity consumption are quantified and reported in paragraph 5.1.6.1 "Diffuse emissions" (air pollutant).

Emissions related to diffuse direct and indirect emissions due to the consumption of diesel and electricity can be quantified in terms of emission of tons of CO_2 equivalent and greenhouse gases.

The production of these substances depends, in addition to the type of diesel used, on the conditions of use and the technologies used (especially with reference to NM-VOC, CO, PM)¹⁷; it is therefore recalled how the reported values are useful at an indicative level to evaluate the trend over time, in order to have an indication on the polluting potential of the equipment, even if they may differ significantly from the real emissions into the atmosphere. The plurality of equipment types and conditions of use does not currently allow a more accurate estimate for the purposes of the report.

The terminals intervened (where possible for budgets, types of vehicles available on the market and fuel available on site) by replacing the older vehicles with new vehicles (cranes and reachstackers for TDT, reachstackers for SECH), designed to reduce NO_x nitrogen emissions at the exhaust, through the Selective Catalytic Reduction (SCR) system, which works by adding urea to the exhaust gases.

Below are some tables showing the quantification of pollutant emissions deriving from the combustion of diesel engines of yard equipment. The calculation of the emissions was estimated using standard emission factors reported in "EMEP / EEA - Emission Inventory Guidebook 2013" published by the EEA¹⁸.

17. NM-VOC: non-methane volatile organic compounds; CO: carbon monoxide; PM: particulate matter.
 18. European Environment Agency: "Non-road mobile sources and machinery", GB, 2013.

Table 40: EEA 2013 emission factors

EEA 2013 EMISSION FACTORS ¹⁹	NO _x	NM-VOC	CH ₄	CO	NH ₃	N ₂ O	PM
2013 (g/kg)	32,792	3,385	0,055	10,72	0,008	0,135	6,258

Table 41: NOx, SOx and other significant atmospheric emissions from diesel combustion

	SECH			TDT		
	2017 (t)	2018 (t)	2019 (t)	2017 (t)	2018 (t)	2019 (t)
NO _x	18,43	21,41	23,46	31,79	31,12	31,04
NM-VOC	1,9	2,21	2,42	3,28	3,21	3,20
CH ₄	0,03	0,04	0,04	0,05	0,05	0,05
CO	6,02	7	7,67	10,39	10,17	10,15
NH ₃	0	0,01	0,01	0,01	0,01	0,01
N ₂ O	0,08	0,09	0,10	0,13	0,13	0,13
PM	3,52	4,09	4,48	6,07	5,94	5,92

Neither SECH nor TDT use substances qualified as ODS in the provision of their services.

Table 42: GHG emissions (Scope 1) from diesel

SITE	GHG EMISSIONS	U.M.	2017	2018	2019
SECH	From natural gas	[tCO ₂ eq] ²⁰	50	70	91
SECH	From diesel	[tCO ₂ eq]	1.790	2.080	2.279
TDT	From diesel	[tCO ₂ eq]	4.206	4.074	4.026

Table 43: Indirect GHG emissions (Scope 2)

SITE	GHG EMISSIONS	U.M.	2017	2018	2019
SECH	From electricity	[tCO ₂ eq]	1.563	1.583	1.675
TDT	From electricity	[tCO ₂ eq]	2.585	2.565	1.909

19. NO_x: Ozone; NM-VOC: non-methane volatile organic compounds; CH₄: natural gas; CO: carbon monoxide; NH₃: ammonia; N₂O: dinitrogen monoxide; PM: particulate matter.

20. Tons of CO₂equivalent.

Table 44: GHG emissions (scope 1 + 2)²¹

SITE	GHG EMISSIONS	U.M.	2017	2018	2019
SECH	Total GHG emissions (diesel+electricity+natural gas)	[tCO ₂ eq]	3.403	3.733	4.045
TDT	Total GHG emissions (diesel+electricity)	[tCO ₂ eq]	5.674	5.589	4.924

(TDT: shuttle transport carried out by an external company included)

Indirect emissions linked to the various vehicles entering and leaving the terminals are not quantified due to unavailability of data. However, the available traffic data are reported:

Table 45: Traffic flows to/from the terminals

	SITE	2017	2018	2019
Vessels	SECH	214	280	268
	TDT	749	669	601
Trucks	SECH	140.593	139.678	145.163
	TDT	178.949	177.944	163.620
Trains	SECH	423	604	733
	TDT	1.267	1.124	469

Table 46: GHG/TEU emissions intensity²²

SITE	GHG/TEU EMISSIONS INTENSITY	U.M.	2017	2018	2019
SECH	Intensity (Scope 1) SECH diesel+natural gas	[tCO ₂ eq /TEU]	0,0059	0,0067	0,0073
	Intensity (Scope 2) SECH electricity	[tCO ₂ eq /TEU]	0,0050	0,0049	0,0052
	Total intensity	[tCO ₂ eq /TEU]	0,0109	0,0116	0,0125
	<i>Denominator [tot. TEU]</i>	[TEU]	312.689	321.932	322.517
TDT	Intensity (Scope 1) TDT diesel	[tCO ₂ eq /TEU]	0,0082	0,0081	0,0072
	Intensity (Scope 2) TDT electricity	[tCO ₂ eq /TEU]	0,0050	0,0051	0,0034
	Total intensity	[tCO ₂ eq /TEU]	0,0132	0,0132	0,0106
	<i>Denominator [tot. TEU]</i>	[TEU]	515.792	502.108	560.339

21. CO₂eq emissions from air conditioning gas refills are not included and equal to: R134A = kg 2.5; R410A = Kg 2.5; R404A = Kg 4. For a total of 24.483 tons of CO₂eq emitted (2.5 * 1430 + 2.5 * 2088 + 4 * 3922) / 1000).

22.TDT: shuttle bus included.



SECH |||||

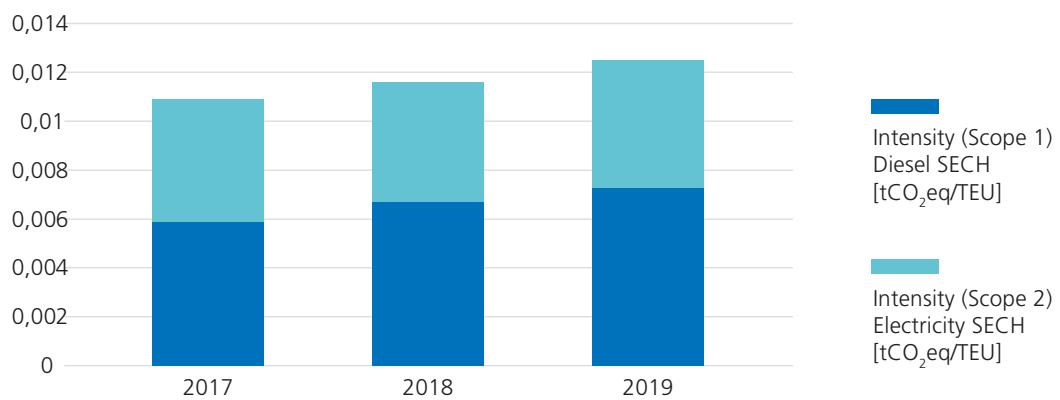


Chart 16: emission intensity GHG TDT



Chart 17: emission intensity GHG/TEU SECH

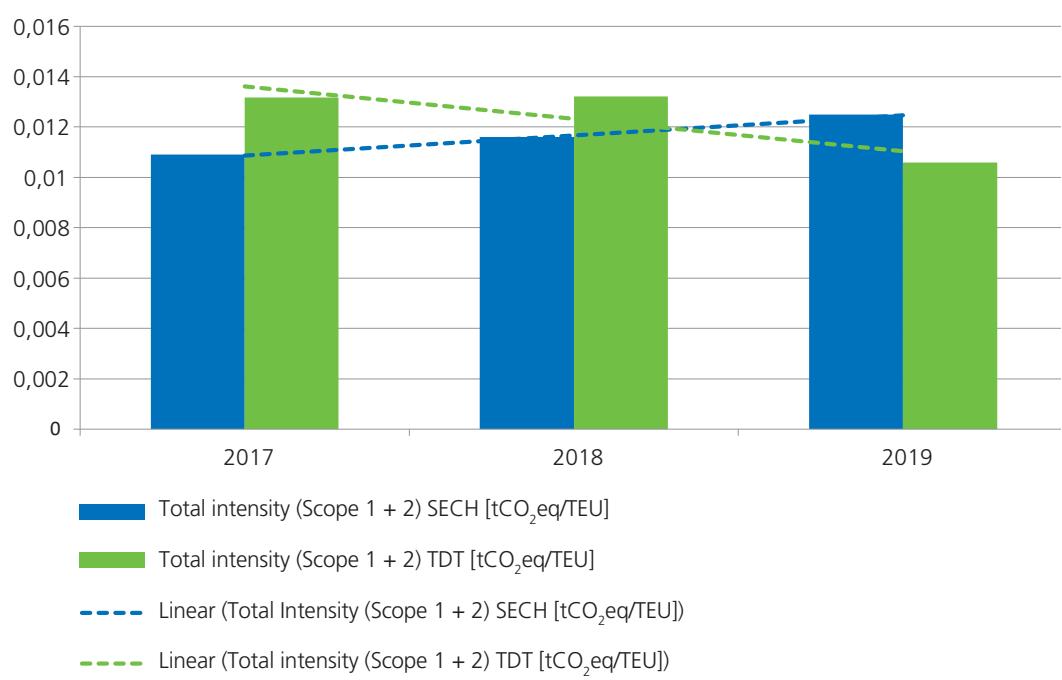
Chart 18: total emission intensity (tCO₂eq/TEU)

Table 47: emission intensity GHG/unit

SITE	EMISSION INTENSITY GHG/UNIT	U.M.	2017	2018	2019
SECH	Intensity (Scope 1) SECH diesel+natural gas	[tCO ₂ eq/unit]	0,0103	0,0114	0,0126
	Intensity (Scope 2) SECH electricity	[tCO ₂ eq/unit]	0,0087	0,0084	0,0089
	Total intensity	[tCO ₂ eq/unit]	0,0190	0,0198	0,0215
	Denominator [tot. unit]	[unit]	178.952	188.013	187.898
TDT	Intensity (Scope 1) TDT diesel	[tCO ₂ eq/unit]	0,0126	0,0128	0,0115
	Intensity (Scope 2) TDT electricity	[tCO ₂ eq/unit]	0,0078	0,0080	0,0055
	Total intensity	[tCO ₂ eq/unit]	0,0204	0,0208	0,0170
	Denominator [tot. unit]	[unit]	333.171	318.887	349.275

For both terminals all energy performance indicators are affected by the number of temperature controlled containers stored, whose units are kept at certain temperatures by means of electrical columns, partly connected to the electricity network (plus rented diesel generators added for this purpose). In the three-year period 2017-2019, the plugging registered significant variations, with a consumption that depends on the energy efficiency of the reefer, on the quantities and on the dwell times and therefore hides the reductions obtained with the energy saving measures adopted.

Table 48: Reefer units

REEFER UNITS	2017	2018	2019
SECH	8.165	9.341	14.834
TDT	98.14	102.065	80.466

For TDT, emission intensity has decreased over time thanks to the energy efficiency actions listed in paragraph 5.3 "Impacts reduction". Any non-reduction values are due to logistical/operational aspects. The consequent GHG emissions are therefore also decreased, both in absolute and normalised terms. Please note that emissions from electricity are calculated with the ISPRA database for GHG factors and the composition of the national energy mix, equal to 43% of renewable energy in 2019, even if TDT electricity is 100% from renewable sources. Therefore emissions and emission intensities would be close to zero.

Table 49: Greenhouse gas (GHG) emissions reduction

SITE	CO ₂ EMISSIONS	U.M.	2017	2018	2019
SECH	CO ₂ tot	[tonn CO ₂ eq]	3.403	3.733	4.045
	Δ CO ₂	[tonn CO ₂ eq] assolute	+375	+330	+312
		[%]	+8,79%	+9,70%	+8,36%
TDT	Emissioni CO ₂ tot	[tonn CO ₂ eq]	6.791	6.640	5.935
	CO ₂ avoided (electricity from FER) ²³	[tonn CO ₂ eq]	-5.511	-5.808	-4.487
	Δ CO ₂	[tonn CO ₂ eq] assolute	33	298	-1.322
		[tonn CO ₂ eq] normalizzate sui TEU	-1.549	29	-1.475
		[%]	-18,58%	0,43%	-19,90%

The reduction in total emissions is also due in TDT to energy efficiency actions. The fact that electricity is 100% from renewable sources and not only 43% is not quantified.

Both terminals also conducted an environmental survey aimed at portraying the air quality in terms of concentration of dust, volatile organic compounds and combustion fumes, conducted during normal terminal activities, in order to evaluate worker exposure to the various chemical compounds deriving from the emissions produced by the combustion exhausts of the terminal operating vehicles, from the degradation of the road surface and tire consumption, from the fumes coming from the vessels at berth and from the filling tanks.

Below is the list of agents considered:

- Carbon monoxide (CO);
- particulate (PM₁₀);
- breathable dust;
- nitrogen dioxide (NO₂);
- sulfur dioxide (SO₂).

The deviation from the TLV (Threshold Limit Value²⁴) of the various substances being evaluated was assessed and, as regards the gases, the verification to show how many times the value equal to one tenth of the TLV was exceeded during sampling was carried out. For the dusts the results obtained were compared with the reference values (the TLV as regards breathable dusts and the limits referred to urban areas as per Ministerial Decree dated 25/11/1994 concerning PM₁₀). The following table summarises the reference values on which the assessments were based:

23. Considered in the total amount.

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

Table 50: Reference value

SUBSTANCE	TLV-TWA ²⁵	1/10 OF TLV-TWA
Carbon monoxide	25 ppm	2.5 ppm
Sulfur dioxide	2 ppm	0.2 ppm
Nitrogen dioxide	3 ppm	0.3 ppm
Breathable dusts	3 mg/m ³	0.3 mg/m ³
PM ₁₀ ²⁶	40 µg/m ³	-

At SECH, the analysis was conducted during 2017: seven sensitive areas were identified, where the measuring instruments were positioned and maintained. The survey revealed concentration values below the limits taken as a reference for all the parameters observed.

As for TDT, the analysis was carried out in 2008-2010 (11 sensitive areas) and repeated in 2013 (3 sensitive areas), following to the dredging activities of some areas of the port, the consequent creation of the second reclamation tank and the related transport of sludge to the aforementioned tank. In 2019, the risk assessment review began, the results of which will be published in 2020.

5.1.6.2 CONVEYED EMISSIONS



The conveyed emissions inside the terminals are represented by:

- Hot water heater emissions;
- emissions from welding activities (from mechanical maintenance activities at SECH - internal - and at TDT - contracted), regulated by the provisions of art. 272 Legislative Decree 152/2006 and Regional Deliberation 1260/2010 (SECH only);
- emissions from mechanical metalworking and/or surface treatments and/or other metalworking (from mechanical maintenance activities at SECH - internal - and at TDT - contracted), regulated by the provisions of art. 272 Legislative Decree 152/2006 and Regional Deliberation 1260/2010 (SECH only).

Conveyed emissions are due to thermal plants. Emissions in abnormal or emergency conditions of the air conditioning systems add also up to these ones.

The thermal power plants, both at SECH and at TDT, are used for the heating of sanitary water in the changing rooms²⁷, whereas the heating of the offices is guaranteed by a system of heat pumps, used in air conditioning mode in the summer season. This solution significantly reduces the consumption of traditional fuels (diesel or natural gas), as well as emissions, however it must be kept under control due to the presence

25. Threshold limit value.

26. There is no TLV for PM₁₀. For this reason, the limit referred to urban areas as per Ministerial Decree, dated 25/11/1994, was taken as reference.

27. At SECH the thermal power plant is also functional for the heating of the same and of the two offices of the maintenance department.

of ozone-depleting substances (ODS)²⁸. At SECH, the power supply for the heating plant used for the heating of sanitary water for the changing rooms is natural gas, whereas in TDT is diesel.

Pursuant to Presidential Decree 74/2013, all systems are equipped with "system booklets", both for thermal power plants and air conditioners. Energy efficiency reports are made at each thermal season, or every two, depending on the periodicity imposed by the legislation.

EC Regulation 2037/2000 (implemented in Italy by Presidential Decree 147 of 2006) banned, since 2012, the placing on the market and the filling in case of losses of R22 gas. The subsequent Regulation (EC) 517/2014 on fluorinated greenhouse gases aims to further reduce the emissions of these gases through a variety of measures: rules relating to the containment, use, recovery and destruction of fluorinated greenhouse gases, conditions regarding the placing on the market of certain types of products or devices that contain or are based on fluorinated greenhouse gases (prohibitions), specific uses of these gases (prohibition of maintenance together with some gases), quantitative limits of placement on the HFC²⁹ market (elimination).

Consequently, at TDT, starting from 2008, a programme to replace machines filled with R22 (completed in 2012) was started with machines with R410-410° gas, while from 2019 machines with gas with a lower impact will be purchased, such as envisaged by the Kindall protocol amending the Kyoto protocol. As for SECH, eight R22-refrigerant gas-carrying machines continue to be operational, which will be progressively replaced without maintenance/filling, as permitted by legislation. For these appliances, whose quantity of gas does not fall within the dictates of Presidential Decree 43/2012, the system booklet is maintained, pursuant to the previous Presidential Decree 147/2006, in order to ascertain the absence of losses. In 2019, a unit located at the EDP room of the administrative building was removed, so the total number of R22 gas-carrying equipment dropped to seven.

Starting from January 24th, 2019, the Presidential Decree n. 146/2018, implementing the EU regulation no. 517/2014 on fluorinated greenhouse gases, repeals and replaces the Presidential Decree n. 43/2012. This entails the termination of the obligation relating to the communication to ISPRA, by May 31st of each year, of information regarding the quantities of emissions of fluorinated gases into the atmosphere (the so-called "F-Gas declaration"). To replace this requirement, a data bank was set up (article 16 of Presidential Decree no.146/2018) on the collection and storage of information relating to leakage control activities, as well as installation, assistance, maintenance, repair, dismantling of equipment containing fluorinated greenhouse gases. Starting from September 24th, 2019, following the first useful intervention for leak control, maintenance, assistance, repair and/or dismantling of the equipment already installed on the date of entry into force of the Presidential Decree n. 146/2018, the terminals, through their suppliers, have communicated electronically to the new database the mandatory information required by the new regulations.

It should be noted that, unlike the previous legislation, all the machines carrying gas are involved, and not only those that exceed 3kg or 5Tons of CO₂.

The following table shows a detail of the situation at SECH and TDT as of 31/12/2019, also containing data on the tons of CO₂.

Below is the list of machines in the two terminals, including those installed on lifting equipment.

28. Ozone-Depleting Substances, mainly of chlorofluorocarbons (CFCs) responsible for ozone layer thinning.

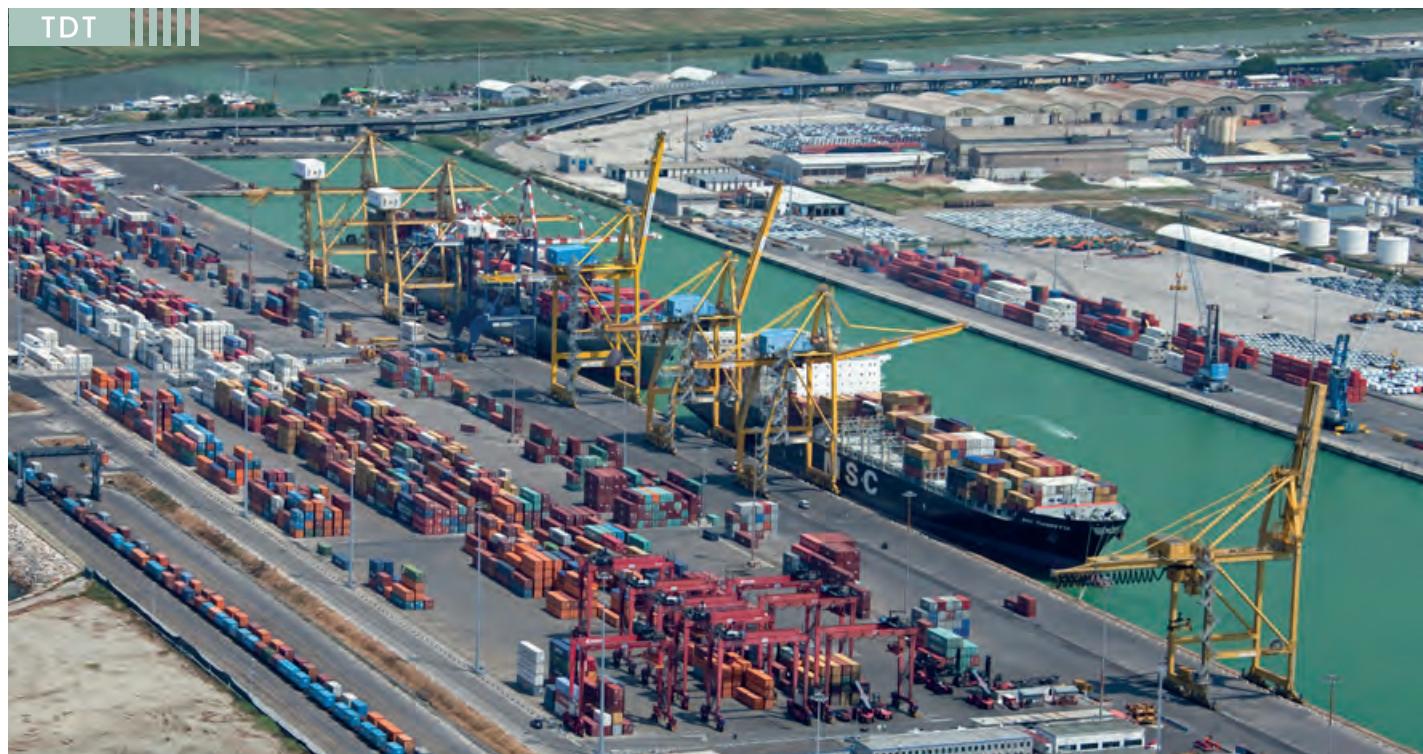
29. HFC: Coolant fluid.

