



***I received information/training Code of Ethics***

***Name:*** \_\_\_\_\_

***ID:*** \_\_\_\_\_

***Date:*** \_\_\_\_\_

***Signature:***  
\_\_\_\_\_

## INDEX

<b>1 INTRODUCTION</b>	<b>3</b>	<b>3.1 Gifts, Gifts and Benefits</b>	<b>6</b>
1.1 Ethical code	3	<b>COLLABORATORS</b>	
1.2 Adoption of the Code of Ethics as part of the Organization, Management and Control Model	3	3.2 Staff pick	6
1.3 Compliance with standards	3	3.3 Establishment of the employment relationship	6
1.4 A cooperative approach and transparency	3	3.4 Personnel Management	6
1.5 Ethical, Egalitarian, Anti-Corruption and Bribery Behavior	4	3.5 Freedom of Affiliation	6
1.6 The Value of Reputation and Fiduciary Duties	4	3.6 Security and health	6
1.7 The value of reciprocity	4	3.7 Privacy Protection	7
<b>2 GENERAL PRINCIPLES</b>	<b>4</b>	3.8 Equality, Integrity and Protection of the Person	7
2.1 Impartiality <b>Discrimination based on gender, disability and/or social status</b>	4	3.9 Duties of the Collaborators	7
2.2 Equity in case of possible Conflicts of Interest	4	<b>CUSTOMERS</b>	
2.3 Confidentiality, Data Protection and External Communication	4	3.10 Fair and Equal Business	7
2.4 Human rights	4	3.11 External Communication	7
2.4.1 Abolition Child Labor and Forced Labor	5	3.12 Behavior towards the Client	8
2.5 Equity of Authority	5	3.13 Client Participation	8
2.6 Moral Integrity of the Person	5	<b>SUPPLIERS</b>	
2.7 Correctness and fairness in the management of contractual relations	5	3.14 Provider Choice	8
2.8 Quality of Services	5	3.15 Integrity and Independence in relations with Suppliers	8
2.9 Fair Business	5	<b>SOCIETY</b>	
2.10 Responsibility towards Society	5	3.16 Economic Relations with Political Parties, Unions and Associations	8
2.11 Environmental Protection	5	3.17 Contributions and Sponsorships	8
2.12 Use of financial resources	5	3.18 Institutional Relations	8
<b>GENERAL CONDUCT</b>		3.19 Regulatory and Antitrust Bodies	8
<b>3 CONDUCT CRITERIA</b>	<b>6</b>		

## 1. INTRODUCTION

### 1.1. Ethical code

"The Code of Ethics of the Salvat Organization represents the Declaration of Intentions and Commitments structured in a Normative framework to follow on Moral Rights and Duties that define the Ethical-Social, Anti-Corruption and Equality Responsibility of each member of the Organization and Parties Interested within the Environment of the Company, its Logistics Chain, Suppliers, Clients and the Society to which it belongs, being mandatory for all of them.

This Code of Ethics is the effective means to prevent Irresponsible or Illegal Behavior by those who work on behalf of the Salvat Organization because it introduces a clear and explicit definition of the Ethical, Social, Anti-Corruption and Equality Responsibilities towards all those who are directly or indirectly involved with the Organization's Environment."

The Code of Ethics expresses the set of Ethical Duties and Responsibilities in conducting a Fair and Egalitarian Business.

This Code of Ethics includes:

- **General principles** on the relations between the Salvat Organization and Interested Parties in our activity. Relationship between the Interested Parties themselves in the development of our activity and their relationship with their internal and external interlocutors.

These principles define the reference values in the Fair and Equal commercial activities of the Salvat Organization.

- **Conduct Criteria** that provide the guidelines and rules that the Salvat Organization and the Interested Parties in the development of our activity must comply with to prevent the risk of Irresponsible or Illegal Behavior, contrary to the Principles established in this Code of Ethics.

- **mechanisms** necessary to implement, monitor, ensure its continuous improvement and spread Respect for and Compliance with this Code of Ethics.

### 1.2. Adoption of the Code of Ethics as part of the Organization, Management and Control Model

The Salvat Organization has adopted this Code of Ethics to provide an Ethical Responsibility to the Interested Parties in the development of their activity, sensitive to the need to ensure conditions of Equity and Transparency in the management of the Fair and Egalitarian commercial activities of the Organization.

