

**HUMAN RIGHTS POLICY
OF LOGISTA HOLDINGS AND ITS SUBSIDIARIES
("LOGISTA")**

Document owner	Board of Directors
Version	1.0
Date	07/11/2023
Classification	PUBLIC INFORMATION

PREPARED	REVIEWED	APPROVED
Position: Compliance Committee	Position: Audit and Control Committee	Position: Board of Directors

RECORD OF AMENDMENTS		
Version	Date	Amendments
1.0	07/11/2023	First edition of the document.

SUMMARY

SUMMARY	3
1. INTRODUCTION	4
2. SCOPE OF APPLICATION	5
3. HUMAN RIGHTS COMMITMENTS	5
3.1. Commitment to employees	5
3.2. Commitment as regards the supply chain and modern slavery	6
3.4. Engagement with society and local communities	6
4. GOVERNANCE AND RESPONSIBILITY	7
5. REACTION TO BREACHES	7
6. WHISTEBLOWING CHANNEL	8
7. DISSEMINATION AND TRAINING	8
8. UPDATING, MONITORING AND FOLLOW-UP	8
9. ENTRY INTO FORCE	9

1. INTRODUCTION

Human rights recognise and protect the dignity of all people without distinction regarding race, sex, nationality, ethnic origin, language, religion or any other status.

Thus, the Board of Directors of Compañía de Distribución Integral Logista Holdings, S.A. (hereinafter, "**Logista**", the "**Company**" or, in conjunction with its subsidiaries, the "**Group**") is legally assigned, as a non-delegable power, the power to determine the Company's general policies, including a human rights policy reflecting the Company's commitment in this area, and which contributes to the aim of promoting a respectful, upright and egalitarian society, enhancing social commitment and equal opportunities.

Logista's Code of Conduct also sets out the Company's commitment to human rights, committing to protect and respect human rights in all its operations, recognising the need to prevent violations, and promoting appropriate management of any adverse human rights impacts that may arise from its activities.

The commitment to human rights is also reflected in Logista's Sustainability Policy; specifically, to determine the sustainability commitments under the "ESG" (*Environmental, Social and Governance*) criteria in said policy, Logista has taken as a starting point the different values on which its business model is based, among them, compliance with regulations through responsible practices in key areas, such as the prevention of illegal conduct or respect for human rights or diversity, among others, and in terms of preparation and reporting of non-financial information, all of this through the implementation of an internal compliance system.

Logista seeks to implement the ethical principles it advocates, as well as exemplary business behaviour, in line with existing best practices in the field of human rights.

The setting of this Policy and, in general, all of Logista's actions are based on the main international benchmarks in place within the United Nations, which are listed below:

- United Nations Global Compact.
- Universal Bill of Human Rights, which constitutes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the Covenant on Economic, Social and Cultural Rights.
- Fundamental rights in the main eight conventions of International Labour Law (ILO) as set out in the Declaration on Fundamental Principles and Rights at Work.
- United Nations Guiding Principles on Business and Human Rights (UNGPs).
- European Social Charter.

2. SCOPE OF APPLICATION

This Policy shall apply to Compañía de Distribución Integral Logista Holdings, S.A. and all its subsidiaries, regardless of the country in which they operate.

This Policy, strict compliance with which is mandatory, shall also apply to all administrators, legal representatives, managers employees, be they permanent or temporary, and, in general, to any person subject to the authority of Logista (hereinafter, the "**Members**").

In investees in which Logista lacks effective control, the Company shall promote principles and guidelines consistent with those set out herein. Moreover, Logista is committed to advancing its human rights objectives by involving, as far as possible, any natural and/or legal persons other than those mentioned above, including business partners and third parties, with whom the Company has contractual or commercial relationships.

3. HUMAN RIGHTS COMMITMENTS

The commitments included in this section take into account the potential effects of Logista's global operations upon stakeholders: employees, participants in the supply chain, local communities and society in general.

The following are material concerns for Logista, which undergird the protection of human rights: (i) corporate governance; (ii) business ethics; (iii) sustainable supply chain management; (iv) climate change; (v) human capital; and (vi) commitment to society.

3.1. Commitment to employees

Human capital is Logista's most important asset. It is therefore essential that the relationship with its employees be governed by principles of fairness, equity, dignity and respect, while guaranteeing the following rights:

- **Fair and favourable working conditions:** use of any form of forced or compulsory labour and all forms of modern slavery and human trafficking are rejected. Use of child labour is also rejected.
- **Equitable and satisfactory remuneration:** Logista supports, incentivises and promotes decent work and wages that make it possible for its employees and their families to meet their basic needs, with remuneration in accordance with the duties performed and the number of hours worked.
- **Work-life balance and rest:** Logista guarantees its employees' right to rest and free time and facilitates a work-life balance by reasonably limiting the length of the working day.
- **Freedom of association and collective bargaining:** Logista protects the fundamental right of its Members and, particularly, of workers to found, join or participate in trade unions or other representative bodies or associations, by

managing relations with workers' representatives and trade unions smoothly and transparently. It also defends the right to strike, which must be guaranteed even if it is not legally recognised in some countries in which Logista operates.

- **Freedom of expression:** Logista promotes the right to freedom of opinion, thought, information and expression, and respects diversity of opinions in the company, encouraging dialogue and communication.
- **Respect for diversity, inclusion and non-discrimination:** Logista upholds the principles of diversity, inclusion, equal treatment and equal opportunity and it undertakes to create a working environment in which people are treated fairly and equally. Logista tolerates no discrimination on the basis of race, colour, gender expression, gender identity, ethnicity, religion, class, politics, citizenship, sexual orientation, marital status, disability or any other basis. Employees' promotion shall be based on objective criteria of merit and ability.
- **Health, safety and welfare at work:** Logista prioritises a safe and healthy working environment, which is manifested in internal rules covering health, safety and well-being and in complying with applicable legislation on health and safety at work. It therefore applies workplace risk prevention measures and procedures in all business lines, and fosters awareness of these measures and procedures among its Members.

