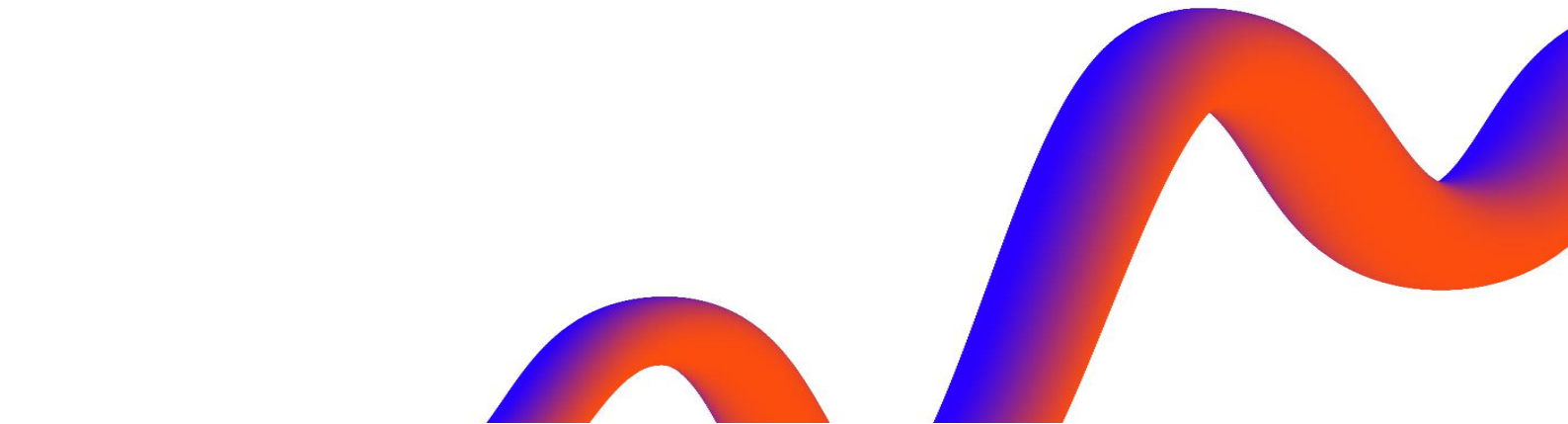
Logista

CODE OF CONDUCT



Logista

Dear Colleagues,

We are glad to present our updated Code of Conduct, that has been approved by Logista's Board of Directors. As you may know, the Code of Conduct is the result of the Company´s firm commitment to ethical principles and fair business behaviours, adapted to Logista´s present footprint and to best market practices. It is specifically aimed at reinforcing the principles of exemplarity, business integrity, transparency, and compliance with laws, that must govern our actions and decisions.

Logista´s employees, its clients, suppliers, business partners, shareholders and communities in which we are involved are the basis of our activities, and this Code of Conduct intends to serve as a guideline for all of them in the effort to foster respect, equality, diversity and creation of long-term sustainable value.

As members of Logista, we are all expected to act in compliance with the highest ethical standards. It is our personal duty to comply with the Code of Conduct and to raise our concerns if we think any unethical or illegal behaviour might be taking place.

We encourage you to understand and get familiar with this Code of Conduct, and to use it in your decisions; it contains useful guidelines and recommendations that the Board of Directors hope will help us to take the right decisions, and also provides us with the necessary tools to ask for advice whenever we need it. By doing so, you are helping Logista to continue on its path of growth in a sustainable way, confirming its credibility and reputation within all its stakeholders.

All of us are personally responsible to comply with the Code of Conduct in our daily activities; this is a commitment that none of us may withdraw. That said, those of us that hold managerial responsibilities within the Group are specifically expected to contribute with our example and to show those persons under our supervision that the ethical principles and guidelines contained in the Code of Conduct are effectively put in place throughout all our operations and activities.

Thank you for your commitment with ethics and compliance.

Leganés, 20 July 2023.

Mr. Gregorio Marañón Bertrán de Lis
President of the Board of Directors

Mr. Íñigo Meirás Amusco
Chief Executive Officer

Logista

SUMMARY

1. HOW DOES OUR CODE WORK 5

- Purpose 5
- Scope of Application 5
- Member's Responsibility 5
- Manager's Responsibility 6
- How to Make the Right Decision 6
- Questions, Concerns and Complaints 7
- Non-retaliation 7

2. PROTECTING OUR PEOPLE 7

- Diversity, Inclusion and Non-Discrimination 7
- Harassment Prevention 8
- Health and Safety at the Workplace 9
- Human Rights 10
- Data Privacy 11
- Use of Social Media 11

3. PROTECTING OUR ASSETS 12

- Accurate Records and Disclosures 12
- Use of Property 13
- Confidential Information 14

4. BUSINESS INTEGRITY 15

- Conflicts of Interest 15
- Corruption and Bribery 17
- Avoiding Money Laundering 18
- Gifts and Hospitality. 19
- Customs and Tax Requirements 20
- Insider Trading 21

- Competing fairly 22
- Our Relations with Suppliers 24

5. PROTECTING OUR COMMUNITIES 25

- Respecting the Environment 25
- Engaging with Governments and Political Bodies 25
- Communicating with Investors, Analysts and the Media 26

Logista

1. HOW DOES OUR CODE WORK

• Purpose

Since its foundation, Logista has created, promoted and supported a business culture and philosophy based on the principles of compliance with laws, honesty, integrity in management, and transparency in the Group's actions and relations with its shareholders, employees, suppliers, customers, communities and other stakeholders.