Similarly, the Salvat Organization requires that all associated or affiliated Companies, as well as their main Suppliers and Clients, behave in accordance with the Principles established in this Code of Ethics.

### 1.3. Compliance with standards

The Salvat Organization and Interested Parties in the development of its activity Salvat Organization and Interested Parties in the development of its activity, undertake to comply with:

- a) With all the laws and regulations in force in each country or context in which the Salvat Organization carries out its commercial activities.
- b) The Principles established in this Code of Ethics
- c) Equality Plan, of a public on our web site : <https://www.salvatlogistica.com/csr/equality>
- d) Procedures and internal regulations applicable to each of the interested parties, as appropriate

#### Compliance: Complaints Channel

If you wish to report or denounce any behavior that violates the Business Integrity of the Salvat Organization, established in the Basic Principles of this Code of Ethics, you may do so through our web site:

<https://www.salvatlogistica.com/web/salvat/cumplimiento>  
<https://www.corporate-line.com/cnormativo-salvat>

### 1.4. A cooperative approach and transparency

The Salvat Organization aspires to maintain and develop a relationship of Trust and Transparency with:

- a) With the companies themselves within the Organization.
- b) Between the Company itself and the Interested Parties in the Development of our activity.
- c) Within the stake holders themselves.
- d) In the relations with the External Interlocutors of the Interested Parties in the development of our activity; These interlocutors include individuals, groups, associations or public and private institutions, including, without limitation, clients and suppliers, whose contribution in commercial, administrative and financial terms is required to achieve the Social-Business purpose of the Salvat Organization and its Environment.

## 1.5. Ethical, Egalitarian, Anti-Corruption and Bribery Behavior

In the conduct of Corporate affairs, Ethical Behavior, based on the principles of Fair and Egalitarian Business, compromises the relationship of Trust between the Salvat Organization and:

- a) The Interested Parties in the development of their activity, within themselves and the relationship between them.
- b) With the External Interlocutors of both the Salvat Organization and its Interested Parties.

In everything that the development of the activity entails, an Exemplary and Egalitarian Ethical Behavior must be maintained, rejecting, and denouncing in such a case, any act of Bribery.

Any behavior that tries to appropriate the benefits of the collaboration of others, exercising positions of Authority, or influence peddling, or any Unethical Behavior, will be considered a Hostile Attitude towards the Salvat Organization, reserving the right to act accordingly. .

## 1.6. The Value of Reputation and Fiduciary Duties

A Good Reputation is an essential intangible resource that:

- a) It favors shareholder investments, builds customer loyalty, attracts the best human resources, gives serenity and peace of mind to suppliers, and gives credibility to relationships with external partners.
- b) It allows making and implementing decisions without disagreements between the Interested Parties in the development of our activity.

This Code of Ethics is one of the preparatory elements for the Good Reputation of the Salvat Organization, so its effective compliance is mandatory for the Organization itself and its Interested Parties in the development of our activity, as one of the Essential Principles for the Commitment of Fair and Equal Business.

## 1.7. The value of reciprocity

This Code of Ethics is based on an ideal of cooperation in view of the mutual benefit between the Salvat Organization and the Interested Parties in the development of its activity. Stakeholders, as well as their External Interlocutors, are required to act in accordance with Principles and Rules inspired by a similar idea of ethical conduct.

## 2. GENERAL PRINCIPLES

### 2.1. Impartiality Discrimination based on gender, disability and/or social status

**Any discrimination will be avoided** by age, sex, state of health, race, nationality, political opinions and religious beliefs, in decisions that affect relationships within the Salvat Organization itself as well as those of its Parties interested in the development of its activity and its own External Interlocutors, including without limitation, the choice of Clients, relations with Shareholders, the management of Personnel or Work Organization, the selection and management of Suppliers, relations with the Company and Public or Private Institutions;

### 2.2. Equity in case of possible Conflicts of Interest

In the development of the activities of the Salvat Organization and its Stakeholders, including Internal and External Interlocutors, situations in which the subjects involved in the Transactions are, or may even appear, in a Conflict of Interest must always be avoided.

