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**ANTI-CORRUPTION POLICY OF LOGISTA HOLDINGS AND ITS
SUBSIDIARY COMPANIES ("GRUPO LOGISTA")**

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1. INTRODUCTION

Compañía de Distribución Integral Logista Holdings, S.A. and its subsidiaries (hereinafter, collectively referred to as the "**Logista Group**" or the "**Group**") are firmly committed to perform their activities in strict compliance with the Law and in accordance with the highest ethical standards of honesty, integrity and transparency.

In accordance with the national and international standards (such as Spanish Criminal Code, Italian Decree 231/01, French Loi Sapin II, UK Bribery Act 2010, OECD Recommendations, and U.S. Foreign Corrupt Practices Act (FCPA), among others), Logista Group has implemented a zero-tolerance policy with regards to any practices that could be considered unlawful, inadequate or which could generate a reputational risk for the Group.

Accordingly, Logista Group requires from all its directors, managers and employees the maximum respect to the business integrity principle, and implements this Anti-corruption Policy (hereinafter, the "**Policy**"), which establishes guidelines and general standards for the prevention of corruption in any form, and which shall govern all the interactions between Logista Group and third parties, whether these are Public Officials or private individuals, with whom the Group maintains any form of business, commercial or professional relationship.

This Policy is mandatory for everyone included in its scope of application.

2. SCOPE OF APPLICATION

This Policy applies to the companies included in the Logista Group, which is made up of Compañía de Distribución Integral Logista Holdings, S.A., as the parent company, and its subsidiaries with registered offices in Spain and other countries.

The Policy also applies to all its directors and legal representatives, managers, employees and, in general, to any person subject to the authority of the Group (hereinafter, the "**Members**"), and must be strictly observed by all its Members.

Board members, directors or managers appointed by the Logista Group in the boards or management positions of companies in which the Logista Group has a shareholding, but which are not controlled by the Logista Group, will be obliged to comply with this Policy, and will internally observe the application of this Policy as appropriate.

Likewise, this Group is committed with the prevention of corruption and, therefore, the Group's Business Partners shall be informed and shall undertake to comply with the Policy insofar as it is applicable. Failure to comply with this Policy will be considered as a breach of the contract, which may lead to the termination thereof by Logista Group.

This Policy should be understood and considered as an extension of the corresponding chapter on Corruption and Bribery of the Logista Group's Code of Conduct and without prejudice to the provisions on this subject of the Prevention of Criminal Risks Manual that may be applicable.

Finally, this Policy shall prevail, in terms of its content and its scope of application, over any other internal policy or standard, unless the latter contains stricter provisions.

3. DEFINITIONS

"Business Partner" means any third party acting for or on behalf of the Logista Group, or any entity owned or controlled by the Logista Group that can interact with outside parties, especially when they are Public Officials; or any alliance in which the Logista Group has economic interests, including, among others, by way of example: advisors, agents, consultants, customers, carriers, delegates or Group's representatives in a certain territory, franchisees, lawyers, manufacturers, partners, and suppliers.

"Corruption" includes the offering, promising, granting, accepting or receiving any undue benefit or advantage of any kind with the intention of influencing the behaviour of a person, whether they are a Public Official or external third parties, with the aim of gaining a business or a personal advantage. Corruption may take two forms: active corruption (conducted by those who offer or provide the advantage or benefit) and passive corruption (conducted by those who claim or accept the advantage or benefit), and both are classified as corruption, regardless of which party takes the initiative to carry out the corrupt act.

"Public Official" includes, without limitation, any person holding or acting on behalf of a person holding a legislative, administrative or judicial office, including any person employed by or acting on behalf of a public agency, a public enterprise or a public international organisation, any political party or an official thereof or any candidate for any political office, any associated party of any government or any department, agency, or part thereof, or of any state owned enterprise or joint venture/partnership with a state owned enterprise (including a partner or shareholder of such an enterprise) or of a public international organisation, or any person acting in an official capacity for or on behalf of any such government or department, agency, or part thereof, or for or on behalf of any such public international organisation, or a relative or Related Party of any such person.

"Object of Value" shall mean anything of value, tangible or intangible, including, among other things, cash or equivalents, gifts, meals, invitations, travel expenses, loans, third-party services, goods, trips, equipment, supplies or amenities, scholarships, reimbursement of expenses, training courses, offers of business, employment or other benefits to a family member, donations, contributions to charities or non-governmental organizations.

"*Related Party*" shall mean, with regard to a Public Official, the spouse or any other person with an equivalent relationship; the dependent children, in accordance with national law; or a legal person, trust or partnership that is directly or indirectly controlled by a Public Official.

4. GENERAL STANDARDS OF CONDUCT FOR PREVENTING CORRUPTION

The Members of Logista Group shall have to observe a series of standards of conduct with both individuals and with any Public Officials or with their Related Parties, to ensure the Group's activity is always carried out within the established principles of transparency and ethics.

