

INTERNAL REGULATIONS FOR CONDUCT IN THE SECURITIES MARKETS

28 April 2020

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INTERNAL REGULATIONS FOR CONDUCT IN THE SECURITIES MARKETS

1. PREAMBLE

The Board of Directors of Compañía de Distribución Integral Logista Holdings, S.A. ("**Logista Holdings**" or the "**Company**"), approved on 27 September 2016 a modification of the "Internal Regulations for Conduct in the Securities Markets of Logista Group", to adapt the text to the provisions of Regulation (EU) N° 596/2014, of the European Parliament and of the Council, of 16 April 2014, on market abuse (hereinafter, the "Market Abuse Regulation").

The various regulatory modifications since that date, the accumulated experience and the organizational changes that occurred in the Company make it advisable to revise this text to adapt it to the new situation.

In consequence, following a favourable report of the Audit and Control Committee, the Board of Directors of the Company, on its meeting of 28 April 2020, has approved these "Internal Regulations for Conduct in the Securities Markets of Logista Group" ("the "**Regulations**", or the "**IRC**"), that repeal and substitute the previous in its entirety, of 27 September 2016.

2. DEFINITIONS

For the purposes of these Regulations the following terms shall have the meaning set forth below:

Directors of the Company.- The members of the Board of Directors of the Company.

External Advisors.- Those individuals or legal persons who are not Directors of the Company, neither Officers or employees of the Logista Group, and who provide financial, legal, consultancy, or any other services to any company within the Logista Group, as a consequence of which they have, or may have, access to Inside Information.

CNMV.- The Spanish National Securities Exchange Commission. (*Comisión Nacional del Mercado de Valores*).

Board of Directors.- The Board of Directors of the Company.

Officers.- Those officers of the Logista Group who report directly to the Board of Directors of the Company or its first Officer, and, in any case, the Internal Audit Corporate Director of the Logista Group.

Confidential Documents.- Any material, whether in written or electronic or other format, that contains Inside Information.

Logista Group.- The Company and all the companies in respect of which the Company is the controlling entity, pursuant to article 42 of the Commercial Code.

Inside Information.- It is considered as Inside Information the information that meets the characteristics set out in article 7 of the Market Abuse Regulation, or in any other regulation that may replace it.

Personal Transaction.- Transactions carried out by Persons Discharging Managerial Responsibilities or their Persons Closely Associated, on the Affected Securities or Financial Instruments, including pledge, loan or any other transactions detailed in Article 19 of the Market Abuse Regulation, or in any other regulation that may replace it.

Persons Discharging Managerial Responsibilities.- The Directors of the Company and the Officers.

Obligated Persons.- Persons to whom all or part of these Regulations are applicable, whether permanently or temporarily.

Persons Closely Associated.- In relation to Persons Discharging Managerial Responsibilities, they are those set out in article 3.1 (26) of the Market Abuse Regulation or any other regulation that may replace it, and particularly:

- (i) the spouse or any other person considered to be equivalent to a spouse in accordance with national law;
- (ii) the dependent children, in accordance with national law;
- (iii) any other relative who has shared the same household for at least one year before the date of the transaction concerned; or
- (iv) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a person discharging managerial responsibilities or by a person referred to in point (i), (ii) or (iii), which is directly or indirectly controlled by such a person, or which is set up for the benefit of such a person, or which economic interests are substantially equivalent to those of such a person;

Company.- Refers to Compañía de Distribución Integral Logista Holdings, S.A., with registered office in Leganés (Madrid), Polígono Industrial Polvoranca, C/ Trigo 39, and with NIF (Fiscal Identification) number A-87008579.

Affected Securities and Financial Instruments.- The securities and other Financial Instruments included in section 3.2 of these Regulations.

