

**HUMAN RIGHTS AND ENVIRONMENTAL SUPPLY
CHAIN DUE DILIGENCE POLICY OF LOGISTA
INTEGRAL AND ITS SUBSIDIARIES ("LOGISTA")**

Document owner	Board of Directors
Version	1.0
Date	07/05/2024
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	07/05/2024	First edition of the document.

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1. INTRODUCTION

Due diligence helps to anticipate, prevent and/or mitigate adverse incidents that impact on relevant matters of different kinds, enabling decisions to be taken on the continuity of certain business arrangements with suppliers, agents, business partners and affiliates.

Logista is aware of the importance of its supply chain, due to both its international presence and the size of its turnover.

Therefore, with its firm commitment to the effective protection of Human Rights and the Environment, Logista has drafted this Human Rights and Environmental Supply Chain Due Diligence Policy (hereinafter the "**Policy**") to ensure that relationships with suppliers, agents, business partners and third parties are based on principles that uphold internationally-recognised fundamental rights. Within the scope of this Policy, the reference to the environment covers cases in which a change in the environment could impact Human Rights.

Thus, the Board of Directors of Logista Integral, 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 supply chain due diligence policy on Human Rights and Environmental matters setting out the commitment, measures and standards of conduct applicable to the Company's operations and supply chain.

This follows from Logista's commitment to identifying, preventing and managing potential risks in its supply chain with respect to Human Rights and the Environment, since, by their very nature, there are third parties who are more exposed to risk.

The setting of this Policy is based on both the aforementioned international benchmarks and on the internal regulations on the protection of Human Rights and the Environment in terms of their possible implication on them.

2. SCOPE OF APPLICATION

This Policy shall apply to Logista Integral, 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 undertakes to promote its Human Rights and Environmental due diligence objectives in the supply chain involving, as far as possible, any other natural and/or legal person other than the foregoing, with whom the Company has contractual or commercial relations.

3. SUPPLY CHAIN

Logista's operational diversity across multiple sectors entails disparity in its types of suppliers and business partners. Therefore, for a better understanding of Logista's supply chain, the sectors in which the Group offers distribution services are:

- **Pharma:** a division specialising in the logistics of pharmaceutical, parapharmaceutical and veterinary products (reception, storage, preparation of orders, dispatch), reverse logistics (returns of pharmaceutical, parapharmaceutical and veterinary products), partial manufacture of medicines (handling) and medicines being researched.
- **Transport:** a division focused on domestic and international full load transport, temperature-controlled transport, parcel and courier services.
- **Tobacco:** focused on the distribution of cigarettes and other tobacco products to tobacco and stamp shops and other retail outlets in Southern Europe.
- **Convenience:** focused on the purchase, sale and wholesale distribution of all sorts of articles and accessories for smokers, objects and products that can be marketed at tobacco and stamp outlets and other commercial establishments, as well as the purchase, sale, distribution and marketing of all kinds of products and goods related to food, beverages and articles for use and consumption.
- **e-Transactions:** it is responsible for distributing electronic recharging products and services, especially in the mobile telephony and e-business sectors.
- **Books:** distribution of books and publishing products in Spain.
- **Public sector:** it distributes stamped bills of exchange, postage stamps and other official documents.
- **Publications:** distributor of periodicals, collectibles and magazines to newsstands and newsagents.
- **Payment services:** focused on collecting invoices, direct debits and other payment documents.

It follows from this that, due to the variety of the Group's suppliers, agents, business partners and third parties, it is essential to pay special attention to the supply chain and, in particular, to the potential impacts on Human Rights and the Environment.

4. DUE DILIGENCE PRINCIPLES RELATING TO THE SUPPLY CHAIN

Logista bases its work and that of its whole supply chain on the following **standards** of professional conduct:

- Logista will promote relationships with suppliers, agents, business partners and/or third parties that respect Human Rights and are not involved in:

- Any form of **torture** or cruel, inhuman or degrading treatment and/or treatment related to modern slavery.
 - Any type of **forced labour**, defined as any kind of work or service exacted from an individual on pain of punishment and for which the individual has not offered himself/herself voluntarily.
 - Any form of **child labour**, which is taken to the employment of children under the local minimum age for employment or compulsory school age (whichever is higher), or under the age of 18 for any work considered hazardous or capable of harming health or safety.
 - Other serious **Human Rights violations** and **abuses**, such as widespread sexual violence.
 - **War crimes** or other serious violations of international humanitarian law, crimes against humanity or genocide.
 - Any form of **discrimination** or **unequal** treatment based on race, religion, sex, age, disability, nationality, sexual orientation and/or political opinions.
 - Serious breaches of employment regulations involving **unsafe and hazardous environments** for workers.
 - Obstruction of **freedom of expression**, thought, opinion and information, undermining diversity of opinion.
 - Violation of measures taken to achieve a healthy and sustainable **environment**.
- Logista is firm in adopting a "zero tolerance" approach to suppliers, agents, business partners and affiliates where there is a reasonable suspicion or *prima facie* evidence of Human Rights abuses.
- Depending upon the Company's specific position in the supply chain, Logista is committed to engaging with suppliers, business partners and other third parties, central and local government, international organisations, civil society and relevant third parties, as appropriate, to improve and monitor the performance of its business to identify, prevent, neutralize or mitigate possible adverse impacts in Human Rights, and environment, using quantifiable measures as appropriate in each case, which shall be taken within reasonable timeframes. As far as possible, interactions with suppliers who do not implement the mitigation measures deemed appropriate or necessary shall be discontinued.