Members must act at all times in accordance with the principles business integrity, prudence and common sense. Therefore, whenever there is a doubt regarding the lawfulness or appropriateness of any act, Members should always check with the Local Compliance Unit of the country in which the act is to take place or, where appropriate, with the Group's Compliance Committee before carrying out said acts.

The good practice guidelines that should govern Logista Group's activities are indicated below:

4.1. Business courtesies and gifts

- 4.1.1 Logista Group expressly prohibits its Members from giving, promising, offering or delivering Objects of Value, either directly or indirectly, when these seek to influence Public Officials or third parties with decision-making capacity regarding any situations or operations that affect the Logista Group or in which the Logista Group might have an interest, or that is aimed at facilitating or accelerating a process.
- 4.1.2 Logista Group expressly prohibits its Members from requesting, receiving or accepting Objects of Value, either directly or indirectly, that may induce them to perform their employment or professional obligations unfairly or improperly.
- 4.1.3 Under no circumstance shall the following be offered, granted, accepted or requested:
- Gifts or personal benefits that could be considered inappropriate according to local market standards.
 - Gifts or benefits that consist of unlawful activities.
- 4.1.4 No Members shall benefit in private purchases from Business Partners from discounts or more favourable terms that exceed the terms that are generally applicable to the rest of Members.

4.1.5 No actual exchange needs to occur to violate this Policy: an offer or promise or the mere acceptance of an Object of Value is sufficient to breach the prohibition stated in paragraphs 4.1.1 and 4.1.2 above.

4.1.6 Offering, granting or accepting gifts or personal benefits may be seen as a token of hospitality or courtesy if they are occasional, without expectation of reciprocity, for a fair value and proportionate to the circumstances and social uses of the territory in which they are made. In case of doubt as to when a specific gift or token should be considered proportionate and adequate to the social uses, the concerned Member shall consult the Local Compliance Unit or, where appropriate, the Compliance Committee.

4.1.7 Any gifts or personal benefits that do not meet the requirements mentioned above shall be rejected.

4.2. Promotional events, collaborations, donations and sponsorships

4.2.1 In the organisation of promotional events, the Group shall ensure that the costs are reasonable, that the content of the events are compliant with, and proportional to, its objective, and that they have been approved following the corresponding internal authorization processes. In turn, the content of the event shall focus mainly on the promotion of Logista Group's brand, products and services, and related to the activity of the recipient of the invitation.

4.2.2 The Group shall not make any contributions to political parties, candidates, electoral lists, groups or coalitions.

4.2.3 The collaborations, donations and sponsorships shall follow the corresponding internal authorisation processes and shall be documented and recorded in the accounts. The Group shall refrain from making any donations or sponsoring individuals or entities that have been convicted or if there is knowledge of them being investigated for corruption-related offences -public or private-, or money laundering activities.

4.3. Good practice guidelines for Logista Group's Members in the exercise of their duties and relationships with Business Partners.

4.3.1 Members shall exercise the duties of the relevant position with a commitment to the Group's purposes, refraining from carrying out any other acts that are contrary to their duties, the applicable laws or which may constitute a conflict of interest.

- 4.3.2 Members shall refrain from taking part in situations, activities or interests that involve unfair competition with Logista Group or which could affect the Group's reputation (including carrying out activities that could affect its objectivity) and/or market position.
- 4.3.3 The relationships between Members and Business Partners shall be maintained according to the highest level of professional ethics. In its contractual agreements, the Logista Group shall require commitments that include compliance with anti-corruption laws.
- 4.3.4 Logista Group shall refrain from carrying out or maintaining any business relationship with third parties whose conduct may constitute acts of Corruption.
- 4.3.5 All operations conducted by the Group will be recorded clearly and accurately in appropriate accounting records that represent the true and transparent view of the conducted transactions.

5. COMMUNICATION AND REPORTING

Any doubts concerning the application of this Policy should be sent to the Local Compliance Unit or, where appropriate, to the Group's Compliance Committee through the reporting mechanisms established in Logista Group.

Members that have knowledge, evidence, or reasonable suspicion of corrupt practices being carried out or attempted within the Group, or if there is a risk that such practices could take place, shall report it immediately to their hierarchical superior, to the Group's Compliance Officer or by communication to the Group's Whistleblowing Channel.

In this latter case, the communication shall be addressed in written form, by ordinary post to the address "Grupo Logista – Att. Compliance Committee – c/ Trigo, 39, Leganés (28914 Madrid) España", or by email to the email address complaintschannel@logista.com.

Complaints received shall be managed and decided according to the provisions of the Whistleblowing Policy of Logista Group.

In any event, a breach of the provisions of this Policy or any implementing or additional provisions, may lead to legal actions, including adopting the corresponding disciplinary measures pursuant to the collective agreement, labour laws and other applicable civil and commercial obligations assumed by the employee, director or manager with Logista Group; and the possible termination of the business contract in the case of the Group's third-party vendors.

6. ENTRY INTO FORCE

This Policy shall enter into force on 10 May 2021.

In Leganés, on 6 May 2021.

The Secretary of the Board and Director

María Echenique Moscoso de Prado