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Subcontractors Policy

For Star Spa the use of sub-carriers is commensurate with the transport activities that are performed, and the agreements made with customers. In any case the sub-carrier selection process clearly states that road transport and other types of transport cannot be sub-contracted until the sub-carriers' safety and quality management system is assessed and judged to be of a comparable level to that of the main carrier.

It is therefore essential:


- Qualify subcontractor on Quality, Safety, Health, Environment, Security and CSR principles.
- Only entrust transport to qualified and assessed sub-contractors.
- Require the sub-contractors to fully implement Company Policies.
- Require the sub-contractors to implement the requirements of Star Spa's customers.
- Schedule and conduct periodic audits to verify compliance with policies, contractual requirements, and operating procedures.
- Require sub-carriers to communicate in advance any inability to comply with requirements.
- Verify compliance with the legal deadlines for documents and mandatory training for fully integrated drivers and carry out systematic monitoring through the extraction of files from tachographs and GPS/APP systems, concerning compliance with driving/rest times and compliance with the maximum speed limits set by the Highway Code of each country.

The conditions for an ongoing assessment of the sub-contractor's safety and performance levels are listed in the sub-contractor's assessment model, which considers all aspects of Quality, Safety, Health, Environment, Security and CSR.

Restrictions imposed by customers and included in individual contracts apply to transport service providers and all logistics solutions and are followed by Business Unit managers and sales managers when selecting sub-contractors.

To achieve an adequate service, Star Spa is committed to the following principles, which are necessary for subsequent evaluation and monitoring:

- Fully integrated sub-contractors working only for Star Spa are fully integrated into the internal management system.
- The sub-contractor's equipment is monitored by Star Spa, together with the driver's documents (driver manual, security plan and driver training documents, including the BBS). Performance is monitored with internal audits during which non-conformities are recorded if necessary.
- Sub-contractors attend meetings where part of the management review is discussed, including objectives and improvement plans.
- Sub-contractors that are not fully integrated are nevertheless monitored, at least once a year, according to an evaluation model that follows the SQAS scheme, in which are asked documents like: maintenance plans, training to share objectives and possible improvement plans are requested. The driver's handbook, the indications for the security plan, is given to the sub-contractor's contact person, who distributes it and informs his own travelling personnel.

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- In particular, for fully integrated transport companies certified with SQAS standards, the corresponding SQAS report is also downloaded.
- Occasional transport companies are not used.

In any case, for a company to work with Star Spa is mandatory:


- not subcontract the service any further. Only one level of subcontracting is permitted unless a different specific agreement is reached with the customer.
- hold a meeting with the operational managers, before starting the collaboration, to give the correct instructions and an adequate evaluation before regularising the relationship.
- collaborate with customers in the same way as Star Spa.
- not exceed 60% of the annual turnover of the services contracted to Star Spa.
- accept the prescriptions contained in the Transport Contract (for foreign sub-carriers, the declaration with the main obligations) and the customers' requests, including the commitment not to subcontract the contracted work except in exceptional cases.

They are therefore fundamental:

1. **Road Safety:** require all its drivers, in addition to respecting the highway code, to adopt correct behaviors to improve road safety (adequate psycho-physical state before each journey, pre-departure check, tire management, lights on during daylight hours even if not required, adequate speed and safety distance based on roads, traffic and weather conditions, attention in avoiding distractions such as using the telephone/smartphone for calls or writing messages while driving or loading and unloading - except in emergencies - and absolute respect for driving and rest periods). Assess in advance the risks deriving from road traffic, especially for transport services lasting more than 4 hours and 30 minutes;
2. **Fleet of vehicles and equipment:** vehicles, equipment and ADR kit are critical to quality, safety and environmental friendliness. It is therefore the organisation's commitment to:
 - use vehicles and equipment only if they comply with regulations;
 - 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 according to the purchase specifications promoted by Star Spa;
 - carry out the vehicles, equipment to scheduled maintenance and constantly check the maintenance and operation of the vehicles for all the requirements established by the regulations, the producer and Star Spa rules.
 - record all interventions and operating costs in order to have a history of interventions in order to plan maintenance and replacements based on their life cycle.
 - raise awareness among staff to communicate any defects or anomalies;
 - keep a register of the flexible hoses and check them periodically, according to a specific procedure, in order to guarantee their good functioning without exceeding the limits established by the manufacturers;
 - store equipment correctly, avoiding deterioration or reduction of their characteristics;


