

Code of Conduct

PLAZA FORWARDING, S.L.



Index

First. Purpose	2
Second. Subjective scope of application	2
Third. Principles of action	2
Fourth. Rules of conduct	3
1. Legality. Rights and freedoms	3
2. Equality at work. Non-discrimination. Rejection of harassment at work	4
3. Use and protection of social assets	5
4. Occupational health and safety	5
5. Duty of loyalty. Conflicts of interest and influence peddling influence peddling	6
6. Dissemination of information: transparency and confidentiality.	
Protection of personal data	7
7. Sustainability and environmental protection	8
8. Security of facilities	9
Fifth. Stakeholder relations	9
Shareholders	9
Customers	10
Employees, contractors and suppliers	10
Public administrations	11
Society	11
Employees	12
Sixth. Approval and validity	12
Seventh. Monitoring and compliance	12
Annex. Principles of the United Nations Global Compact	13



FIRST. Purpose

- **To establish guidelines of conduct, integrity and ethical behaviour, in line with the corporate image and reputation of the company before the Communities in which it operates.**

In the current framework of the growing development of Corporate Social Responsibility, Plaza Forwarding wishes to strengthen relationships of trust and not opportunistic relationships with our stakeholders, as they are a source of value generation.

The purpose is to procure a professional, ethical and responsible behaviour of its employees in the development of the company's activities and in the fulfilment of its functions, creating a business culture based on the integrity of our behaviour in line with the corporate image and reputation that we wish to be projected before the Communities in which Plaza Forwarding operates.

In order to achieve these objectives, this Code establishes a guide of conduct that must be assumed by the employees in order to improve relations within Plaza Forwarding and with the other groups of interest.

SECOND. Subjective scope of application

The present Code is applicable to the members of the administrative and management bodies of the company, and to all members of the company's

management bodies of the company, and to all the employees of the companies that make up Plaza Forwarding.

Plaza Forwarding will also promote the Code among all its suppliers, contractors and collaborators, in order to create a link and guidelines for action in accordance with the principles and values contained in this Code.

Notwithstanding the above, the subjective scope of application may be extended to all those subjects that due to their activity or their special link with the entity may be included in the same.

THIRD. Principles of action

- **The Code includes universally accepted ethical values and basic principles of reference for the conduct of the people who make up the company, inspired by the Mission, Vision and Values of Plaza Forwarding.**

Plaza Forwarding intends to achieve with this Code a management system based on the ethical, honest and good faith behaviour of its employees, which will be projected in its relations with the Communities where it operates, inspired by the Mission, Vision and Values of Plaza Forwarding.



MISSION: "Our mission is to carry out the transport of goods in a continuous, efficient and safe way. We work to perform our function better every day, with the conviction that we are providing an important service to society".

VISION: "Our vision is to contribute to economic, environmental and social progress, to provide customers with excellent service, to ensure profitability for shareholders, and to encourage the promotion of employees and the reconciliation of their personal and professional lives. With this, we aim to be an international benchmark in the transport of goods, collaborating in their responsible use, attending to the safety of people and the protection of the environment, and cooperating in the prosperity of the localities where we have business units. With all this, we also aspire to make our employees feel proud to be part of the company, aware of their social relevance and the importance of their work".

VALUES: "We are a company of integrity, responsibility and efficiency, whose culture is based on attributes such as safety, commitment and the ability to generate trust among its stakeholders".

This Code of Conduct also incorporates and endorses the universal principles of the United Nations Global Compact, which are annexed to this Code.

FOURTH. Standards of Conduct

1. Legality. Rights and freedoms

- **Compliance with current legislation and ethical values.**

Plaza Forwarding assumes the commitment to act in compliance with the legislation in force, by means of an ethical behaviour in accordance with the Mission, Vision and Values of the company and with the principles of the subscribed United Nations Global Compact.

All persons included in the scope of application of this Code must comply with the legislation in force and, in the course of their work, endeavour not to harm the Community or the interests of the company.

They must act with integrity in their relations with third parties, not collaborating with conduct that may be illegal and avoiding activities that could be illegal and avoiding those activities that could legally compromise Plaza Forwarding.

All the employees will have at their disposal the necessary mechanisms to be informed about the regulations that apply to them for the performance of their work, trying to keep the information updated at all times. (Through the Intranet, Internet and/or requesting the necessary information from their hierarchical superior).