This Code of Conduct (the "Code of Conduct" or the "Code") establishes the standards and ethical principles that govern our activities, sets the requirements for conduct that all Members of the Group should comply with in their day-to-day work and, finally, serves as the key basis for the Group's Policies and Procedures, all of which should be interpreted and applied according to the general framework of this Code.

• Scope of Application

This Code of Conduct is applicable to Logista Integral, S.A. and all its subsidiaries and affiliates ("Logista", or the "Group").

All employees, either permanent or temporary, managers, directors, legal representatives and, in general, any person subject to the authority of Logista (collectively, the "Members") are required to understand and comply with the Code of Conduct, the Group's Policies and Procedures and with the applicable laws and regulations.

Board members, directors or managers appointed by Logista in the boards or management positions of companies in which Logista has an equity or stake, but which are not controlled by it, will be obliged to comply with this Code, and will internally observe the application of this Code of Conduct as appropriate.

Third parties with which Logista maintains any type of business, commercial or professional relationship, such as providers, customers, and business partners, should comply with the requirements described in this Code of Conduct when acting for or in connection with the Group.

• Member's Responsibility

Each of us, as Members, is responsible for acting according to the provisions of this Code. We don't behave according to what others do: it is our personal responsibility to comply with the Code of Conduct, and to raise our voice if we see or suspect any unethical or illegal behaviour.

On the basis of the above, Members should always follow these minimum guidelines:

✓ Ensure we know, understand and comply with the Code of Conduct and the Group's Policies and Procedures.

- ✓ Carry out our activities in a professional and ethical manner.
- ✓ Complete all Group's regular training.
- ✓ Immediately report actual or potential breaches of the Code of Conduct, of the Group's Policies and Procedures or of the law, even when such breach could come from a third party in its commercial, business or professional relations with the Group.

A breach of the Code of Conduct or of the Group's Policies and Procedures may be constitutive of a labour infringement and, in this case, it will be punishable under the labour disciplinary regime in force, according to laws or collective agreements.

Notwithstanding the foregoing, such breach may lead to legal actions in case of infringement of criminal, civil or commercial laws or obligations.

- **Manager's Responsibility**

Managers have the fundamental responsibility to set the *"tone at the top"*, serving as a role model for the employees under their supervision. With this purpose, managers should ensure to:

- ✓ Share and explain the Code of Conduct, helping the employees under their supervision to understand and comply with it.
- ✓ Offer guidance and support about the Code of Conduct.
- ✓ Encourage the employees under their supervision to ask questions, raise concerns and speak up.
- ✓ Take the actions needed to immediately stop any actual or potential situation in their area of responsibility that might be contrary to the provisions of the Code of Conduct, and report them to their Local Compliance Unit or, where appropriate, to the Group's Compliance Committee.

- **How to Make the Right Decision**

It is impossible to anticipate or regulate every question or situation. If you are unsure about how does the Code of Conduct rule any particular topic, or what decision should be taken about a specific business action or decision, ask yourself the following questions:

- ✓ Is it legal?
- ✓ Will it appear ethical to stakeholders?
- ✓ Is it consistent with our Code of Conduct and values?
- ✓ Am I giving a good example?

- ✓ Do I understand the consequences?
- ✓ Would I be comfortable explaining my actions to my colleagues, family and friends?
- ✓ Would Logista and/or myself be comfortable if it was reported in the news?

If the answer to any of these questions is "no", then the next step is clear: don't proceed, and ask for guidance from your immediate manager. Always remember that the Group has implemented the adequate processes, guidance and resources to help its Members to follow the Code of Conduct.

- **Questions, Concerns and Complaints**

You can raise questions or concerns about any topic related to the Code of Conduct to your immediate manager. If you do not feel comfortable speaking up to your immediate manager, you can raise your concerns to a higher level manager, or you can contact your Local Compliance Unit or the Group's Compliance Committee.

Members that have knowledge, evidence, or reasonable suspicion of a breach of the Code of Conduct, the Group's Policies and Procedures or of the applicable law, must report it immediately by communication to the Group's Whistleblowing Channel.

For these purposes, the complaints should preferably be submitted through the secure communication platform integrated in Logista's corporate website, accessible from the following link:

https://www.logista.com/es/home/sustainability/whistleblowing-channel.html

Alternatively, they may also report them to Logista's Whistleblowing Channel by ordinary mail, by writing to the Logista Compliance Committee - c/ Trigo, 39, 28914 Leganés (28914 Madrid) Spain

- **Non-retaliation**

Logista will not tolerate any form of retaliation against an individual who in good faith discloses or reports an actual or suspected breach of the Code of Conduct. Retaliation may result in discipline, up to and including dismissal.

