



CODE OF CONDUCT



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01. A WELCOME MESSAGE FROM THE CEO

The purpose of **this Code of Conduct** is to set out **the values, principles and standards** that should govern the behaviour and performance of every employee and manager at **PANTOJA Grupo Logístico**. The Code of Conduct also forms a fundamental pillar of the Group's Criminal Risk Prevention Model.

Furthermore, the Code also applies to subcontractors and suppliers who interact with the Group, insofar as the values, principles and standards set out in this Code are relevant to them.

PANTOJA Grupo Logístico aims to continue growing in a responsible manner, whilst remaining committed to all our divisions; as such, our operating principles are set out in our 'Mission' and our 'Values'.



JAVIER LAFUENTE MUMPAO – CEO

02. SCOPE OF APPLICATION, ACCEPTANCE AND COMPLIANCE

2.1. SCOPE OF APPLICATION

The Code applies to the following vulnerable groups, whether natural or legal persons:

- **Members of the Board of Directors, senior management, employees or associates of any kind**, regardless of the contract governing their employment relationship, the post they hold or the geographical area in which they carry out their work.
- **Work experience students or interns.**
- **Department supervisors and Group executives**, regardless of the contract governing their employment relationship, the position they hold or the duties they perform. In all cases, officers/directors shall be members of senior management, all division managers, department/store officers and team leaders.
- **Subcontractors, suppliers and other interested parties**, to the extent that the provisions of the Code apply and provided that PANTOJA Grupo Logístico is able to implement them.

This Code is intended to be dynamic and will be reviewed and updated every two years, or sooner if necessary.

2.2. ACCEPTANCE AND COMPLIANCE

PANTOJA Grupo Logístico will take the necessary measures to ensure compliance with the set of values, principles and standards set out in the Code, by disseminating its content amongst those for whom it is intended and addressing any queries that may arise regarding its application.

To this end, it will endeavour, as far as possible, to ensure that all those involved are committed to ensuring that these values, principles and standards comply with the applicable regulations in each case.

No one, regardless of their position within the Group, is authorised to request a breach of the Code of Conduct.

No one may justify conduct that breaches the Code or constitutes malpractice on the grounds that it was an order from a superior or that they were unaware of the contents of the Code.

All employees are required to report any breach of the Code of which they are aware via the Whistleblowing Channel. When making such a report, they must comply with the provisions set out in the company's Procedure for Using the Whistleblowing Channel.

03. RESPONSIBILITY FOR COMPLIANCE

3.1. COMPLIANCE COMMITTEE

It is the body responsible for overseeing and ensuring the smooth running of the Criminal Risk Prevention Model, and its functions include:

- To promote the Company's ethical standards amongst all its members.
- To drive and oversee the implementation of the Criminal Compliance management system across the various areas of the organisation.
- To resolve any queries or issues that may arise from the application of the Company's internal regulations (Code of Conduct, procedures, policies, etc.)
- To support supervisors in dealing with ethical dilemmas that may arise at any time.
- To investigate reports received via the Whistleblowing Channel.
- To rectify any breaches of the Code of Conduct that are detected.
- To report to the Board of Directors.

3.2. SUPERVISORS

All departmental supervisors have the following responsibilities:

- Communicate the standards of the Code to your team; lead by example in ensuring compliance.
- Support your teams with any ethical dilemmas that may arise at any time.
- Establish, in a timely and appropriate manner, mechanisms to ensure compliance with the Code within your areas of responsibility.
- Report any potential irregularities to the Compliance Committee of PANTOJA Grupo Logístico.

3.3. EMPLOYEES

All employees are required to comply with the following obligations:

- To familiarise themselves with the Code of Conduct and make decisions in accordance with the principles and policies set out therein.
- To responsibly report any evidence of processes or actions that contravene this Code of Conduct.

Failure by supervisors and employees to comply with the rules set out in the Code may result in disciplinary proceedings, sanctions and, in the most serious cases, dismissal.

