

Issuing body: Board of Directors of

Compañía de Distribución Integral Logista Holdings, S.A. ("Logista Holdings")

Date: May 6th, 2021

TRANSLATION FOR INFORMATION PURPOSES ONLY. SPANISH VERSION PREVAILS.

INFORMATION AND COMMUNICATION POLICY WITH INSTITUTIONAL INVESTORS AND PROXY ADVISORS, AND ON THE COMMUNICATION OF FINANCIAL, NON-FINANCIAL AND CORPORATE INFORMATION OF LOGISTA



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Policy 5/2021 Board of Directors of Compañía de Distribución Integral

Logista Holdings, S.A. ("Logista Holdings") May 6th, 2021

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0. PREAMBLE

Under the Law of Capital Companies, the determination of a company's policies and general strategies is one of the non-delegable powers of a Board of Directors.

The Rules of the Board of Directors of the Compañía de Distribución Integral Logista Holdings, S.A. (hereinafter, "Logista" or "the Company"), of February 4th, 2021, also lay down, among the non-delegable powers of the Board of Directors, the determination and approval of the Policy on information and communication with shareholders, institutional investors and proxy advisors.

In addition, the Code of Good Governance of quoted companies, approved by the *Comisión Nacional del Mercado de Valores* (CNMV-National Securities Market Commission) on 18 February, 2015, included as a principle of good governance, and recommended, that quoted companies should define and promote a public policy on information and communication with shareholders, institutional investors and voting advisors which fully observes the regulations against abuse of the market and treats equally shareholders who find themselves in the same position. In this context, Policy 3/2015 "*The Grupo Logista's Policy on Information and Communications with Shareholders, the Securities Markets and Public Opinion*" was adopted on June 23rd, 2015.

The last revision carried out in June 2020 by the CNMV on the above-mentioned recommendations of the Code of Good Governance has led to a rewording of Recommendation 4 related to this Policy, which advises reviewing Policy 3/2015 to adapt it to this new situation.

Consequently, the Logista's Board of Directors, in its meeting of May 5th, 2021, following a favourable report from the Audit and Control Committee, approved this "*Information and communication Policy with institutional investors and proxy advisors, and on the communication of financial, non-financial and corporate information"*.



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1. OBJECT AND SPHERE OF APPLICATION

1.1 The object of this Policy is to define and introduce an Information and Communication Policy, laying down:

- i) the definition of the policy regarding information and communication with all stakeholders, as defined below;
- ii) the Company's principles and general criteria for action in relation to the dissemination of economic and financial, non-financial and corporate information;
- iii) the Company's instruments for information, communication and contact, as well as the partners designated to implement them;
- iv) in particular, the Company's criteria for action in information and communication with shareholders, analysts and large professional or qualified investors, and proxy advisors.
- 1.2 The provisions of this Policy should be understood as being without prejudice to the provisions relating to the shareholder's right to information or relating to intervention and participation in the General Meetings of the Company's Shareholders, in the legislation governing Capital Companies, in the Company's Bylaws and in the Rules of the General Shareholders' Meeting; all of which provisions shall prevail in every case.
- 1.3 The provisions of this Policy must also be understood as being without prejudice to strict compliance with the rules of conduct in relation to Privileged Information, contained in the Internal Rules of Conduct in matters connected with the Securities Market, in the Board's Rules and in Logista's Code of Conduct, as well as those relating, where appropriate, to the processing of any other type of regulated information.
- 1.4 This Policy will apply to the information, communications, or any meeting or contact which the Company has with stakeholders, understanding as such, the shareholders, the securities markets through the CNMV, other public bodies, financial entities, intermediaries, managers and custodians Logista's shares, investors, voting advisors, credit rating agencies, investment analysts and banks and, in general, all those who prepare and make investment recommendations or give another kind of information recommending or suggesting an investment strategy to public opinion, as well as any other person or body set up by the applicable legislation.



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2. GENERAL PRINCIPLES AND CRITERIA FOR COMMUNICATION AND DISSEMINATION OF FINANCIAL, NON-FINANCIAL AND CORPORATE INFORMATION

The communication and dissemination of the information related to the Company, will be done observing the following principles or general criteria:

 Transparency, veracity, immediacy, relevance and consistency, adequacy and clarity in the dissemination of economic-financial, non-financial and corporate information, which is carried out both voluntarily and in compliance with applicable regulations and, in general, in the dissemination of any external and internal information.

In particular, these principles will be strictly applied to Logista's actions before the securities markets, in relation to the privileged information, that will be disseminated to the market under the terms provided by the current legislation and in the Internal Rules of Conduct in matters connected with the Securities Market.

These same principles shall apply in the dissemination of any other relevant information which the Company is required to publish in accordance with the applicable legislation or which the Company, in addition to the principle of relevance, considers it necessary to disseminate to the market in the terms laid down in the securities market legislation.

- Equality of treatment for all shareholders who find themselves in the same position, who are not affected by any conflict of interests with Logista and are neither its competitors nor competitors of companies in its Group.
 - Without prejudice to this principle, the Company can set up specific channels of communication, or hold informative meetings or 'roadshows' for large investors, in which debates are held on subjects connected with the general corporate development or other subjects of interest to such investors, always with strict observance of the prohibition on communicating Privileged Information.
- 3. The promotion of the informed participation of shareholders in the General Shareholders' Meetings, and the facilitating of the exercise of their rights. In particular, the Company will arrange for the appropriate channels through which to know the proposals formulated by shareholders in connection with the management of the Company and of its group of companies.
- 4. Strict compliance, in all cases, with the regulatory provisions concerning the subjects of this Policy, and very especially with the regulations relating to abuse of the market and to the prohibition on communicating privileged information.