Reports of suspected breaches of the Code shall be considered to be made in good faith as long as they provide complete and accurate information about a specific topic, even if they finally are found mistaken or unsubstantiated.

2. PROTECTING OUR PEOPLE

- **Diversity, Inclusion and Non-Discrimination**

Logista is committed to providing equal opportunities to all its Members, encouraging diversity and respect for difference. We work to ensure for all Members an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity. All our employment decisions are taken on the basis of merits, qualifications, skills, performance, and achievements.

Members should treat other Members and any other third parties involved with the Group with dignity, respect, fairly and equally.

Logista will not tolerate any discrimination based on race, colour, gender expression, gender identity, ethnic, religion, social class, politics, citizenship, sexual orientation, marital status, disability or any other cause.

Members must:

Create a work environment where colleagues can contribute, develop and fully utilize their talents.

Demonstrate respect for others keeping an open mind to new ideas, various cultures and customs and different points of view.

Treat others respectfully and professionally.

Report immediately all incidents of discrimination.

Members must not:

Discriminate based on race, colour, gender expression, gender identity, ethnic, religion, social class, politics, citizenship, sexual orientation, marital status, disability or any other protected ground as established by law.

Accept or contribute to anything that excludes an individual or group.

Fail to speak up when others are being mistreated.

- **Harassment Prevention**

All Members have the right to work in an environment that is free from intimidation, harassment and abuse. Harassment is a behaviour that creates and offensive, intimidating, humiliating or hostile work environment that unreasonably interferes with other person's work performance. Harassment includes any form of sexual, gender-based, verbal, non-verbal and physical behaviour which is abusive, humiliating or intimidating, even without constituting degrading treatment.

All these conducts are strictly forbidden and will not be tolerated.

Members must:

Help each other by speaking up when a Member's conduct makes you or others uncomfortable.

Report all incidents of intimidation and harassment.

Members must not:

Harass, abuse or be perceived as offensive, intimidating, malicious or insulting.

Tolerate intimidation or harassment of any kind.

Use of profanity, referring to others using derogatory names or remarks or verbal abuse.

Make comments, jokes or materials, including emails, which others might consider offensive.

Bully, threat or commit abuse of authority.

- **Health and Safety at the Workplace**

Logista is committed to providing healthy and safe working conditions for Members and third parties working within, or visiting, our premises and facilities, complying at all times with all applicable laws and regulations on health and safety at work.

It is the responsibility of all Members to understand and be responsible for incorporating safe behaviour in daily activities.

Members must:

Work and behave safely.

Comply with Logista's Health, Safety and Wellbeing Policy, other health and safety procedures and instructions relevant to their work, as well as applicable laws and regulations, and encourage other Members to follow them.

Complete the specific health and safety training as may be required.

Immediately report any accident, injury, illness, risky situation or unsafe condition as soon as they are aware of it.

Members must not:

Carry out any unsafe or unhealthy activity at work.

Remove safety devices in the facilities or from the machinery.

Work under the influence of drugs, alcohol or when using medication improperly.

- **Human Rights**

Logista is committed to protecting and respecting human rights throughout its operations, including the International Bill of Human Rights, the International Labour Organization's (ILO) core conventions, the principles and guidance contained within the United Nations Guiding Principles (UNGP) on Business and Human Rights and the European Social Charter. We recognize the need to avoid infringing on the human rights of others and to adequately address adverse human rights impacts that might take place in our activities.

In this regard, the Group conducts its activities respecting the human rights of the Members, of the third parties it works with and of the communities in which it operates. In turn, Members are also obliged to respect the dignity and human rights of all other Members and third parties they come into contact with in the development of their activities.

As a minimum basis, Logista complies with the applicable labour laws, rules and regulations, with full respect to the fundamental right of trade-union freedom, and, managing the relations with the workers' representatives and Trade Unions in a fluent and transparent manner. All employees have the right to decide to join or not a trade union, or to have recognized employee representation in accordance with applicable law.

We will never use, or permit to be used, forced or trafficked labour, neither employ any person under 16 years old, or less than the local minimum employment age or mandatory school age (whichever is higher) nor employ any person under 18 years old to undertake any work which is considered hazardous or likely to harm the health or safety.

We require our suppliers to comply with their labour obligations to their workers, to respect workers' labour and union rights and to pay wages that comply with the statutory minimum or the collective agreements in force, whichever is higher. Human trafficking or forced labour are strictly forbidden. Likewise, our suppliers are required to promote integrity, teamwork, diversity and trust, ensuring a fair and respectful workplace free from any type of harassment, discrimination or any other form of degrading behaviour, and to promote a positive health and safety culture, prohibiting unacceptable or potentially hazardous behaviour at work.

Members must:

Conduct business activities in a manner that promotes and respects human rights

Members must not:

Fail to speak up if we see a human rights violation.

- **Data Privacy**

Logista respects the privacy of all individuals and manages their personal data in accordance with the applicable laws and regulations.

In the course of conducting our business, we process personal information about Members, customers, providers, shareholders, business partners, candidates and other third parties. We will collect, use, protect and share personal data only for legitimate purposes, according to the applicable laws and the Group's Policies and Procedures.

