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Policy for quality, safety, health and the environment

Quality, Safety, Health and Environment Policy defined and supported by the Management is disseminated to all levels of the organisation so that everyone works to ensure its systematic and correct implementation.

The management is convinced that, in order to maintain a high quality standard, it is essential that the Management System adopted complies with the requirements of UNI EN ISO 9001:2015, GMP+ and the SQAS scheme for both the Transport and Tank Cleaning modules.

The objectives, company policies, organisation, company procedures and the HACCP plan must comply with these standards and the applicable reference regulations.

The main purpose of this policy is:

- be appropriate to the organisation's objectives;
- define and communicate the implicit and explicit needs of customers within the organisation, in order to satisfy them;
- provide a structural framework for establishing and reviewing quality, safety, health and environmental objectives;
- systematically and continuously pursue the improvement of the organisation's performance with particular reference to the requirements of the services provided from the point of view of quality, safety, personnel health and environmental protection;
- make human, structural and financial resources available;
- systematically review this policy to check that it is appropriate to the company's reality.

They are therefore fundamental:


1. Customer satisfaction: win the trust of customers by demonstrating your ability to regularly provide transport and tank cleaning services that meet the requirements and regulations in force;

2. Objectives: set and achieve measurable objectives to assess the effectiveness of the Management System adopted; communicate them to the various managers in order to involve them in the analysis to adopt measures and practical suggestions to be considered and put into practice when considered valid and feasible;

3. Competent Authorities: collaborate with the Authorities and qualified Bodies in the development of measures that improve health and environmental protection together with guaranteeing correct quality that protects customers and the entire supply chain;

4. Drivers: the quality and safety of loading, unloading and transport operations depend on the driver's knowledge, skills and experience; therefore, it is the organisation's commitment to hire drivers with the necessary qualifications, a minimum age of 21 years and at least 3 years' experience in the sector and to establish information, education and training programmes to increase knowledge and skills in order to adopt professionally correct behaviour during work activities;

5. Washing machines: The quality and safety of washing operations depend on the knowledge, skills and experience of the washers; therefore, it is the organisation's commitment to recruit sufficiently expe-

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rienced washers and to establish information, education and training programmes to increase knowledge and skills in order to adopt correct behaviour;

6. Transport execution: require all its drivers and those of sub-carriers to comply with the road traffic regulations established in the various countries, in particular those relating to maximum total mass, driving and rest times, speed limits, ban on passenger transport, applicable ADR regulation, availability of vehicle, equipment, load and driver documentation;

7. Washes execution: ask all your wash workers to respect the washing standards established by internal regulations as well as by all applicable technical standards, implementing the washing requests provided by customers, without causing any damage to other people's vehicles or to products that will be loaded subsequently, guaranteeing adequate safety standards throughout their stay in the plant;

8. Information and training: the knowledge and competence of one's own staff and that of suppliers, especially sub-carriers, is essential to carry out high quality services, in absolute safety and to preserve health, reduce environmental impact and comply with all applicable general and specific reference standards. For this reason, Star Spa undertakes to establish minimum skill requirements based on the criticality of the tasks and to plan periodic information and training sessions to provide knowledge, updates and to improve knowledge, skills and awareness and the adoption of corrective behaviours, including BBS program, driving and rest times; BBS training must be carried out both during the hiring phase and during the collaboration phase, based on the results achieved by the individual drivers/washermen. The BBS program must be implemented for all fully integrated drivers and car washes every 3 years;


9. Non-conformity: the improvement of the quality service, safety and health of oneself and others personnel, respect for the environment and security passes through correct and timely management of negative cases. It is therefore Star Spa's commitment to encourage the reporting of non-conformity, accidents and near misses as well as timely management analyzing the primary and secondary causes in order to adopt corrective actions aimed at eliminating the causes themselves;

10. Sub-carriers: Star Spa undertakes to use qualified sub-carriers, to which Star Spa's policies apply; is required to apply the requirements requested by Star Spa customers, and to set up periodic audits to verify legislative compliance and requirements (ref. POL-05);

11. Change management: Assess risks for regulatory changes, new itineraries, new products, new equipment and new procedures. For this reason it has established a specific procedure and appointed a resource for managing changes;

12. Alcohol, drugs and medicines: train all staff on the effects of alcohol, drugs, smoke and medicines, absolutely prohibiting the use of drugs and alcohol during all work activities.

13. Legislative compliance: the organization undertakes to comply with all applicable regulations, both general and specific, regarding safety, health, environment, road traffic and those relating to transported products, including all relevant regulations, both mandatory and technical to the internal washing of road tanks. For this reason, it systematically carries out audits and analyses the work of drivers to verify compliance with driving and rest times, speed limits, vehicle capacity and infringements of the highway code, and the work of car washes to verify of the service execution times, for the correct use of detergents and solvents, for the setting of the washing programs according to the customer's requests;

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14. Fleet of vehicles and equipment: Vehicles, equipment and equipment are critical to quality, safety and environmental friendliness. It is therefore Star Spa's commitment:


- use vehicles, equipment and systems only if they comply with the regulations and purchase specifications.
- plan the purchase of vehicles with the best technologies relating to consumption, comfort and active and passive safety devices also based on power sources with a lower environmental impact.
- subject the vehicles, equipment and equipment to scheduled maintenance and constantly check the maintenance and functioning of the vehicles for all the requirements established by the regulations, the manufacturers and Star Spa.
- use a washing system equipped with all the devices required by the applicable standards, duly installed and compliant with the reference technical standards, periodically subjecting it to internal surveillance and a maintenance program agreed with the installer himself to guarantee correct functioning throughout its life cycle.
- make use of industry-leading suppliers for both transport and tank washing activities, so that all vehicles, systems, equipment and equipment are checked, checked and maintained according to the manufacturer's specifications and, in any case, according to the best techniques available in that specific historical moment sector;
- record all interventions and operating costs to have access to the history of interventions and plan maintenance and replacements based on their life cycle;
- raise awareness among staff to communicate any defects, having previously trained them on the requirements of the equipment and their correct use;
- keep a register of the flexible hoses and check them periodically, according to the appropriate procedure;
- store equipment and equipment correctly, avoiding deterioration or reduction of their characteristics;