5. DUE DILIGENCE PROCEDURE

To guarantee effective application and development of this Policy, a due diligence procedure must be set out, consisting of six phases, which shall deal with the guidelines and processes that must be complied with in all Group companies. Moreover, where appropriate, they may each have a specific procedure to develop this Policy, notwithstanding application in full of the common provisions of this Policy.

Logista's *General Principles of Supplier Behaviour* sets out the minimum standards and basic rules of behaviour that shall govern the activities of the Company's suppliers, both in their relations with the Group and with their own workers and third parties.

The procedure set out below aims to reduce the occurrence of potential Human Rights and Environmental impacts in the supply chain.



Table 1: Summary of Logista due diligence procedure.

5.1. Cross-cutting integration of due diligence

All companies of which the Group consists must integrate the concept of Human Rights and Environmental due diligence into the terms of this Policy to be implemented properly.

Thus, the governing bodies of the Group's companies shall make a commitment to due diligence, of which the Code of Conduct and the Human Rights Policy, among other internal rules relevant to this purpose, are part.

5.2. Identification of actual and potential adverse impacts

Logista shall identify actual and potential adverse Human Rights and Environmental impacts emerging from its analysis of its own operations and those of its subsidiaries, both direct and indirect, as well as the impacts produced in established commercial relations.

During the identification, Logista shall bear in mind affected collectives, including stakeholders.

To keep the identified potential impacts updated, Logista shall review them at appropriate intervals.

5.3. Prevention of adverse effects

As a sign of its commitment to preserving Human Rights and the Environment in the supply chain, Logista shall take appropriate measures to prevent or, where prevention is not possible or not immediately possible, to mitigate identified potential adverse effects on Human Rights and the Environment.

The Group shall safeguard the Human Rights and Environmental guarantees of potentially affected collectives when implementing prevention measures by providing appropriate and proportionate resources to those responsible for such measures.

Logista fosters, institutes and maintains high levels of accountability towards its suppliers, encouraging them to meet not only the quality requirements of the service provided, but also to observe the legislation and ethical, social and environmental standards.

5.4. Setting out measures to stop the adverse effects

Logista shall pursue the elimination of identified and actual adverse effects on Human Rights and the Environment by taking appropriate measures to neutralise or, where appropriate, to minimise the extent of such effects.

When necessary, Logista shall work and follow up on the recommendations required to end or minimize the adverse effects.

Logista shall require third parties with which it interacts to adopt or implement measures and corrective actions necessary to end adverse Human Rights and Environmental impacts and, failing that, and where possible, it shall temporarily suspend or, where appropriate, terminate the contractual relationship with them if maintaining it would entail the continuation of an adverse Human Rights and Environmental impact.

Moreover, true to its commitment to the communities impacted, it shall seek to repair the damage caused as far as Logista is liable.

5.5. Establishing a complaints procedure

Logista has put in place complaint mechanisms to allow potentially affected groups to communicate or report any matter related to Human Rights and the Environment in the supply chain. The aim is to put in place remedy mechanisms as quickly as possible.

Logista shall guarantee that these mechanisms can be used by the people or stakeholders who are affected by the adverse impact, or who have reasonable grounds to believe that they may be affected by an adverse effect.

5.6. Approval of a monitoring and reporting procedure

Logista shall assess the Group's operations and measures and its business relationships at appropriate intervals.

For this purpose, Logista shall monitor the Human Rights and Environmental due diligence procedure, which shall be specified in the development procedure.

6. COMMUNICATION MECHANISMS

Communication mechanisms are a cornerstone of the Human Rights and environment strategy to improve the Human Rights and environment due diligence process, since they facilitate the identification of potential impacts on Human Rights and the Environment and enable it to react early.

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, shall report it to Logista's Whistleblowing Channel, preferably through access to the secure communication platform integrated into Logista's corporate website:

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

Alternatively, they may also communicate them to the Complaints Channel by writing to the following address: Comité Cumplimiento - c/ Trigo, 39, 28914 Leganés (28914 Madrid) Spain", or by email to canaldedenuncias@logista.com.

Reports received shall be handled and resolved according to the Logista Group's Whistleblowing Policy, which guarantees confidentiality, the procedural safeguards, anonymity, 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. GOVERNANCE AND RESPONSIBILITY

Logista has designed a Human Rights and Environmental governance model based on the following principles:

- Logista's **Board of Directors** is the body responsible for approving this Human Rights supply chain due diligence policy.
- On the basis of this Due Diligence Policy, the Company shall, at **Management Committee level**, set out the strategic plans for Human Rights and the Environment 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 Logista's existing coordination mechanisms, and matters relating to the Company's supply chain that affect Human Rights and the Environment shall be reported according to the requirements set out in this Policy and other applicable internal rules.

For this purpose, Logista shall guarantee the implementation of reporting systems that enable appropriate monitoring and integrity of the information required to understand Logista's impact on Human Rights and Environmental issues in the supply chain, as well as the information needed to show how these matters affect Logista's performance, results and position, and shall put in place mechanisms to control risks and opportunities related to Human Rights and the Environment, all in coordination with Logista's General Risk Management Policy. The reporting and monitoring system shall be implemented by the relevant procedure.

8. 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.

9. UPDATING, MONITORING AND FOLLOW-UP

To achieve ethical behaviour that respects Human Rights and the Environment of the people subject to this Policy, it shall be reviewed and subject to continuous improvement, especially when the regulatory, social, business or any other kind of 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.

10. ENTRY INTO FORCE

Logista's Human Rights and Environmental Supply Chain Due Diligence Policy shall enter into force on 15 May 2024.

This Policy is precisely the Policy that was approved by Logista's Board of Directors on 7 May 2024.

Leganés, 07 May 2024.

The Secretary Director,

María Echenique Moscoso de Prado