Members must:

Process personal data in compliance with applicable laws, privacy principles and the Group's Policies and Procedures.

When applicable, obtain the required mandatory consents, and undertake to use such data only for the purposes expressly consented.

Take appropriate technical and organisational measures to ensure that personal data are kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

Contact the Data Protection Officer (DPO) immediately with any questions or concerns.

Without undue delay report DPO any personal data breach.

Members must not:

Process sensitive personal data if processing is not on the grounds established in the personal data protection legislation.

Share personal data collected with anyone—inside or outside of Logista Group— except when disclosure is authorized or based on legal grounds.

Use personal data for other purposes expressly consented.

- **Use of Social Media**

Social media includes any digital communication channels to create and share content and post comments, such as blogs, social networking sites, photo sharing sites, etc.

Members should always be mindful of the content created or shared, remembering that the internet is a public place and that a simple mistake on the social media can negatively affect the Group's reputation very quickly.

You should take great care when disclosing information about Logista, and make sure that you never disclose Logista's confidential or private information, including photographs or images, over social media.

Members must comply with the Group's policies in their use of social media.

Members must:

Be fair and courteous, and never post content that may be viewed as malicious, obscene, harassing, defamatory or discriminatory.

Take care not to disclose Logista's confidential or private information over social media, including photographs.

Members must not:

Comment on Company's confidential or private information unless they are authorized to do so.

Give the impression that they are speaking on behalf of the Company in any personal communication.

3. PROTECTING OUR ASSETS

• Accurate Records and Disclosures

Logista maintains honest, accurate and complete financial and non-financial business records. All data included in our business records must accurately reflect the transactions or events they are referred to. This is an essential and mandatory requirement for shareholders, regulators and other stakeholders to be able to rely on the accuracy and completeness of our disclosures and business records, and for the Group to comply with its legal obligations.

We must ensure that our financial and non-financial statements, regulatory reports and other publicly disclosed information comply with all applicable and accepted accounting principles, applicable laws and regulations and our internal Policies and Procedures.

Failure to record transactions accurately, or falsifying records and accounts or misrepresenting the facts, or influencing others to do so, constitutes fraud and could lead to fines or penalties for Members or the Group.

Members must:

Comply with all local and national laws relating to the accurate and complete maintenance of our financial and non-financial business records.

Be honest, objective and loyal in the performance of recordkeeping responsibilities.

Members must not:

Prepare or submit misleading information.

Make a dishonest or deceptive entry in any report or record.

Create an unrecorded or improperly described fund.

- **Use of Property**

Logista's Property include the collective assets, property and rights owned by Logista, that is made available to all Members for the deployment and fulfilment of their professional and labour duties.

Logista's Property includes, by way of example, assets and business equipment, such as credit cards, computers, networks, hardware, software, email, telephones and other mobile devices, printers, photocopiers, vehicles, the facilities used by Members, as well as the use by Members of other elements that are not tangible, such as the internet, provided by Logista, the knowledge and business methods, and technological processes associated with said resources.

Additionally, it is also regarded as the Property of Logista the Group's the information, which may include personal information collected by the Group, the information systems, the business opportunities or Logista's trade secrets, the industrial and intellectual property, and any other equipment and facilities used by Members

Members shall be responsible for the proper use of the Property, protecting it from misappropriation, misuse, damage, waste, abuse, sabotage, fraud, theft or loss. Likewise, Members are expected to give the property and resources of third parties the same treatment that we give to our own Property.

Limited or occasional personal use of the Property is allowed, provided that:

✓ It is reasonable and does not interfere with or has no negative effect on the performance of the Members' duties and productivity.

✓ This use complies with the Group's Policies and Procedures and the applicable laws.

Members must:

Use company resources in a way that is appropriate, reasonable and responsible; according to the applicable laws and the Group's Policies and Procedures.

Protect Logista's Property with due care and diligence.

Keep our Intellectual Property and Trade Secrets highly confidential and use it only for permitted purposes.

Report any suspected infringement of the Group's intellectual or industrial property rights.

Respect the intellectual property rights of others.

Members must not:

Use the Group's Property for personal gain.

Damage, misuse or misappropriate the Group's Property.

Use the Property for more than limited or incidental personal use or used in violation of the applicable laws and the Group's Policies and Procedures.

Disclose Intellectual or Industrial Property to anyone, including friends and family Members, except when disclosure is authorized or legally required.

Use technology, including software, which may infringe third parties' intellectual property rights.

- **Confidential Information**

All the information produced, created, recorded or received by Members in the course of the Group's activities is the property of the Group. This information includes documents, files, emails, reports, photographs, videos, in whatever format, either electronic, physical or even verbal.

The Group's information may be identified as Public Information, Private Information and Confidential Information. Members shall manage each type of information according to Logista's Policies and Procedures on this matter; however, Members have a duty to protect and safeguard all Group's Information, regardless how it is identified.