15. Safety: carry out and periodically update an assessment of all risks inherent to company activities, defining prevention and protection measures as required by Legislative Decree 81/2008 and subsequent amendments. In particular, it is expected that any new risk must be duly assessed before the suspension of the activity for the time necessary to evaluate the risk itself and to prepare suitable mitigation measures capable of guaranteeing the safety of all workers;

16. Road Safety: require all its drivers and those of sub-carriers, in addition to respecting road traffic rules, to adopt correct behaviours to improve traffic safety. The use of any electronic device while driving is prohibited. It is necessary to evaluate the risks deriving from road traffic in advance, especially for services that require transport times longer than 4 hours and 30 minutes;

17. Loading and unloading: loading and unloading operations always have a minimum risk, therefore it is necessary to:

- evaluate in advance the risks of the activities, identifying responsibilities;
- prepare specific instructions, also adopting guidelines for "safe loading/unloading";
- distribute and require the use of adequate PPE, subjecting it to periodic checks;
- train drivers on risks, including near misses;
- carefully check the presence of all safety requirements before and after loading;

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- plan for interruptions in the presence of unsafe activities;
- prohibit loading and unloading operations in unsafe conditions;
- respect the maximum filling level of the containers, be they tanks or containers, based on the product transported by checking any specific customer requirements on the loading order, even for non-ADR goods;

18. Health surveillance: the suitability of the tasks of one's employees is important for their own health and safety and that of others. It is Star spa's commitment to evaluate all risks, establishing a health protocol based on these risks, appointing a competent doctor, planning and implementing health surveillance (initial and periodic) as required by current legislation, encouraging, through information and training activities on behavioural correct in health matters;

19. Personal protective equipment: in addition to evaluating the risks to the health and safety of its workers and adopting specific procedures or operating instructions, Star Spa's commitment is to encourage the use of collective and individual protective equipment suitable to minimize risk any damage, including those resulting from contact with chemical substances. In particular, the company undertakes to supply and periodically verify category III PPE, providing the information and training required by current legislation.


20. Security: evaluate the security risks to which is refers the structures, systems, vehicles, goods, equipment, IT devices and related data may be subject, sensitive and/or critical considerations from losses resulting from inefficiency of devices, acts vandalism, unauthorized entry, infringements, incidents relating to security and theft by adopting adequate prevention, protection and safety measures.

21. IT system: analyse the risks connected to IT systems, identify possible threats and attacks, accidental and unwanted events, the causes of data loss by adopting active (logical security) and passive (physical security) protection measures disseminating rules for the use of IT tools as well as data management to all staff.

22. Emergencies: managing an internal or external emergency promptly and correctly is essential to minimize damage. Star Spa is committed to adopting suitable emergency procedures and carrying out annual simulations to verify their adequacy and train staff in correct management;

23. Environment: implement an environmental protection policy aimed at constantly reducing the CO2 emitted by all its activities, differentiating actions based on the environmental aspects examined. As regards the transport sector, this objective will be pursued through the acquisition of vehicles powered by alternative fuels, which use low resistance tyres, a tire pressure monitoring system (TPMS) and in general any technological tool which allows make decisions to this end, promoting and encouraging inter-modal transport compared to road transport, through the involvement of the customers themselves; however, as regards the tank washing sector, this objective will be pursued by identifying ways of generating energy through renewable sources (for example, through the installation of solar panels), remodulating the performance of services by trying to reduce energy and water consumption as much as possible, monitoring market to identify possible improvements and innovations in the washing system;

24. Food safety: the Management of Star Spa, to guarantee Food Quality and Safety to its customers, has decided to document and maintain over time a Food Safety Management System for transported products which complies with current legislation and regulations and the GMP+ standard, also defining the strategic lines; to this end, specific procedures are envisaged for the application of rules that prevent any contamination or qualitative alteration of the food product, training its employees in the application of specific hygiene rules and identifying prevention systems and methods of control of the critical phases

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for health of consumers, thanks to the collaboration of producers, transporters and customers themselves;

25. Social Responsibility: guarantee and support the commitment to the continuous improvement of the environmental, health and safety at work aspects connected to its activities, in firm respect and support of the contents of the "Universal Declaration of Human Rights", of the "Declaration of the International Labor Organization on Fundamental Principles and Rights at Work" and adhering to the principles of the ECTA "Responsible Care" programme.

26. Human rights: respect human rights, ensure correct working conditions and hours worked, prohibit any discrimination of the person (race, sex, religion and political choices), prohibit child labour, guarantee the freedom and dignity of employees by prohibiting use of any form of physical or mental constraint, offenses against the personal dignity of any employee or collaborator, condemn any illicit behaviour likely to conflict with dignity or physical and/or moral integrity;

27. Competition: adopt fair trade and business ethics procedures with rules against corruption, tangent, conflicts of interest, fraud, money laundering and anti-competitive practices.

28. KPIs and monitoring: establish and implement procedures to monitor your activities, identifying and calculating specific KPIs and subjecting them to systematic evaluation to establish corrective actions and continuous improvement objectives.

Locate di Triulzi, 04.04.2024

Il Presidente
 Presidente del Consiglio di amministrazione
 REMONDINI EMANUELE
 (Emanuele Remondini)