Table 51: SECH AC machines situation

YEAR	TOTAL UNITS	TOTAL KGS OF CONTAINED GAS	TCO ₂ EQUIVALENT	AC MACHINES DISMANTLED AND REPLACED	ADDED AC MACHINES	AC MACHINES ELIMINATED AND NOT REPLACED	GAS R22 DISPOSED (kg)	GAS R22 RESIDUAL (kg)
2017	171	187,495	354,395	9	3	0	0	7,64
2018	180	204,905	386,522	11	9	0	0	7,64
2019	181	212,865	402,711	9	1	0	1,15	6,49

Table 52: TDT AC machines situation

YEAR	TOTAL UNITS	TOTAL KGS OF CONTAINED GAS	TCO ₂ EQUIVALENT	AC MACHINES DISMANTLED AND REPLACED	ADDED AC MACHINES	AC MACHINES ELIMINATED AND NOT REPLACED	GAS R22 DISPOSED (kg)	GAS R22 RESIDUAL (kg)
2017	202	194	403	21	3	0	0	0
2018	203	255	465	14	1	0	0	0
2019	208	273	489 ³⁰	19	0	0	0	0



30. The tons of CO₂eq indicated are not emitted, they are the accounting of the gases included. Emissions are only there in case of losses. In 2019 equal to: R134A = kg 2.5; R410A = Kg 2,5; R404A = Kg 4, for a total of 24.483 tons CO₂eq emitted ($2.5 * 1430 + 2.5 * 2088 + 4 * 3922 / 1000$), NOT included in scope 1 and 2 emissions.

5.1.7 Electromagnetic emissions



In both terminals the emissions of electromagnetic radiation are linked to the presence of electrical systems, transmitting antennas, servers and two-way radios for communication between people employed in the operations departments, when they are working at yard and between the internal planning and operations management offices.

At SECH a survey was conducted in July 2017 aimed at assessing electric field strengths and magnetic induction. The monitoring concerned the following sources: transformers, motors, equipment and control panels. The high-frequency electromagnetic field was also monitored, in order to highlight any contributions determined by the radio-communication system inside the terminal and any sources of external origin (radar and radio and tele-communication systems). A broadband field analyser equipped with three isotropic probes was used for this purpose, to make measurements both in low frequency ELF31 (1Hz – 400 kHz) and in high frequency RF 32 (100 kHz – 40 GHz).

The assessment results are as follows:

» SECH OUTCOMES

Measurements performed at SECH were made after identifying the points where the electric field and magnetic induction could have the highest values, i.e. close to the equipment and electrical panels. The measurement points were then selected based on the geometry of the spaces, the location of the sources and by a field level screening for the two components of the electromagnetic field. In total, 13 areas were identified (quay cranes, RMGs, data centre rooms, transformer cabin, workshop, quay, yard and gate) for a total of 46 measurement points, for some of which we also proceeded to measure RF field. The surveys in the workshop concerned, in particular, the sources consisting of tools for daily use (grinding wheel, miter saw, welding machine, etc.) and were carried out with the operator in activity and positioning the probe near the head and the trunk. The results of the analysis carried out testified the compliance with the current regulations. The values measured in low frequency (ELF) were always below the most precautionary threshold values, indicated as "General Public 1998" and those identified for the protection of workers and indicated as "2013/35/EU", for workshop equipment. As far as the high frequency sources (RF) are concerned, the values are often at the limit of the sensitivity of the instrument, or well below the regulatory limits.

31. ELF: Extremely Low Frequency.
32. RF: Radio Frequency.

As far as TDT is concerned, the last technical evaluation was carried out in 2017 and was addressed as exposure of workers to electromagnetic fields.

Here are the conclusions:

» TDT OUTCOMES

The measurements carried out at the company "TERMINAL DARSENA TOSCANA S.R.L." were carried out in all workplaces considered to be potentially exposed to magnetic and/or electromagnetic fields, by extension to the previous assessments.

Both the measurements of magnetic induction at mains frequency (50 Hz) and those of radio-frequency electromagnetic field (100 kHz - 3 GHz) have been carried out - as specified by the Standard - by placing the measuring instrument, unless otherwise specified, at a height of 1.5 metres from the ground, measuring the emissions for a period of 6 minutes and recording the maximum value, the minimum and the average RMS value. Inspection measurements were made keeping the instrument at a height of 1.5 metres and at a distance from walls and metal objects greater than 1 metre, and moving it slowly into the room or area under investigation.

The measuring points were 56 and concerned: terminal facilities (electrical substations, reefer towers, access point towers, offices, etc.), external areas, equipment and operating vehicles in use.

From the surveys and measurements carried out, with the active sources analysed, THERE ARE NO EVENTS FOR TDT WORKERS OVER THE ACTION LIMITS ENVISAGED BY THE LEGISLATION.

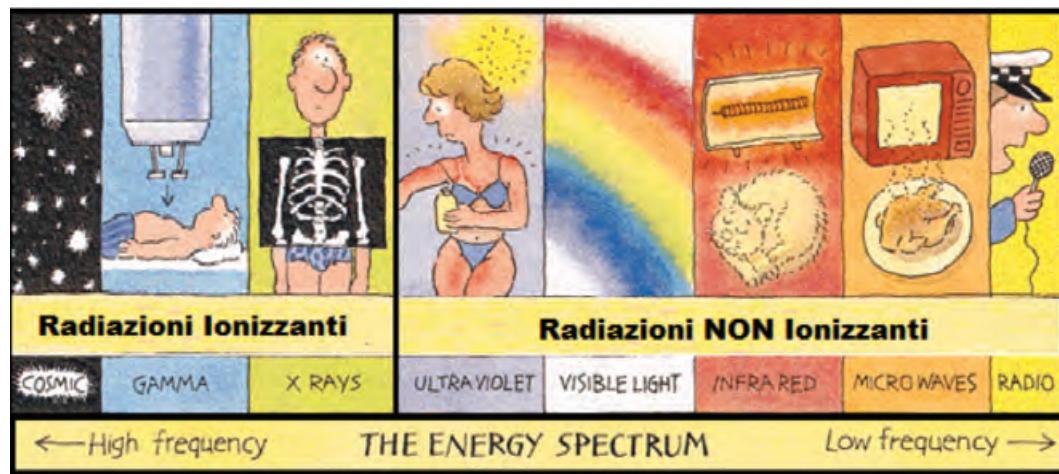


Figure 5: Where are the "electromagnetic fields"?

5.1.8 Light emissions



At SECH the prevailing light emissions are made up of light towers, quay cranes and yard RMGs. Specifically, 22 floodlights are mounted on the quay cranes:

- Under the trolley, 235W LED with diffused light;
- 7 x 1000W traditional sodium vapour fixed beam (SON-T);
- 5 x 1000W traditional sodium vapour moving beam (SON-T);
- 4 x 145W LED on the lower cross beams of the prime movers for street lighting;
- 78 x 455W LED floodlights are set up on the 9 lighting towers, while two still remain with traditional 1000W SON-T floodlights, 18 in all;
- on the RMGs there are 20 new projectors on each crane, which absorb a power of 138W.

To these must be added, as regards the external light emissions, the 10x145W LED floodlights on the roof of the administrative building and the 16x120W plus 4x145W of the company parking lot.

At Terminal Darsena Toscana the light emission sources are represented by 33 lighting towers and by the night lighting of the cranes, provided for safety reasons to guarantee work during the night hours and for signalling the area next to the flight corridor of the landing aircrafts at the nearby city of Pisa.

All the lights are turned on and off by means of a twilight switch.

The lighting towers are located along the road that leads to the terminal as well as inside the yard area and are distributed as follows:

- 12 of 40 m, located on the quay side (equipped with 12 asymmetric LED projectors);
- 16 of 45 m, at yard (equipped with 12 asymmetric LED projectors);
- 5 of 12 m, on the railway junction (equipped with 4 adjustable projectors with 400W lamps for each pole).

The replacement of the sodium vapour lamps with LED took place in 2018 on all the tallest towers, while the ones on the five of the railway connection and on two cranes were replaced in 2019.

In both terminals the intensity was adjusted according to the minimum requirements for ground lighting in port areas provided by the various UNI standards (for example UNI EN 12464), while the orientation was kept downwards, with a structure of protection over each crown of headlights, to avoid dispersion and therefore light pollution. During routine maintenance, the correct orientation of the lamps is assessed.

5.1.9 Visual impacts

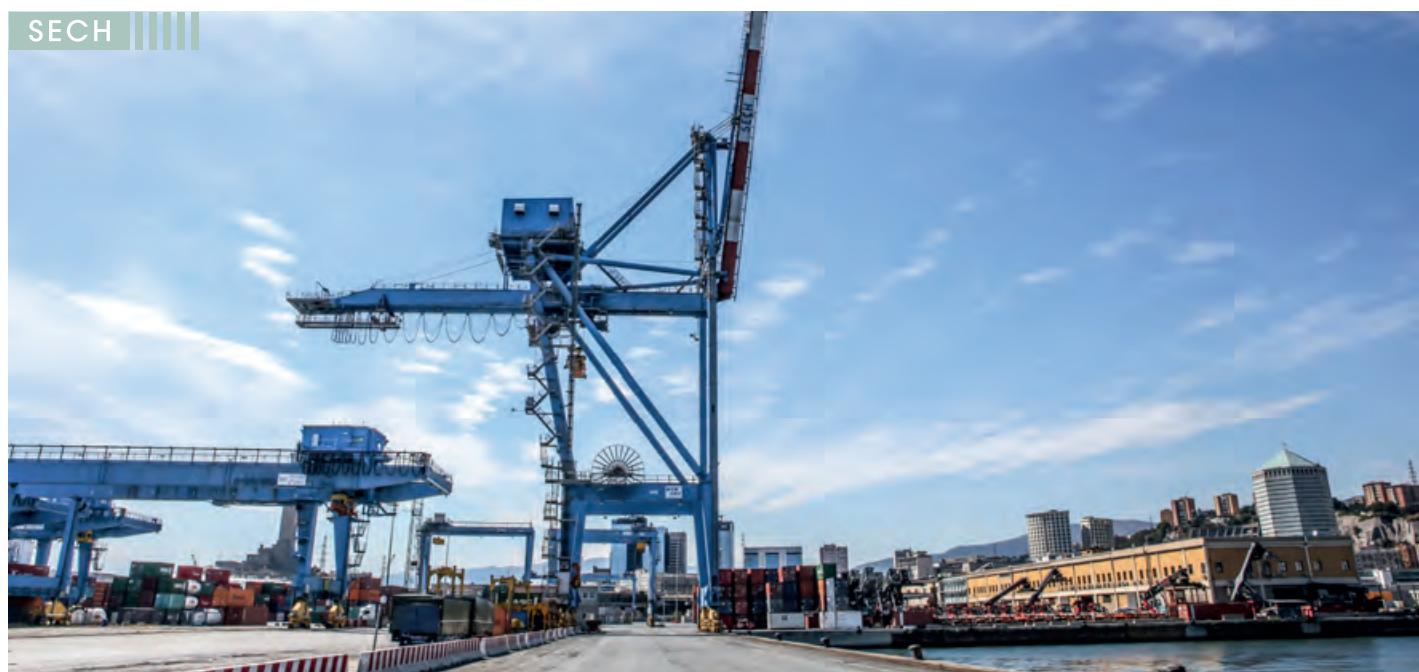
5.1.9.1 SECH VISUAL IMPACTS



SECH is located within the port of Genoa in the Sampierdarena basin, at Calata Sanità, in a port area easily accessible from the open sea, whose distance does not exceed 2 miles. The area is bordered to the north by the ferry terminal, to the south by the railway junction and the land filling of Calata Bettolo, to the west by the port road network, the "Lanterna" (i.e. lighthouse) promenade and some buildings pertaining to port activities, and finally to the east by the docks of Genoa Sampierdarena.

The area falls (from the acoustic point of view) in Class VI "exclusively industrial areas", the visual impact involves SECH the highest installations (quay cranes), visible from the urban context adjacent to the port.

The terminal is in fact equipped with 5 quay cranes (called PTs), 6 RMGs at yard (called TTs) and 6 RTGs. In order to operate on ever larger ships, as required by the evolution of the maritime container market, in the recent past SECH undertook an investment programme on the five quay cranes, with the extension of the boom of four of them, allowing them to operate on the vessel the containers stowed in the twentieth row sea side, so as to be able to work large ships (14.000 TEUs). Another change that led to an increase in the visual impact is represented by the raising of the bays at yard from the 3' to the 4' tier, with the consequent revamping of the 6 RMGs, in order to have an extra position for every single cell of the storage areas involved and therefore expand the storage capacity and the receptive capacity of the terminal by about 1.500 containers.



5.1.9.2 TDT VISUAL IMPACTS



TDT is located in an industrial port area, on a poorly urbanised area to the south and west, while to the east it is close to other industrial plants with risk of a major accident; to the north it is adjacent to the Calambrone touristic area.

The visual impact is related to the equipment placed on the quay and at yard, visible from the nearest beaches of the Calambrone, while the containers stored do not present characteristics of significance.

The terminal is equipped with 8 quay cranes (1 of which alienated in 2019) and 13 RTGs, of which 11 operate on 5+1 tiers and 2 operate on 2+1 tiers. In order to maintain a satisfactory level of competitiveness in a traffic scenario that foresees the implementation of vessels of ever greater capacity, in 2015 TDT undertook an investment programme with the replacement of 2 quay cranes with 2 post-panamax cranes, i.e. cranes with outreach up to 18 rows of containers on board and height below spreader up to 38 meters above sea level. The delivery of this machine occurred in 2017. TDT always stacked containers up to the 5th tier in height, both for empty and full.

5.1.10 Ionising radiations



There are no ionising radiations in any of the two terminals, except for those emitted inside the structure in which the scanner of the Customs Agencies is, during the activity of containers scanning, which is however carried out in the absence of personnel on the inside of the facility.

5.1.11 Odorous emissions



For both terminals, the activity carried out does not give rise to significant olfactory impacts, as they are limited to the emissions of motor vehicles and heavy vehicles. More significant odorous emissions may instead be due to the presence of vessels at quay and railway locomotives.



For TDT, the activities of the adjacent petrochemical centre, which affects all the nearby residential area of Stagno mostly in windy conditions from the ground (N-NE) or in the absence of winds, represent the most significant source of odorous emissions in the area. The number of sources estimated for this sector is more than 500, some with a significant olfactory impact, others of little relevance, but an important emission source, being close together. The petrochemical sector alone constitutes 94% of the emission sources surveyed.



In the absence of a specific national legislation and therefore of mandatory limits to odorous emissions, the preparation of a "Monitoring and Control Plan" was indispensable. The municipal administrations of Leghorn and other municipalities therefore entrusted ARPAT³³ with the work order and in October 2016 a monitoring plan and control of odorous emissions for that area was presented, which set the goal of achieving the maximum possible reduction in the levels of odorous emissions coming from industrial and service sources, through the adoption, for many companies in a voluntary form, of targeted and effective interventions to achieve a positive impact on olfactory pollution.



Figure 6: Odoriferous area in proximity of TDT

33 ARPAT: Agenzia regionale per la protezione ambientale della Toscana (Regional Agency for Environmental Protection of Tuscany).

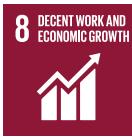
In the first report of July 2017 the study of the issue and the first remediation interventions were reported, in particular on the waste and water purification sector. In May 2018, the second report was presented, with the already completed phases of the plan involving various companies, particularly in the petrochemical sector, with voluntary improvement actions.



5.2 INDIRECT ENVIRONMENTAL IMPACTS



The indirect environmental impacts are due to activities related to those of the terminals and delegated to third parties or linked to subjects upstream and downstream of the main processes, i.e. along the production chain.



Such activities are as follows:

- Maintenance of mechanical and lifting equipment;
- tyre maintenance;
- support to handling/transport;
- shuttle transport service to/from the quay, yards and rail areas;
- port services on board the vessels (lashing/unlashing on board);
- maneuvers of railway wagons;
- empty stock management;
- controls/inspections (accesses, gate technical inspection, reefer);
- gate private security for entrance and night access;
- plugging/unplugging/reefer monitoring activities;
- office cleaning;
- cleaning yards and waste disposal;
- vehicle washing;
- in/out flows of transport by truck/rail/vessel;
- commuting of employees home/work;
- flows of visitors and suppliers in/out of the terminals.



On all such activities, the management control level of the terminals is indirect and depends on the influence that the companies have on that particular process or supplier: on the processes and activities carried out internally on the site, the terminals have a greater level of control (for example, on contractual clauses, audits, inspections, etc.), while for activities held outside the terminal areas (e.g. transport to/from the terminals) the power of intervention is not significant, since the activities are independent of the core business and outside the area of influence of the two organisations.

All suppliers operating at SECH must be previously qualified and periodically evaluated, in compliance with the procedures of the quality management system in force. These procedures have been progressively integrated with environmental controls, since the adoption of the organisational and management model pursuant to Legislative Decree 231/2001. Among the usual suppliers, particular attention was paid to the transporters and waste disposers, for which at each intervention the compliance with the requisites required by current legislation is assessed. The other resident suppliers are regulated by specific contractual clauses. Any anomaly found is managed as a system non-conformity. There are no consumption data relating to the activities carried out by suppliers operating at SECH.

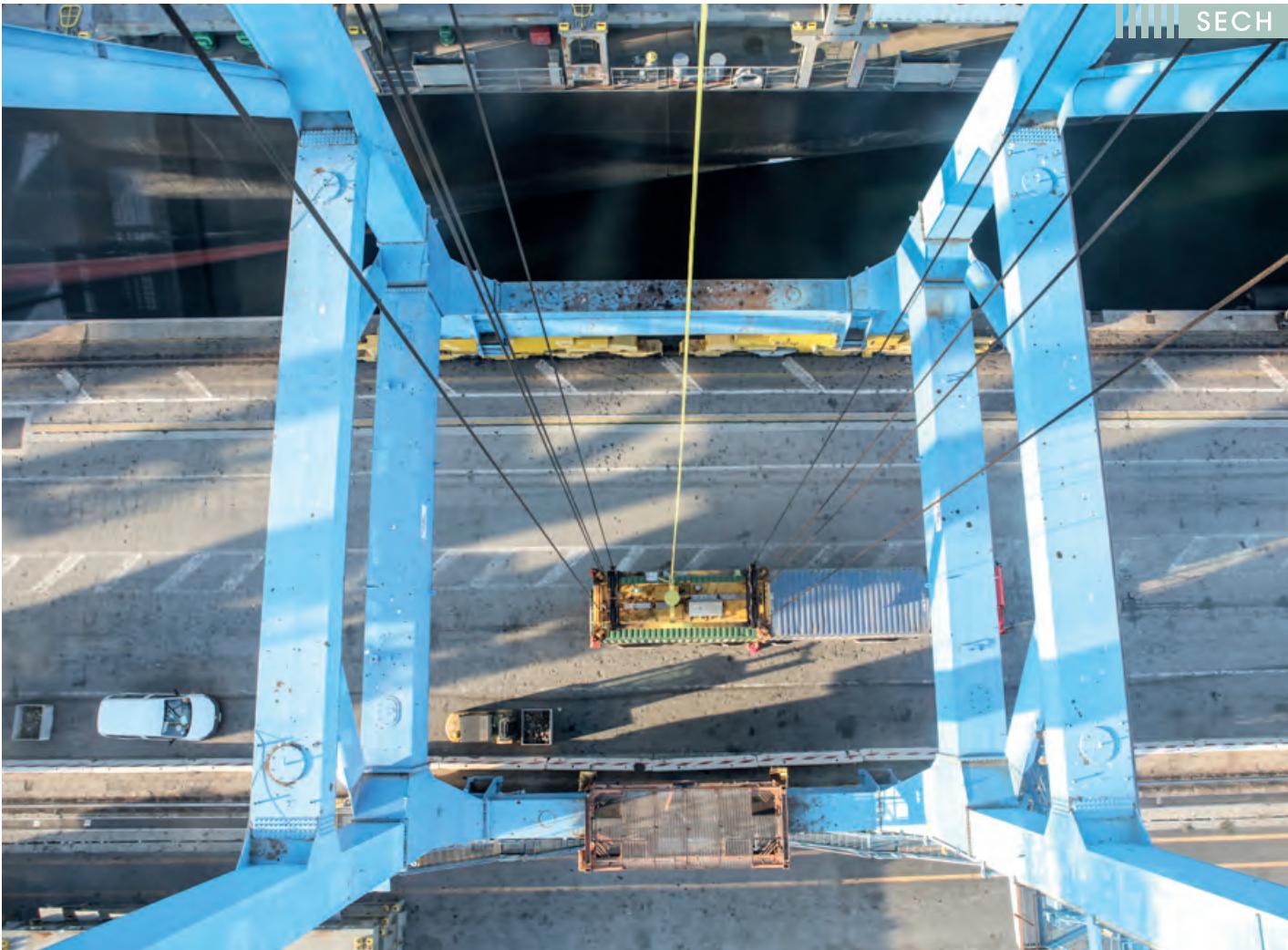
The significant environmental aspects linked to the activities pertaining to the supply chain at TDT are framed within the environmental analysis and evaluated exactly as the direct ones.