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3. INSTITUTIONAL INSTRUMENTS FOR PUBLICITY AND THE DISSEMINATION OF INFORMATION

The publicity and the dissemination of Company information shall be effected under the principles of transparency, veracity, immediacy, relevance and consistency, adequacy and clarity, by the following means:

A) The Comisión Nacional del Mercado de Valores

Through the *Comisión Nacional del Mercado de Valores*, and fundamentally, by means of insertions in its official website, all privileged information, regulated information and other relevant information, in the terms defined in the securities markets legislation.

B) The Corporate Website

In conformity with current legislation, the Company has a corporate website (www.logista.com) as its main means of communication with shareholders and investors.

The following are published in the corporate website:

- i) the Regulated Information about the Company;
- ii) the other information that current legislation and the *Comisión Nacional del Mercado* de Valores require to be included in the same;
- iii) any information, other than the above, which the Company voluntarily considers appropriate for inclusion in it.

The content and the period of dissemination are adjusted to conform to the current regulations.

The information in the corporate website is published in Spanish and English, simultaneously whenever possible, and in case of discrepancy, the information in Spanish will prevail.

C) Dissemination by other means

Included in the section of the Company's corporate website entitled "Shareholders and Investors" is an e-mail address (investor.relations@grupologista.com) which is available to analysts and investors so that they can contact the Company directly, through the Investor Relations Department.

The privileged information and other relevant Information, after it has been sent to the CNMV and published in the Company's corporate website – when such publication is



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mandatory – may be disseminated by electronic mail to analysts and investors, or sent to the media.

D) The Investor Relations Department

The Investor Relations Department constitutes a means of exchange and communication that is permanently available for consultations, questions, suggestions or proposals relating to the management of the Company, from shareholders who are registered in its database, on telephone number +34 91 481 98 26 and via the e-mail address: investor.relations@grupologista.com.

E) The Logista's Corporate Communication Directorate

The Logista's Corporate Communication Directorate is responsible for the coordination and management of the media, social networks and digital platforms in which the Group is present, both internally and externally, as well as for managing the positioning aligned with the Group's strategy.

4. PUBLICITY AND DISSEMINATION OF PRIVILEGED INFORMATION AND OTHER RELEVANT INFORMATION AND, IN GENERAL, OF ANY INFORMATION RELATED TO THE COMPANY

- 4.1 As stated in section 3 A) above, the Company undertakes to immediately make public and disseminate to the market except in certain cases admitted by the regulations all Privileged Information, in accordance with the Internal Rules of Conduct in matters connected with the Securities Market and with the securities market regulations.
- 4.2 Without prejudice to the provisions of the current regulation with regard to privileged information, that can only be disseminated once it has been published through CNMV and the corporate website, it may be communicated through any other means of public communication if the provisions of this Policy are strictly respected, and after approval has been obtained from Logista's Corporate Communication Directorate.



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5. RELATIONS WITH ANALYSTS AND INSTITUTIONAL OR QUALIFIED INVESTORS, AND PROXY ADVISORS

The Investor Relations Department undertakes to be permanently available to deal with enquiries from analysts, professional investors or qualified investors about variable-income, fixed-income and socially responsible investments, for which purpose it has an e-mail address (investor relations@grupologista.com) and the telephone number +34 91 481 98 26.

Logista can organize informative meetings, of a general nature, about the running of the company and of the group, intended for the shareholders. The meetings are held in those localities which have the most relevant financial markets in Spain and in other countries, in coordination with the Investor Relations Department, and without prejudice to the strict observance by Logista of the principle of equal treatment of all shareholders who find themselves in identical situations, and who are not affected by conflicts of competition or interest.

Also, the Investor Relations Department, in co-ordination with the General Secretariat, may organize such meetings with proxy advisors, in relation with those issues submitted to the General Shareholders Meeting.

In no case can relations between the Company and the analysts or the institutional or qualified shareholders and proxy advisors lead to the delivery to any of them of any information which could place them in a privileged or advantageous situation in relation to the other shareholders.

6. SUPERVISION AND REVIEWING

It falls to the Audit and Control Committee to supervise compliance with the provisions of this Policy, to review it regularly, and, when appropriate, to make proposals for its modification to the Company's Board of Directors.

7. LANGUAGE AND DISSEMINATION

This Policy is published in Spanish and English. In case of divergence between the two, the former will prevail. The Policy will be included in the Company's corporate website.



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8. REVOCATION

From the effective date of this Policy, Policy 3/2015 of 23 June 2015 "Grupo Logista's Policy on information and communications with shareholders, the securities markets and public opinion" shall be revoked.

9. EFFECTIVE DATE

This Policy will take effect on May 10th, 2021.

The content of the foregoing Policy is that which was unanimously approved by the Board of Directors of Logista at its meeting of May 6^{th} , 2021

Leganés, May 6th, 2021

The Secretary of the Board and Director

María Echenique Moscoso del Prado