Confidential Information shall at all times be maintained and preserved as confidential, and shall only be disclosed on a need to now or right to know basis. In turn, Members shall not accede, try to accede, solicit or wilfully obtain confidential information belonging to third parties. Access to third parties' confidential information shall be strictly restricted to those cases where Members have the right to do so under the applicable laws or a valid agreement in force.

By way of example, the following shall be considered as Confidential Information:

✓ Business plans and marketing strategies.

- ✓ Financial results.
- ✓ Sales and business analytics data.
- ✓ Tariffs and commercial terms.
- ✓ Trade secrets.
- ✓ Members' personal and labour data.
- ✓ IT systems data.
- ✓ Agreements with providers and/or customers.
- ✓ Any information, of Logista or third parties, whose non-authorized disclosure could harm Logista, its shareholders, Members, providers, customers or other stakeholders.

Members must:

Comply with applicable laws and the Group's Policies and Procedures relating to Confidential Information about Logista.

Share confidential information only with those who need to know or have a right to know.

Make sure that the people who we share confidential information with understand the restrictions and obligations with respect to the Confidential Information that apply to them.

Use non-disclosure agreements approved by legal department, when sharing Confidential Information with others.

Respect third parties' confidential information.

Members must not:

Disclose to others inside and/or outside Logista Confidential Information that is not publicly available, except where disclosure is required by applicable law or they have an authorization to do.

Disclose Confidential Information in public places, or using public computers.

Seek to obtain or use confidential information relating to third parties, including our competitors, even if we indirectly receive the information.

4. BUSINESS INTEGRITY

• Conflicts of Interest

Members have an obligation to act at all times in the best interest of the Group. A conflict of interest arises when a Member has a personal relationship or financial or other interest that could interfere with this obligation, or when they use their position in the Group for personal

benefit or gain, either of the Member or of those close to the Member, and without regard that this benefit or gain is effectively obtained.

Conflicts of interest can have a significant negative impact on the Logista reputation. It is therefore very important that Members recognize and take proactive actions to prevent conflicts of interest. By way of example, a conflict of interest may arise when a Member:

- ✓ Hires, manages, supervises, promotes, decides the terms and conditions of employment, or has an influence on the hiring, management, supervision, promotion or decision on the terms and conditions of employment of a relative or of someone with whom the Member has close personal relationship.
- ✓ Has a relative or a close personal contact who is a public official that could influence the Group's business or activities.
- ✓ Has a financial interest in a Group's competitor.
- ✓ Has a financial interest in a supplier, provider or customer of the Group, if the Member has any involvement in the Group's relationship with such supplier, provider or customer, or supervises any Member who does.
- ✓ Uses information obtained at work, or takes advantage of a business opportunity learned about at work, for the Member's personal gain or benefit, or for the benefit of a Member's relative or with whom the Member has a close personal relationship.

It is not always clear when a particular situation could create a conflict of interest. However, if you are, or think you could be, subject to an actual or potential conflict of interest, you should follow the following rules:

- ✓ Communicate in writing the actual or potential conflict of interest to your immediate manager.
- ✓ Abstain from making any decision or taking any direct or indirect action in connection with the matter or person subject of the conflict of interest.
- ✓ Act always with independence and in the best interest of the Group.

Once you have communicated the actual or potential conflict of interest, the situation will be evaluated by your immediate manager together with the Local Compliance Unit or the Group's Compliance Committee. They will determine whether a conflict of interest effectively exits, and the appropriate measures to manage the potential risks. It is your duty to follow these guidelines strictly.

Sometimes, conflict of interest may involve the management. Where an Executive Director is involved, the conflict will be managed according to the applicable law. Where a Corporate Manager, General Manager or Business Manager is involved, the potential conflict of interest

will be managed by a specific Committee integrated by the Group's Compliance Officer, the Corporate Human Resources Manager, and the Corporate Internal Audit Director (this latter will act as an advisor without the rights to vote).

Members must:

Act at all times in the best interests of the Group

Follow the Group's Policies and Procedures when selecting suppliers and business partners.

Report any situation of a possible conflict of interest and abstain from getting involved in the matter.

Strictly comply with any measure that may be adopted to manage the conflict.

Members must not:

Give priority to their own or third party interests at the expense of those of Logista.

Participate, directly or indirectly, in any decision-making process or activity when a possible conflict of interest exists.

- **Corruption and Bribery**

Logista is firmly committed to developing our activities in strict compliance with all the applicable laws and regulations, regardless the countries in which we operate, implementing a zero-tolerance policy towards to any practices that could be considered unlawful, inadequate or which could generate a reputational risk for the Group.

All forms of corruption and bribery are strictly forbidden. A violation of bribery and corruption laws is a serious criminal offense for the individuals and the company concerned that can result in large fines and even imprisonment.

Corruption includes the offering, promising, granting, accepting or receiving any undue benefit or advantage of any kind with the intention of influencing the behaviour of a person, whether they are a public official or external third parties, with the aim of gaining a business or a personal advantage. A bribe or kickback is the act by which the corruption takes place.

Members will never, directly or indirectly:

✓ Offer or give bribes, kickbacks or improper advantages to any public official or third party, which are, or look as that they are, intended to influence decisions related to Logista, or aimed at facilitating or accelerating a process in which the Group has an interest.