- Production/management of waste (from maintenance activities, external vehicles in transit);
- discharges to the ground (from containers and external/rental vehicles);
- diffuse emissions into the atmosphere (dust and gas from vehicles in transit and from reclamation tanks).

The suppliers residing inside the site and those who temporarily carry out activities at the terminal are evaluated and checked in terms of legislative compliance and acquiescence with the contractual clauses, however there are no consumption data relating to the activities carried out by them.

The logistics activities upstream and downstream of the processes (from ship, truck, train moves to employee home-work commute) are out of the organisations' management control: It is not possible to carry out reliable assessments and consumption measurements on them.

In TDT there is a noticeable increase in trains, due to the strengthening and electrification of the railway network, which has allowed a greater flow of containers by rail instead of truck/road, with a positive impact in terms of reduction of consumption and indirect emissions.



5.3 REDUCTION OF IMPACTS

5.3.1 Reduction of impacts at SECH



SECH, in 2015, commissioned externally and voluntarily (the company does not fall within the scope of application of the reference legislation) the execution of the energy diagnosis required by Legislative Decree 102/2014, also in order to identify possible measures to improve their energy-environmental performance. The outcome highlighted some measures and the relative margins for improvement, listed below:



Table 53: SECH energy-environmental performance

#	MISURA	MEASURE	POWER SUPPLY SAVINGS	NATURAL GAS SAVINGS	DIESEL SAVINGS	PRIMARY ENERGY SAVINGS	AVOIDED GHG EMISSIONS	INVESTMENT
	MWh/year	MWh/year	Sm ² /year	l/year	tep/year	tCO ₂ e/year	€	€/year
1	Energy consumption monitoring system	277	430	19.700	69,3	187,8	54.500	65.000
3	Replacement of lighting PT Crane	163	-	-	30,6	79	52.500	26.600
2	Replacement of TT crane lighting	61	-	-	11,5	29,7	22.200	10.000
5	Installation of RTGs fuel-saving systems	-	-	7.400	6,4	20	22.100	7.400
4	Replacement of lighting towers	359	-	-	67,2	173,6	58.400	58.400

Some of these actions have already been implemented, a brief description of which is provided below.

Consumption monitoring

In order to keep energy consumption under control and to be able to consciously evaluate any corrective and energy efficiency activities, SECH checks the diesel consumption of all owned vehicles through daily surveys: the activity allows to have indicators that can serve as a bell alarm in case of undetected malfunctions.

Consumption of electricity, water and methane is also monitored; as regards electricity, in particular, the withdrawal curves are available for download from the portal of the energy supplier, whose progress can also be observed at group level, through the GIP purchasing function. Unfortunately, it is still necessary to implement the setting up of separate metres by type of user (lighting, reefer units, equipment), which would allow targeted analysis to be carried out and to evaluate the incidence of the actions taken, the effect of which is drowned in general consumption, which in recent years was affected by the increase in temperature-controlled containers.

Replacement of lights typology

With regard to the operating area, the result of the work carried out between 2016 and 2019 is reported below.

- **RMGs:** in the two-year period 2016-2017, 20 new LED projectors were mounted on each of the 6 revamped cranes, which absorb a power of 138W, while previously each crane was equipped with 24x250W projectors on the fixed structure and 5x400W under the trolley, all of the SON-T high pressure sodium vapor type. Savings achieved around 31kW.
- **SSGCs (PT):** 22 projectors are mounted on the quay cranes: 6 under the carriage, 7 on the fixed beam, 5 on the mobile boom and 4 on the lower crossbars used as street lighting for port tractors. These were all 1000W SON-T sodium vapor lamps nonetheless, after having tested the suitability for the operators, the 6 ones on the trolley and the 4 on the crossbars were largely replaced with Storm Marine LED 235W diffused light projectors in 2019 on each crane. Savings achieved around 38kW.
- **Lighting towers (TF):** originally 11 light towers were located in the terminal, equipped with 100 traditional 1000W SON-T projectors (total power 100 kW). Since 2017, replacement interventions have been completed with the modernisation of the light towers and, in 2019, work was also done on the projectors. At the end of the interventions in the terminal there are 9 LED light towers that mount a total of 80x455W LED projectors, to which must be added 2 that still mount 15 traditional floodlights. The power was therefore reduced to 51.4 kW with a saving of 68.6 kW.

As regards the office area, during 2018 the terminal concluded the replacement of the neon lights used for internal lighting with 36W and 18W powers in both buildings. The intervention concerned all the ceiling lights with fluorescent tubes, which were replaced with LED technology tubes. The 10 250W SON-T projectors of the administrative building roof with 145W LED (saving about 1kW) and those of the company parking lot (18 mercury vapor lights of 150W with 16 LED of 120W plus 4 of 145W) were simultaneously replaced with a saving of about 200W.

Replacement of vehicles and equipment

Since 2015, SECH fleet has been progressively integrated with four new reachstackers, model CVS F500 series, whose salient feature is to be eco-compatible, since they are designed to reduce NO_x nitrogen oxide emissions at the exhaust, through the Selective Catalytic Reduction system (SCR), which works by adding urea to the exhaust gases. For this reason the reachstackers must be periodically supplied with a liquid called "DEF" Diesel Exhaust Fluid - reducing liquid (urea) - which is therefore stored in a tank, located at yard, in front of the workshop. Instead, the replacement of the washing system with a more modern and efficient one is scheduled for 2020.

5.3.2 Reduction of impacts at TDT



In the 10 years that elapsed since the implementation of the environmental management system, numerous and diversified improvement actions were carried out, involving transversally all terminal sectors, as shown below:



- **Energy consumption:** after a series of technical-economic feasibility assessments on the possibility and convenience of installing wind or photovoltaic systems, it was currently decided to proceed with the following actions:

- » Certified energy supply from certified renewable sources;
- » installation of twilight lights for external office lighting;
- » installation of presence sensors in office bathrooms;
- » installation of sensors for reefer units lighting only in case of need;
- » replacement in 2010 of 75 neon lamps with 75 dimmed neon lights, with a verified saving of 42-46%; the return on investment was achieved in about 5 years;
- » replacement of some more ancient operating means;
- » replacement of lights in the forecourt towers with LED projectors in 2018, with a verified saving of over 50%; the return on investment was achieved in approximately 2.6 years;
- » replacement in 2019 of the lights of two cranes with LED lights;



- **dusts:** the Port System Authority intervenes for the reduction of dust in case of transfer of sludge to/from the filling tank with daily sweeping and street washing in the summer; TDT sweeps yards 3 times a week;
- **leakages:** a new Mafi Tank was purchased for the segregation of leaking containers, bringing the number of equipment to three. A procedure for charging the event management costs was also activated;
- **spills:** Numerous corrective actions were carried out to reduce the causes of some recurring events (defective o-rings³⁴ non-original pipes, non-functioning overflow systems, non-functioning auto shut-off systems, as well as replacing the oldest vehicles; in 2019 the replacement of 3 vehicles was registered);
- **raw materials:** raw materials: The purchase of printing and hygiene paper, preferably recycled or non-chlorinated FSC³⁵ was approved;

34. O-ring: it is an elastomer ring, with a circular section used as a mechanical seal. The o-rings are designed to be inserted in special housings and be compressed during the assembly of two or more parts, thus creating a sealing gasket..

35. FSC: The Forest Stewardship Council (FSC) is a non-profit international NGO that has created an internationally recognised forest certification system. The purpose of the certification is the correct forest management and the traceability of the derived products and the FSC logo guarantees that the product was made with raw materials deriving from forests correctly managed according to the principles of the two main standards: Forest management and chain of custody.

- **PCB/PCT³⁶:** elimination and progressive replacement of oil transformers with resin transformers (two in 2018 and 2019);
- **reduction of ozone depleting gases (F-gas):** progressive replacement of all air conditioners with R22 from 2008 to 2012 and replacement from 2019 of those with R410A with refrigerant gases with a lower environmental impact, as required by the Kindall protocol;
- **waste:** there is an improvement in the organisation of the storage areas, due to monitoring activities, calls where possible, training and information for internal and external staff, inclusion of contractual liability clauses in the contracts, signposts prohibiting access;
- **water consumption:** checked monthly through metre monitoring, anomaly detection, leak detection, installation of flow reducers in the yard showers.

Impact reductions are demonstrated by a series of cross-integrated data:

- The trend of performance indicators (consumption and emissions) which demonstrate an improvement in all energy performance indicators thanks to the aforementioned actions carried out.

Table 54: Reduction of energy consumption required for TDT products and services (expressed in joules or multiples)

	TDT INDICATORS	U.M.	2017	2018	2019
TDT	DIESEL TOT/ MOVES TOT	[GJ/move]	36,02	37,17	32,77
	OPERATIONAL DIESEL/MOVES diesel vehicles/equipment	[GJ/move]	49,95	52,11	49,79
	ELECTRICITY/MOVES TOTAL	[GJ/move]	0,027	0,030	0,021
	ELECTRICITY (-lighting tower AP-reefer)/MOVES TOTAL	[GJ/move]	0,014	0,014	0,011
	Energy intensity per move (Gjoule/move) - TDT	[GJ/move]	0,0601	0,063	0,0676
	TEP /moves tot	[tep/move]	0,0023	0,0022	0,0018

In this case it is noted that the aggregated data, i.e. inclusive of reefer consumption (which represent more than 50% of total electricity consumption without being linked to company performance) and of Port Authority's lighthouse towers consumption, however, indicate a reduction. See the dedicated table in paragraph 5.1.6.1 for further details;

- from the specific energy and economic savings of some savings actions;
- the reduction of non-conformities;
- from the production of economic savings from what were previously only costs (see analysis of costs and savings by individual aspect reported in paragraph 5.3.2).

36. PCB/PCT: polychlorinated biphenyls and polychlorotrophenyls, are chlorinated synthetic compounds extensively used, since the 1930s, in the electrotechnical sector as insulators.

Table 55: Reduction of energy consumption at TDT

AZIONE DI MIGLIORAMENTO		U.M.	2017	2018	2019
TDT	Installation of reefer lighting presence sensors	[euro]	-€ 430	-€ 430	-€ 430
		KWh	-56.576	-446.280	-34.144
	Lighting towers LED	%	-	47%	-42%
		euro	-	-€ 8.147	-€ 68.584
		[KWh]	-25.344	-11.967	-18.591
	Dimmable offices lamps	[euro]	-€ 3.639	-€ 1.834	-€ 2.647
		[%]	-45%	-44%	-43%
	TOTAL		-€ 4.069	-€ 10.411	-€ 71.661

TDT



5.4 ENVIRONMENTAL EXPENSES

5.4.1. SECH environmental expenses

SECH reports all environmental expenses divided by environmental aspect, differentiating them by category. These data are included in the company financial statements. The values are shown below on a three-year basis.

Table 56: SECH environmental expenses

TYPOLOGY (€)	2017	2018	2019
WASTE DISPOSAL + ADSP FEE ³⁷	61.138	50.431	61.967
CLEANING COSTS	380	-	-
ENVIRONMENTAL CONSULTANCY	1.664	832	832
INSTALLATION OF "CLEAN" TECHNOLOGIES	-	-	41.952
EXPENSES FOR TRAINING (waste management)	-	1.185	-
ENVIRONMENTAL INSURANCE	-	-	-
TOTAL	63.182	52.418	62.799

In 2019 many costs were eliminated thanks to effective preventive actions that allowed the non-repetition of past events.

5.4.2 TDT environmental expenses

Table 57: TDT environmental expenses

YEAR	INVESTMENTS (€)	ECONOMIC RESOURCES DEPLOYED (€)	TAXES (€)	ECONOMIC BENEFITS OBTAINED (€)
2017	39.847	292.786	43.211	- 11.869
2018	224.297	338.283	44.497	- 21.587
2019	1.548	294.897	44.955	- 92.237
TOTAL	265.692	925.966	132.663	-125.693

37. It includes the costs incurred by AP for the municipal solid waste collection service on the ground (in 2019 equal to € 36,574.85).

Table 58: TDT environmental expenses broken down by typology

TYPOLOGY	YEAR	INVESTMENTS (€)	ECONOMIC RESOURCES DEPLOYED (€)	TAXES (€)	ECONOMIC BENEFITS OBTAINED (€)
LEAKAGE MANAGEMENT	2017	26.800	10.535		- 3.685
	2018		3.685		- 3.685
	2019				- 21.386
WASTE MANAGEMENT	2017		126.137	43.211	
	2018		127.077	44.497	
	2019		127.526	44.955	
VEHICLES SPILLS MANAGEMENT	2017		9.951		- 2.831
	2018		13.764		- 5.686
	2019		3.957		
WATER DISCHARGES	2017		5.692		
	2018		4.526		
	2019		6.078		
HSEQ SYSTEMS MANAGEMENT	2017		5.945		- 2.500
	2018		7.900		
	2019		4.020		
EMISSIONS (THERMAL PLANT)	2017	11.671	31.247		
	2018	21.844	33.544		
	2019		11.700		
WATER CONSUMPTION	2017		34.400		
	2018		65.807		
	2019		81.341		
MP CONSUMPTION	2017		12.960		
	2018		13.612		
	2019		23.705		
FIRE-FIGHTING SYSTEM	2017	1.376	14.118		
	2018	1.693	11.289		
	2019	1.548	11.630		
ENERGY MANAGEMENT	2017		41.799		- 2.853
	2018	200.760	57.079		- 12.216
	2019		17.750		- 70.851
TRASFORMATORS	2019		2.189		
NOISE	2019		5.000		
TOTAL		€265.692	€925.966	€132.663	-€ 125.693

5.5 COMPLIANCE WITH ENVIRONMENTAL LEGISLATION



For both terminals, the procedures for checking compliance with the legal requirements are described in a dedicated procedure and the regulatory update is guaranteed by subscribing to a series of newsletters, so as to be promptly informed about outgoing or exiting and pending regulations to enter into force. An external compliance audit conducted

by an external party as a first-party audit, verifies annually that compliance is guaranteed. For TDT, which is ISO 14001 certified, the management system provides for the keeping of a list of applicable laws, indicating the reference aspect, the specific subject, the date of entry into force, the source, the type of legislation, all deadlines (past, current and subsequent), as well as the evidence and the responsible company function. The subsequent third party audit by the certification body verifies compliance a second time. Failure to comply with a regulatory requirement, be it a payment, compliance with limits, an obligation to report and/or send to the competent body, prevents certification from being obtained. Also the internal audits envisaged by the Management Model (MoG) pursuant to Legislative Decree 231/01 ascertain in both terminals the absence of non-conformities representing an environmental criminal offense.

In 10 years no first level non-conformity, which is linked to a lack of serious legislative compliance, has ever been detected.

The discrepancies found are managed as non-conformities, with corrective actions whose outcome is evident.

Table 59: Monetary value of sanctions and total number of non-monetary sanctions for non-compliance with environmental laws and regulations

INDICATOR	2017	2018	2019
307-1 Monetary value of sanctions and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	SECH	0	0
	TDT	0	0





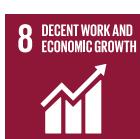
06

Social Sustainability

6.1 HR EVOLUTION AND COMPOSITION



SECH workforce, which has remained more or less stable in recent years, suffered a slight decrease since 2018, due to the exits of some employees not compensated by as many hires.



Over the past three years, TDT's workforce has undergone a slight decline (- about 3%), mainly due to leavings to achieve retirement requirements (17 out of 21 exoduses), which two voluntary resignations and two layoffs add up to.



In both companies, permanent contracts represent - currently - the main contractual form used, representing almost 100% of the total contracts in force.

Table 60: HR composition

YEAR	2017		2018		2019	
HR COMPOSITION	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL WORKERS	242	303	238	296	236	292
BY GENDER						
Men	218	251	214	244	212	240
Women	24	52	24	52	24	52
BY AGE						
29 and younger	6	11	4	9	4	4
Between 30 and 50	154	214	139	206	118	198
From 51 onwards	82	78	95	81	114	90
Personnel average age	47	46	48	45	49	46
BY PROFESSIONAL CATEGORY						
Executives	6	6	5	6	5	7
Managers	7	6	7	6	8	6
Employees	127	157	125	153	122	149
Workforce	102	134	101	131	101	130
BY CONTRACT TYPE						
Open-ended contract	240	300	237	295	235	292
Fixed-term contract	0	3	0	1	0	0
Trainees	2	0	1	0	1	0
Full time	235	283	232	280	228	275
Part time	7	20	6	16	8	17

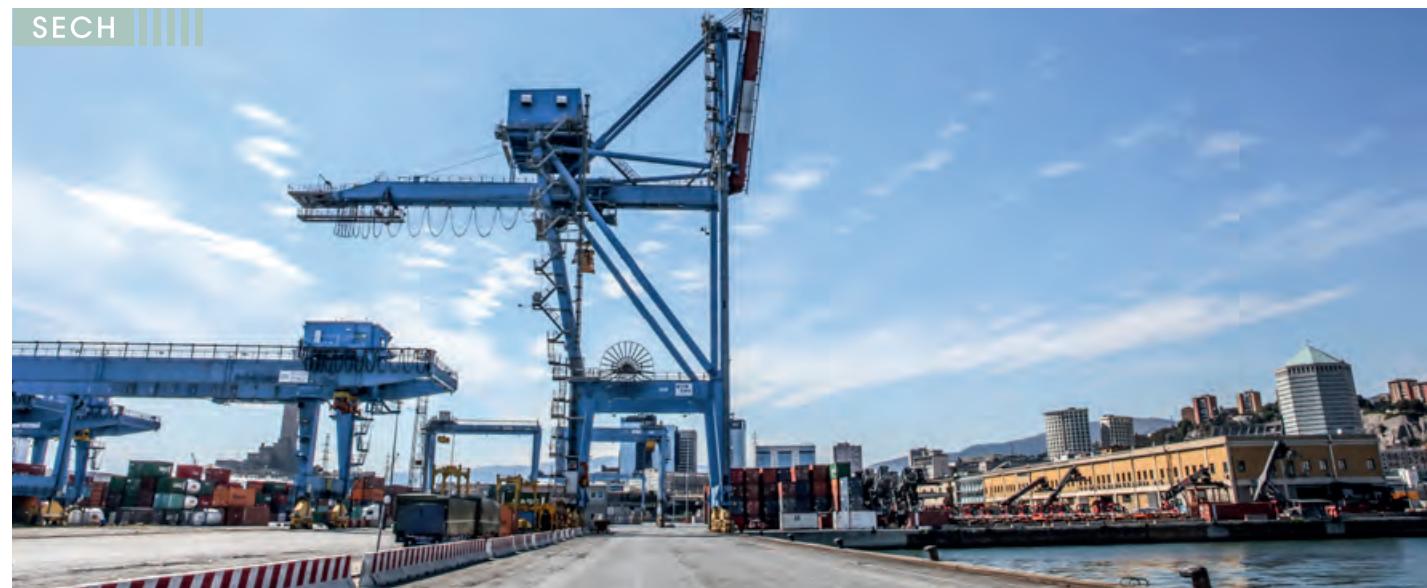


Table 61: Workers in and out

YEAR	2017		2018		2019	
WORKERS IN AND OUT	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL WORKERS	242	303	238	296	236	292
WORKERS HIRED DURING THE YEAR	1	5	0	1	1	1
Men	1	5	0	1	1	1
Women	0	0	0	0	0	0
29 and younger	0	3	0	0	1	0
Between 30 and 50	0	1	0	0	0	0
From 51 onwards	1	1	0	1	0	1
WORKERS LEAVING DURING THE YEAR	2	8	4	8	3	5
Men	2	8	4	8	3	5
Women	0	0	0	0	0	0
29 and younger	0	2	0	0	0	0
Between 30 and 50	0	1	2	0	0	2
From 51 onwards	2	5	2	8	3	3

Table 62: Overall turnover rate

YEAR	2017		2018		2019	
OVERALL TURNOVER RATE (%) ¹	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL	1,24	4,27	1,67	3,01	1,68	2,5
Men	1,24	4,27	1,67	3,01	1,68	2,5
Women	0,00	0,00	0,00	0,00	0,00	0,00
29 and younger	0,00	1,64	0,00	0,00	0,42	0,00
Between 30 and 50	0,00	0,66	0,83	0,00	0,00	0,68
From 51 onwards	1,24	1,97	0,83	3,01	1,24	1,37

1. Overall turnover rate: units hired + leaving in the period/average headcount of the period.

Table 63: Positive turnover rate

YEAR	2017		2018		2019	
POSITIVE TURNOVER RATE (%) ²	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL	0,41	1,63	0,00	0,33	0,42	0,42
Men	0,41	1,63	0,00	0,33	0,42	0,42
Women	0,00	0,00	0,00	0,00	0,00	0,00
29 and younger	0,00	0,98	0,00	0,00	0,42	0,42
Between 30 and 50	0,00	0,33	0,00	0,00	0,00	0,00
From 51 onwards	0,41	0,33	0,00	0,33	0,00	0,00

Table 64: Negative turnover rate

YEAR	2017		2018		2019	
NEGATIVE TURNOVER RATE (%) ³	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL	0,82	2,61	1,65	2,64	1,26	1,70
Men	0,82	2,61	0,00	2,64	1,26	1,70
Women	0,00	0,00	0,00	0,00	0,00	0,00
29 and younger	0,00	0,65	0,00	0,00	0,00	0,00
Between 30 and 50	0,00	0,33	0,83	0,00	0,00	0,68
From 51 onwards	0,82	1,63	0,83	2,64	1,26	1,02

Table 65: Turnover compensation rate

YEAR	2017		2018		2019	
TURNOVER COMPENSATION RATE (%) ⁴	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL	50,00	62,50	0,00	12,50	33,33	20,00
Men	50,00	62,50	0,00	12,50	33,33	20,00
Women	0,00	0,00	0,00	0,00	0,00	0,00
29 and younger	0,00	150,00	0,00	0,00	33,33	0,00
Between 30 and 50	0,00	100,00	0,00	0,00	0,00	50,00
From 51 onwards	50,00	20,00	0,00	12,50	0,00	33,33

2. Positive turnover rate: units hired in the period/headcount at the beginning of the period.

3. Negative turnover rate: units leaving in the period/headcount at the beginning of the period.

4. Turnover compensation rate: units hired in the period/units leaving in the period.

At SECH, the previous value of personnel turnover was confirmed, which remains at absolutely low values. It is believed that this is a positive element and an index of a good corporate climate, also due to the possibility of internal staff growth.