We refer both to the case in which a beneficiary pursues an interest different from the Directives and Principles established in this Code of Ethics by the Salvat Organization, and to the balance of interests of the shareholders or benefits "personally" from the business opportunity of the Organization, also in which representatives of External Partners act contrary to the fiduciary or institutional duties associated with their position.

### 2.3. Confidentiality, Data Protection and External Communication

The Salvat Organization ensures the confidentiality of the information in its possession and refrains from searching for reserved data, except in the case of express and informed authorization and without prejudice to the limits of the law.

Similarly It is required that the Interested Parties, in the development of our activity, as well as their Internal or External Interlocutors, do not use confidential information for purposes not related to the exercise of the commercial relationship.

All Parties involved in the development of our activity are obliged to provide complete, correct, transparent, understandable and accurate information, so that the Parties are capable of making autonomous decisions, aware of the interests involved and the consequences of handling information.

### 2.4. Human rights

The Salvat Organization **you** I know **commits** o promote

respect for Human Rights in accordance with the Objectives *Sustainable Development* (SDG) of the United Nations (UN) aligned with the principles of the World Labor Organization (WTO).

The Salvat Organization is committed to strengthening its own human resources, and promoting their value, to improve and increase skills and competitiveness of the skills possessed by human value.

The Organization applies the Basic Principles contemplated in its Code of Ethics of honest treatment and respect for Human Rights and requires all Interested Parties in the development of our activity to comply with these Principles.

#### **2.4.1 Abolition Child Labor and Forced Labor**

The Salvat Organization does not admit child labor, shall not use child labor, nor shall it incorporate into its business activity any product or service derived from child labor in any of the countries in which it operates, and shall ensure compliance with the provisions of the International Labor Organization (ILO) in relation to child labor.

☞ In the remote case that child labor is detected, the Salvat Organization shall take the corresponding remediation measures.

We express our total rejection of child labor and all types of forced, compulsory, or coerced labor. ☞

#### **2.5. Equity of Authority**

In contractual and organizational relationships that imply the establishment of hierarchical relationships within the Salvat Organization, any person in a higher hierarchical position undertakes to ensure that the authority they exercise will be in a Fair and Correct manner, avoiding any abuse.

It must be guaranteed that authority does not become an exercise of power that damages the dignity and autonomy of the collaborator and that the choices of work organization safeguard the value of the collaborators.

#### **2.6. Moral Integrity of the Person**

The Salvat Organization is committed to protecting the moral integrity of people, offering working conditions that respect Individual Dignity in safe and healthy work environments.

Requests or threats aimed at inducing people to act against the law or the Principles established in this Code of Ethics, or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each individual, are not tolerated in any way.

#### **2.7. Correctness and fairness in the management of contractual relations**

Whoever works on behalf of the Salvat Organization must avoid trying to take advantage of contractual gaps, or unforeseen events, to renegotiate the contract for the sole purpose of exploiting the position of dependency or weakness in which the interlocutor has had.

#### **2.8. Quality of Services**

The Salvat Organization is oriented towards Fair and Egalitarian Business for the satisfaction and protection of its Clients, responding to requests that may favor continuous improvement in the quality of its services.

#### **Diligence and Precision in the Execution of Tasks and Contracts**

Contracts and work assignments must be carried out as consciously established by the parties; The Salvat Organization undertakes not to take advantage of the conditions of ignorance or incapacity of its counterparts.

#### **2.9. Fair Business**

The Salvat Organization protects the value of Fair Competition, refraining from collusive, predatory conduct and abuse of a dominant position.

It undertakes to inform the competent Bodies, through appropriate reporting tools, of all practices aimed at reducing free competition in the market.

#### **2.10. Responsibility towards Society**

The Salvat Organization is aware of the influence that its activities may have on the conditions and the General Welfare of the Society and in this sense it operates through a rigorous program of self-control and compliance with this Code of Ethics.

#### **2.11. Environmental Protection**

The Salvat Organization is committed to complying with current environmental laws and regulations in all the countries where it operates.

#### **2.12. Use of financial resources**

The Salvat Organization requires that all subjects that use the financial resources of the Organization act in accordance with criteria based on legality, and inform the Control Body of the contrary when necessary or reasonably appropriate.