3. GENERAL PROVISIONS

3.1 Subjective Scope of Application

- 3.1.1 These Regulations shall apply to the Persons Discharging Managerial Responsibilities, and in general, to any employee of the Logista Group who may hold Inside Information related to the Company, as well as to any person who provides services or performs work of any kind for it and who has access to such Inside Information because of his/her work in the Company.
- 3.1.2 The rules contained in section 5 of these Regulations shall apply only to Persons Discharging Managerial Responsibilities and their Persons Closely Associated.
- 3.1.3 The Persons Discharging Managerial Responsibilities and their Persons Closely Associated shall be included in the corresponding Registry of Persons Discharging Managerial Responsibilities, whose drawing up and maintenance shall be competence of the General Secretariat of the Company.
- 3.1.4 The General Secretariat of the Company shall inform the Persons Discharging Managerial Responsibilities of their inclusion in the Registry of Persons Discharging Managerial Responsibilities, and of the rights and other matters provided for in the applicable legislation on personal data protection. Likewise, the General Secretariat shall inform them of their obligations in the interest of such consideration, as well as of any infringements and sanctions that may be applicable.
- 3.1.5 The General Secretariat shall provide the Persons Discharging Managerial Responsibilities with a copy of these Regulations, who shall be obliged to send to this Secretariat a signed declaration, stating their commitment to due compliance with the same, in the terms stated in **Annex 1**.

3.2 Objective scope of Application

These Regulations shall apply to Securities and Financial Instruments set out by the Market Abuse Regulation, or any other regulation that may replace it, and in any event, to negotiable securities (or for which a request for admission to trading has been made), issued by the Company or by Companies of the Logista Group, whether they are shares, bonds or other forms of securitised debt, financial instruments issued by the Logista Group, associated to the mentioned securities, as well as any other security or financial instrument (even those not issued yet by the Logista Group), that may have underlying Securities and Financial Instruments.

4. CONDUCT REGULATIONS REGARDING INSIDE INFORMATION

4.1 Public Disclosure of Inside Information

4.1.1 Duty of Public Disclosure of Inside Information

The Company, as a security issuing company, undertakes to make public, as soon as possible, the Inside Information which directly concerns it, in a manner which enables fast access and complete, correct and timely assessment of the Inside Information by the public.

The Company shall not combine the disclosure of Inside Information to the public with the marketing of its activities.

4.1.2 Delay in the Public Disclosure of Inside Information

The Company may, on its own responsibility, delay disclosure to the public of Inside Information, in accordance with the terms established in the Market Abuse Regulation or other regulation that may replace it. In particular, according to such Regulation, the public disclosure of Inside Information may be delayed provided that all of the following conditions are met:

- a) immediate disclosure is likely to prejudice the legitimate interests of the Company or of Logista Group;
- b) delay of disclosure is not likely to mislead the public;
- c) the Company is able to ensure the confidentiality of that information.

In order to ensure the confidentiality of the Inside Information, the Company will control its access and take the necessary monitoring and protective measures established by law and those set out in the following sections 4.2 and 4.3 of these Regulations, on Monitoring and Protective Measures and Treatment of Confidential Documents, and in addition:

- i) Will deny access to such Inside Information to persons who do not require such information for the execution of their functions.
- ii) Will guarantee that the persons with access to such Inside Information know the legal duties that apply and are aware of the sanctions and responsibilities related to the improper use of such information.
- iii) Will immediately publish and disclose the Inside Information in the event that the Company cannot guarantee the confidentiality of the Inside Information.

In the event that the Company delayed the disclosure of Inside Information, it shall inform the National Securities Market Commission (CNMV) immediately after

the Inside Information is disclosed to the public, and shall provide a written explanation of how the conditions set out in this section 4.1.2 were met.

4.1.3 Time and form of the Public Disclosure of the Inside Information

Public Disclosure of Inside Information shall be made by communication to the CNMV, and, simultaneously, by posting on the Company's corporate website, within the established deadlines, and in accordance to the procedures set forth in the regulations in force.

4.1.4. Meetings with analysts, investors or communication media

The meetings with analysts, investors or communication media shall be previously planned, so that the persons participating in such meetings do not disclose Inside Information that has not been previously disclosed to the market.