At TDT, the three-year period 2017-2019 saw a peak in the increase in positive turnover in 2017 which gradually decreased significantly over the following two years. The negative turnover rate, stable in the first two years of the three-year period, fell significantly in 2019 (-1 percentage point), until it almost halved; this not so much due to a strong slowdown in exoduses, rather it is owing to a lower impact on the overall workforce, already reduced by the leavings of the previous years.

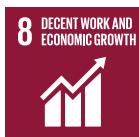
Table 66: Parental leave

YEAR	2017				2018				2019			
	PARENTAL LEAVE				SECH		TDT		SECH		TDT	
GENDER	M ⁵	F ⁶	M	F	M	F	M	F	M	F	M	F
Nº of workers entitled to parental leave	90	11	109	21	90	8	99	19	90	7	86	18
Nº of workers who took parental leave	9	0	11	9	14	0	15	9	13	0	5	4
Nº of workers returned from parental leave in the reference year	9	0	11	6	14	0	15	7	13	0	5	4
Nº of workers returned to work at the end of parental leave and still employed in the following 12 months	9	0	11	6	14	0	15	7	13	0	5	4
Percentage (%) of workers returned to work at the end of parental leave and still employed in the following 12 months	100	0	100	100	100	0	100	100	100	0	100	100

5. M: male

6. F: female

6.2 RECRUITMENT



Human resources are an essential business asset; their growth is a fundamental and essential factor for the development of both terminals.

The research and selection process aims to ensure the two companies the necessary skills to offer a quality service to customers: it is managed by the HR department, which also oversees relations with schools, universities and employment centres.

The search and selection methods used by the companies comply with the principles of the Code of Ethics adopted both by SECH and TDT, as well as of the labour law, the national collective labour agreements (i.e. ports and managers of industrial companies national agreements) in all their disciplined institutions and in strict compliance with the requirements established by law.

The policy of both companies guarantees equal opportunities for men and women in accessing employment, without any discrimination on grounds of sex, ethnicity, nationality, language, religion, political opinions, sexual orientation, personal and social conditions, in line with the applicable legislation and, in particular, with the equal opportunities code (Legislative Decree 198/06).

Human resources are hired solely on the basis of regular employment contracts, no form of irregular employment being tolerated, neither for Italian citizens nor foreigners. The candidate must be made aware of all the features relevant to the employment relationship.

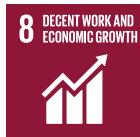
The recognition of salary increases or other incentive instruments and access to higher roles and assignments (promotions) are linked, in addition to the rules established by the law and by the sector collective employment contract, to the individual merits of the workers, among which are the ability to express organisational behaviours and skills based on the ethical principles of reference of the companies.

Table 67: HR composition

YEAR	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
HR COMPOSITION (% BROKEN DOWN BY EDUCATIONAL QUALIFICATION) ⁷						
Graduated from University	9,50	9,24	10,1	9,80	10,6	9,8
High-school diploma	45,50	39,27	44,5	39,19	44,4	42,5
Professional diploma	16,50	0,66	16,8	0,68	17,0	0,7
Primary/junior high school	28,50	50,83	28,6	50,34	28,0	47,00

7. Values are calculated as a percentage on the total numbers of workers.

6.3 TRAINING



Training has become an increasingly important element for businesses to achieve success and it is clear that, in any work and production environment, it is necessary to be interconnected and to ensure that all workers, from the first to the last, feel they are taking part in a common project, so as to operate in a cohesive and efficient manner.

It is believed that, even from a psychological point of view, company training fulfills an indispensable task, in terms of utility and benefit, on a dual axis: for the workers, since they feel valued and essential for the performance of the company, and for the company itself, as in this way the workers will work with greater commitment and motivation.

Human resources are undoubtedly the tool with the most influence for the growth of companies and the importance of corporate training is clear as, through the personal and professional development of individuals, improvements are made on the whole working line.

Owing to training activities, creativity and spirit of initiative benefit from it, the ability to find cooperative solutions increases and workers acquire greater awareness about the meaning and importance of their role in the company; therefore the importance of corporate training should not be underestimated, as it allows a positive growth of SECH and TDT workers as well, which translates into a general development of the companies.

The tables below represent a detailed picture of training in the two companies, as follows:

Table 68: Average training hours

YEAR	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
TOTAL HOURS (H)	3.750	7.072	5.998	4.486	3.999	4.123
• Of which internal training	189	5.669	410	2.424	568	2.852
Average hours per worker ⁸	19	25	25	20	20	16
Average hours per all workers ⁹	15	23	25	15	17	14
Average hours by category of worker						
• Executives	51	37	136	81	57	7
• Managers	49	23	134	11	63	11
• Clerks	22	17	25	18	22	14
• Operating workforce	13	35	10	21	11	18
Average hours by worker gender						
• Men	19	24	23	22	19	15
• Women	29	29	38	17	22	19
% workers' coverage	80%	42%	100%	71%	86%	89%

8. Workers who received training.

9. Workers who received training

Table 69: Training costs

YEAR	2017				2018				2019					
	TRAINING COSTS		SECH		TDT		SECH		TDT		SECH		TDT	
AMOUNTS AND RATIOS	€	%	€	%	€	%	€	%	€	%	€	%	€	%
Financed training cost	434	1	49.350	73	56.366	62	44.488	66	19.285	35	28.550	73		
Non-financed training cost	47.922	99	18.593	27	34.193	38	22.938	34	34.823	65	10.511	27		
TOTAL	48.356	100	67.843	100	90.559	100	67.426	100	54.108	100	39.061	100		

The above data consider all the funding received directly from the company, but do not instead take into account the funded training, whose ownership remains with accredited training bodies, which allow training to be provided to employees without any disbursements for teaching (obviously the loss of income of the students is always charged to the company).

Within the economic investments made over the last three years on training, **SECH** has managed to use loans from private inter-professional funds and from public funds, as detailed below:

- **2017:** € 434 were funded;
- **2018:** € 56.366 were funded, of which:
 - » € 50.366 from private inter-professional funds (Fondimpresa and Fondirigenti);
 - » € 6.000 from public funds (ESF - European Social Fund).
- **2019:** € 19.285 were funded, 100% from private inter-professional funds (Fondimpresa and Fondirigenti).

The economic investments made over the last three years by TDT on training have been covered for over 68% by the revenues received from private inter-professional funds, such as Fondimpresa and Fondirigenti, to which the company has adhered for several years.

Table 70: Amount used by class typology

YEAR	2017		2018		2019	
TRAINING PROVIDED BY CLASS TYPOLOGY (H)	SECH	TDT	SECH	TDT	SECH	TDT
Managerial training	7.500	39.915	16.473	30.742	2.546	13.383
Security training	11.225	8.552	19.717	7.334	17.239	9.620
Professional development	29.631	24.376	54.369	29.350	34.323	16.058
TOTAL	48.356	67.843	90.599	67.426	54.108	39.061
DELIVERY MODE (%)	SECH	TDT	SECH	TDT	SECH	TDT
% Class	100	98,7	100	98	100	94
% On line	0	1,3	0	2,4	0	6,3

During 2019 the total number of training hours carried out at SECH remained in line with the previous years and concerned almost all the resources in force.

It is useful to highlight that the hours of managerial training and professional updating are an expression of the company's will, while the hours of safety training are also mandatory. In fact, for the year 2020, various training activities are planned, some of which deriving from the obligations established by the State-Regions Agreements on health and safety in the workplace.

In 2019, a potential assessment process began, aimed at a small group of figures belonging to SECH and TDT, with the aim of identifying strengths, areas for improvement and the possibility of developing their human resources to enhance their growth paths. The first training courses in this regard, as far as SECH is concerned, started in October.

Continuing a journey that has been going on for years now, SECH's commitment to training and prevention has continued. The number of emergency workers has grown and it has become more necessary than ever to carry their path in terms of first training or compulsory updating.

Also with regard to safety, SECH, after the purchase of three external semi-automatic AED¹⁰, organised a course for cardiopulmonary resuscitation and defibrillation with AED for 36 people, three of which are workers' safety representatives (RLS).

The electrical maintenance area has been the subject of various training and updating courses: on the maintenance of MV/MV and MV/LV electrical substations, on inverters and on the *Profinet* data transmission protocol.

In order to identify improvement actions to manage operating activities more effectively, and thus obtain the highest degree of satisfaction among customers and maintain competitiveness with contending container terminals, SECH, in the two-year period 2018 and 2019, organised a series of meetings with workers, dividing them into groups and listening to their opinions, in order to achieve the intended goal.

Confirming what happened in the recent past, also in 2019, English language courses were provided at TILC (The International Language Center), attended by SECH staff from various departments.

10. Automated external defibrillator.



As regards TDT in 2019, the training activity focused mainly on professional and/or managerial training, on safety and security training and on operational training.

In 2019 the percentage of staff involved in the training activity was similar to that of previous years, reaching more than two thirds of the workforce.

Confirming what happened in the recent past, also in 2019, English language courses were provided, attended by TDT staff from various departments.

As regards safety, the usual updates were made on basic training for emergency workers (firefighting, first aid, BLSD¹¹) and for the maintenance and growth of the skills for the resources assigned to the health, safety and security management system (i.e. HSSE, RLS training). In addition, specific basic and supplementary safety training was carried out for particular tasks (quay crane operators, RTGs operators, stevedores, superintendents) and the new emergency staff was trained, according to the turnover occurred. Still on the subject of safety, additional specific courses were also provided, which are discussed in more detail in paragraph 6.6.2 "TDT approach".

With regard to security, the familiarisation of all terminal resources in accordance with the IMO Model Course 3.25 was completed, and the training of security for personnel with specific security tasks, IMO Model Course 3.24, was extended, also to all emergency personnel.

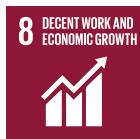
As for SECH, a potential assessment project was also activated in TDT, which involved 18 units between Senior (first levels of the organisation) and Talent (staff holding specialist roles with high professional content), for each of which a hypothetical managerial development plan to be implemented in the next three years is envisaged.

The professional updating activities have seen the continuation of the training of personnel authorised to process personal data on EU regulation 2016/679 - GDPR and the continuation of foreign language training for those who hold roles which are mostly exposed to the use of the English language.

TDT in 2019 continued its training activities for the personnel involved in the operations; in fact, during the year, 59 training courses were held for both internal and external personnel, which allowed the achievement of new certificates and the updating of already obtained qualifications. The new internal credentials concerned the operation of quay cranes, RTGs and prime movers.

11. Basic Life Support Defibrillation.

6.4 SUPPLIERS' QUALIFICATION, SELECTION AND ASSESSMENT



The companies prepared and maintained active documented procedures regarding the qualification of suppliers, i.e. their initial assessment, selection and periodic re-evaluation, with particular reference to the aspects of quality, environment, safety and anticorruption, in order to guarantee the capacity of the same to meet the supply requirements. On the strategic or common purchase categories, the qualification of a new supplier is subject to the approval of the holding's purchasing department, which has the task of verifying the coherence of the proposal with the defined purchase strategies.

The initial qualification consists in verifying the possession of the basic requirements to be able to work with the terminals, so that the process may take place in compliance with the criteria of transparency, equal opportunities of access, professionalism, reliability and cost-effectiveness, without prejudice to the prevalence of the requirements of legality. These assessments allow the keeping of a list of suppliers approved by the terminals, which purchase orders can be issued to.

A monitoring activity is subsequently developed for the suppliers, mainly by monitoring the quality of the supplies and services provided, and by periodically reevaluating the suppliers, modifying and supplementing the list of qualified suppliers.

The criteria for choosing supplies include an overall assessment considering the following parameters:

Compliance with the functional specifications defined in the purchase request and guaranteed by the manufacturer;

- the formulation of the judgment expressed by the end user regarding the quality of the product;
- the reduced impact on the environment throughout the life cycle, compared to other products and services used for the same purpose;
- the judgment on the quality of the service must be formulated on the basis of historical purchase experiences made and in the absence of detected non-conformities;
- the judgment on price must be formulated on the basis of the comparison with what is offered by the competition, also including the future management costs generated;
- compliance with the delivery times specified in the contract or order;
- the coverage offered by the guarantee;
- ease of access to pre- and post-sales assistance.

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

6.5 TERMINALS' PRIVACY PROTECTION AND DATA SECURITY



The issue of privacy protection and personal data protection is of paramount importance for GIP. Throughout 2019, the group engaged in the consolidation of the internal culture in the privacy field and in the organisation of the activities started in previous years, in execution of the provisions of the European regulation on the protection of personal data (EU Regulation n.2016/679 - GDPR).

The main interventions on the topic, coordinated by the DPO - group data protection manager - concerned:

- A constant updating of the treatment register;
- updating of documentation, through:
 - » sending information and requests for consent to employees;
 - » sending information to visitors;
 - » the publication of the information on the website;
 - » impact assessment on the protection of personal data with reference to video surveillance;
 - » the preparation of documents for the exercise of the rights of the interested party and other affiliated activities;
- updating of the signs relating to video surveillance;
- the implementation of the data breach procedure;
- updating and distribution of company IT regulations to all staff;
- the audit on the GDPR, IT management and corporate business processes from which, following to the investigations, improvement actions arose;
- periodic meetings between the managers of the IT, HR, privacy, safety & security and compliance areas and the DPO, in order to constantly evaluate the state of compliance of the company with the regulations currently in force;
- the annual performance of the anti-intrusion tests in the systems, in order to monitor the effectiveness of the protection of the IT system with reference to possible unwanted access. In the last test, the result was positive and without observations;
- for SECH, the signing of a software contract that measures IT reputation: a quantitative, objective assessment of the level of IT risk was performed and the current corporate security level was found to be intermediate;
- for TDT, on the GDPR compliance side, a maintenance contract was signed for the software, whose final output is the GDPR compliance report.

Information security in the activities carried out by the two terminals also consists in establishing and maintaining a uniform standard, which allows the port cluster to move as a *unicum* and in the most efficient way possible, thus trying to minimise waste and correcting all those drifts that the use of different systems brings along.

These activities consist of Authority-Business and Business-Business relations:

A2B

AIDA (Integrated Customs Excise Automation). It is the information system of the Customs Agency, operational since November 10th, 2003. This system makes the digitalisation of the relationship with users and administrations tangible. The portal for interoperability among administrations and among these ones and users (Aida Services for Interoperability) makes the "integrated" processes working with the administrations involved in a one-stop shop logic and offers new interactive services to users.

PMIS (Port Management Information System). The PMIS system is employed by the Harbour Master's staff both in the performance of administrative procedures related to the arrival and departure of vessels and for the supervision of traffic within the port waters.

B2B

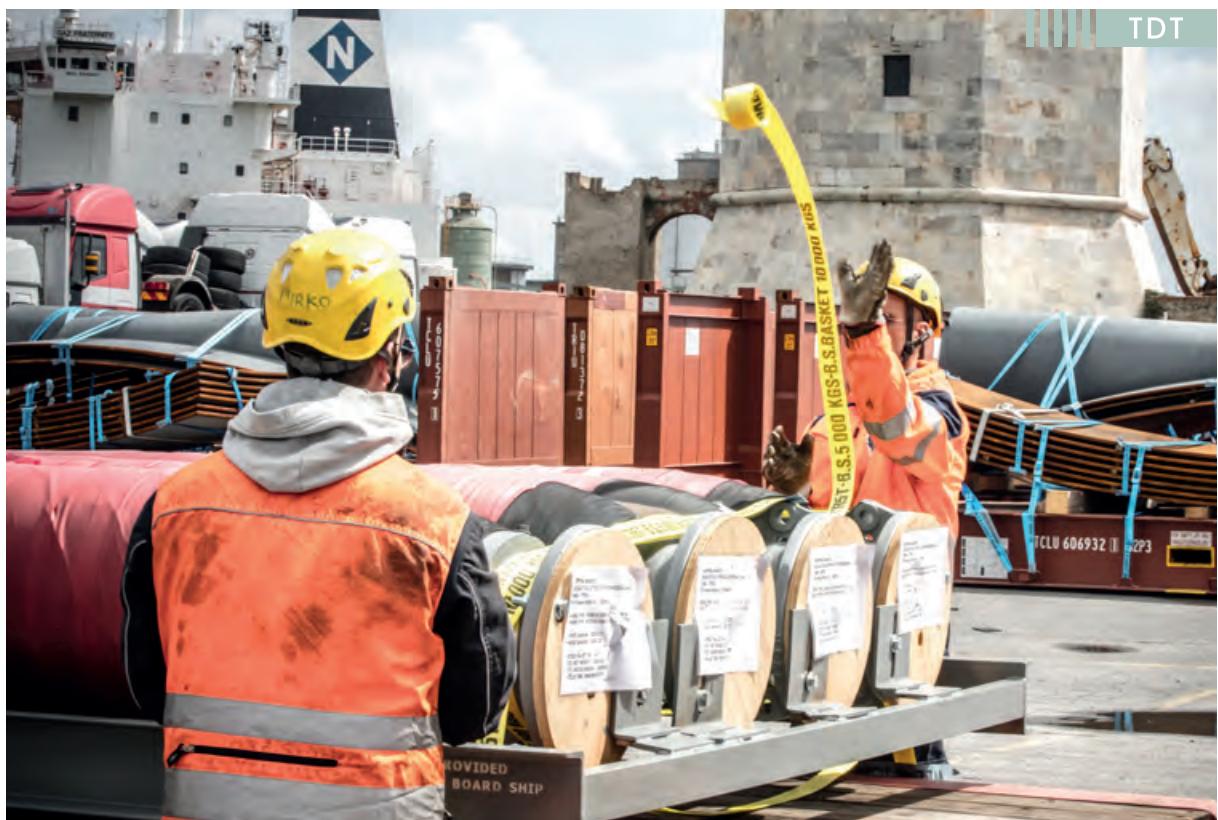
E-Port (since 2004) in Genoa and TPCS (since 2008) in Leghorn are sharing platforms or Port Community Systems (PCS), which consent the various operators of the port to interact in a safe environment. SECH and TDT are, starting from the design and the birth of the two systems, at the centre of the dialogues for the development of the structure which guarantees the security of information flows among different subjects that are part of it, allowing the elimination of paper documents, with the achievement of a significant goal, consisting in the normalisation and rationalisation of processes.



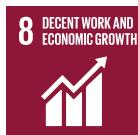
6.6 HEALTH, SAFETY AND SECURITY AT WORK

» WORLD DAY FOR HEALTH AND SAFETY AT WORK

The World Day for Safety and Health at Work is held on April 28th of each year, which is part of a campaign to promote safe, healthy and dignified work and is managed by the International Labour Organization (ILO) since 2003. A culture of safety and health at work is one in which the right to a healthy and safe working environment is respected at all levels, where governments, employers and workers actively participate in the safety of a healthy working environment and safe through a system of defined rights, responsibilities and duties, and where the highest priority is accorded to the principle of prevention.



» HEALTH AND SAFETY MANAGEMENT SYSTEM



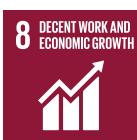
The choice of SECH and TDT to structure their management systems with a view to **CONTINUOUS IMPROVEMENT** highlights the importance assigned not only to the quality of the services provided, therefore to the attention paid to customer needs, but also to the respect for the environment and the protection of all operators. In this context, both terminals pursue, with the utmost commitment, the objective of guaranteeing and continuously improving their health and safety performance and, for this reason, in 2019 they completed, on a voluntary basis, the transition from the BS OHSAS 18001:2007 standard to the new standard, obtaining the **UNI ISO 45001:2018** certification. The transition was completed after an in-depth analysis of the context in which the organisations operate, which entailed the identification of internal and external factors, health and safety requirements at work by all the parties concerned and the mapping of business scenarios, with the attribution of risk and opportunity values for each of them, according to a defined criterion that associates the probability of occurrence with the extent of the consequences. In particular, the suitability of the interventions implemented by the companies to align the risks that emerged to the acceptable threshold was verified, also defining corporate objectives and improvement actions, aimed at further reducing the risks and seizing new opportunities.



» THE ADOPTION OF SAFE BEHAVIOUR MEANS HAVING ACQUIRED A CULTURE OF SAFETY, SINCE IT MUST NOT BE EXPERIENCED AS A BOND, AN OBLIGATION, BUT AS A VALUE, AS IS LIFE, WHICH WE MUST PRESERVE AND RESPECT.



» HEALTH AND SAFETY RISKS ASSESSMENT AND MANAGEMENT



For SECH and TDT it is crucial to establish, implement and maintain processes aimed at the continuous identification and elimination of hazards, so as to minimise the risks to the health and safety of operators (in terms of probability of occurrence or potential severity of the damage achieved). These processes take into consideration, in addition to routine business activities, also non-routine activities, accidents, emergency situations and organisational changes.

Once the hazard identification and risk assessment phases have been completed, the terminals adopt effective preventive and protective measures, to guarantee the protection of the health and safety of workers and all those who access the companies' premises.

Furthermore, SECH and TDT implement a system of controls aimed at ascertaining the compliance of the health and safety management system with the mandatory and voluntary standards of reference and at verifying the implementation and effectiveness of the prevention and protection measures planned based on the risk assessment activity, as well as the preparation of resources and adequate means to maintain and continuously improve the management system. It should be noted that, in 2019, cases of non-compliance with laws and/or regulations were not ascertained or reported for both terminals.