04. PROCEDURES FOR REPORTING COMPLAINTS

PANTOJA Grupo Logístico makes the **Internal Information Channel or Whistleblowing Channel** available to interested parties; the management of this channel is outsourced to external advisers, and it allows information to be reported both confidentially and anonymously. Through this channel, written complaints may be lodged, and evidence may be submitted. The channel can be found on the company's website and via the following link:

<https://grupopantoja.canalconformalegal.es>

Through this channel, breaches of this Code and of the company's other internal regulations may be reported to the **Head of the Information System**, as well as any breaches that may constitute a criminal offence or administrative offences, whether serious or very serious.

En este sentido, PANTOJA Grupo Logístico ha establecido un Procedimiento de Gestión de la Información y un Procedimiento de Utilización del Canal de Denuncias que se encuentran a disposición de los usuarios

In this regard, PANTOJA Grupo Logístico has established an Information Management Procedure and a Procedure for Using the Whistleblowing Channel, both of which are available to users.

At national level:

- Independent Whistleblower Protection Authority (IWPA):

<https://www.proteccioninformante.gob.es/presentacion-de-informaciones-sobre-infracciones>

- By email: canal.externo@proteccioninformante.es
- By post (Independent Whistleblower Protection Authority, Calle Luis Cabrera 9, 28002 Madrid)
- By requesting a face-to-face meeting.

At regional level:

- Andalusian Office for Combating Fraud and Corruption (www.antifraudeandalucia.es).
- Calle San Juan de Ribera, S/N.
- Hospital de las Cinco Llagas. 41009, Sevilla.
- Telephone: (+34) 954 59 21 20.
- Email: antifraudeandalucia@antifraudeandalucia.es.

The External Reporting Channel does not have the authority to deal with breaches of the company's internal regulations.

All groups mentioned in this document are obliged to comply with this Code and to help ensure compliance with it.

Should any breach of the principles set out herein come to light, interested parties may report it, either confidentially or anonymously, via the Internal Reporting Channel or the Whistleblowing Channel.

This channel may also be used to report any irregularities arising from the commission of a criminal offence or an administrative offence.

Anyone seeking advice or wishing to report an incident will be treated with respect and dignity, in accordance with the following principles:



Confidentiality

The information and statements provided will be treated in strict confidence.



Comprehensiveness

Any information received regarding possible breaches of the Code of Conduct will be thoroughly investigated to determine the veracity of the reported situation.



Respect

At no time will the rights of those involved in any alleged breaches be disregarded.



Proportionality

Any decision must be taken in a reasonable, proportionate and appropriate manner, taking into account the circumstances and context of the facts.

05. GUIDELINES FOR CONDUCT THAT PROMOTE RESPECT FOR THE LAW

Each group mentioned in this Code is also responsible for being aware of and complying with the laws applicable to its role, in accordance with its area of responsibility and place of work, and must carry out its duties and obligations in full compliance with established procedures.

In case of doubt, they may seek guidance on how to comply with the provisions of this Code and other applicable regulations from their line manager or superior, as well as from the Compliance Committee.

Any employee who is under investigation or charged in criminal proceedings that may affect their role within the company, particularly if such proceedings arise from their work at the company, must inform the Compliance Committee as soon as possible. They must also report the existence of any administrative proceedings concerning them.

Failure to comply with the rules set out herein may result in civil and legal liability, without prejudice to the application of the relevant disciplinary action, which may result in dismissal.

Accordingly, PANTOJA Grupo Logístico reserves the right to terminate its contractual relationship with any employees, subcontractors or suppliers who breach the Code, whether such breaches are 'minor' but repeated or serious, and may claim compensation in accordance with the law.

5.1. RESPECT FOR THE LAW

In the course of their professional duties, employees shall not knowingly collude with third parties in breach of any national or international law, nor shall they cooperate with them in acts or omissions that undermine the principle of legality, or which, if disclosed, could damage the Group's reputation.

5.2. INTEGRITY

Under no circumstances shall persons subject to this Code make offers of, or accept, gifts, invitations, bribes or other inducements from or intended for public officials or private individuals that might reward the exertion of influence over a business decision in their official capacity or through contacts at PANTOJA Grupo Logístico.