- **Protection of the fundamental rights and freedoms of the people affected by the activities of Plaza Forwarding.**

Plaza Forwarding is committed to the dissemination and observance of the universal principles of the United Nations Global Compact, and will at all times respect international standards for the protection of human rights and fundamental freedoms of persons who may be affected by its activity.

It shall avoid the violation of these rights and shall work within its sphere of influence for the promotion of human rights and fundamental freedoms.

2. Equality at work. Non-discrimination. Rejection of harassment at work.

- **A pleasant and respectful working environment. Cooperation and teamwork to achieve objectives.**

All Plaza Forwarding employees must foster a pleasant and respectful working environment.

Cordial relations and collaboration between colleagues, teamwork, and cooperation between the different areas of the company will be encouraged in order to achieve a greater and better work efficiency, which allows the achievement of the objectives and interests of the company, taking advantage of the abilities of the employees and the resources that Plaza Forwarding places at their disposal.

The external relations, between entities or with the different interest groups will also be based on a climate of professional based on a climate of professional respect, cordiality and collaboration.

- **Equal opportunities in the training and development of employees.**

The company will promote the participation of the personnel and continuous improvement, having for this purpose different procedures for the participation of the personnel that are applicable to all the activities and organisational levels of Plaza Forwarding.

Plaza Forwarding also has training procedures that aim to detect, evaluate and plan the training needs of the personnel, promoting above all equality, giving everyone the opportunity to grow and train on a daily basis in accordance with criteria of merit, capacity and performance of the professional functions required for each specific position.

Employees will commit themselves to Plaza Forwarding to make the most of the professional development opportunities that the company makes available to them, as well as to keep their knowledge up to date in order to be able to offer a higher quality in the work carried out.

- **Non-discrimination for reasons of race, sex, ideology, nationality, illness, religion or any other personal or social circumstance.**

In the training and professional development of the employees, Plaza Forwarding will guarantee non-discrimination for any reason.



Any discriminatory conduct is rejected by Plaza Forwarding, which will promote above all respect and non-discrimination between employees.

- **Rejection of intimidating or offensive conduct towards employees.**

Plaza Forwarding and its employees will watch over the integrity of the people, rejecting any kind of intimidating, offensive or non-respectful conduct with the rights of the workers, as well as any manifestation of sexual or moral harassment, or abuse of authority of any kind.

Mechanisms will be made available to employees to enable them to report, confidentially, facts or conduct such as those described above, so that the company can take the appropriate measures to avoid these and any future conduct that is totally prohibited.

3. Use and protection of company assets

- **Protection and adequate use of the resources made available to employees for the performance of their job functions.**

Plaza Forwarding puts at the disposal of its employees all the necessary resources so that they can efficiently develop the own functions of each work position.

The employees of Plaza Forwarding are committed to the correct use of the resources that the company puts at their disposal, which will be used in a responsible, efficient and appropriate way to the professional activity that they carry out, and they will protect them to avoid that they can derive damages for the interests of the company or for the Community.

The resources that the company places at the disposal of employees shall not be used for personal or extra-professional uses, or activities that are not related to the activity carried out in the company.

4. Occupational health and safety

- **Safe and healthy working environment.**

Plaza Forwarding will make available to the employees all the security elements that are necessary and in accordance with the work position that they carry out, creating security and labour health policies that will be of obligatory fulfilment for all the employees, promoting the preventive measures that are adjusted to each case.

All employees must know and comply with the health and safety protection rules of their job, committing themselves to observe these rules as well as the use of the safety measures that



Plaza Forwarding makes available to them, looking after their own safety, that of their colleagues and that of any other person that may be affected.

To this end, Plaza Forwarding has a Safety Management System and an Occupational Risk Prevention Plan, which covers all aspects of the organisation that have repercussions on the protection of people, goods and the environment against the risks inherent to or related to our activity, focused on the minimisation or adequate control of the risks and the management of all the applicable prevention regulations of Plaza Forwarding.

Plaza Forwarding has established a process to register and document those recommendations or suggestions that the personnel of the company emits, in its interest of improvement in the management of the security.

In addition, Plaza Forwarding will inform the affected personnel about the novelties or changes derived from the prevention, environment and safety regulations through the communication channels established in the internal and external communication procedures on the Management System.