Such a control system allows the identification of non-compliant services and activities and is mainly divided into:



FIRST- AND SECOND-PARTY AUDITS (on the main suppliers), conducted by trained and in-house internal personnel, and third-party audits conducted by independent and accredited certification bodies. These verifications make it possible to ascertain the compliance of the terminals with the voluntary OHSAS 18001:2007 standard and to ascertain any non-conformities and/or recommendations for the improvement of the company health and safety performances;



PERIODIC AND SYSTEMATIC INSPECTIONS OF WORK ENVIRONMENTS, carried out by internal staff of the HSSE department, to ensure compliance with health and safety requirements and conditions, in all places and in the performance of all corporate activities;



EMERGENCY RESPONSE TRAININGS planned to test the possible emergency scenarios identified by the two terminals, in order to assess the effectiveness of the intervention plans and the preparation of the assigned personnel. The multi-year planning of the exercises is periodically reviewed on the basis of the results of the simulations carried out and the actual emergency events. The results of the tests are managed from a systemic perspective, through the identification, where necessary, of actions aimed at improving the response to the various events that may occur;



PERIODIC INSPECTIONS BY THE COMPETENT DOCTOR to ascertain that working environments and conditions guarantee respect for the health and safety of the operators;



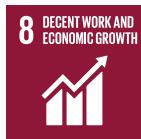
ADOPTION OF MANAGEMENT SYSTEMS THAT ENABLE THE FULFILLMENT OF MANDATORY AND VOLUNTARY HEALTH AND SAFETY OBLIGATIONS and the controlled management of any non-conformities detected, implementing all the corrective actions necessary to restore the full effectiveness of the health and safety management system. The above is particularly necessary also and especially in the case of accidents (injuries and nearmiss), occupational diseases and damages, as a result of which the terminals react immediately by starting the investigation activities indispensable to ensure a timely reconstruction of the dynamics of events, allowing the search for the causes that triggered them and their subsequent elimination, in order to avoid their recurrence.

» SAFETY CAMPAIGN

In 2019, the Safety Campaign ended, launched in 2018, to sensitise workers and permanent suppliers to adopting safe behaviours that can prevent accidents. As part of this initiative, classroom meetings were organised with workers, films and themed panels and posters were affixed, with the slogan "**PROTECTION ISN'T ENOUGH IF YOU DON'T USE YOUR HEAD**" (concept of the whole Campaign) and others on the risks covered, relating to: safe driving, use of PPE, compliance with the rules, correct perception of the risk, activities on board the ship and dangerous goods. To create greater involvement in relation to the message to be conveyed, some SECH and TDT workers who, under the patronages of GIP, participated in the creation of posters and videos were chosen as testimonials of the Campaign. Furthermore, new information and brochures have been printed, containing the rules of safe behaviour for visitors and transporters. The same rules of conduct have been affixed by means of suitable vertical signage, at the waiting rooms for acceptances and installed at the visits and general cargo areas. At the end of the Campaign, a questionnaire was administered to all the participants in the training course, some of whom were interviewed to better understand the meaning and scope of the answers provided in order to highlight any critical issues and strengths that emerged.



» WORKERS' PARTICIPATION, CONSULTATION AND COMMUNICATION REGARDING HEALTH AND SAFETY



SECH and TDT establish processes to promote the communication, participation, consultation and involvement of workers in health and safety matters, both directly and indirectly through the company RLS; the company communication methods take place respecting the diversity of gender, language, culture, literacy and disability.

Through the communicative processes, organisations prescribe appropriate behaviours in matters of health and safety towards internal and external subjects, such as, for example: direct and indirect workers, suppliers, contractors and visitors.

The corporate communication processes of SECH and TDT ensure that workers acquire the necessary awareness relatively to:

- Policy and objectives relevant to health and safety in the workplace;
- the importance of their own contribution to the effectiveness and improvement of the performance of the health and safety management system and the implications and potential consequences arising from not complying with the legal and system requirements;
- the active participation of workers in the analysis of the accidents concerning them and the results of the analysis of the relative causes; in fact, the terminals ensure that workers at all levels are encouraged to report dangerous situations, so as to be able to take preventive measures and take corrective actions;



- the involvement of workers and personnel existent in the terminals in the audit activities, to ascertain compliance with the requirements of the management system;
- knowledge of the risks existing in the context in which they operate;
- the adoption of safety procedures and instructions in force;
- identifying hazards, health and safety risks;
- the ability to move away from work situations that they consider to represent a serious and immediate threat to their life or health.

Consultation activities involve a kind of communication that promotes dialogue and exchanges; the consultation actually involves making the essential information available to the workers and the RLS, so as to provide informed feedback that must be taken into consideration by the terminals before making a decision in terms of workers' health and safety.

» TOGETHER IN SAFETY

Safety in the workplace is not guaranteed only by managers or by safety workers, but also by all workers who with their behaviour can create conditions of safety or insecurity for themselves and their colleagues; hence the logo "Together in safety".



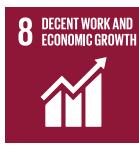
Protection isn't enough if you don't use your head

 Five workers wearing orange short-sleeved shirts, orange high-visibility vests, and hard hats are standing in a row against a teal background. They are all looking upwards and slightly to the right. The worker on the far left has his arms crossed.

Together in safety.

GIP SECH TDT

» HEALTH SURVEILLANCE



Health surveillance is one of the preventive measures for workers exposed to health risks which may be caused by physical, chemical, biological or ergonomic agents.

Health checkups are carried out according to a schedule defined by the competent physician in agreement with the employers of the terminals, who is in possession of the requisites foreseen by the law, carrying out medical examinations in suitable environments equipped for the checkup of the various aspects of physical and psycho-attitudinal functionality of workers.

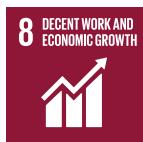
The outcomes of the medical examination are attached to the health and risk record and according to them the competent doctor expresses a judgment relating to the specific task, which may be: suitability; partial, temporary or permanent unsuitability, with prescriptions or limitations; temporary unsuitability; permanent unsuitability.

The activity of the competent physician does not end with the health surveillance of the workers, in fact he/she collaborates with the employer and with the HSSE department for the risk assessment and the implementation of the measures for the protection of health and psycho-integrity of workers; they also collaborate in the organisation of the first-aid service, with particular regard to the definition of medical-surgical aids available to the first-aid workers in charge.

The competent doctor also participates in the information and training of workers and is the only one authorised to provide information to workers about the results of diagnostic tests and health surveillance and the delivery of medical documentation, upon request or upon termination of the employment relationship. It is important to underline that the risk health record contains sensitive data and must therefore be treated in compliance with professional secrecy and the provisions of Legislative Decree 196/2003 regarding the protection of personal data.

In addition to the health surveillance activities described above, both terminals signed private insurance, to guarantee all workers access to health services, even outside of work, with the aim of preserving health thanks to programmes of annual checkups and further visits and examinations for diagnostic tests.

» TRAINING OF WORKERS ON HEALTH AND SAFETY MATTERS



It is the duty of SECH and TDT to carry out an information and training activity consistent with the company policies, the ethical principles contained, the applicable legislation on the subject, the voluntary adoption of standards, their commitments and the corrective actions relating to the prevention of repetition of non-compliance, accidents and injuries.

It is the terminals' task to ensure that workers are competent, including the ability to identify hazards; for this purpose SECH and TDT plan, organise, implement and verify the learning and effectiveness of information and training activities internally or through qualified external subjects. SECH and TDT provide workers with training on security, in compliance with the provisions of the State Regions Conference Agreement n. 221 of 21st December 2011, pursuant to Legislative Decree 9th April 2008, no. 81, which rules the duration, minimum contents and methods of mandatory training in terms of safety, personal development of workers, supervisors and managers, as well as the optional training of the subjects referred to in Article 21, paragraph 1, of the same Legislative Decree n. 81/08.

In detail, the terminals provide the following types of training on health and safety, also guaranteeing the updates envisaged according to regulatory requirements:

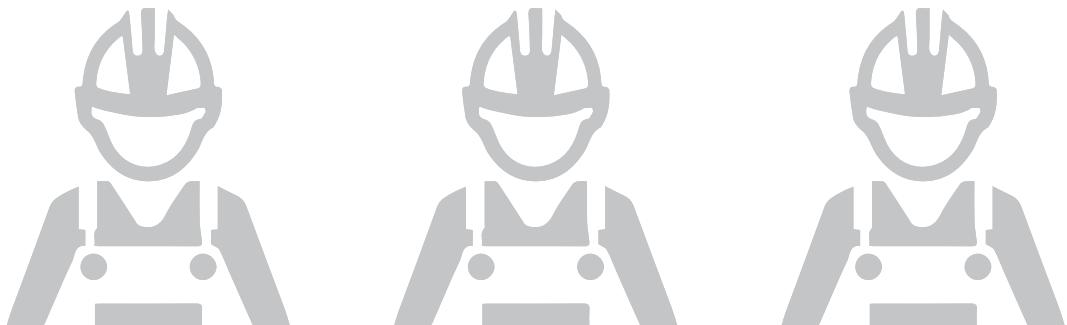
- General training, lasting 4 hours, concerns all workers and focuses on the general concepts of safety at work (Article 37, Legislative Decree 81/2008). This training is provided to all personnel on a one-off basis.
- Specific training refers to the tasks, the risks associated with these and the related prevention and protection measures and procedures, which are characteristic of the sector which the company belongs to. The duration of specific training is added to the general one and is variable of 4, 8 or 12 hours depending on whether it is addressed to tasks with low, medium or high risk respectively. E-learning training is allowed for workers only for the general part (4 hours) and not for the specific part. This training is updated every 5 years, subjecting the workers to a 6-hour training.
- Training for those in charge of safety and security is of a minimum duration of 8 hours and is provided in addition to that received as a worker and includes the development of the following topics:
 - » Main targets of the company prevention system;
 - » relations among the various internal and external subjects of the prevention system;
 - » definition and identification of risk factors;
 - » nearmiss and injuries;
 - » communication and awareness-raising techniques for workers;
 - » risk assessment of the company, with particular reference to the context in which the person in charge operates;
 - » identification of technical, organisational and procedural prevention and protection measures;
 - » methods of exercising the function of checking compliance by workers.

This training is updated every 5 years, subjecting the workers to a 6-hour training.

- Training for managers lasting at least 16 hours, divided into 4 modules:
 - » Legal - regulatory form;
 - » safety management and organisation;
 - » risk identification and assessment;
 - » communication, training and consultation of workers.

This training is updated every 5 years submitting the managers to a 6-hour training.

- Training for RLS, pursuant to article 37, paragraph 11 of Legislative Decree 81/2008 and subsequent amendments, which provides for an initial training of at least 32 hours and an 8-hour annual update.
- Compulsory training of resources covering roles of emergency preparedness and response divided into:
 - » Training for workers in charge of first-aid, provided in accordance with the provisions of Ministerial Decree 388/03. This lasts 16 hours and is updated every 3 years through a 6 hour course. First aid workers are trained in the use of the automatic external defibrillator (AED) and are listed in the regional network of authorised persons. The specific training on BLS (Basic Life Support) is updated every 2 years, as required by law;
 - » training for firefighting workers. This training, provided in accordance with the provisions of the Ministerial Decree 10/3/98, has a different duration, varying between 4 and 16 hours depending on the type of company and the risk related to the job held. It is renewed every 3 years through a course that varies from 2 hours (low risk) to 8 hours (high risk);
 - » training relating to the use of vehicles and equipment, necessary for the purposes of issuing the qualification to conduct them, governed by the State Regions Conference Agreement, n. 53 of 22nd February 2012, which regulates the methods for the recognition of the authorisation to drive work equipment, the trainers, the duration, the addresses and the minimum validity requirements of the training, in implementation of article 73 paragraph 5 of the Legislative Decree 81/2008 and subsequent amendments. In the terminals, the vehicles that fall within the scope of this legislation are: forklift, mobile and scissors lift and reachstackers. Again, this training that must be updated every 5 years;
 - » training for the authorisation to run other vehicles and equipment present in the terminals and whose training is not part of the State Regions Conference Agreement n. 53 of 22nd February 2012, but is provided in compliance with internal procedures and in accordance with the provisions of Legislative Decree 81/08.





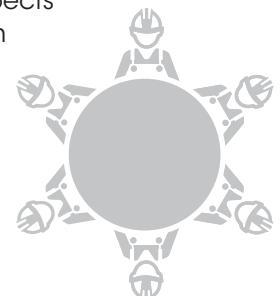
6.6.1 SECH approach



For 2019, with a view to continuously improving health and safety performance, SECH has undertaken the following initiatives:

» WORKERS' COMMUNICATION, PARTICIPATION AND INVOLVEMENT

- In November 2019 a new monitor was installed in the dining room below the office of the operations superintendents, which adds up to the two monitors installed in the dining areas of both terminal buildings. In this way, the company communication channels aimed at workers have been further enhanced, as it is now also possible from this area, crowded by employees and third party workers, who in various times intervene in the terminal, to view the contents projected within the company schedule. The display of the wind conditions status always appears on a second monitor, which has been integrated into the corporate network, an aspect that should guarantee better reliability in the event of breakdowns and blackouts, since the IT department can also intervene remotely;
- the meetings of the "improvement groups" took place from December 2018 and February 2019, an initiative requested by most of the resources, who expressed their willingness to be more involved and informed on the different aspects of the company business. This project allowed colleagues from different departments to meet and create synergies favouring collaboration, with the aim of obtaining better performing business results, in a context that becomes increasingly challenging and competitive. In this sense, each resource participated in the activities envisaged by the "improvement groups", within which everyone had the opportunity to share information and ideas, to bring solutions aimed at improving productivity, climate and organisation in the departments where each of them operates every day. The feedback from the participants was positive, in fact the unanimous request was to keep up the meetings, but, above all, to follow up on the proposals that emerged during the classroom works, through an activity of collecting and organising all the comments received. Therefore, an analysis and planning process was launched, aimed at implementing the improvement proposals, the implementation phase of which is constantly updated and communicated through various methods, such as the company newsletter and a series of monitors that have been installed in different terminal locations;



» PPE

Always with a view to continuous improvement, in 2019 the purchase of safety shoes was re-evaluated with the company RLS, directing the choice towards a more durable and robust model. The electrical maintenance personnel was also equipped with better gloves for protection during work under voltage or in the vicinity up to 500 V. A pneumatic verifier was purchased for these devices, in order to carry out their six-monthly testing.

» CREATION OF A WALLPAINTING AT SECH

In conjunction with the celebration of the world day for health and safety at work, the new wallpainting was inaugurated, set up on the east wall of the pedestrian underpass connecting the two buildings at SECH terminal. The work, which completes the activity already carried out on the west side wall, consists of a wallpainting, conceived by Simona Piccardo, specialist student of the two-year course in Decoration from the Accademia Ligustica of Genoa and created directly by the students.

The project saw the collaboration of the students with the company RLS and the mural painting reproduces the container as context. Within the pictorial composition, graphic elaborations of safety signs have been included, as well as a large writing that refers to the concept of safety and attention. The composition follows the world of neo-pop culture, with references to the graphics of the first computers. This is the second pictorial intervention carried out by the students and an explanatory brochure was distributed to all workers.



Accademia
Ligustica di Belle Arti
di Genova





» EMERGENCY DEVICES

During 2019, three lifesaving safeguards were set up against cardiovascular arrest, to protect workers, visitors and all external staff at the terminal. In fact, every year in Italy this phenomenon affects, unfortunately, one person in a thousand, with an estimate of about 55 thousand cases every 12 months, with a survival rate of 3 percent. However, in countries with early defibrillation, survival can reach 50 percent. 118¹² was notified of the installation, in order to integrate the appliances in the Ligurian territorial emergency network. Defibrillators belong to the category of external automatic typology (AED), which guides the operator in all phases of the rescue, indicating the operations to be carried out at each step. In June, the training of employees to use the defibrillator was carried out, in order to ensure a continuous presence 24 hours a day.

» EQUIPMENT

Following to a request from the maintenance and operations department, the terminal was equipped with a cage for lifting people, designed to be brought to altitude with the forklift. Such equipment will allow to perform extraordinary activities on various typology of cargo more easily and safely (lashing and unlashing) or maintenance work at height, which cannot otherwise be performed with traditional equipment. In order to ensure that personnel are informed and trained in the use of this equipment, a specific safety instruction has been prepared, with the subject of the course addressed to the supervisors and colleagues who will use it.



» TRAINING

SECH's commitment to safety training also continued in 2019. The provision of the compulsory safety training update, the PES-PAV¹³ update for electrical maintenance

12. Rescue squads.

13. The PES/PAV/PEI is a training course necessary to be able to work in the presence of electrical hazards and is aimed at all personnel working on live or out-of-voltage electrical systems. The reference standard is CEI 11-27:2014.





» "IDEAS TO PROMOTE SECURITY AT SECH" COMPETITION

On April 28th, 2019, on the occasion of World Security Day, the two *ex-aequo* winners of the competition "Ideas to promote security at SECH" were awarded and all staff were invited to present ideas for the benefit of the workers' health and safety. The company has undertaken to carry out what is suggested, increasing the use of the shuttle bus to offer a service for the transfer of seafarers from on board the vessels to the reception area and vice versa and a dedicated service to transport workers to the allocated vehicles at yard at the beginning of each shift. Thanks to this improvement action, the exposure to investment risk, to which personnel passing through operating areas by foot is extremely exposed, will be further reduced.



workers, the update for employees using scissor lifts, reachstackers, industrial trucks and telescopic-boom trucks has been planned and implemented, as well as the update for the management of dangerous goods pursuant to the IMDG¹⁴ Code and the fire and first-aid update for emergency workers, which from this year is completed with the maneuvers of use of the defibrillator. Since training to SECH, however, does not only mean fulfilling the obligation envisaged by laws and regulations, during the year the company offered its employees the opportunity to grow and keep up to date, to always keep their skills and competences adequate, with respect to the evolution of the working activity. In this context falls the activity of the improvement groups, which included a training session aimed at raising workers' awareness of the importance of reporting the threats they encounter in carrying out their duties, as well as creating a network of managers who could cope with them. Among the growth patterns that the organisation has offered to its workers, there are the courses for the qualification to drive vehicles excluded from the State Regions Agreement (RMGs, RTGs, SSGCs), as well as those aimed at enabling operational tasks (stevedores). These courses include a large section on behavioural safety rules to be followed during the job and on the main risk prevention and management measures. Dedicated extra training activity is then addressed to the leading roles of the security area (HSSE and employees) who, during 2019, covered the following topics:

- How to build safety behaviours and culture;
- risk reduction at ALARP¹⁵ level and health and safety performance indicators in compliance with UNI ISO 45001;
- the MSDS¹⁶ for dangerous substances;
- guidelines for assessing the effectiveness of safety training;
- workplace safety in port operations and business organization models for a workplace health and safety management system.

14. International Maritime Dangerous Goods.

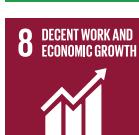
15. As Low As Reasonably Practicable.

16. Material Safety Data Sheets.

6.6.2 TDT approach



For 2019, with a view to continuously improving health and safety performance, TDT undertook the following initiatives:



» WORKERS' COMMUNICATION, PARTICIPATION AND INVOLVEMENT



TDT's commitment to continuously improve internal and external communication processes, participation and involvement of staff working at TDT is ongoing.

As regards employees, the following initiatives are highlighted for 2019:

With a view to obtaining an ever greater and effective participation of workers in the analysis of incidental events involving them, since 2019 the HSSE workers have further improved the participation procedure of the RLS, so as they are pooled for each event analysis of the causes to agree on corrective actions.

In the second half of 2019 several specific meetings were convened between the HSSE workers and the RLS for the collection of reports and feedback on issues impacting on health and safety, for the sharing of ideas, projects and improvement proposals; the HSSE department keeps track of these meetings, sometimes even informal ones, in the management system, drawing up specific meeting minutes.

As regards the external users of the terminal, the main TDT activities aimed at improving the communication, participation and involvement area follow:

- **Vertical signals and safety information**

A new and wider signal was installed, with both Italian and English versions, containing the safety rules and the behaviours to be followed in the areas of the terminal with greater attendance by external staff as well as in the area dedicated to the storage of hazardous containers. Brochures holders containing safety information sheets have also been positioned in some of the company's busiest areas.

- **Suppliers' awareness with respect to terminal security**

TDT met the main suppliers in order to define and share actions and work strategies aimed at maintaining and, where necessary, improving high levels of health and safety at work. In this sense, the prevention and protection service has also elaborated and delivered a questionnaire dubbed "Specific safety at TDT" to the external resident supplier of the shuttle service managing the internal transport of the containers, with the aim of further sensitising the supplier of a service so important and impacting on the safety and health of workers, as well as on procedural and behavioural aspects deemed particularly sensitive, and therefore essential, to operate according to high safety standards.

» “TAKE CARE OF YOURSELF ... YOU ARE A WORK OF ART ,”

On the occasion of the 2019 World day for Safety and Health at work, TDT promoted a campaign entitled "Take care of yourself ... You are a work of art", created by Unigum as part of the "Educating to safety" project, which has the objective of conveying the message of safety in a diverse way from all the already existing campaigns on the subject.

The purpose of the campaign was to promote and encourage the use of personal protective equipment, through unconventional images that do not rely on fear, but on beauty, uniqueness and the desire to love each other.

Two totems were exhibited, postcards were distributed, some T-shirts and themed posters were displayed in the areas mostly visited by the personnel.

In addition to the awareness campaign on the topic, the security office took the opportunity to distribute to all employees a questionnaire on "The perception of security in port" created by ASL¹, Port Authority and INAIL², as part of the wider "Prevention plan aimed at improving job security in companies operating in the ports of Leghorn and Piombino".