Employees and management must avoid or declare any conflict of interest that might place a personal priority above the collective good, and must act with integrity. Under no circumstances must they seek to gain an advantage for themselves or for third parties by using their position or through contacts at PANTOJA Grupo Logístico.

Under no circumstances shall the Company be implicated in the political parties to which employees belong.

When carrying out their professional duties, employees shall prioritise the interests of the Company or its clients over their own personal interests, those of their family members or those of other persons associated with them.

5.3. COMPETITION LAW

The Company and its employees must adhere to the principles and rules of fair competition and must not breach competition law. Any agreements between competitors intended to coordinate their behaviour in the market are prohibited.

5.4. INVESTMENTS IN BUSINESSES IN WHICH THE COMPANY HAS AN INTEREST

If an employee wishes to engage in business activities in which the company has an interest, or in which it is directly involved, or even in those from which the company has withdrawn, they must first obtain authorisation from the Compliance Committee.

5.5. TRANSPARENCY OF INFORMATION

The company and its staff undertake to ensure the transparency of all information provided to external parties, other companies, its auditors and public bodies, paying particular attention to financial information.

The company rejects misleading or disparaging advertising, as well as any other practices by competitors or third parties that are contrary to good faith.

The company has implemented a Criminal Risk Prevention Framework to which it is firmly committed.

5.6. CORPORATE IMAGE AND REPUTATION

In addition to complying with this Code, the applicable regulations in each case and the internal procedures of PANTOJA Grupo Logístico, all persons bound by this Code must always demonstrate ethical behaviour in their professional activities and avoid any conduct which, even if it does not breach the law, could damage the Group's reputation and adversely affect its interests and public image (such as the inappropriate use of social media).

5.7. HUMAN RIGHTS

will respect and promote human rights. The Group recognises that human rights are fundamental and universal rights, which must be recognised and interpreted in accordance with international law and practice, namely the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation.

Given the Group's core business (transport and logistics), we are particularly mindful of the need to prevent smuggling and human trafficking. Consequently, any behaviour constituting such conduct is expressly prohibited, as is, more generally, any behaviour that could infringe the fundamental rights recognised in the aforementioned legislation.

5.8. DISCRIMINATION

The Group recognises that the principle of equal treatment and equal opportunities, regardless of race, colour, nationality, ethnic origin, religion, gender, political or sexual orientation, marital status, age, disability or family responsibilities, is a guiding principle of its Human Resources policies and shall apply both to the recruitment and selection process and to training initiatives, potential career progression, salary levels and other aspects of employees' work.

At no time shall the exercise of the rights of association, trade union membership and collective bargaining be prevented or restricted under the regulations governing each of these fundamental rights.

5.9. HARASSMENT, FORCED LABOUR/CHILD LABOUR

PANTOJA Grupo Logístico prohibits the abuse of authority and any form of harassment or punishment, whether physical, psychological or sexual, as well as any other conduct that may create an intimidating, offensive or hostile working environment for individuals. No form of child labour or forced labour will be tolerated.

Employees are obliged to comply with this principle, and those with staff under their supervision must promote and ensure, using the means at their disposal, that such situations do not arise.

5.10. PROFESSIONAL DEVELOPMENT: COMMITMENT TO EMPLOYEES

PANTOJA Grupo Logístico believes that employees are essential to achieving business objectives and creating high-quality jobs, in an environment that focuses on training, professional Development and the promotion of diversity in skills, cultures, beliefs and nationalities, all on the basis of equality and equal rights.

PANTOJA Grupo Logístico will promote the personal and professional development of its employees, encouraging them to improve their own skills and abilities. Policies and measures relating to the selection, recruitment, training and promotion of employees are based on clear criteria of ability, competence and professional merit.

Employees will be informed about the policies governing the assessment of their work and will actively participate in management processes designed to improve their work, initiative and dedication.

It is the company's commitment, in accordance with its corporate social responsibility guidelines, to strive to ensure a healthy work-life balance for employees with a view to promoting their well-being.

The company seeks to foster a communicative and consultative working environment by promoting social dialogue between employees and company representatives.

The internationally recognised rights to organise, associate and engage in collective bargaining must be respected by all employees.