4.2 General Obligation to protect Inside Information

Without prejudice to the provisions of section 4.1 above, and to the prohibitions contained in section 4.4. below, all Obligated Persons, having access to Inside Information, have the obligation to protect it, taking the required measures to avoid such Information being used unfairly or abusively and, if appropriate, taking the measures that could be necessary to correct the consequences of an unfair or abusive use of it.

4.3 Specific obligations regarding Inside Information. Insider List.

The Company will draw up a list of all persons who have access to Inside Information, and who work for the Company or for the Logista Group under a corporate, commercial or labour relationship, or that perform tasks through which they have access to Inside Information, such as advisors, accountants or credit rating agencies.

In particular, during the studying, preparation and/or negotiation phases of any type of transaction, in which Inside Information or information likely to be considered as such is acknowledged or generated ("**Relevant Transaction**"), the following conduct shall be followed:

4.3.1 Qualification as Inside Information and Creation of the Insider List.

Officers in charge of the departments involved in the Relevant Transaction shall inform of this situation, confidentially, and as soon as possible, the General Secretariat, who, in coordination with the Finances Corporate Directorate, may analyse if such information should be qualified as Inside Information. The General Secretariat will inform the Officers involved in the Transaction of such situation.

If the information is qualified as Inside Information, each Officer involved in the Relevant Transaction shall submit to the General Secretariat a list of the employees under their control who will have access to the Inside Information, headed by themselves; which list shall be updated when appropriate.

Access to Inside Information by persons other than those detailed in section 3.1.1, including External Advisors, will require their previous signature of a Non-Disclosure Agreement, and their acceptance of the Prohibitions related to its use, in accordance with paragraph 4.5 following, in the terms stated in **Annex 2**.

Based on information received, the General Secretariat will draw up a section of the Insider List, according to the specific format stated in the applicable regulation, indicating, at least:

- a) the identity of the persons having access to the Inside Information;
- b) the reason for including that person in the Insider List.
- c) the date and time at which that person obtained access to Inside Information.
- d) the date on which the corresponding section of the Insider List was drawn up.
- e) any other information required by the applicable Law.

The Officers involved in the Relevant Transaction are responsible for reporting to the General Secretariat the following circumstances, in order to keep updated the Insider List:

- a) When there is a change in the reasons for a person appearing in said Register.
- b) When it is necessary to add a new person to the register, for having access to Inside Information.
- c) When a person included in the Insider List ceases to have access to Inside Information.

The date and the time of the change which generate the update, shall be recorded.

The Insider List will be divided into separate sections relating to different Inside Information. Each section of the Insider List shall only include details of individuals having access to the Inside Information relevant to that section.

Likewise, the Insider List shall contain, in a supplementary section, a list of persons who, by virtue of their position or duties, have access, at all times, to Inside Information ("**Permanent Insiders**").

The General Secretariat shall inform Permanent Insiders of their inclusion in such list.

The details of Permanent Insiders included in the supplementary section of the Insider List shall not be included in the other sections of the said list.

The details registered in the Insider List shall be kept by the Company under the terms and for the deadlines stated in the regulations in force, and will be available to the CNMV if required by it.

The General Secretariat shall inform the Obligated Persons of their inclusion in the Insider List, and of the other matters provided for in regulations on the protection of data of a personal nature. Likewise, the General Secretariat shall inform the Obligated Persons of all aspects required by the regulations in force, regarding their inclusion in an Insider List, due to their access to Inside Information, particularly of the infringements or sanctions and labour, administrative and criminal liabilities derived from its inadequate use, requesting their signature of the Non-Disclosure Agreement set forth in Annex 2.

The Insider Lists and its updates will be drawn up in electronic format, in accordance with the templates provided for each of them, 1 (Insiders for a specific Transaction) and 2 (Permanent Insiders), in Annex I of the Implementing Regulation (EU) 2016/347, of 10 March.

4.3.2. Monitoring and protective measures

- a) The Investor Relations Directorate will monitor the trend of the Affected Securities or Financial Instruments and the news issued by professional disseminators of economic information and the media which could affect them.