1. Local health authority.

2. National institute for insurance against industrial injuries.



» EMERGENCY MANAGEMENT

In the field of emergency management, in addition to the exercises carried out in application of the safety regulations and the requirements of the health and safety management system, TDT organised an emergency exercise with recovery of the operator from the quayside crane, with the participation of the local fire brigade command.

The exercise allowed to test one of the most difficult and proper management scenarios, to improve relations with the authorities in charge and to identify opportunities for improvement in emergency management.

In addition, in 2019, on the initiative of the prevention and protection service, TDT purchased and donated two 20-foot containers free of charge to the provincial command of the Leghorn fire brigade, to be assigned to the institutional service carried out by the national fire brigade.

The containers will be used as storage for equipment, for logistics and operations on the territory as well as to simulate emergency interventions.



» INFRASTRUCTURES AND LAYOUT

As part of the progressive replacement of the fleet, TDT has invested in the purchase of two new 36T goosenecks with safety hooks, a new automatic device for the handling of OOG containers and a new 60-foot rolltrailer.

The terminal also proceeded to improve the state and layout of the yard through extraordinary maintenance and safety of deteriorated areas and the revision of the layout of the visiting area with the tracing of a roundabout to facilitate vehicles entry and exit maneuvers. In addition, new pedestrian paths for truck drivers in the gate area were refurbished and added.

» CONTINUOUS IMPROVEMENT OF THE HEALTH AND SAFETY SYSTEM

In 2019, additional safety indicators were identified, in particular for the areas of involvement and participation of workers and other Stakeholders, for events of adverse weather conditions and in the context of training, management of emergencies and occupational diseases, health surveillance, healthy workplace.

» TRAINING ON SAFETY AND EQUIPMENT

At TDT, staff training plays a fundamental and paramount role; with two offices specifically dedicated to safety training and the use of vehicles, the company responds both to regulatory training requirements and to the awareness of the personnel, employee or third party involved, and to the increase in health and safety conditions at the workplace.

In 2019, in addition to the mandatory training for emergency response personnel, specific supplementary training for particular tasks and training for the maintenance and growth of the skills of the personnel assigned to the health and safety management system, as referred to in paragraph 6.3 "Training", specific and additional courses were held, such as:

- Specific additional in-depth training for personnel dedicated to the management of dangerous goods (IMDG Code);
- a specific training course "workers in charge of front loaders (mechanical shovels)" for workers in the RoRo cycle (for the handling of rolling stock);
- specific behavioural training, aimed at educating workers to a correct perception, and therefore management, of their own risks during their work.

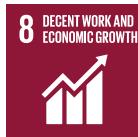


6.7 INJURIES AT WORK AND OCCUPATIONAL DISEASES AT THE TERMINALS

6.7.1 Injuries at work



The adoption by SECH and TDT of health and safety of workers' schemes according to the UNI ISO 45001:2018 standard guarantees the management of anomalies detected according to an internationally recognised standard.



Following to the occurrence of injuries, in particular, the terminals react immediately by initiating in-depth investigation activities, necessary to ensure a timely reconstruction of the dynamics of the events. The analysis of the data and the testimonies collected allow the identification of the root causes underlying the occurrence of the events and the determination of the actions to be implemented, to avoid recurrence of the event as well as improve health and safety conditions of the workplace.



Below are the figures relating to the trends of SECH and TDT.

Table 71: Occupational injuries of the terminals' direct workers

TERMINALS' DIRECT WORKERS	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
Number of injuries	10	8	13	5	10	10
of which severe ¹⁷	2	3	4 ¹⁸	3	2	5
of which fatal	0	0	0	0	0	0

Table 72: Occupational injuries of the terminals' external workers

TERMINALS' EXTERNAL WORKERS	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
Number of injuries	2	3	3	7	4	8
of which severe	N.D.	0	N.D.	3	N.D.	3
of which fatal	0	0	0	0	0	0

17. Serious injuries are defined as those exceeding 39 days of absence from work. SECH terminal does not keep the record relating to the days of absence of non-employee external personnel.

18. Data processed on 18/09/2019 when the last injury of 2018 officially closed.

Table 73: KPI injuries at work

TERMINALS DIRECT WORKERS	2017		2018		2019	
	INJURIES	SECH	TDT	SECH	TDT	SECH
Incidence Rate	41,70	26,32	54,85	16,70	42,55	34,17
Frequency Rate	26,90	16,71	33,89	10,72	26,38	22,23
Fatal Frequency Rate	0	0	0	0	0	0
High-consequence work-related injuries	5,38	6,27	10,43 ¹⁹	6,43	5,28	11,11
Recordable work-related injuries	21,51	10,44	23,46 ¹⁹	4,29	21,10	11,12
Severity Rate	0,8	1,13	2,03 ¹⁹	0,66	0,74	1,01
Average Duration	30	67,50	60,23 ¹⁹	61,60	28,00	45,30

The above rates follow the below calculation methods, consistent with what is indicated by the GRI Guidelines:

- **Incidence Rate²⁰:**
(n° injuries*1.000/n° workers);
- **Frequency Rate²¹:**
(total injuries/total worked hours)*1.000.000;
- **Severity Rate:**
(total lost days/total worked hours)*1.000²²;
- **Average Duration:**
(n° absence days due to injury/n° of injuries).

19. Data processed on 18/09/2019, when the last injury of 2018 was officially closed.

20. Starting from 2018 Sustainability Report, this index was calculated using a multiplier of 1.000 instead of 100, to obtain a value aligned with the parameters of the law, rather than a figure that until now was considered more representative compared to the size of SECH.

21. Starting from 2018 Sustainability Report, this index was calculated using a multiplier of 1.000.000 instead of 100.000, to obtain a value aligned with the parameters of the law, rather than a figure that until now was considered more representative compared to the size of SECH.

22. Compared to other indicators, this index is calculated using a multiplier of 1.000 to obtain a representative value compared to SECH dimensions.

6.7.1.1 SECH INJURIES ANALYSIS

Over the last decade, analysing the data relevant to **SECH employees**, they went from 19 cases in 2009 to 10 events in 2019, with a 50% decrease in the accident phenomenon.

Further proof of the good statistical performance can be deduced from the strong contraction of the general phenomenon over the longer term, of more than 75%, obtained in the 10 years of activity (36 accidents with 210 employees in 2009 and 10 accidents with 236 employees in 2019) as well as inferred from the chart below. Although in 2019 there was a decrease compared to 2018 (from 13 to 10 cases), in the last three years, however, the trend has shown a slight increase compared to the minimum point reached in 2013 and 2016, corresponding to 7 accident cases, also coinciding with less terminal operation.

Below are the data relating to the accident performance of SECH:

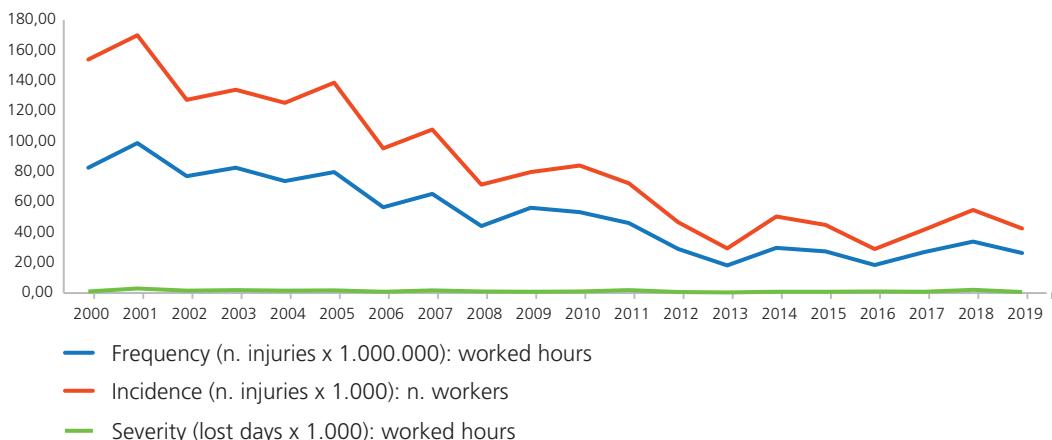


Chart 19: SECH trend

The statistical data of frequency (26.38%), incidence (42.55%), severity (0.74%) and duration (28) were all lower than the average of the previous 5 years (27.4%; 44.2%; 1.1%; 41.5), confirming the good company performance.

The **company professionals** involved, in 2019, were: two maintenance operators, one maintenance coordinator, one stevedore, two customs inspections operations coordinators, one customs inspections officer, one gate officer and two HSSE workers.

Over a period of ten years, the professional figures exposed to the greatest risk are the stevedore, the staff driving equipment and vehicles and the workers in the rolling stock maintenance department.

In 2019, 4 accidents also occurred to **non-employees** operating in the terminal. In particular, these events occurred during the exercise respectively of the duties of employee in charge of vehicle management and unlashing belonging to CULMV staff and in charge of guarding the main concierge of the terminal belonging to the staff of the external company entrusted with the service.

As regards the main causes of injuries at SECH, please find a more detailed table below:

Table 74: Root causes of injuries at SECH

YEAR	2017		2018		2019	
	I	E	I	E	I	E
ROOT CAUSES OF INJURIES AT SECH						
Fall from different levels	0	0	1	0	0	0
Fall on ground level	3	0	3	0	1	1
Equipment circulation	0	0	0	1	0	0
Recoil	0	1	1	0	1	0
Descent from vehicles/equipment	2	0	2	0	1	0
Descent from stairs	1	0	1	0	2	1
Airborne materials	0	0	1	0	2	1
Crushes	3	0	1	1	2	0
Cuts	0	0	2	0	0	0
Collision	1	1	1	1	1	0
Ascent of stairs	0	0	0	0	0	1
TOTAL	10	2	13	3	10	4

During 2019, it should be noted that 60% of accidents related to internal staff find causes equally distributed between stair descent, airborne materials and crushes. The remaining 40% is divided between descent from vehicles, falls on ground level, recoils and collisions.

Over a ten-year period, the main causes that underlie the occurrence of events are descent from vehicles, collisions, falls on ground level and crushes.

With regard to 2019, considering the type of accidents occurred, the intervention activities in order to reduce or eliminate their recurrence, specifically, were:

- Individual information and training interventions aimed at sensitising operators regarding the correct behaviours to follow during the execution of specific work activities;
- improvement of the mapping of the manhole covers to be monitored, within the checklists of the HSSE service;
- installation of signs on the platforms of the quay cranes, which prohibit the stationing of personnel during the transit of the trolley.

As for the accidents that occurred to external personnel, in 2019 the causes of the events were the dispersion of materials in the air following to a gust of wind, the improper ascent/descent of stairs from the guardhouse of the main concierge of the terminal and the fall on ground level during transit in a non-pedestrian area.

To avoid the recurrence of this type of accident, the intervention activities in order to reduce or eliminate their recurrence, specifically, were:

- The application of a handrail on both sides of the access staircase to the main gatehouse of the terminal, in order to facilitate the entry and exit phases of the security staff;
- disagreements with the work of some workers, so that they may adopt a more careful behaviour during the performance of their duties inside the terminal.



6.7.1.2 TDT INJURIES ANALYSIS

Compared to the previous year, 2019 recorded a slight increase in the number of accidents at work: 10 events against the 5 occurred in 2018.

The figure is in any case in line with the positive trend that has been established since 2012, the year from which an average of just under 11 accidents per year was recorded, an already improving value compared to the previous period 2006-2011, in which the average was 28 accidents per year and for the period 2009-2011 (first three years of certification, more undeviating in number of employees and hours worked), in which the average was 25 accidents per year.

Also as regards the number of days of absence from work, an appreciable improvement of 34.4% was recorded, if compared with the average for the decade 2009-2019 (going from 691 average days of injury to 453 in 2019), and an improvement of about 11% compared to the period of the previous three years (2016-2018).

The improvement trend over the years is shown in the following graph: frequency (22.23), incidence (34.17), severity (1.01).



Chart 20:TDT trend

As regards the main causes of injuries at TDT, please find a more detailed table below:

Table 75: Root causes of injuries at TDT

YEAR	2017		2018		2019	
	I	E	I	E	I	E
ROOT CAUSES OF INJURIES AT TDT						
Behaviour	6	3	4	6	9	7
Technical	1	0	1	1	0	0
Organisational	0	0	0	0	0	0
Procedural	0	0	0	0	0	0
Other	1	0	0	0	1	1
TOTAL	8	3	5	7	10	8

As shown in the table, the behavioural datum is the most important one.

This macro category includes: accidental fall, accidental event, incorrect handling or misuse of equipment, accident between vehicles, violation of speed limits that cause an accident, driving vehicles, procedures not followed, handling of the wrong load, failure to use personal protective equipment, collision with obstacles, incorrect operation and intentional event. In most of the events listed above, the reason behind the accident is not actually considered as a separate cause, capable, by itself, of generating the event, since this would lead to neglect the conditions in which the performance that results in a damaging event occurs; in the analysis, on the other hand, the conditions at the origin of distraction are considered, such as, for example, process factors and interfaces that may favour forgetfulness or confusion (work-related or not). Or, again, interference with other tasks or other objects of attention. The identification of these elements is fundamental to be able to significantly tackle work and therefore bring a concrete and effective improvement.

In order to avoid the recurrence of this type of accident, the following actions have been taken in order to reduce or eliminate their relapse, specifically:

- Conclusion of the safety campaign aimed at improving workers' awareness, involving also permanent external suppliers;
- extension of training on the correct behaviour to be followed once in terminal, in order to prevent injuries to all TDT operating employees;
- conducting safety coordination meetings with permanent suppliers.

In 2019, 8 accidents also occurred, occurring to staff not employed, but operating in the terminal. All accident events relating to external TDT workers are not attributable to critical issues detected in the workplace, but derive from the performance of the specific activity of the permanent supplier. The number of accidents concerns six different companies that deal with crane maintenance, vehicle maintenance, tyre maintenance, monitoring of temperature-controlled containers, work on board and the internal container transport service. With particular regard to 2019, there are 2 accidents for the crane maintenance company and 6 for the company that carries out work on board.

As for the dynamics:

Table 76: TDT injuries dynamics

YEAR	2017		2018		2019	
TDT INJURIES DYNAMICS	I	E	I	E	I	E
Injury while ascending/descending	3	1	1	2	3	1
Fall on ground leve/tumbles	0	0	1	1	2	3
Fall from height	0	0	1	0	1	0
Collision	0	0	1	1	0	0
MMC ²³ - materials dropping	0	0	0	0	0	0
MMC - manipulation	1	1	0	1	0	2
MMC - crush	2	0	0	0	1	0
MMC - efforts	0	1	0	1	0	2
Accident between vehicles	0	0	0	0	0	0
Aggression	0	0	0	0	0	0
Inappropriate movement	0	0	1	0	0	0
Past pathology	1	0	0	0	0	0
Pneumatic burst	1	0	0	0	0	0
Other - Presence	0	0	0	0	3	0
Technical-mechanical breakdown	0	0	0	1	0	0
TOTAL	8	3	5	7	10	8

As emerges from the data analysis, over the years, the most frequently occurring case history is linked to the “ascending, descending, walking” macro-category, followed, in 2019, by the “falling/tumbling” cases, that is, the cases of accidents which occur while the victim walks, descends a stair or an operating vehicle or climbs up there. It should be noted that it is precisely in this area, mostly linked to the behavioural aspect, that the management system focusses its interventions; over the years, the reduction in accidents is linked precisely to the clear improvement that the workplace health and safety management system has brought to this area.

23. MMC: manual handling of loads (*movimentazione manuale dei carichi*).

6.7.2 Nearmiss

The attention of the terminals is also constantly addressed to the identification of the so-called **nearmiss**, that is, of those accidents for which, due to a fortunate circumstance, no damage to people occurred, but that if these favourable conditions had not occurred, they could have had consequences, sometimes even of a certain severity.

The analysis of the nearmiss represents, therefore, an important prevention tool, as it provides the terminals with significant information regarding the signals of malfunction of the HSSE management system. It should also be considered that not only losses from accidents are economically significant for the company, but also productivity losses resulting from interruptions in the work process, caused by those events that do not cause accidents or material damage.

The terminals therefore analyse and deal with nearmiss, with the aim of identifying new potential dangers and providing adequate and effective measures, that can avoid the recurrence of these events.

In particular, in the face of nearmiss occurred in 2019, **SECH** has initiated the following corrective actions:

- Recall of some employees or external workers, through their respective reference figure, in order to raise awareness about compliance with the correct work procedures;
- sending communications to invite maintenance work to be carried out on the ship's deck;
- operators awareness, through the campaign on safe behaviours, also focussed on the correct use of PPE, and monitoring, so that operators wear the protective helmet;



- carrying out alcoholic checks on employees in the company during the evening shifts;
- carrying out specific checks on all the gangways of the cranes to ascertain the presence of any loose element on the fixing bars, in order to prevent any fall of materials from above;
- planning the periodic verification of the anchorage points of the safety signs posted on the cranes, as they are exposed to the risk of falling in case of strong wind;
- verification, together with the manufacturer, of any design or manufacturing defects in the cables of the spreader of the cranes;
- construction of a traffic light system on the quay aimed at indicating the correct position in which to park the prime movers during vessels' operations, in order to prevent any accidents;
- integration of the fire-fighting equipment with an extinguisher for vehicles, mostly used by emergency workers, in order to always guarantee prompt intervention;
- insertion into the system of periodic verification of the entire spreader fleet, to ascertain any anomalies or loosening.

As for **TDT**, the most significant actions resulting from the 2019 nearmiss records are the following:

- Integration of a section of fence in the gate area-visitor area, to avoid new jersey overpasses during operations;
- replacement of the original pads of quay cranes with other more performing and resistant ones;
- integration of non-destructive controls on spreaders with penetrating/ultrasound liquids on an annual basis;
- distribution of information, by the HSSE department, to make the operators more aware of always reporting to the offices in charge cases of strong impacts to the spreader, ropes and anomalies in general on the equipment;
- implementation of a daily check on the spreader of the operating cranes during the shift change between the first and second shift;
- additional control introduced on the "full" tyres of the scissors lift: monthly measurement of the distance of the centre of the wheel axis from the ground on a level surface with the machine always in the closed configuration;
- in addition to the above, during 2019, against certain events, ad-hoc written reminders were issued and specific training reminders were provided, where necessary.

6.7.3 Occupational diseases

Table 77: Direct workers' occupational diseases

YEAR	2017		2018		2019	
	SECH	TDT	SECH	TDT	SECH	TDT
DIRECT WORKERS' OCCUPATIONAL DISEASES						
Number of occupational diseases	0	1	0	0	0	1 ²⁴
Number of deaths owing to occupational diseases	0	0	0	0	0	0
Occupational Diseases Rate [(total occupational diseases/total worked hours)*100.000].	0	0,21	0	0	0	0,22

Table 78: Direct workers occupational diseases typology

YEAR	2017		2018		2019	
	I ²⁵	E ²⁶	I	E	I	E
OCCUPATIONAL DISEASES TYPOLOGY (TDT ONLY)						
Lumbo-sacral spondylodiscopathy	1	N.D.	0	N.D.	1	N.D.
TOTAL	1	N.D.	0	N.D.	1	N.D.

The analysis of the data shows that for SECH no case of occupational disease occurred in the three-year period of reference, while TDT registered the first case in 2017 and appealed against the acceptance of occupational disease in 2019.

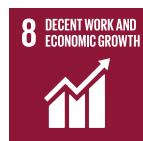


24.TDT appealed against the acceptance of occupational disease

25. I = internal employees.

26. E = external workers who are not employees, but whose activity or place of work is controlled by the organisation.

6.8 DANGEROUS GOODS MANAGEMENT



Regarding the management of dangerous goods, SECH and TDT guarantee compliance with national and international regulations and with recommendations issued by the IMO in the "Revised Recommendations on the Safe Transport of Dangerous Cargoes and Related Activities in Port Areas". In order to allow the segregation of units, SECH and TDT have dedicated stacking areas for the storage of containers used for the transport of dangerous goods (IMO).

Within these areas dedicated to the storage of dangerous goods, the containers must be positioned in compliance with the relevant hazard classes and segregation constraints, imposed for reasons of compatibility between the different materials stored in the containers. Dangerous goods belonging to the following hazard classes are excluded from storage: class 1 (except class 1.4 S), class 6.2 and class 7, which can be accepted only with the prior authorisation of the authorities, based on the provisions of legal requirements.

The procedures require that the structure of the IMO storage areas, the correct segregation and the presence of any anomalies are constantly monitored. The presence of dangerous goods within a temporary port depot is, in fact, subject to continuous changes, being constantly influenced by the handling (loading/unloading, receiving/delivery) activity that takes place within its areas. Therefore, the risk analysis is dynamic and is managed through a dedicated software, Hacpack, which is used in many other Italian terminals and allows to constantly assess the risk based on the type of goods, the hazard class, the packaging, the weight of each single package and the total weight of the containers in the dedicated stacking area. Furthermore, the software is also able to provide in real time the safety data sheets of the goods extant in the storage area to allow a rapid and correct management of any emergency interventions, both for environmental and health as well as safety aspects for workers. Furthermore, SECH and TDT set up specific monitoring procedures and systems in order to guarantee the management of dangerous goods and the response to emergencies. In this regard, the Terminals ensure specific training of all employees, as well as information to all third-party personnel accessing their areas, about the existent risks, the behaviours to be held and the emergency procedures adopted.

Table 79: Total IMO cargo at SECH and TDT 2017 - 2019

YEAR	2017		2018		2019	
	IMO CARGO	SECH	TDT	SECH	TDT	SECH
Import	1.611	972	1932	1.072	1913	1.192
Export	3.506	3.075	4.098	2.695	5040	1.865
Total containers ²⁷	5.117	4.047	6.030	3.767	6.953	3.057
CSC/NSN/TSC ²⁸	353	1.659	439	1.216	228	2.501
TOTAL	5.470	5.706	6.469	4.983	7.181	5.558

27. For safety reasons the unit of measurement taken into consideration is the container and not the weight or volume of the substances handled.