3.2. Commitment as regards the supply chain and modern slavery

Logista believes in working with suppliers, agents, business partners and third parties who share its respect for human rights, and it undertakes to take measures to prevent modern slavery from existing in any part of the supply chain.

As such, suppliers, business partners and other third parties in Logista's supply chain must also comply strictly with human rights through sustainable supply chain management and internal due diligence regulations.

Logista shall demand that its suppliers, agents, business partners and affiliates adopt appropriate measures to guarantee that the rights set out in this Policy are preserved.

The Group's internal supply chain due diligence rules shall apply to matters regarding third parties in Logista's supply chain.

3.4. Engagement with society and local communities

Logista's priorities including improving the rights of the societies in which it operates, and it shall therefore promote the following rights:

- **Minority and community rights:** Logista is committed to offering employment opportunities for vulnerable people, such as people with disabilities and/or who are in situations of severe social exclusion.

- **Anti-corruption and anti-bribery:** Logista's Code of Conduct recognises Logista's commitment to doing business in strict compliance with applicable laws and regulations, regardless of the countries in which it operates. Logista condemns corruption in all its forms and implements the measures and procedures set out in the Criminal Compliance Policy and the Anti-Corruption and Anti-Bribery Policy, as well as the Gifts and Hospitality Policy.
- **The right to a clean, healthy and sustainable environment:** Logista is committed to operating in a sustainable and environmentally friendly manner, fostering the maximum environmental responsibility among its Members. Thus, Logista 's Code of Conduct and Sustainability Policy include a commitment to the environment, as does the Quality, Environment and Energy Efficiency Policy, which sets out guidelines and best practices to contribute to the fight against climate change, to preventing pollution in production processes, to promoting the circular economy, appropriate use of water resources and the protection of biodiversity.

4. GOVERNANCE AND RESPONSIBILITY

Logista has designed a human rights governance model based on the following principles:

- Logista's **Board of Directors** is the body responsible for approving this Human Rights Policy.
- On the basis of this Human Rights Policy, the Company shall set out, at **Management Committee** level, strategic plans for human rights in Logista's supply chain, within the framework of the Company's Strategic Sustainability Plan.

The integrity of the governance model shall be guaranteed by means of the Company's current coordination mechanisms, and matters relating to the Company's supply chain that impact human rights shall be reported according to the requirements set out in this Policy and other applicable internal rules.

To this end, Logista shall guarantee the implementation of reporting systems that enable adequate monitoring and integrity of the information required to understand Logista's impact on human rights issues in the supply chain, as well as the information needed to show how such matters affect Logista's performance, results and position, and shall put in place mechanisms to monitor human rights related risks and opportunities, all in coordination with Logista's General Risk Management Policy. The reporting and monitoring system shall be implemented by the relevant procedure.

5. REACTION TO BREACHES

Notwithstanding any other liabilities that may have been incurred, Members' failure to comply with this Policy may constitute an employment violation and, as such, shall be punishable under applicable employment disciplinary rules, pursuant to law or collective bargaining agreements. In the event of any breach or infringement of the guidelines,

principles and commitments set out in this Policy by commercial partners and third parties, Logista may exercise its contractual and/or legal rights and remedies.

Such breaches may also result in legal action in the event of breaches of criminal, civil or commercial laws or obligations.

6. WHISTEBLOWING CHANNEL

Communication mechanisms are a cornerstone of the human rights strategy to improve the human rights due diligence process, since they facilitate the identification of potential human rights impacts and allow for early reaction.

Logista has a whistleblowing channel open to all its Members and authorised third parties, where they may notify or report any possible irregularity, breach or behaviour contrary to Logista's ethical principles and values in running its business, to the law or to the Code of Conduct and other internal Logista regulations, as set out in the applicable legislation (hereinafter, "**Malpractice**").

Members who have knowledge, evidence or reasonable suspicion that Malpractice is taking place, or has been attempted, or who believe there is a risk of such practices taking place, may report it to Logista's Whistleblowing Channel by writing to the following address: Comité Cumplimiento - c/ Trigo, 39, 28914 Leganés (28914 Madrid) Spain", or by email to complaintschannel@logista.com.

Reports received shall be handled and resolved according to the Logista Group's Whistleblowing Policy, which guarantees confidentiality, the procedural safeguards, fundamental rights and the presumption of innocence, proportionality, accuracy and security of information and personal data, and compensation, such that Logista will not retaliate against the whistleblower.

7. DISSEMINATION AND TRAINING

To ensure that it is accessible and publicly known, this Policy shall be accessible to all stakeholders by being published on Logista's corporate website and being notified to all Members by email and being posted on the Intranet.

This Policy shall also be included in the mandatory training subjects for all Members.

8. UPDATING, MONITORING AND FOLLOW-UP

To achieve ethical behaviour and respect for the human rights of the persons subject to this Policy, it shall be reviewed and subject to continuous improvement, especially when regulatory, social, business or any other circumstances so require.

The Board of Directors shall be responsible for complying with this Policy, ensuring that it is disseminated among Logista personnel and to third parties with which the Group deals in carrying on its business.

Moreover, the actions arising from this Policy shall be monitored.

9. ENTRY INTO FORCE

Logista's Human Rights Policy shall enter into force on 7 November 2023.

Leganés, 7 November 2023.

The Secretary Director,

María Echenique Moscoso de Prado