- ✓ Request or receive bribes, kickbacks or improper advantages from any third party, which are, or look as at they are, intended to induce them to perform their employment or professional obligations unfairly or improperly

No actual exchange needs to occur to violate this prohibition: an offer or promise or the mere acceptation of a bribe or kickback shall constitute a breach of this Code of Conduct.

Any Member who is requested for a bribe shall refuse to make the payment and immediately inform the Local Compliance Unit or, where appropriate, the Group's Compliance Committee.

For more information, please see the Anti-Corruption and Anti-bribery Policy of the Logista Group.

Members must:

Act at all times in accordance with the principles of business integrity, prudence and common sense.

Reject any gifts or personal benefits that do not meet the requirements mentioned in the Anti-Corruption and Anti-bribery Policy and the Gifts and Hospitality Policy of Logista.

Report any activity that could be considered corrupt.

Members must not:

Request, receive o accept, anything of value (i.e. cash or equivalents, gifts, meals, invitations, travel expenses, loans, third-party services, goods, trips, equipment, supplies or amenities, etc.), either directly or indirectly, that may induce them to perform their employment or professional obligations unfairly or improperly or secure an improper advantage with a government official, provider or customer.

- **Avoiding Money Laundering**

Money laundering is the process of creating the appearance that proceeds obtained from criminal activities are legitimate or originated from a lawful source. Money laundering is a serious criminal offense for the individuals and the company concerned that can result in large fines and imprisonment.

Logista has implemented adequate measures to properly identify, approve and homologate our customers and providers before we enter into business relations with them, along with strong Policies and Procedures to prevent and control payments in cash or bearer checks. We should always strictly follow the applicable laws and these Policies and Procedures, complying actively and in a timely manner with the due diligence obligations we are subject to in our relationships with third parties.

Our commercial and business relationships should always be clear and transparent, avoiding any strange or suspicious activity or transaction that may indicate or be related with any criminal activity. Members dealing with any of these situations should suspend the negotiations or transaction and report it immediately to the Local Compliance Unit or the Compliance Committee.

The following are examples of strange or suspicious transactions that should raise "red flags" and encourage Members to seek guidance from the Local Compliance Unit or the Compliance Committee:

- ✓ Customer payments from multiple bank accounts.
- ✓ Payments in non-invoice currencies.
- ✓ Payments through or to third parties, different than our counterpart in the agreement.
- ✓ Failure to provide the information requested to comply with our customer or provider approval and homologation process.
- ✓ Payments to natural or legal persons resident in tax havens, or to bank accounts open at banks located in tax havens.
- ✓ Transactions that are unusual or inconsistent whit their trade or business, or are substantially different from past transactions.
- ✓ Transactions with natural or legal persons involved in any criminal activity.

Members must:

Comply with applicable laws and the Group's Policies and Procedures relating to receipts and payments.

Follow the Group's Policies and Procedures on customers' and providers' identification and homologation.

Make sure that the suppliers and business partners are established where due to their legal system it is possible to identify their stakeholders or end beneficiaries.

Report any cases of irregular payments or actual or potential money laundering activity.

Members must not:

Accept any cash payments, except when such payments are authorized according to the Group's Policies and Procedures.

Make payments in cash, except when such payments are authorized according to the Group's Policies and Procedures.

- **Gifts and Hospitality**

Hospitality, gifts and entertainment can be seen as a token of courtesy and play a positive role and help us to build stronger and better business or professional relationships. However,

we should never offer or accept gifts and entertainment if doing so could give rise to an obligation or give the impression of an obligation, or could generate actual or potential conflicts of interest.

Hospitality, gifts, entertainment or personal benefits shall always be occasional, without expectation of reciprocity, for a fair value and proportionate to the circumstances and social uses of the territory in which they are made.

Members shall never offer, grant, accept or request gifts that could be considered inappropriate according to local market standards, or that consist of unlawful activities.

For more information, please see the Anti-Corruption and Anti-bribery Policy and Gifts and Hospitality Policy of Logista.

Members must:

Where appropriate, offer or grant gifts or personal benefits, without expectation of reciprocity and proportionate to the circumstances and social uses, in compliance with the requirements set out in the Anti-Corruption and Anti-bribery Policy and Gifts and Hospitality of Logista.

Where appropriate, offer or grant gifts or personal benefits that are reasonable and customary for the business relationship.

Members must not:

Offer or grant gifts or personal benefits that could be seen to influence business decisions or create an obligation to do something in return.

Neither offer nor accept cash or cash equivalent as a gift.

Offer or receive gifts or professional hospitality in private home.

Offer or request gifts that could be considered as inappropriate, or that could put the Group in an embarrassing situation.

Accept any gifts or personal benefits that do not meet the requirements mentioned in the Anti-Corruption and Anti-bribery Policy and Gifts and Hospitality Policy of Logista.

Make any contributions to political parties, candidates, electoral lists, groups or coalitions.