If an unusual oscillation should occur in the negotiated prices or in the trading volume of the Affected Securities or Financial Instruments, the Investor Relations Directorate shall immediately inform the Chief Executive Officer of the Logista Group and the General Secretariat. The Company, where necessary and if there are reasonable indications that such oscillation is taking place as a consequence of the premature, partial or inaccurate disclosure of Inside Information, shall take appropriate steps, including its immediate public communication, to inform, in a clear and precise way, about the stage of the transaction, or include a preview of the information to be submitted, all without prejudice to the provisions contained in 4.1.2 of these Regulations ("Delay in the Public Disclosure of Inside Information")

- b) The Company will subject the development of the transactions over Affected Securities or Financial Instruments, including the transactions in treasury stock by the Logista Group, to measures that avoid the investment or divestment decisions being affected by the knowledge of Inside Information.

4.4 Treatment of Confidential Documents

Any Obligated Persons having Confidential Documents shall act with diligence in their use and handling, and shall be held responsible for their custody and preservation and for keeping their confidentiality. To these purpose, all Confidential Documents shall be processed and filed providing measures that guarantee the confidentiality of the Inside Information, and shall be transmitted exclusively to those persons who, for a concrete operation, were included in the Insider List.

4.5 Prohibitions related to Inside Information

Any person who acknowledges Inside Information, whether included in the corresponding Insider List or not, must abstain from executing on their own account or on the account of third parties, directly or indirectly, any of the actions set out in the regulations in force, and in any event, the following ones:

1) Insider Dealing:

Any person who has Inside Information may not:

- a) Carry out, or try to carry out, any kind of operation (acquiring, transmitting, disposing), for his own account or for the account of third parties, directly or indirectly, concerning the Affected Securities or Financial Instruments, as well as to amend or cancel an order concerning the same.
- b) Recommend or induce another person to acquire, transmit, dispose, cancel or amend an order of acquisition or disposal concerning the Affected Securities or Financial Instruments, using Inside Information.

The use of the recommendations or inductions referred to in this paragraph b) is considered an Insider Dealing Transaction, when the person using the recommendation or inducement knows or ought to know that it is based on Inside Information.

2) Unlawful Disclosure of Inside Information:

Any communication of Inside Information to another person shall be unlawful, except where such communication occurs in the normal exercise of his/her work, profession or functions and in compliance with the provisions of the Market Abuse Regulation and this IRC.

5. CONDUCT REGULATIONS REGARDING PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES AND THEIR CLOSELY ASSOCIATED PERSONS

5.1. Blackout Periods

Without prejudice to the prohibitions set out in previous section 4.5, Persons Discharging Managerial Responsibilities and their Closely Associated Persons will refrain from carrying out Personal Transactions, directly or indirectly, for their own or for the account of a third party, within the thirty natural days preceding the scheduled date of publication by the Company of the Half Year or Annual Financial Statements, or of the interim management declaration. However, the Company may authorise, exceptionally, the conduct of transactions in the cases laid down in the Market Abuse Regulation or regulations replacing it.

5.2. Communication of Personal Transactions

Persons Discharging Managerial Responsibilities and their Closely Associated Persons will be able to carry out Personal Transactions out of the Blackout Periods stated in the previous section, always that they do not have Inside Information.

Persons Discharging Managerial Responsibilities and their Closely Associated Persons are responsible for the communication to the CNMV and to the Company of the execution of the abovementioned transactions, within the deadlines and terms established in the regulations in force. For the communication of Personal Transactions to the CNMV, they may request the assistance of the General Secretariat.

The communication of Personal Transactions shall be made according to the following rules:

- 1) **Personal Transactions of Directors of the Company or of their Closely Associated Persons:**
 - i) **Notification period:** Deadline for notification to the CNMV and to the Company is of three business trading days from the date of the Personal Transaction.