28. CSC: out-of-vessel cycle truck/truck; NSN: transshipment; TSC: out-of-vessel cycle rail/truck. For TDT the value is relevant only to the NSN (transshipment) movements; CSC and TSC are equal to 0.

The charts show the total as well as broken down trend in import/export/other cycles of IMO containers (classified as dangerous goods) handling in the last three years.

This activity required a constant commitment in order to guarantee, given the particularity of the goods present, adequate conditions both in terms of health and safety as well as in terms of access security.

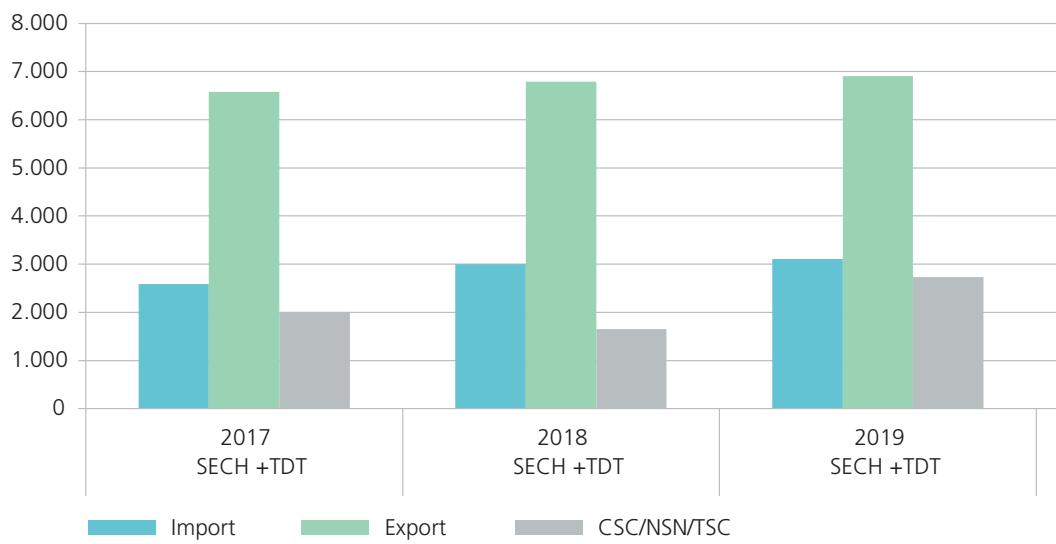


Chart 21: Overall number of IMO containers for import /export/other - SECH and TDT cycles 2017 - 2019

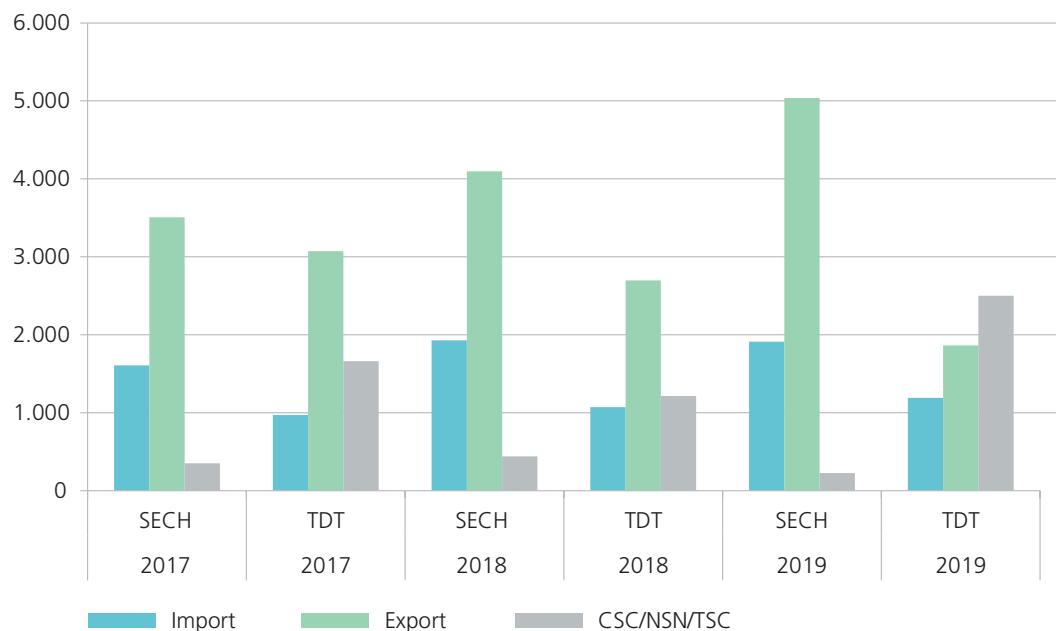


Chart 22: Number of IMO containers for import/export/other divided by SECH and TDT cycles

6.8.1 SECH dangerous goods area

SECH dangerous goods area has a storage capacity of 549 TEUs; the terminal is also endowed with a fire extinguishing system in this area, whose equipment amounts to 10 hydrants and 10 different foam barrels:

Four hydrants with the related 200-litre foam barrels placed underground;

six hydrants with the relevant 200-litre foam barrels placed overground.

SECH also makes use of the compulsory supplementary fire-fighting service, carried out by an external supplier for the surveillance of the dangerous goods area 24/7, in compliance with the provisions of the Port Authority of Genoa, n. 4/2001.

To prevent that the spillage of products from a container or from a tank may produce a leak of substances on the ground, SECH set up a collection tank in the dangerous goods area, divided into four sections, with a total area of about 60 square metres and the perimeter walls built in reinforced concrete.

The tank is capable of housing four 20-foot containers or two 40-foot containers simultaneously plus their contents and is equipped with pipes and shut-off valves that allow direct aspiration of any product existent in one of the sections.

Emergency personnel continue to be duly trained in the procedures provided by the IMDG Code, as well as about the use of the installed equipment, further to the practical tests carried out directly on the field.



Table 80: SECH breakdown of dangerous goods by import/export hazard class (%)

		IMPORT (%)			EXPORT (%)			TRANSHIPMENT (%)		
CLASSES	DESCRIPTION	2017	2018	2019	2017	2018	2019	2017	2018	2019
1	Explosives	0,00	0,00	0,00	0,00	0,15	0,00	0,00	0,00	0,00
2	Gases	0,06	0,00	0,00	0,31	0,02	0,06	1,47	0,00	0,00
2.1	Flammable gases	1,55	1,20	2,14	3,82	3,43	2,98	1,47	2,56	3,50
2.2	Non-flammable/ non-toxic gases	1,61	2,08	4,23	3,79	4,49	6,59	5,15	6,55	4,89
2.3	Toxic gases	0,12	0,00	0,26	0,09	0,15	0,24	0,00	0,29	0,00
3	Flammable liquids	34,70	45,27	48,72	43,16	49,89	50,42	20,22	35,61	27,97
4.1	Flammable solids, self-reactive substances and desensitised explosives	3,04	1,98	2,72	0,40	0,56	0,38	1,84	1,71	5,59
4.2	Materials subject to spontaneous ignition	1,12	1,04	0,05	0,17	0,52	0,08	0,00	0,57	1,40
4.3	Substances which, in contact with water, emit flammable gases	0,50	0,36	0,52	0,99	0,34	0,55	0,00	0,00	2,80
5.1	Oxidising substances	2,55	3,23	2,82	2,68	3,85	2,06	2,94	8,83	5,59
5.2	Organic peroxides	0,62	0,10	0,00	2,40	0,42	0,42	0,37	0,00	1,40
6.1	Toxic substances	8,94	6,92	5,18	1,91	2,31	1,94	7,72	8,55	4,20
8	Corrosive substances	16,02	13,11	11,19	19,60	16,80	16,82	40,81	8,83	9,79
9	Different dangerous materials and objects	29,17	24,71	22,17	20,68	17,07	17,46	18,01	26,50	32,87

From the statistical analysis it is clear that the export movement of flammable material belonging to class 3 is predominant, even in 2019, which alone exceeds 50% of the general export movement, followed by class 9 and 8, which affect the about 17%. As regards imports, the representation of volumes continues to be more evenly distributed among the 4 most significant classes, resulting in class 3 in further increase (from 45% to 48%), followed by class 9 in further decrease (from 25% to 22%), while classes 8 and 6.1 show a further slight decrease compared to 2018 (respectively from 13% to 11% and from 7% to 5%). With regard to the transhipment cycle, the most important volumes were recorded for class 9, which exceeded class 3, these two respectively standing at 33% and 28% of the total transhipment containers.

6.8.2 TDT dangerous goods area

TDT dangerous goods area has a storage capacity of 864 TEUs, which can be extended by an additional 576 TEUs in case of need. In order to comply with the provisions of the local, national and international regulations for the management of dangerous goods, TDT identified specific predefined bays, dedicated to the stacking of dangerous goods containers, pursuant to the IMDG Code. In such areas, the DG cargo containers are stored respecting safety distances (damage distance and segregation) and any additional prescriptions, from time to time indicated by the local chemical port service. Specific areas are also dedicated to the stacking of rolling stock, considered IMO pursuant to the IMDG Code (e.g. UN 3166 and UN 3171), and to cargo openings and inspections required by local authorities.

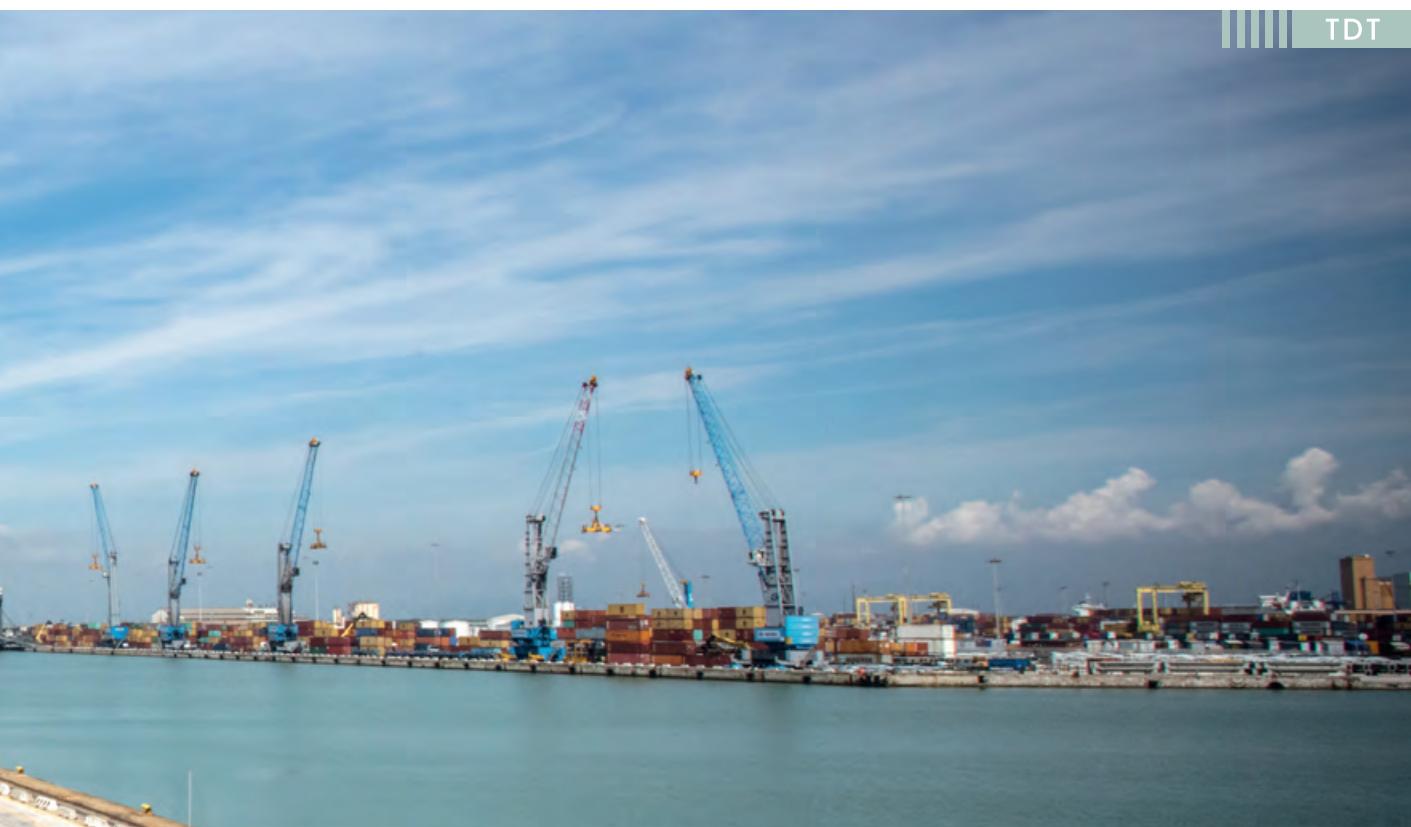
To contain any spills, the terminal has equipped itself with mobile systems, more exactly three 45' Mafi, equipped for the containment of spills of solid or liquid materials from containers. For emergency management, a 50 kg wheeled fire extinguishers, A-B-C approved, are provided to cover the area, located in outdoor areas, close to the base of the lighting towers; there is always an emergency management team that has equipment available for intervention and for the area circumscription.

As can be seen from the table, the main traffic concerns containers belonging to the classes: 3 flammable liquids (a sharp drop in exports ,but an increase in imports), 5.1 oxidising substances (increasing in exports and slightly decreasing in 2019 in transhipments), 8 corrosive substances (reduced in import/export) and 9 dangerous materials and objects. The import for the 4.3 class is down.



Table 81: TDT breakdown of dangerous goods by import/export hazard class (%)

CLASSES	DESCRIPTION	EXPORT (%)			IMPORT (%)			TRANSHIPMENT (%)		
		2017	2018	2019	2017	2018	2019	2017	2018	2019
2	Gas	2,21	0,07	0,00	0,10	0,00	0,04	0,00	0,00	0,00
2.1	Flammable gases	2,28	4,49	3,00	9,88	6,25	4,45	2,23	2,22	1,56
2.2	Non-flammable / non-toxic gases	4,39	5,08	0,87	2,98	1,59	5,48	2,35	2,63	1,41
2.3	Toxic gases	0,20	0,00	1,58	0,00	0,19	0,04	0,12	0,08	0,04
3	Flammable liquids	22,02	22,15	7,50	21,09	15,30	25,50	24,17	21,46	22,93
4.1	Flammable solids, self-reactive substances and desensitised explosives	0,49	0,41	0,00	0,31	0,19	0,58	0,18	0,82	0,74
4.2	Materials subject to spontaneous ignition	0,03	0,04	0,00	0,00	0,00	0,04	0,12	0,41	3,09
4.3	Substances which, in contact with water, emit flammable gases	1,37	2,60	1,82	6,58	7,18	1,57	0,18	0,08	0,00
5.1	Oxidising substances	25,79	27,61	45,73	8,33	20,71	21,96	17,60	12,91	8,93
5.2	Organic peroxides	0,16	0,22	0,00	0,00	0,19	0,37	0,24	0,90	0,15
6.1	Toxic substances	2,73	3,38	7,03	6,28	7,74	1,40	5,36	3,45	2,98
8	Corrosive substances	13,53	14,40	8,85	21,71	19,12	15,12	10,49	10,69	14,63
9	Different dangerous materials and objects	24,81	19,55	23,62	22,74	21,55	23,44	36,95	44,33	43,54



6.9 SECURITY



Security management in SECH and TDT has always been of paramount importance, in consideration of the fact that the terminals are exposed to potential thefts as well as attempts to cross the threshold by illegal immigrants.

Following the tragic event of September 11th, 2001 and the issuing in 2004 of the International Security Code - ISPS Code, the terminals further raised their level of attention, also aimed at managing potential terrorist attacks.

SECH and TDT terminals provide specific training to all internal personnel with security duties, in compliance with the provisions and requirements of international and national regulations, and carry out familiarisation interventions with all the rest of the company personnel, in order to obtain the greatest awareness possible of the issues for all employees.

The guidelines to which SECH and TDT refer to for the provision of the aforementioned security training activities are the IMO Model Course 3.24 and 3.25 - designed to facilitate the adoption of the International Convention on training, certification and performance standards Marine Guard (STCW) of 1978 - and ISPS Code sheet 6 of the National Maritime Security Program (PNSM).

As a company rule and as required by the reference standards, also the companies providing security services must operate at the terminals with staff duly trained under the ISPS Code.

It should also be noted that the code of ethics of the two organisations, in addition to identifying the set of values that represent corporate social ethics, contain the guiding principles that must be complied with by all those who directly or indirectly establish relationships with SECH and TDT.

In fact, these individuals, each within the scope of their responsibilities, according to the principles of sound and prudent management and in compliance with national and EU laws, as well as policies, plans, regulations, and internal procedures, must contribute to the achievement of the corporate mission and must also report to the supervisory body, set up together with the adoption of the organisational model pursuant to legislative decree 231/2001, all useful information on any deficiencies in the controls, reprehensible behaviour or founded suspicions of "bad management".

By way of example, some of the ethical principles adopted by the terminals and specifically referable to the exercise of security activities are cited: responsibility and compliance with laws, impartiality, integrity, protection of privacy and individual personality, repudiating any manifestation of violence, especially if aimed at limiting personal freedom.

In particular, as regards security checks on people and their personal effects, these are carried out respecting the fundamental rights and dignity of the human person, respecting gender and different cultural and religious sensitivities.

The supervisory bodies existing in both terminals perform periodic assessments on the company work, so that the applicable and internal voluntarily adopted rules, such as the code of ethics, are always respected.

With regard to the SECH terminal, to date, the percentage of personnel performing specific security duties and trained in human rights matters is 100%.

During 2019, SECH improved the reporting of intruder alarms in two border areas of the terminal, potentially subject to unwanted entrances. The installation of some cameras with detection alarms for very sensitive movements took the form of an analysis and evaluation of the corporate decisions adopted by the Port Authority PFSO²⁹ and only following formal approval by the competent authority, the local harbour office.

With regard to TDT terminal, in 2019, newly assigned personnel were sent to training in the role of "operations assistant", who carried out the course in compliance with the IMO Model Course 3.24 for terminal staff with specific security tasks. The percentage of personnel with specific security positions trained according to this course is 100%.

Furthermore, basic training on security, familiarisation, had already been provided in the past years to almost all TDT employees. However, since unevenness was created in the courses provided over the years, in 2017 it was decided to carry it out from scratch, according to a model course structured on the basis of the contents of the reference IMO Model Course (IMO Model Course 3.25). This new training was completed in 2019 and is extended to all terminal staff without specific security duties.

The PFSOs, the PFSO deputies of both terminals, the PFSO assistant at TDT, as well as the external resources used to comply with the security service, maintain their skills by participating in periodic updating training sessions compliant with the IMO models and the sheet 6 of the PNSM³⁰. In 2019, specific training interventions on internal security procedures were provided to external personnel with security assignments.

All the courses mentioned above, where provided, are carried out at training centres authorised by the Ministry of Infrastructures and Transport - General Command of the Port Authority Corps, with Decree n. 1310/2009; otherwise they are held by the same PFSO or Deputy PFSO.

The training of terminal staff in terms of security, in addition to the provision of the aforementioned courses, is also ensured by exercises and teachings, investigation of accidents, as well as by the information and indications generated during the audits.

The exercises were held regularly for both terminals, as per the defined plan and the considerations, sent to the designated authority, highlighted a good knowledge of the emergency procedures as well as proper management of communications by the resources of both organisations, ensuring times and methods of response to adequate emergencies; the latter will also be tested in 2020, through a similar training programme.

29. Port Facility Security Officer.

30. Programma Nazionale di Sicurezza Marittima (National Security Programme).



07

Methodology

7.1 OUR METHODOLOGY

For the preparation of the sustainability report, the companies have chosen to adopt the 2016 standard GRI guidelines with the related amendments of 2018 - widely used all over the world - and the official Italian translation published in the summer of 2019, defined by Global Reporting Initiative (GRI). The intent of SECH and TDT is to ensure maximum transparency while also allowing comparability over time and space (i.e. benchmarking) of the information contained in the report.

Global Reporting Initiative (GRI) is an international, independent, non-profit organisation and leader in the sustainability sector, which established standard guidelines with the aim of helping governments and organisations understand and communicate the impacts of their activities on sustainable issues.

For this reason, every organisation using the "Consolidated set of GRI Sustainability Reporting Standards" guidelines is required to notify the GRI of the use of the standard by sending a copy of the report to standards@globalreporting.org or registering it on the site www.globalreporting.org/standards.

GRI has strategic partnerships with the United Nations Environment Program (UNEP), the United Nations Global Compact, the Organisation for Economic Cooperation and Development (OECD), the International Organisation for Standardisation (ISO) and other international cooperation bodies.

SECH and TDT also for 2019 ventured together in a broader scale reporting and conducted the project using an internal work team, transversal to the two companies. A special mention goes to the individual team members for their commitment to the creation of the document. This is therefore to thank Mr. Thomas Bertacchini, Ms. Paola Cavassa, Mr. Mariano Finocchiaro, Ms. Tiziana Gianuzzi, Mr. Massimiliano Gustini and Ms. Silvia Previdi for SECH; Ms. Valentina Del Greco, Ms. Adriana Maconi, Mr. Nicola

Mannori, Ms. Eleonora Piagneri, Mr. Fabio Ranieri, Mr. Andrea Referendario, Mr. Massimo Santarneccchi, Ms. Federica Tommasi for TDT.