## 3. CONDUCT CRITERIA

### Section I - General Rules of Conduct

#### 3.1. Gifts, Gifts and Benefits

No form of gift, present or benefit is allowed that may be interpreted as exceeding normal business or courtesy practices, or that in any case has the objective of obtaining favorable treatment in the performance of any activity related to the Salvat Organization, and in particular, any form of gift, gift or benefit to Spanish and foreign public officials, or their relatives, that may influence the independence of judgment or induce them to secure any advantage for the business, is prohibited.

The Interested Parties in the development of our activity that receive unforeseen gifts or benefits in the permitted cases, they are obliged to notify the Salvat Organization, which will evaluate their suitability and, if it deems it necessary, will notify the sender of the Organization's policy on this matter.

### Section II - Rules of Conduct in Relations with Collaborators

#### 3.2. Staff pick

The evaluation of the personnel to be hired is carried out based on the correspondence of the profiles of the candidates with respect to those expected and the needs of the Company, in compliance with equal opportunities for all interested parties.

The requested information is strictly related to the verification of the aspects foreseen by the professional and aptitude profile of the subject, respecting the private sphere and the opinions of the candidate.

The Personnel Department, within the limits of the information available, adopts the appropriate measures to avoid favoritism, nepotism or forms of patronage in the selection and hiring phases.

#### 3.3. Establishment of the employment relationship

The staff is hired with a regular employment contract and any form of irregular work is not tolerated and in the establishment of the employment relationship each employee receives precise and clear information about:

- Characteristics of the function and duties to be performed
- Regulatory and remuneration elements, as regulated by the applicable employment contract.
- Standards and procedures to be adopted to avoid possible health risks associated with work activity
- Reception training for new incorporations

- Training according to job needs
- Code of Ethics and Policies

#### 3.4. Personnel Management

The Salvat Organization, without prejudice to the application of the general rules established by this Code of Ethics, applies the following Principles:

- a) Avoid any form of discrimination against collaborators and in the context of personnel management and development processes, as well as in the selection phase, the decisions made are based on the correspondence between the expected profiles and the profiles owned by the collaborators and /or in considerations of own merit.
- b) The evaluation of the collaborators is carried out involving the Hierarchical Managers, the Personnel Management and, to the extent possible, the subjects who have established a relationship with those evaluated.
- c) Promote the professional skills of collaborators, favoring their professional development and growth.
- d) The Hierarchical Managers will ensure to improve the working time of the collaborators requesting a consistent performance in accordance with the exercise of their functions and with the work organization plans.
- e) Requesting, as an act due to the hierarchical superior, services, personal favors or any conduct that constitutes a violation of this Code of Ethics, constitutes abuse of the position of authority.
- f) The involvement of the collaborators in carrying out the work must be ensured, providing moments of participation in the discussions and functional decisions for the achievement of the objectives of the Salvat Organization. Each collaborator must participate in these moments with a spirit of collaboration and independence of judgment.

#### 3.5. Freedom of Affiliation

The Salvat Organization respects the Right and Freedom of association of our employees, including the organization and participation in Associations and Unions.

#### 3.6. Security and health

The Salvat Organization is committed to complying with current legislation on health and safety at work

and to achieve this goal, it is committed to disseminating and consolidating a culture of health and safety, developing awareness of risks and promoting responsible behavior by all collaborators.

To this end, the internal structure, attentive to the evolution of the reference scenarios, carries out interventions of a technical and organizational nature, through its External Prevention Service, which ensures:

- The introduction of a risk and security management system.
- A continuous analysis of the risk and criticality of the processes and resources to be protected.
- The adoption of the best technologies;
- Control and updating of work methods.
- The contribution of training and communication interventions.

### 3.7. Privacy Protection

The privacy of the collaborators is protected, excluding any research on the ideas, preferences, personal tastes and private life of the collaborators.

In the case of the treatment of sensitive data, the Salvat Organization adopts all the necessary precautions and compliances prescribed by law.

### 3.8. Equality, Integrity and Protection of the Person

The Company is committed to protecting the moral integrity of its collaborators, guaranteeing the right to working conditions that respect the dignity of the person and therefore protects workers from acts of any type of violence, psychological, sexual harassment, or any attitude or discriminatory or harmful behavior, beliefs and/or preferences.

Employees of the Salvat Organization who believe that they have been harassed or have been discriminated against for reasons related to age, sex, race, health, nationality, political opinions and/or religious beliefs, will inform the Company for evaluation of the actual violation of the Code of Ethics.