In case of requesting the assistance of the General Secretariat to do the corresponding notifications, the information requested by the General Secretariat, related to such Personal Transaction, should be submitted in a maximum deadline of two business trading days from the date of execution of the Personal Transaction.

- ii) Notification template: Notification shall be made through the submission to the CNMV and to the Company of Model NOD established by the CNMV (or any other model that replaces it), available at the website www.cnmv.es.

In case of requesting the assistance of the General Secretariat in making such notification, the General Secretariat will provide the person subject to the notification obligation a copy of the notification template, in order to obtain the necessary information so that the Company can notify the Personal Transaction to the CNMV on behalf of the obliged person.

2) Personal Transactions of Officers and their Closely Associated Persons:

- i) Notification period: Deadline for notification to the CNMV and to the Company is of three business trading days from the date of the Personal Transaction, once that the total amount of the Personal Transactions carried out within a calendar year, without netting, reaches Euro 20,000.

In case of requesting the assistance of the General Secretariat to do the corresponding notifications, the information requested by the General Secretariat, related to such Personal Transaction, should be submitted in a maximum deadline of two business trading days from the date of execution of the Personal Transaction, in which the abovementioned threshold is exceeded.

- ii) Notification template: Notification shall be made through the submission to the CNMV and to the Company of Model NOD established by the CNMV (or any other model that replaces it), available at the website www.cnmv.es.

In case of requesting the assistance of the General Secretariat in making such notification, the General Secretariat will provide the person subject to the notification obligation a copy of the notification template, in order to obtain the necessary information so that the Company can notify the Personal Transaction to the CNMV on behalf of the obligated person.

Persons Discharging Managerial Responsibilities will notify, in writing, their Closely Associated Persons, and will keep a copy of such notification, of their obligation to notify the Company and the CNMV the Transactions on Affected Securities and Financial Instruments they conduct, without prejudice that such notifications might be made by the Director of the Company, or by the Officer, on behalf of their Closely Associated Persons.

5.3. Portfolio Management Contracts

When Persons Discharging Managerial Responsibilities or their Closely Associated Persons may sign a discretionary portfolio management contract, such contract shall be deemed to be a Personal Transaction.

Such contracts shall contain an express instruction to the manager of not conducting transactions over Affected Securities and Financial Instruments which are prohibited by these Regulations.

As an exception to the provisions of the preceding paragraph, discretionary portfolio management contracts which do not contain such instruction could be signed, if they are concluded at a time when the Persons Discharging Managerial Responsibilities or their Closely Associated Persons are not in possession of any Inside Information, and if such contracts absolutely and irrevocably guarantee the following:

- (i) That the transactions will be carried out without intervention of any of the above mentioned persons, and thus exclusively under the professional criteria of the manager, and according to criteria applied in general to customers with similar financial and investments profiles; and
- (ii) That the abovementioned persons will be immediately notified of the execution of the transaction over Affected Securities and Financial Instruments, in order that such persons can fulfil their communication duty, according to the provisions of section 5.2 above ("Communications of Personal Transactions").

6. CONDUCT REGULATIONS REGARDING THE MANIPULATION WITH TRADING OF THE AFFECTED SECURITIES OR FINANCIAL INSTRUMENTS

The Obligated Persons shall refrain from preparing or conducting practices that distort pricing of the Affected Securities or Financial Instruments ("Market Manipulation") on a regulated market, or in the relevant organized trading facility.

The following behaviours shall be considered as practices that distort pricing:

- a) Any transactions or orders that give or are likely to give false or misleading signals as to the supply of, demand for, or price of, the Affected Securities or Financial Instruments.

- b) Any transactions or orders that secure, or are likely to secure, at an abnormal or artificial level, the price of the Affected Securities or Financial Instruments
- c) Any transactions or orders that employ fictitious devices or any other form of deception or contrivance which affect or are likely to affect the price of the Affected Securities or Financial Instruments.
- d) Disseminating information, through the media, including the Internet, or by any other means, which gives or is likely to give false or misleading signals as to the supply of, demand for, or price of, the Affected Securities or Financial Instruments, or is likely to secure the price of the Affected Securities of Financial Instruments at an abnormal or artificial level, including the dissemination of rumours, where the person who made the dissemination knew, or ought to have known, that the information was false or misleading.