The contents of the report and the level of detail have thence been defined by SECH and TDT considering:

- **The expectations and interests of the Stakeholders:** the report is addressed to all the parties involved in the terminal activities, a preventive assessment was therefore carried out, identifying the Stakeholders and their interests, in order to consistently define the reporting of the indicators required by the GRI, selected on the basis of their relevance to the terminal activity and their information capacity towards the Stakeholders;
- **the context of sustainability and the relationships between sustainability and the organisations' strategy:** in the discussion of the topics SECH and TDT exposed their understanding of sustainable development and the connections with the business strategy, explaining how the organisations contribute, or aim at contributing in the future, to the improvement or worsening of conditions, developments and economic, environmental and social trends, at a local, regional and global level;
- **the materiality of the indicators and of the topics covered:** for each topic the materiality of the same was assessed in terms of relevance in the decision-making process of the Stakeholders and sustainable effects generated by the activity of the two terminals in the economic, social and environmental sphere;
- **the completeness of the information:** in order to allow readers to evaluate the performance of the organisations in the reference period and the related impacts at the economic, environmental and social level, additional information and data were included with respect to the requirements of the GRI guidelines, reporting the reasons in case of unavailability of data (see paragraph 7.4 "Standard contents and GRI indicators").



7.2 APPLICATION LEVEL OF GRI STANDARDS

"This report has been prepared in accordance with the GRI Standards: Core option".

The companies have also reported numerous indicators required by the comprehensive option (so-called comprehensive/global level), in order to maximise the information content to Stakeholders.

The reference period of this SECH and TDT sustainability report is 2019 - from 1st January to 31st December, unless otherwise specified - and the data for the previous two-year period are also reported, so as to allow an analysis on a three-year basis, as required by the GRI guidelines. The reference period of the previous report is 2018.

The data were calculated based on the information available within the accounts and the management systems of the two terminals; some data are the result of estimates, in which case the calculation hypotheses are clearly reported. With regard to information of external origin, the source in the notes is reported each time.

SECH and TDT decided not to submit the 2019 Sustainability Report to verification by an external certifying body, but to proceed with the registration or sending of the same to the GRI, as required by the 2016 guidelines.

7.3 STRUCTURE

The structure of the report was defined with the aim of making it easy to read for all Stakeholders to whom it is addressed; the chapters are divided according to the macro areas of interest, as defined in the GRI guidelines: economic, environmental and social sustainability. In addition, emphasis was given to the correspondence between individual GRI topics and related SDGs, based on the "Compass 2016" document and its update dating back to March 2020.

Before the three thematic chapters, the management approach of the companies with respect to the three macro areas of responsibility is illustrated.

The in-depth information required by the GRI 2016 Guidelines that SECH and TDT deemed important to offer are treated right after.

To facilitate the search for precise information, in paragraph 7.4 "Standard contents and GRI indicators" all the GRI indicators and the general contents required are listed, with indications of the pages in which these topics are treated. The next chapter lists the non-applicable or non-material indicators, with the relevant explanation.

7.4 STANDARD CONTENTS AND GRI INDICATORS

Below is the general contents index (GRI 102 - General Disclosures 2016), the details of the indicators that express how SECH and TDT manage each material topic (GRI 103 - Management Approach 2016) and the list of published indicators relating to each material aspect identified by the two Organisations (Topic-Specific Standards Disclosures; GRI 200-Economic; GRI 300-Environmental; GRI 400-Social). In order to facilitate the reading and research of the indicators of interest, the GRI code is reported for each element, with possible identification of the area of interest (e.g. strategy and analysis, governance, economic, environmental, etc.) and the paragraph of the report where the connected information can be found. In addition, the symbols relating to the specific sustainable development objectives (SDGs) discussed for each paragraph are reported, where applicable.

With reference to the general contents, the Core/Comprehensive column highlights the points required by the option application level.

Some contents related to the comprehensive option were not reported for 2019 ("NR" in the table).

SECH



Table 82: GRI 102 - General Disclosures

SECTION	CORE/ COMPREHENSIVE	GRI DISCLOSURE	SDG #	DESCRIPTION	PARAGRAPH
Organisational profile	Core	102 - 1		Name of the organisation.	2.2.1, 2.2.2
	Core	102 - 2		Activities, brands, products, and services.	2.2.1.2, 2.2.2.2
	Core	102 - 3		Location of headquarters.	2.2.1, 2.2.2
	Core	102 - 4		Location of operations.	2.2.1, 2.2.2
	Core	102 - 5		Ownership and legal form.	2.2.1, 2.2.1.1, 2.2.2, 2.2.2.1
	Core	102 - 6		Markets served.	2.3, 2.3.1, 2.3.2
	Core	102 - 7		Scale of the organisation.	2.2.1.1, 2.2.2.1, 2.3.1, 2.3.2, 4.1, 4.2, 4.3, 6.1
	Core	102 - 8	8	Information on employees and other workers.	4.4, 4.5, 6.1, 6.2
	Core	102 - 9		Supply chain.	4.5, 6.4
	Core	102 - 10		Significant changes to the organisation and its supply chain.	2.2.2.1, 2.2.2.1, 4.1, 4.5
	Core	102 - 11		Precautionary Principle or approach.	3.1.2, 5
	Core	102 - 12		External initiatives.	4.4, 4.5
	Core	102 - 13		Membership of associations.	2.2.1.1, 2.2.2.1
Strategy	Core	102 - 14		Statement from senior decision-maker.	1
	Comprehensive	102 - 15		Key impacts, risks, and opportunities.	NR
Ethics & Integrity	Core	102 - 16	16	Values, principles, standards, and norms of behaviour.	2.2, 6.2
	Comprehensive	102 - 17	16	Mechanisms for advice and concerns about ethics.	2.2.1.1, 2.2.2.1
Governance	Core	102 - 18		Governance structure.	2.2.1.1, 2.2.2.1
	Comprehensive	102 - 19		Delegating authority.	2.2.1.1, 2.2.2.1
	Comprehensive	102 - 20		Executive-level responsibility for economic, environmental, and social topics.	2.2.1.1, 2.2.2.1
	Comprehensive	102 - 21	16	Consulting Stakeholders on economic, environmental, and social topics.	3.2, 6.6
	Comprehensive	102 - 22	5, 16	Composition of the highest governance body and its Committees.	2.2.1.1, 2.2.2.1



SECTION	CORE/ COMPREHENSIVE	GRI DISCLOSURE	SDG #	DESCRIPTION	PARAGRAPH
Governance	Comprehensive	102 - 23	16	Chair of the highest governance body.	2.2.1.1, 2.2.2.1
	Comprehensive	102 - 24	5, 16	Nominating and selecting the highest governance body.	NR
	Comprehensive	102 - 25	16	Conflicts of interest.	NR
	Comprehensive	102 - 26		Role of highest governance body in setting purpose, values, and strategy.	2.2.2.1, 2.2.2.1
	Comprehensive	102 - 27	4	Collective knowledge of highest governance body.	1, 2.2.1.1, 2.2.2.1
	Comprehensive	102 - 28		Evaluating the highest governance body's performance.	NR
	Comprehensive	102 - 29	16	Identifying and managing economic, environmental, and social impacts.	2.2.1.1, 2.2.2.1, 3.2
	Comprehensive	102 - 30		Effectiveness of risk management processes.	2.1, 2.2, 3.1, 3.1.1, 3.1.2, 3.1.3, 3.3, 3.3.1, 3.3.2, 5, 6.6
	Comprehensive	102 - 31		Review of economic, environmental, and social topics.	2.1, 2.2, 3.1, 3.1.1, 3.1.2, 3.1.3
	Comprehensive	102 - 32		Highest governance body's role in sustainability reporting.	1, 2.2.1.1, 2.2.2.1
	Comprehensive	102 - 33		Communicating critical concerns.	2.2, 3.1, 3.1.1, 3.1.2, 3.1.3, 5, 6.6
	Comprehensive	102 - 34		Nature and total number of critical concerns.	NR
	Comprehensive	102 - 35		Remuneration policies.	4.4
	Comprehensive	102 - 36		Process for determining remuneration.	4.4
	Comprehensive	102 - 37	16	Stakeholders' involvement in remuneration.	4.3, 4.4
	Comprehensive	102 - 38		Annual total compensation ratio.	4.4
	Comprehensive	102 - 39		Percentage increase in annual total compensation ratio.	4.4
Stakeholder engagement	Core	102 - 40		List of Stakeholder groups.	3.2
	Core	102 - 41	8	Collective bargaining agreements.	4.4
	Core	102 - 42		Identifying and selecting Stakeholders.	3.2
	Core	102 - 43		Approach to Stakeholder engagement.	3.2, 6.6, 6.6.1, 6.6.2
	Core	102 - 44		Key topics and concerns raised.	3.2

SECTION	CORE/ COMPREHENSIVE	GRI DISCLOSURE	SDG #	DESCRIPTION	PARAGRAPH
Reporting practice	Core	102 - 45		Entities included in the consolidated financial statements.	4.3
	Core	102 - 46		Defining report content and topic Boundaries.	3.4, 7.4
	Core	102 - 47		List of material topics.	3.4, 7.4
	Core	102 - 48		Restatements of information.	2.2, 2.2.2.1, 2.2.2.1
	Core	102 - 49		Changes in reporting.	7.1
	Core	102 - 50		Reporting period.	7.2
	Core	102 - 51		Date of most recent report.	7.2
	Core	102 - 52		Reporting cycle.	7.2
	Core	102 - 53		Contact point for questions regarding the report.	7.6
	Core	102 - 54		Claims of reporting in accordance with the GRI Standards.	7.2, 7.3
	Core	102 - 55		GRI content index.	7.4, 7.5
	Core	102 - 56		External assurance.	7.2

Table 83: GRI 103 - Management Approach

GRI DISCLOSURE	SDG #	DESCRIPTION	PARAGRAPH
103 - 1	12, 13, 14, 15	Explanation of the material topic and its Boundary.	2.2, 3.1, 3.1.1, 3.1.2, 3.1.3
103 - 2	1, 5, 8, 12, 13, 14, 15, 16	The management approach and its components.	2.2, 3.1, 3.1.1, 3.1.2, 3.1.3
103 - 3	12, 13, 14, 15	Evaluation of the management approach.	2.2, 3.1, 3.1.1, 3.1.2, 3.1.3

Table 84: GRI 200 - Economic Topic-specific Standard Disclosures

TOPIC	GRI MANAGEMENT APPROACH OR TOPIC-SPECIFIC DISCLOSURES	SDG #	PARAGRAPH
Economic performance	201 - 1: Direct economic value generated and distributed.	2, 5, 7, 8, 9	4.2, 4.3, 4.5
	201 - 2: Financial implications and other risks and opportunities due to climate change.	13	NR
	201 - 3: Defined benefit plan obligations and other retirement plans.		4.4
	201 - 4: Financial assistance received from government.		4.5
Market presence	202 - 1: Ratios of standard entry level wage by gender compared to local minimum wage.	1, 5, 8	4.4
	202 - 2: Proportion of senior management hired from the local community.	8	4.5
Indirect economic impacts	203 - 1: Infrastructure investments and services supported.	2, 5, 7, 9, 11	3.3, 3.3.1, 3.3.2, 4.4, 4.5
	203 - 2: Significant indirect economic impacts.	1, 2, 3, 8, 10, 17	2.3, 4.5
Procurement practices	204 -1: Proportion of spending on local suppliers.	12	4.5
Anti-corruption	205 - 1: Operations assessed for risks related to corruption.	16	2.2
	205 - 2: Communication and training about anti-corruption policies and procedures.	16	2.2
	205 - 3: Confirmed incidents of corruption and actions taken.	16	2.2
Anti-competitive behaviour	206 -1: Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices.	16	2.2
Tax	207-1: Approach to tax.	1, 10, 17	4
	207-2: Tax governance, control, and risk management.	1, 10, 17	3.1.1
	207-3: Stakeholder engagement and management of concerns related to tax.	1, 10, 17	3.1.1
	207-4: Country-by-country reporting.	1, 10, 17	NR



Table 85: GRI 300 - Environmental Topic-specific Standard Disclosures

TOPIC	GRI MANAGEMENT APPROACH OR TOPIC-SPECIFIC DISCLOSURES	SDG #	PARAGRAPH
Materials	301 - 1: Materials used by weight or volume.	8, 12	NR
	301 - 2: Recycled input materials used.	8, 12	5.1.1.2 (TDT only)
	301 - 3: Reclaimed products and their packaging materials.	8, 12	NR
Energy	302 - 1: Energy consumption within the organisation.	7, 8, 12, 13	5.1.1.1 (TDT only)
	302 - 2: Energy consumption outside of the organisation.	7, 8, 12, 13	5.2 (TDT only)
	302 - 3: Energy intensity.	7, 8, 12, 13	5.1.1.1
	302 - 4: Reduction of energy consumption.	7, 8, 12, 13	5.3.2 (TDT only)
	302 - 5: Reductions in energy requirements of products and services.	7, 8, 12, 13	5.3.2
Water and effluents	303 - 1: Interactions with water as a shared resource.	6, 12	5.1.1.3
	303 - 2: Management of water discharge-related impacts.	6	5.1.1.3
	303 - 3: Water withdrawal.	6	5.1.1.3
	303 - 4: Water discharge.	6	5.1.2.2
	303 - 5: Water consumption.	6	5.1.1.3
Biodiversity	304 - 1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	6, 14, 15	NR
	304 - 2: Significant impacts of activities, products, and services on biodiversity.	6, 14, 15	NR
	304 - 3: Habitats protected or restored.	6, 14, 15	NR
	304 - 4: IUCN Red List species and national conservation list species with habitats in areas affected by operations.	6, 14, 15	NR
Emissions	305 - 1: Direct (Scope 1) GHG emissions.	3, 12, 13, 14, 15	5.1.6.1
	305 - 2: Energy indirect (Scope 2) GHG emissions.	3, 12, 13, 14, 15	5.1.6.1
	305 - 3: Other indirect (Scope 3) GHG emissions.	3, 12, 13, 14, 15	5.1.6, 5.1.6.1
	305 - 4: GHG emissions intensity.	13, 14, 15	5.1.6, 5.1.6.1
	305 - 5: Reduction of GHG emissions.	13, 14, 15	5.1.6.1, 5.3, 5.3.2
	305 - 6: Emissions of ozone-depleting substances (ODS).	3, 12, 13	5.1.6, 5.1.6.1, 5.1.6.2
	305 - 7: Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions.	3, 12, 13, 14, 15	5.1.5, 5.1.6, 5.1.6.1, 5.1.7, 5.1.8, 5.1.11



TOPIC	GRI MANAGEMENT APPROACH OR TOPIC-SPECIFIC DISCLOSURES	SDG #	PARAGRAPH
Effluents and waste	306 - 1: Water discharge by quality and destination.	3, 6, 12, 14	5.1.2.2
	306 - 2: Waste by type and disposal method.	3, 6, 12	5.1.3.2
	306 - 3: Significant spills.	3, 6, 12, 14, 15	5.1.4.1, 5.1.4.2
	306 - 4: Transport of hazardous waste.	3, 12	5.1.3.1, 5.1.3.2
	306 - 5: Water bodies affected by water discharges and/or runoff.	6, 15	5.1.2.2 (TDT only)
Environmental compliance	307 - 1: Non-compliance with environmental laws and regulations.	16	5.5
Supplier environmental assessment	308 - 1: New suppliers that were screened using environmental criteria.		6.4 (TDT only)
	308 - 2: Negative environmental impacts in the supply chain and actions taken.		5.2, 6.4



Table 86: GRI 400 - Social Topic-specific Standard Disclosures

TOPIC	GRI MANAGEMENT APPROACH OR TOPIC-SPECIFIC DISCLOSURES	SDG #	PARAGRAPH
Employment	401 - 1: New employee hires and employee turnover.	5, 8, 10	6.1
	401 - 2: Benefits provided to full-time employees that are not provided to temporary or part-time employees.	3, 5, 8	4.4
	401 - 3: Parental leave.	5, 8	6.1
Labour/ management relations	402 - 1: Minimum notice periods regarding operational changes.	8	4.4
Occupational Health and Safety	403 - 1: Occupational health and safety management system.	3, 8, 16	2.2, 6.6
	403 - 2: Hazard identification, risk assessment, and incident investigation.	8	6.6, 6.7, 6.8
	403 - 3: Occupational health services.	8	6.6
	403 - 4: Worker participation, consultation, and communication on occupational health and safety.	8, 16	6.6, 6.6.1, 6.6.2
	403 - 5: Worker training on occupational health and safety.	8	6.6, 6.6.1, 6.6.2
	403 - 6: Promotion of worker health.	3	4.4, 6.6
	403 - 7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships.	8	6.6, 6.7, 6.8
	403 - 8: Workers covered by an occupational health and safety management system.	8	6.6
	403 - 9: Work-related injuries.	3, 8, 16	6.7
	403 - 10: Work-related ill health.	3, 8, 16	6.7
Training and education	404 - 1: Average hours of training per year per employee.	4, 5, 8	6.3
	404 - 2: Programmes for upgrading employee skills and transition assistance programmes.	8	6.3
	405 - 1: Diversity of governance bodies and employees.	5, 8	6.3
Diversity and equal opportunity	405 - 2: Ratio of basic salary and remuneration of women to men.	5, 8	2.2.1.1, 2.2.2.1, 6.1
	406 - 1: Incidents of discrimination and corrective actions taken.	5, 8, 10	6.1
Non- discrimination	407 - 1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk.	5, 8, 16	6.2
Freedom of Association and Collective Bargaining	408 - 1: Operations and suppliers at significant risk for incidents of child labour.	8	6.2
Child labour	409 - 1: Operations and suppliers at significant risk for incidents of forced or compulsory labour.	8, 16	6.2



TOPIC	GRI MANAGEMENT APPROACH OR TOPIC-SPECIFIC DISCLOSURES	SDG #	PARAGRAPH
Forced or compulsory labour	410 - 1: Security personnel trained in human rights policies or procedures.	8	6.2
Security practices	411 - 1: Incidents of violations involving rights of indigenous peoples.	16	6.9
Rights of indigenous peoples	412 - 1: Operations that have been subject to human rights reviews or impact assessments.	2	6.2 (SECH only)
Human rights assessment	412 - 2: Employee training on human rights policies or procedures.		6.2
	405 - 1: Diversity of governance bodies and employees.		6.2
	412 - 3: Significant investment agreements and contracts that include human rights clauses or that underwent humanrights screening.		6.2 (SECH only)
Local communities	413 - 1: Operations with local community engagement, impact assessments, and development programmes.		NR
	413 - 2: Operations with significant actual and potential negative impacts on local communities.	1, 2	NR
Supplier social assessment	414 - 1: New suppliers that were screened using social criteria.	5, 8, 16	6.4
	414 - 2: Negative social impacts in the supply chain and actions taken.	5, 8, 16	6.4
Public policy	415 - 1: Political contribution.	16	3.1.1
Customer health and safety	416 - 1: Assessment of the health and safety impacts of product and service categories.		NR
	416 - 2: Incidents of non-compliance concerning the health and safety impacts of products and services.	16	NR
Marketing and labelling	417 - 1: Requirements for product and service information and labelling.	12, 16	NR
	417 - 2: Incidents of non-compliance concerning product and service information and labelling.	16	NR
	417 - 3: Incidents of non-compliance concerning marketing communications.		NR
Customer privacy	418 - 1: Substantiated complaints concerning breaches of customer privacy and losses of customer data.	16	6.5
Socioeconomic compliance	419 - 1: Non-compliance with laws and regulations in the social and economic area.	16	6.6



7.5 REASONS FOR THE NON-APPLICABILITY OF GRI DISCLOSURES

Table 87: Reasons for the non-applicability of GRI disclosures

NON-APPLICABLE GRI DISCLOSURES	REASON
201 - 1: Direct economic value generated and distributed.	The terminals do not carry out an assessment in this regard at the moment.
207 - 4: Country-by-country reporting.	The terminals operate in just one country.
301 - 1: Materials used by weight or volume.	Not material for the activities carried out inside the terminals.
301 - 3: Reclaimed products and their packaging materials.	Not material for the activities carried out inside the terminals.
304 - 1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Terminals are not located in these areas.
304 - 2: Significant impacts of activities, products, and services on biodiversity.	Terminals are not located in these areas.
304 - 3: Habitats protected or restored.	Terminals are not located in these areas.
304 - 4: IUCN Red List species and national conservation list species with habitats in areas affected by operations.	Terminals are not located in these areas.
413 - 1: Operations with local community engagement, impact assessments, and development programmes.	The terminals do not carry out an assessment in this regard at the moment.
413 - 2: Operations with significant actual and potential negative impacts on local communities.	The terminals do not carry out an assessment in this regard at the moment.
416 - 1: Assessment of the health and safety impacts of product and service categories.	Not applicable to the type of service provided by the terminals.
416 - 2: Incidents of non-compliance concerning the health and safety impacts of products and services.	Not applicable to the type of service provided by the terminals.
417 - 1: Requirements for product and service information and labelling.	Not applicable to the type of service provided by the terminals.
417 - 2: Incidents of non-compliance concerning product and service information and labelling.	Not applicable to the type of service provided by the terminals.
417 - 3: Incidents of non-compliance concerning marketing communications.	The terminals do not carry out an assessment in this regard at the moment.



MAX. GROSS
32 500 kg
71 650 lbs

TARE
2 350 kg
5 180 lbs

MAX PAYLOAD
30 150 kg
66 470 lbs

CUBE
33.2 m³
1 172 cuft

7.6 SECH AND TDT CSR CONTACT INFORMATION

For any information, comments, requests or suggestions on the contents of the 2019 SECH and TDT Sustainability Report, please refer to the relevant functions by sending a letter or an e-mail to the following contacts, i.e. the Managing Editors of the report:

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