### 3.9. Duties of the Collaborators

Without prejudice to compliance with the General Principles contained in this Code of Ethics, the functions of the collaborators comply with the following principles:

- a) The collaborator must act with loyalty to

comply with the obligations signed in the employment contract and the provisions of this Code of Ethics.

- b) The collaborator must know and implement the provisions of the Salvat Organization's policies regarding information security to guarantee its integrity, confidentiality and availability.

- c) They must avoid situations where conflicts of interest may arise and refrain from personally taking advantage of business opportunities of which they become aware.

- d) In the event that a principle of conflict of interest arises, the collaborator is obliged to notify their Hierarchical Manager, who will verify the real existence of the case, and inform the Control Body.

- e) Each collaborator must work diligently to protect the assets of the Salvat Organization, through responsible behavior and in line with the General Principles established in this Code of Ethics.

- f) Each collaborator is responsible for the protection of the resources entrusted to him and has the duty to report any risk or event harmful to the Organization.

- g) The Salvat Organization reserves the right to prevent the misuse of its assets and infrastructure, without prejudice to compliance with the provisions of current legislation.

## Section III - Rules of Conduct in relations with Clients

### 3.10. Fair and Equal Business

The negotiation with the Clients is carried out in line with the normative principle of contractual Good Faith, and the Basic Principles of a Fair and Equal Business, in the correct execution of the reciprocal obligations, between the Salvat Organization, its Clients, Collaborators and Interested Parties. in the development of our activity.

### 3.11. External Communication

Communications to Clients and/or any Party interested in the development of our activity, including advertising messages and the content of the Company's website, will be:

- Clear and simple, formulated in a language as close as possible to that normally used by interlocutors
- The communications will comply with current regulations, without resorting to elusive practices or contrary to the

General Principles established in this Code of Ethics.

- The information will be complete so as not to overlook any relevant element for the Client's decision.
- **Reliable and Non-Misleading Information** in terms of content and communication tool.
- Any form of pressure or favorable attitudes from the media is not allowed.

### 3.12. Behavior towards the Client

The Behavior of the Salvat Organization and of the Interested Parties in the development of their activity towards Clients is based on availability, respect and courtesy, with a view to a highly professional collaborative relationship.

### 3.13. Client Participation

The Salvat Organization undertakes to always respond to the suggestions and complaints of the Clients, making use of appropriate and timely communication systems.

## Section IV - Rules of Conduct in relations with Suppliers

### 3.14. Provider Choice

Without prejudice to the application of the General Principles contained in this Code of Ethics, the purchasing processes are based on the following Principle:

- In the search for the maximum competitive advantage for the Salvat Organization, the granting of equal opportunities for each supplier, loyalty and impartiality.

### 3.15. Integrity and Independence in relations with Suppliers

The Salvat Organization undertakes not to arbitrarily discriminate against its Suppliers.

Negotiation with Suppliers is carried out in accordance with the normative principle of Good Faith and with the Basic Principles of a Fair and Egalitarian Business.

## Section V - Rules of Conduct in Relations with the Company

### 3.16. Economic Relations with Political Parties, Unions and Associations

The Salvat Organization does not finance political

parties or associations in Spain or abroad, nor their representatives or candidates, nor does it sponsor congresses or parties that have the exclusive purpose of political propaganda.

It refrains from exerting direct or indirect pressure on politicians.

The General Principles of a Fair and Egalitarian Business and this Code of Ethics must always be followed.

### 3.17. Contributions and Sponsorships

The Salvat Organization may adhere to requests for contributions limited to proposals from Organisms and Associations declared non-profit and with statutes and regular social deed, which are of high cultural, environmental, social, sports, entertainment, artistic, or charitable value and that they have a National or International scope, and in any case, that they involve the environment of all the Interested Parties.

### 3.18. Institutional Relations

Any relationship with Institutions, including international ones, is attributable exclusively to forms of communication aimed at evaluating the implications of legislative and administrative activity towards the Company, as a result of the development of our activity.

### 3.19. Regulatory and Antitrust Bodies

The **Salvat Organization** falls under compliance full compliance with the rules established by the National Competition Commission and the provisions issued by the Market Regulatory Authorities.