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## GENERAL PRINCIPLES OF CONDUCT

### OF THE SUPPLIERS OF LOGISTA GROUP

- **Introduction**

These General Principles of Supplier Conduct (the "General Principles of Conduct") set out the minimum standards and basic rules of conduct that are to govern the activity of the Suppliers of Compañía de Distribución Integral Logista Holdings, S.A. and its subsidiaries (the "Logista Group" or the "Group"), both in their relations with the Logista Group and with their own employees or other third parties involved in the implementation of their activity.

The General Principles of Conduct aim to extend the Group's philosophy and culture of compliance - based on the principles of compliance with legislation, professional standards and best practices, honesty and integrity in management, and transparency in the Group's actions and relations with its shareholders, suppliers, customers and employees - to all third parties that maintain commercial relations with any of the Group's companies.

Thus, the General Principles of Conduct are a range of commitments, which the Logista Group makes its own and accepts as its own, and which it will require its Suppliers to assume in their entirety and without reservation, referring to them, as the case may be, as a requirement to be a Group supplier or, in the event of non-compliance therewith, as a reason for terminating current contracts.

- **Scope of application**

The General Principles of Conduct are applicable to all Suppliers of goods and services of any of the Logista Group companies, and especially to those Suppliers who are linked to the Group in a stable and lasting manner. For these purposes, the Logista

Group warrants that all its Suppliers will have direct and permanent access to the updated text of the General Principles of Conduct, by means of publication on the Group's website. ([www.grupologista.com](http://www.grupologista.com)) and incorporation into the respective contracts.

- **Compliance**

Logista Group Suppliers must be aware of and accept the General Principles of Conduct, which must be complied with in order to enter into contract with any of the Group's companies. To this end, Suppliers will have to sign a statement declaring compliance with the General Principles of Conduct. In addition, a copy of the General Principles of Conduct will be attached to the respective agreements, forming part of the same.

Any conduct, event, act or omission that constitutes a breach of current legislation, the Logista Group's internal regulations or the General Principles of Conduct may be reported through the Logista Group Complaints Channel, by ordinary post, to the following address "Grupo Logista – Att. Comité del Canal de Denuncias – c/ Trigo, 39, 28914 Leganés (Madrid)", or by e-mail to the following address [denuncias@logista.es](mailto:denuncias@logista.es).

The Logista Group undertakes to ensure the confidentiality and – to the extent possible – anonymity of the complaint, the indemnity of the complainant, except in cases of bad faith, and the processing of the complaint in accordance with the Logista Group Malpractice Complaint Policy and Procedure, in full compliance with current legislation on the protection of personal data.

Suppliers may not use the Complaints Channel to discuss employment, business or commercial issues with the Logista Group.

- **General Principles of Conduct**

**I. *Business Integrity***

**1. Compliance with applicable laws and regulations:**

Logista Group Suppliers are bound by a strict commitment to comply with applicable legislation at all times, acting in an honest and ethical manner in their commercial relations.

**2. Transparency in relations with government bodies:**

Logista Group Suppliers are bound by principles of transparency and honesty in their relations with government bodies, rejecting any action that may be linked to bribery, influence peddling or any form of corruption.

**3. Fair competition:**

Logista Group Suppliers advocate the proper functioning of the market, and trust, honesty and professional ethics in the business environment, in strict compliance with the competition laws that affect their business.

**4. Prevention of money laundering:**

Logista Group Suppliers comply with the regulations for the prevention of money laundering, for the prevention and detection of this type of conduct, with the aim of ensuring that their goods or services cannot be used for money laundering activities or to conceal the proceeds of criminal activities.

**5. Against bribery and corruption:**

Logista Group Suppliers strictly comply with the laws against bribery and corruption, expressly prohibiting offering, giving or accepting any gift, payment or other benefit that seeks to secure an improper advantage for the supplier or for the Logista Group, or may create a conflict of interest or may be viewed as a bribe.

**6. Compliance with tax and social security regulations:**

Logista Group Suppliers act with honesty, transparency and respect for the law facing the tax authorities and social security authorities.

**II. *Responsible business practices***

**7. Application of the principles of honesty and transparency in relationships with customers, suppliers and the market:**

Logista Group Suppliers are transparent in their relations with their customers, suppliers and the market, taking special care to ensure their products and services are marketed correctly, and abiding by the most stringent standards of conduct.

**8. Accounting and financial records:**

Logista Group Suppliers comply with their accounting and financial record-keeping obligations in an accurate, honest and objective manner, in accordance with accounting laws and regulations.

**9. Use of Group property, assets and resources:**

Logista Group Suppliers acknowledge and accept that the Group's property, physical or electronic assets, resources and industrial and intellectual property rights that, when appropriate, they have to use to provide their services are the property of the Logista Group and must be used for the purpose intended by the Logista Group.

**10. Confidentiality of information:**

Logista Group Suppliers protect and monitor the privacy of information, not only that which is owned by the Group, but also that which is owned by customers, third parties or even competing entities to which they may have access in the course of their business.

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**11. Respect for intellectual and industrial property rights:**

Logista Group Suppliers promote respect for intellectual and industrial property rights resulting from the work, experience and know-how of both the Group itself and third parties.

**12. Conflicts of interest:**

Logista Group Suppliers always avoid conflicts of interest in their decision-making.

**III. *Trust, respect and social responsibility.*****13. Respect for personal and family privacy:**

Logista Group Suppliers promote respect for the personal and family privacy of their employees, customers, suppliers and other persons with whom they interact.

**14. Data privacy:**

Logista Group Suppliers are committed to complying with current regulations on the protection of personal data, and put in place appropriate measures and collect personal data only for legitimate purposes.

**15. Compliance with obligations under employment law:**

Logista Group Suppliers comply with their labour obligations to their workers, do not engage in human trafficking or forced labour, do not use fraudulent or deceptive hiring practices, respect workers' labour and union rights and pay wages that comply with the statutory minimum or the relevant collective bargaining agreement, whichever is higher.

**16. Respect for employees:**

Logista Group Suppliers 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.

**17. Healthy and safe work environment:**

Logista Group Suppliers promote a positive health and safety culture and prohibit unacceptable or potentially hazardous behaviour at work.

**18. Protection of the environment:**

Logista Group Suppliers promote professional, fair, impartial and honest conduct in the protection, conservation and restoration of the environment, complying with the requirements established in applicable legislation.

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Logista Group, February 2019.