5.11. RECRUITMENT AND REMUNERATION

Fees and costs relating to the recruitment process or the termination of a contract will not be charged to workers, and at no time will workers be asked to make any payment or deposit. Medical tests and examinations not related to work (for example, pregnancy or HIV) are not permitted.

Uniforms and personal protective equipment are provided to each employee free of charge and in sufficient quantities. Replacement and the provision of new equipment are carried out free of charge whenever necessary or requested by the employee.

PANTOJA Grupo Logístico will offer fair and appropriate remuneration in line with the labour market in which it operates. Furthermore, overtime will be voluntary and employees who refuse to work overtime will not be penalised. However, in circumstances defined by the applicable legislation in the Labour Code and subject to prior agreement between the employer and the employee, overtime may be compulsory for a short period. In this way, the Group will seek to help employees balance their work with their personal and family lives.

5.12. HEALTH AND SAFETY

The health, safety and hygiene of employees is a priority for the company, which actively strives to maintain a comfortable and safe working environment, whilst at all times complying with the Occupational Health and Safety Policy.

PANTOJA Grupo Logístico is committed to ensuring a safe and healthy working environment, taking all reasonable measures to maximise health and safety at work.

Furthermore, the Group will provide the necessary resources (personal protective equipment – PPE and work tools) to ensure full compliance with occupational health and safety measures. All staff covered by this Code will be responsible for maintaining their workplace in accordance with health and safety rules and practices.

5.13. ALCOHOL AND DRUG USE

The consumption of alcoholic drinks during working hours is prohibited, as it may compromise safety and productivity in the workplace, as well as being unprofessional. The use of drugs is strictly prohibited on the premises of PANTOJA Grupo Logístico.

5.14. TOBACCO CONSUMPTION

Tobacco consumption is regulated in accordance with national legislation and any procedures that PANTOJA Grupo Logístico may decide to put in place in this regard. Smoking is strictly prohibited on the premises. In any event, in areas where smoking is permitted, respect and consideration for non-smokers and any minors present must always be shown.

5.15. ENVIRONMENTAL PROTECTION

PANTOJA Grupo Logístico has an Environmental Policy that sets out the guidelines for establishing and reviewing environmental objectives. All employees, subcontractors and suppliers must implement these policies in their professional activities.

The Group's Environmental Policy is based on the following principles:

- Apply environmental criteria in all planning and decision-making processes relating to issues that may affect the environment.
- To comply with the environmental legislation applicable to the activities of PANTOJA Grupo Logístico, as well as any additional commitments undertaken voluntarily.
- Implement the necessary tools to prevent environmental pollution.
- Use resources wisely, minimising the consumption of water, paper and energy, reducing waste and emissions, encouraging recycling and seeking eco-efficient solutions.
- Involve all stakeholders in achieving the proposed environmental objectives through training and awareness-raising programmes.
- Promote good environmental practices amongst suppliers and customers.

5.16. PROPER USE OF WORK TOOLS

Employees of PANTOJA Grupo Logístico must use work equipment (computers, printers, email, the intranet, the internet, telephones, fax machines, etc.) in accordance with the terms and conditions of their role and the duties they perform. Work equipment must not be misused, either for personal gain or for activities that may damage the Group's reputation or image. Misappropriation and misuse of these assets will result in consequences.

Furthermore, only authorised users with the relevant licences may access the computer systems. They must not install, use or distribute any software that could compromise the security of the systems, nor may they make unauthorised copies or carry out any actions that could allow computer viruses to enter the systems.

Users of any equipment or means of communication owned by PANTOJA Grupo Logístico, must not disclose or transmit information that is illegal, sexist, abusive, defamatory, obscene, racist, offensive, pornographic or of any other nature that is offensive or not authorised by national laws and the group's policies.

The intellectual property rights to any programme or process, whether computerised or not, developed using PANTOJA Grupo Logístico resources or on the Group's premises during the term of the employee's employment contract, belong exclusively to the Group.

Employees shall respect the intellectual property and the right of use vested in the Company in relation to computer programmes and systems; equipment, manuals and videos; knowledge, processes, technology, 'know-how' and, in general, any other works and creations developed or produced within the Company. Consequently, such materials shall be used solely in the course of their professional duties within the Company, and all media on which they are stored shall be returned upon request and when they cease to be employed.