- **Customs and Tax Requirements**

Logista is firmly committed to complying with customs and tax requirements, actively collaborating with Customs and Tax Authorities in the performance of our activities. Customs

and Tax Authorities' trust and confidence in the Group's actions and behaviour as taxpayer is of the utmost importance to us, and we must always do our best efforts to deserve such trust and confidence.

Because of this, Logista must always comply with all customs and taxation laws in the countries in which it operates, paying all taxes that are due. Tax evasion is criminal offense for the individuals and the company concerned that can result in large fines and even imprisonment.

We should never set up or get involved in any tax evasion scheme neither provide assistance or collaborate with someone who we know or suspect to be involved in tax evasion.

We oppose and fight against the illicit trade of the products we distribute, proactively working with the Authorities to prevent smuggling and guaranteeing traceability throughout the supply chain to protect our customers' products.

Members must:

Comply with all local and national customs and tax laws and regulations and complete maintenance of our financial business records.

Be honest, objective and loyal in the performance of tax responsibilities.

Co-operate, when necessary, with customs and tax authorities

Members must not:

Fail to speak up any suspected infringement of our customs and tax obligations.

- **Insider Trading**

Generally speaking, "Inside Information" is that information of a precise nature that is not available to the public and that a reasonable investor would probably consider important when deciding to buy or sell Logista's shares.

Examples of Inside Information are the following:

- ✓ Relevant corporate transactions such as acquisitions, mergers or divestments.
- ✓ Changes in the dividend policy previously approved.
- ✓ Events that can give rise to material judicial proceedings, claims or sanctions for the Group.
- ✓ Judicial or administrative resolutions with a material impact for Logista.

Members who have access to Inside Information should always comply with Logista's Internal Regulations for Conduct in the Securities Market.

In any case, it is prohibited to buy, sell or to recommend someone to buy or sell securities of Logista when having Inside Information. It is also forbidden to disclose or communicate the Inside Information to any third party, except as expressly provided in Logista's Internal Regulations for Conduct in the Securities Market. Trading or encouraging others to trade while aware of Inside Information is a criminal offence that can led to fines and imprisonment.

For more information, please see Logista's Internal Regulations for Conduct in the Securities Market.

Members must:

Comply with applicable laws and the Group's Internal Regulations for Conduct in the Securities Market.

Members must not:

Trade with Logista's shares based on Inside Information.

Advise or encourage anyone else, whether inside or outside Logista, to buy or sell shares based on inside information.

Make negative or false statements about Logista in order to influence the price of Logista's shares.

- **Competing fairly**

Logista believes in fair competition. Excellence and professionalism in the provision of our services has made us the leading Group that we are. However, we must always compete fairly and in accordance with competition laws.

Anti-competition conducts are unethical, harm the market, damage our reputation and may give rise to significant fines to Logista and the involved Members. By way of example, Members should raise a "red flag" in case facing any of the following situations:

✓ If you think that commercially sensitive information between competitors is being exchanged, or if you think we are participating in any scheme for sharing such information.

✓ If you consider that we may be participating in anticompetitive agreements with competitors, such as agreements on pricing, commercial conditions, wages or distribution costs.

- ✓ If you think there is a case of abuse of dominant position; for example, by denying third parties access to our distribution services without a legitimate reason, or by boycotting a supplier, customer or distributor.
- ✓ If you consider that we are gathering information from the market or competitors in a manner that could be considered unlawful or improper.
- ✓ If you become aware that we may be obtaining confidential or non-public information from a competitor from new hires or candidates for employment at Logista.

Because competition laws are complex and sometimes difficult to understand, we should always seek advice from the Legal Department in case of any doubt as to when a particular situation could raise antitrust concerns, and in any case before making any decision on this regard.

Members must:

Comply with competition law and regulations that apply in the markets in which Logista operates.

Remain neutral in all of our business engagement activities.

Consult the Legal Department before entering into business relationship that may involve the exchange of information with competitors such as prices, customers, geographic areas or terms and conditions.

Before taking part in a trade association or industry event, ensure that the subject of the event or of the discussions complies with competition laws, and exercise a high level of caution in all meetings or discussions.

Leave immediately any meeting with competitors if inappropriate discussions or topics are raised, and report the incident to the Legal Department afterwards.

Undertake all relevant training in competition matters.

Members must not:

Enter into any type of agreement with a competitor without legal advice of Logista.

Exchange commercially sensitive information or data with competitors, or participating in any scheme for sharing commercially sensitive information between third parties.

Take part in cartels.

Use our market position unfairly, in breach of competition law and regulations that apply in the markets in which Logista operates.

Inappropriately solicit or obtain competitor's confidential or non-public information.

Obtain confidential or non-public information from a competitor from new hires or candidates for employment at Logista.

Engage in industrial espionage or undercover.

- **Our Relations with Suppliers**

Logista considers its suppliers and subcontractors to be a key element for carrying out its activities. We promote relationships with them based on the principles of non-discrimination, mutual recognition, proportionality, equal treatment and transparency, as set forth in Logista's General Principles of Conduct of Suppliers.

These Principles set out the minimum standards and basic rules of conduct that are to govern the activity of all our suppliers, both in their relations with Logista and with their own employees or other third parties involved in the implementation of their activity.