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- provide adequate information, education and training on the requirements of the equipment as well as knowledge and skills on correct use.
3. **Drivers:** the quality and safety during loading, unloading and transport operations are independent of the knowledge, ability and experience of the driver, therefore it is the sub-contractor's commitment to hire drivers who, in addition to possessing the qualifications, have a minimum of 21 years and experience of at least 3 years, as well as establishing information, education and training programs aimed at increasing knowledge and skills in order to adopt correct behaviours.
 4. **Legislative compliance:** the sub-contractor's organization undertakes to comply with all applicable regulations, both general and specific regarding safety, health, environment, road traffic and those relating to the products transported. For this reason, it systematically carries out checks and analyses driver's work to verify compliance with driving and rest times and compliance with speed limits, vehicle capacity and infringements of the highway code.
 5. **Information, education and training:** the knowledge and competence of the sub-contractor's drivers is essential to carry out high quality services, in absolute safety and to preserve health, reduce environmental impact and comply with all specific general and reference regulations applicable. For this reason, Star Spa is committed to establishing minimum skill requirements based on the criticality of the tasks and to planning periodic information and training sessions to provide knowledge, updates and improve knowledge, skills and awareness for the purposes of adoption of correct behaviours, including the BBS program, load security and driving and rest periods.
 6. **BBS:** promote, through external organisations, the application of the BBS (Behaviour Based Safety) guidelines, aimed at educating and making all staff aware of compliance with behavioural safety standards, through adequate training activities aimed at all staff, with particular attention to traveling personnel, to be carried out both during the hiring phase and during the collaboration phase, based on the results achieved by the individual drivers. The program must be implemented for all drivers every 3 years.
 7. **Loading and unloading:** operations represent a risk and therefore it is necessary to:
 - evaluate the risks in advance.
 - identify the responsibilities between driver and loader.
 - prepare specific instructions, also adopting "safe loading/unloading" guidelines, which provide responsibilities, transfer methods and authorizations for non-standard operations.
 - distribute and require the use of adequate PPE and subject them to periodic checks.
 - inform drivers about risks, including near-misses.
 - carefully check the presence of all safety requirements before and after loading.
 - plan interruptions in presence of unsafe activities.
 - prohibit loading and unloading operations in unsafe conditions such as taking samples from above, filling IBCs from tanks with dangerous products or in places open to the public.
 - respect the minimum and maximum filling level of the loading units and of the tanks, prohibiting circulation with tanks filled between 20 and 80%.
 - respect the safe loading and unloading guidelines

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Each sub-carrier that collaborates with STAR Spa must, through a formal declaration, undertake to:

- comply with all applicable national and international laws and regulations.
- be in possession of the appropriate authorizations for the type of activities and operations carried out, in particular:
 - Registration in the register of third-party accounts.
 - Registration in the waste transport register (if they transport waste).
 - Appointment of the ADR consultant (if they transport dangerous ADR class products).
 - Community license (optional).
 - Implementation of BBS (Behavior Based Safety) principles relating to driving and loading and unloading.
- Self-declaration by the owner of the sub-carrier that their drivers/operators are in possession of a valid ADR certificate/licence.
- Respect for working/driving hours and related records.
- Respect the ban on the consumption of alcohol and narcotics while carrying out work.
- Park the vehicles according to the instructions of STAR spa and as indicated in the driving manual.
- Forward customs and transportation documents to all relevant parties, including Equipment Interchange Receipt (EIR) where required.
- The use of emergency numbers/emergency response capabilities. The sub-contractor, if some of its drivers find themselves in emergency situations for services requested by the Customer, has the obligation to communicate the emergency situation and the measures adopted to STAR spa, which will inform the customer.
- Appoint a consultant for ADR with the necessary qualifications for the type of goods transported.
- Appoint a person responsible for the prevention and protection service (RSPP) in compliance with the obligations relating to Legislative Decree 81/08 and subsequent amendments.
- Carry out correct preventive maintenance of vehicles used in services for Star Spa.
- Carry out inspections and tests of vehicles used in services for Star Spa.
- Carry out checks and tests on flexible hoses used in services for Star Spa.
- Use authorized tank washing stations.
- Perform services in accordance with customer site requirements.
- The adequate selection of drivers (compliance with applicable laws, specific customer requirements).
- Implement driver training with appropriate criteria (e.g. product-specific, legislative or customer training).
- Do not subcontract the transport entrusted to them.
- To take advantage of the mandatory insurance coverage: Car liability insurance with maximum-minimum flammable law (Italian) for damage to people and things (preferable 50 million euros).
- To avail of vector insurance coverage for the national service and CMR for the international service (preferred).
- Management and recording of non-conformities that occur during the transport service.
- To the confidentiality of the Customer's operations and commercial data.
- Implement adequate security measures as required by law.
- Equip staff with adequate PPE and emergency equipment.

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- Use latest generation vehicles equipped with cutting-edge equipment and devices according to Star spa specifications in transport services on behalf of STAR.

The owner of the vehicle subcontractor company declares that:

- having implemented procedures at its headquarters to ensure that its drivers do not exceed the maximum weights permitted in the various countries, having implemented procedures for the management of non-conformities (complaints), as well as near-miss and methods for collecting samples and procedures for working at heights.
- Has carried out and recorded internal and external training activities at its headquarters and aimed at all its employees.
- Undertake to have their drivers fill in and occasionally check the daily worksheet according to the indications given in the SQAS or (chap. 9.2.2.2. a->m)
 - inspection of the vehicle for any damage.
 - control of the level and pressure of the lubricating oil.
 - operation of the braking system.
 - tire conditions.
 - lights.
 - inspection of the vehicle to identify any leaks.
 - tightening the wheel bolts.
 - fire extinguishers.
 - dpi.
 - wheel chocks.
 - bottle with eyewash liquid.
 - manhole cover.
 - emergency remote control for the foot valve.

The Customer informs the owner of the sub-contractor company that the Ecta - BBS guidelines are adopted for the safety of both.

STAR Spa informs the owner of the sub-contractor company that the Driver's Manual and related attachments will be delivered to him, in addition to the Security Plan, the Logistics Solutions Plan with related information on safety, health, environment, protection of transported products which it will be the sub-contractor's responsibility to instruct the driver on the content, as well as the driving times, and the Policies.

Locate di Triulzi, 04.04.2024

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