They shall not use the image, name, trademarks or logo of the Company or its subsidiaries, except for the proper performance of their professional duties within the Company. It is the Company's aim to ensure compliance with intellectual and industrial property laws; therefore, employees must check, before using any information obtained from the internet, whether it is protected by intellectual or industrial property laws.

5.17. COMMITMENT TO COMPLIANCE WITH ANTI-MONEY LAUNDERING REGULATIONS

The Company prohibits any conduct directly or indirectly related to money laundering (the acquisition, use, conversion or transfer of assets derived from, or resulting from participation in, certain criminal activities, with the aim of concealing or disguising their origin or assisting a person who has participated in the criminal activity to evade the legal consequences of their actions) and the financing of terrorism. All employees are obliged to report any suspicious behaviour or conduct that may constitute an offence of money laundering or terrorist financing. We also have an Anti-Money Laundering Policy in place.

5.18. COMMITMENT TO COMPLIANCE WITH TAX AND SOCIAL SECURITY REGULATIONS

The Company is obliged to comply strictly with tax and fiscal regulations at both national and international levels. All employees are required to comply with these regulations, as well as with internal policies on tax and fiscal matters. Employees must report any conduct or incident that contravenes these policies.

Furthermore, PANTOJA Grupo Logístico, is committed to complying with current legislation on workers' rights and social security. All employees must comply with the relevant

regulations in this regard and report any conduct that infringes workers' rights or may constitute social security fraud.

06. GUIDELINES ON CONDUCT TOWARDS THIRD PARTIES

6.1. RELATIONSHIPS BETWEEN EMPLOYEES WITHIN THE COMPANY

Relationships between staff at PANTOJA Grupo Logístico will always be based on mutual respect and equal treatment, regardless of their position in the hierarchy, their gender or any other circumstances.

No infringement of dignity, the right to moral and physical integrity, or the right to non-discrimination, as fundamental rights guaranteed by the Spanish Constitution, European Union legislation and Spanish labour law, will be tolerated.

6.2. RELATIONS WITH SUPPLIERS

The procurement of external supplies and services, as well as negotiations with external suppliers, must be carried out in accordance with the internal expenditure procedure. The selection of suppliers shall be carried out responsibly, always taking into account the principles of transparency, objectivity and equal opportunities, and ensuring that objective and balanced criteria are applied.

PANTOJA Grupo Logístico expects its suppliers to uphold the principles set out in this Code; it may therefore require suppliers to demonstrate that they are applying these principles, or stipulate in a contractual clause that they must comply with the provisions of this Code.

Employees and managers of the company must never influence the decisions of third parties, either directly or indirectly, by offering favours, in order to obtain benefits or advantages for their own benefit or that of the company.

6.3. CUSTOMER RELATIONS

Relationships with clients must be guided by the utmost honesty, always offering the best possible service.

Exclusive relationships with clients that could lead to excessive personal ties or restrict the client's access to other employees must be avoided.

The Company's employees and managers must never influence the decisions of third parties, either directly or indirectly, through favours, in order to obtain benefits or advantages for their own interests or those of the Company.

CUSTOMER FOCUS

PANTOJA Grupo Logístico regards customer satisfaction as a priority. Consequently, it focuses on process efficiency, transparency in performance and customer service. Ensuring the quality of customer service must be a goal for all the company's employees.

At PANTOJA Grupo Logístico, there is a culture of quality that leads to the development of action plans and continuous improvement initiatives designed to enhance customer satisfaction. The wide range of services offered by the company ensures that customers' needs are met across the various market segments.

PANTOJA Grupo Logístico primary objective is to ensure customer satisfaction through a wide range of services and offerings, clear and reliable information, transparent operational procedures, the swift resolution of issues and personalised advice whenever the customer requires it.

TRANSPARENCY IN COMMUNICATION

PANTOJA Grupo Logístico is committed to being honest and transparent with its customers, always providing them with reliable, clear, useful and accurate information when marketing its services. Furthermore, it will demonstrate that the services it offers comply with all the required and advertised specifications.