Members must:

Act in an objective, transparent and impartial manner when participating in procurement processes.

Ensure that suppliers comply with the General Principles of Supplier Conduct and that they are extended to their supply chain.

Foster collaboration with new suppliers and promoting the professional development of existing suppliers.

Maintain professional and exemplary conduct in the interaction with suppliers or subcontractors, applying the principles of transparency and collaboration.

Maintain continuous, clear and precise communication with the supplier, favouring an adequate management of mutual expectations and avoiding possible conflicts.

Members must not:

Be involved in any type of conflict of interest in our business relationship with suppliers or in the acceptance of any advantage that affects impartiality and objectivity.

Manipulate, not disclose or inappropriately use privileged or confidential information obtained in the relationship with suppliers or subcontractors or in the procurement processes with suppliers or subcontractors.

Conceal, cover up or ignore the suspicion of corruption, bribery or any other conduct by a supplier that is incompatible with our Code of Conduct or our Policies and Procedures.

5. PROTECTING OUR COMMUNITIES

• Respecting the Environment

Logista is committed to the highest level to develop its activities in a sustainable way and respect for the environment, applying the most respectful technologies with nature and promoting maximum environmental responsibility among Members.

Being responsible for sustainability, the Group seeks, develops, and implements the best possible practices available to control and manage the current and foreseeable impacts of its activity on the environment, and to address key environmental aspects.

We collaborate, participate, and support national and international initiatives for the protection of the environment.

On the basis of the above, Members should always be on guard for the strict execution of any legal requirements that may apply, as well the Group's Policies and Procedures on this matter. Members making decisions about how our products, accessories, consumable materials or any other substances necessary to carry out our activities have to be used, stored, transported or disposed should be aware and understand how should they be legally, responsibly and safely managed and handled throughout our operations.

Members must:

Be familiar and comply with environmental laws and the Group's Policies and Procedures relating to environment.

Guarantee the sustainable use of resources, increase the efficiency of their use, and promote the consumption of materials that ensure greater environmental protection.

Take into account the environmental risks associated with our activities.

Immediately report any fact or incident that affects the environment.

Members must not:

Fail to reduce waste, recycle and re-use where possible.

Fail to speak up any suspected infringement of our environmental obligations.

• Engaging with Governments and Political Bodies

Because of the nature of our business, Logista, regularly interacts with official, employees or other representatives acting on behalf of the government, legislators, regulatory bodies, industry bodies and public interest groups.

Members must be aware that more restrictive rules apply in these situations, because certain activities that may be acceptable when dealing with private companies, could be inappropriate or illegal when dealing with government and political bodies. This is why Members must act with honesty, integrity and in compliance with local and international laws and with Logista's Anti-corruption and Anti-bribery Policy.

Logista shall not make any contributions to political parties, candidates, electoral lists, groups or coalitions, neither in cash nor in kind. These contributions include any financial or in-kind support to political parties, their representatives or intermediary organizations or entities supporting political parties.

Members must:

Act at all times in the best interests of the Group, remaining politically neutral when acting in their professional activities.

Ensure that they support and contribute to political parties or groups in their personal capacity, without giving the impression that they are acting on behalf of Logista.

Obtain legal advice prior to any interactions with governments, regulatory bodies, public interest groups.

Members must not:

Make any contributions to political parties, candidates, electoral lists, groups or coalitions in the name of Logista.

Use company resources for support political activity.

- **Communicating with Investors, Analysts and the Media**

Since its origins, Logista has evolved according to an upright behaviour, based on ethical, business, social, environmental, economic and transparency values. Our reputation, is one of our most valuable assets.

Logista has a commitment to maximum transparency in information to the markets and firm respect to applicable regulations, ensuring that all investors have equal access to honest and accurate information.

To this end, Logista has approved a Policy on Information and Communication with Institutional Investors and Proxy Advisors, and on the Communication of Financial, Non-Financial and Corporate Information, that establishes the Company's information, communications and contact instruments, and defines the criteria when communicating and contacting shareholders, analysts and large investors. Accordingly, Logista provides the investors community with relevant information on the Company related to its strategy,

activities and results through information published in its corporate website, as well as through meetings, personal contacts, participation in conferences and seminars, etc.

We must ensure that our disclosed information comply with our internal Policies and Procedures, in a coherently, consistently and accurately manner.

Furthermore, all contacts with the media (television, radio, newspaper, etc.), including speeches, testimonials or other public statements made on behalf of Logista or about its business must be approved by the Corporate Communication Directorate. Members may not respond to any inquires for interviews, comments or information from any media either on or off the record, unless you have express authorization from division responsible for media relations.

It is important that only authorized persons speak on behalf of Logista.

Members must:

Report to the division responsible for media relations or investor relations all requirements of company information, either on or off the record.

Always to ask advice from the division responsible for media relations or investor relations about the content of any message before they communicate

Members must not:

Never comment on Company Information with investors, analysts and the media unless they are authorized to do so.

Give the impression that they are speaking on behalf of the Company in any personal communication.

This Code of Conduct was approved by the Board of Directors of Logista on 22 July 2021 and updated on 20 July 2023.