Likewise, the following practices will be considered as preparing or conducting practices that distort pricing, that is, they constitute Market Manipulation:

- a) The conduct by a person, or persons acting in collaboration, to secure a dominant position over the supply of or demand for Affected Securities of Financial Instruments, resulting in the direct or indirect formation of purchasing or selling prices or other non-equitable conditions.
- b) The sale or purchase of Affected Securities or Financial Instruments at the opening or closing of the market, which has or is likely to have the effect of misleading investors who act on the basis of the prices displayed, including the opening or closing prices.
- c) Taking advantage of occasional or regular access to the media, whether traditional or electronic, expressing a view on an Affected Securities or Financial Instrument or, indirectly, on the issuer thereof, after having taken positions on the Affected Securities or Financial Instrument, and having benefited from the repercussions of the view expressed on the price of said Affected Securities or Financial Instrument without having simultaneously informed the public opinion of this conflict of interest in the right and effective manner.
- d) Any other practice that distorts pricing, when foreseen by the CNMV, by means of the relevant regulation (Circular Letters).

It shall not be considered as Market Manipulation the conducting of transactions or operations, according to accepted market practices, approved by the CNMV by

means of the relevant regulation (Circular Letters) (e.g. liquidity agreements), nor the transactions carried out in compliance with buy-back programmes under the terms established by law.

7. CONDUCT REGULATIONS REGARDING TREASURY STOCK TRANSACTIONS

The Company's treasury stock transactions will normally be carried out through Shares Buy-Back Programmes of those established in the Market Abuse Regulations or Liquidity Contracts Regulations that meet the characteristics of CNMV Circular 1/2017 of 26 April, on liquidity contracts.

Without prejudice to this, the Board of Directors may, exceptionally and in accordance with the needs of the Company, authorise the performance of discretionary operational treasury stock, and in this case must expressly establish all the necessary precautions to ensure that such operation takes place in full respect of the rules laid down in the Market Abuse Regulation or regulations that complement or replace it.

8. ENFORCEABILITY AND EFFECTS OF BREACH

These Internal Regulations of Conduct are enforceable against the Obligated Persons and shall be communicated to these persons by the General Secretariat, when appropriate, and the document attached as Annex 1 to these Regulations shall be signed by each of the Obligated Persons.

The General Secretariat shall inform the Audit and Control Committee of the measures taken to promote knowledge and ensure compliance with these Regulations, its degree of compliance and the main incidents that have occurred.

The Obligated Persons shall also act, in every moment, in accordance with the legal regulations and with the stock market regulations.

The failure to comply with the provisions of the Internal Regulations of Conduct may be considered as caused of dismissal on disciplinary grounds in the common and special labour order, as violation of the contractual good faith, and abuse of the confidence in the development of the work, as well as cause of termination of any commercial relationship that may bound Directors to the Company.

The above will be understood without prejudice of the breach that may derive of the provisions of the Securities Market Law and the civil or criminal responsibility as may apply to the noncompliant party in each case.

The Audit and Control Committee may, in exceptional cases and for justified reasons, waive certain obligations set out in these Regulations, provided that such exemption does not imply a breach of the applicable legislation.

9. LANGUAGE

These Regulations shall be published in Spanish and English, prevalent being the first, in case of divergence between the two languages.

10. EFFECTIVE DATE

These Regulations shall enter into force on 29 April 2020, when the Internal Regulations for Conduct in the Securities Market, of 27 September 2016, shall be repealed.

The above shall be understood without prejudice to the application of the Regulation (EU) 596/2014, of April 16, on Market Abuse, and its Delegated and Implementing Regulations, as well as any other legal or regulatory provisions applicable, and Circular Letters of the CNMV, on related matters, which shall prevail.