Should customers be dissatisfied with the services provided, the necessary channels will be made available for them to raise any complaints.

ECONOMIC AND SOCIAL DEVELOPMENT

The logistics and transport sector promotes and stimulates business activity by linking supply and demand, which in turn leads to direct and indirect job creation within the sector. PANTOJA Grupo Logístico is proud to be part of the wealth-creation chain in the areas where it operates, whilst respecting the culture of local communities.

07. DATA PROTECTION AND COMMERCIAL INFORMATION

PANTOJA Grupo Logístico must ensure the protection of personal data stored and exchanged during day-to-day business operations. Therefore, all employees and groups required to comply with the provisions of this Code must at all times comply with legislation on the protection of personal data, whether when processing the personal data of customers, suppliers or employees.

The commitment to quality and efficiency towards all those associated with the Company means that employees are obliged to respect the right to data protection, the right to honour and the right to personal privacy of all individuals whose data they have access to by virtue of carrying out their duties within the Company.

Such respect must extend to any information relating to an individual: identifying details, personal background, family details, financial information, audiovisual material or any other information that enables the individual to be identified.

Personal data shall be processed in accordance with the principles set out in data protection legislation, such that:

- Only data necessary for the activity will be collected.
- The collection, processing (whether by computer or on paper) and subsequent use of such data will be carried out in a manner that guarantees its security, truthfulness and accuracy, the right to privacy of individuals, and compliance with the obligations arising from the applicable regulations.
- Access to personal data shall be limited to that which is necessary in accordance with the roles and profiles assigned to employees, as set out by the Company.
- The duty of secrecy and confidentiality regarding personal data shall be guaranteed at all times, and such data shall not be disclosed to third parties other than the data subject. All employees must comply with the data protection duties and obligations set out in the internal regulations, without prejudice to any instructions received from the Security Officer.

Employees must maintain the strictest professional secrecy and treat as confidential all information handled in the course of their professional duties. To this end, 'Confidential Information' is defined as any information that may be disclosed verbally, in writing or by any other means or medium, whether tangible or intangible, to which the employee may have access during the course of their professional duties.

Confidential Information must not be accessed, used or disclosed unless you have been duly authorised in writing by your line manager. In case of doubt, and unless otherwise specified, employees and groups subject to this Code shall treat as confidential any information to which they have had access in the course of their professional duties.

In any event, the following rules apply to the handling of Confidential Information:

- Confidential information shall only be disclosed to and used by the person designated for that purpose, in accordance with their employment contract or the relationship binding them to PANTOJA Grupo Logístico. Should the assistance of a third party be required and it be necessary to disclose confidential information to them, the necessary measures shall be taken to ensure that the information is duly protected.
- The information shall not be used, in whole or in part, for any purpose other than that for which it was intended.
- The information shall not be copied, reproduced or duplicated, in whole or in part, without the written authorisation of PANTOJA Grupo Logístico.
- The employee shall report any mishandling or misuse of confidential information as soon as possible, and shall cooperate with PANTOJA Grupo Logístico in order to protect this information.

- No employee shall store information relating to PANTOJA Grupo Logístico on personal computers or other devices not provided by the company.
- Should it be necessary to remove information from PANTOJA Grupo Logístico premises in order to carry out work-related tasks or tasks inherent to their relationship with the Group, this information must be returned to the company's premises once the tasks have been completed.
- Employees shall, under no circumstances, seek to benefit personally, or through an intermediary, from any opportunity of which they become aware in the course of their duties.
- Employees must refrain from disclosing any news or rumours, either personally or through any media outlet.

08. QUESTIONS OR SUGGESTIONS

Any enquiries or suggestions regarding this Code should be sent to rrhh@grupopantoja.com, which will immediately forward them to the Compliance Committee for resolution.

Version	Author	Date	Changes
1	External advisers – Compliance Committee	December 2022	Creation
1	Joint administrator	22/05/2023	Approval
1	Compliance Committee	March 2024	Reviewed without amendments
1	Compliance Committee	February 2025	Reviewed without amendments
2	Compliance Committee	February 2026	Introduction to the AIPI