ANNEX 1

ACKNOWLEDGEMENT AND ACCEPTANCE STATEMENT OF THE INTERNAL REGULATIONS FOR CONDUCT IN THE SECURITIES MARKETS OF COMPAÑÍA DE DISTRIBUCIÓN INTEGRAL LOGISTA HOLDINGS, S.A. ("the Company")

To the General Secretariat of the Company

1. Identification of the undersigned:

Name and Surname	NIF (Identity Card number)	Position	Area or Department

2. Identification of the undersigned's Closely Associated Persons:

Name and Surname/Corporate Name	NIF (Identity Card Number)

3. Securities of Logista Group held by the undersigned directly or through a Closely Associated Person

Number of Securities	ISIN Code	Date of the acquisition	Identification of the owner (the undersigned or Related Person)

The undersigned states that he/she knows and accepts the Internal Regulations for Conduct in the Securities Markets of the Company, of 28 April 2020, which copy he/she has received, and undertakes to properly perform his/her obligations thereunder.

Particularly, he/she states the following:

- a) That he/she has been expressly informed of the following:
 - i) of the confidentially obligation in relation to the Inside Information he/she has access to, and obligations of the custody, conservation and treatment of Confidential Documents.
 - ii) of the Prohibition of Inside Dealing, and of the unlawful disclosure of the Inside Information.
 - iii) that the breach of said duties and obligations could constitute a labour infringement or an administrative offence, very serious or serious, according, respectively, with articles 282.6 and 295.5 of the Consolidated Text of the Securities Market Law, or an Insider Trading offence, set out in articles 285, 285 bis, 285 ter and 285 quarter of the Criminal Code (Organic Act 10/1995, of 23 November), which could be sanctioned with pecuniary fines, public warnings, suspension or barring for a profession and imprisonment.
- b) That the Affected Securities or Financial Instruments he/she owns, directly or indirectly, are, exclusively, those stated in previous section 3.
- c) That has informed his/her Closely Associated Persons of their obligation to notify the Company every transaction they have conducted or may conduct related to the Affected Securities or Financial Instruments, whose voting right are not under their control.

In addition, the undersigned expressly consents to the processing and incorporation of the data of a personal nature provided, on occasion of the notification made in compliance with the Regulations, in an automatic file under the responsibility of Compañía de Distribución Integral Logista Holdings, S.A. the only purpose of which is the implementation of these Regulations.

The rights recognized under the current regulations of Personal Data Protection may be exercised by sending a communication addressed to the General Secretariat, Polígono Industrial Polvoranca, C/ Trigo, 3, Leganés, 28914 Madrid, Spain.

In _____, on _____, _____ of _____.

Signed: _____

ANNEX 2
NON-DISCLOSURE AGREEMENT

Name: _____

First Surname: _____

Second Surname: _____

With (complete as applicable) **D.N.I. (Identity Card Number)** _____
/Passport _____

States that,

(i) For the reasons mentioned below he/she needs to have access to certain information, related to:

(the "Inside Information")

(ii) For that purposes, on [date and time], he/she has had access to Inside Information of the Company and/ or of the Logista Group related to

_____.

And states that,

(i) He/she knows the regulation on Treatment of Inside Information and Confidential Documents, contained in the Internal Regulations for Conduct in the Securities Markets of the Company, dated 28 April 2020, which copy he/she has received, and undertakes to properly comply with his/her obligations thereunder, and also make his/her dependent staff to comply with them, in whatever is applicable.

(ii) He/she has been expressly informed of the confidentially obligation in relation to the Inside Information he/she has access to, the prohibition on the Insider Dealing and unlawful disclosure of Inside Information and the penalties, offenses and liabilities that could arise from an infringement of such obligations.

(iii) While the information received is considered as Inside Information, he/she will be included in the Insider List and shall strictly comply and ensure the compliance by staff that report to him/her, with the provisions of the IRC and of the Market Abuse Regulation, concerning the use restrictions of the Inside Information.

In _____, on _____, _____ of _____.

Signed: _____