Plaza Forwarding will try to ensure that the health and safety regulations are always respected in its work centres and outside them when collaborating with other companies. Likewise, the collaborators, contractors and suppliers that work with Plaza Forwarding will be required to behave in accordance with that established internally.

5. Duty of loyalty. Conflicts of interest and influence peddling

- **Communication and treatment of conflicts of interest between the company and its employees.**

In the performance of their functions and professional responsibilities, the employees will have to act with loyalty to Plaza Forwarding, avoiding incurring in situations of conflict between personal interests and those of the company. In this sense, Plaza Forwarding will respect the participation of its employees in other financial or business activities, as long as they are not illegal and do not collide with their responsibilities as employees or with the interests of the company.

In order to make the most appropriate decisions in each case, employees must previously inform the company in the event that they or their relatives could be affected by a conflict of interest, which could compromise their impartial performance. Employees shall refrain from representing Plaza Forwarding or intervening on its behalf, unless expressly authorized, in all situations in which they directly or indirectly have a personal interest.



- **Policy on hospitality and gifts.**

The employees of Plaza Forwarding will not be able to receive gifts or presents from any person or entity that can compromise the independence in the taking of decisions inherent to the exercise of their profession.

Likewise, they may not make gifts, nor give gifts or compensate in any way that is not accepted by social uses, to try to influence in an illegal or improper manner the decisions or the sales, professional or administrative relations.

Gifts or hospitality that are not permitted by current legislation, ethical principles, internal regulations or that may damage the company's image, as well as those that are not the subject of accepted business or social practice, must be refused and returned, provided that this gesture does not cause serious offence to the person or entity offering the gift, in which case the company's management must be informed in order to act accordingly.

In case of doubt, employees shall inform the company, through their hierarchical superior, to decide on the appropriateness of accepting or giving gifts or presents, which must comply with the guidelines established in the internal regulations on institutional relations and corporate identity.

6. Dissemination of information: transparency and confidentiality.

Protection of personal data

- **Complete, accurate and truthful dissemination of corporate information.**

Plaza Forwarding considers the truthfulness and transparency of the information as a main and essential asset for its business management, so that the employees in the performance of their duties must always transmit, internally or externally when appropriate, truthful, exact and not misleading information.

It is guaranteed that the information provided to shareholders shall be true and complete, complying with the principle of transparency. This information shall adequately reflect the financial situation of the company and shall be communicated in accordance with the rules governing the operation of the markets and good corporate governance that the company assumes.

- **Safeguarding of information of a reserved and confidential nature.**

The information of Plaza Forwarding of non-public character, has the consideration of reserved and confidential. For that reason all the employees of Plaza Forwarding are obliged to keep the strictest confidentiality on the information to which they have access, and not to divulge it beyond the strictly necessary for the accomplishment of their work, since they will be responsible for the use that they give to the information.

Any fraudulent or unauthorised use of the information constitutes a breach of loyalty to Plaza Forwarding.



- **Prohibition of the use of the confidential information in own benefit or of third parties.**

The employees of Plaza Forwarding, that have access to confidential information will have to preserve it so that it is not used in an inadequate form, in own benefit or of third.

In the event of having knowledge of the improper use of any kind of information that may be considered confidential and reserved of the company, the company will be informed through the hierarchical superior, in order to act accordingly.

In any case, the legislation in force in this area shall be applicable.

- **Protection of personal data, ensuring their correct use and privacy.**

Plaza Forwarding complies with the current legislation on personal data protection, protecting especially the data provided by employees, customers, suppliers, candidates in selection processes or other persons.

Employees who have access to this data in the course of their work undertake not to disclose such data, ensuring the privacy and trust placed in the company, and will respect the legitimate rights of the owners of the personal data.

The specifications contained in the internal regulations on security policy for automated files containing personal data, as well as their development procedures, shall be complied with in all cases.

7. Sustainability and environmental protection

- **Efficient use of resources and minimisation of the environmental impacts derived from the activities.**

The policy of Plaza Forwarding is committed to the environment, and for this reason it tries in each of its activities to minimise the negative effects for the environment, by means of the adoption of norms and procedures inspired by the best practices in this matter, trying to reach a high degree of security in each of its processes, facilities and services, paying special attention to the protection of the environment.

The employees and collaborators of Plaza Forwarding must know and assume this policy and act at all times with the criteria of respect and sustainability that inspire it, making an effort to minimise the environmental impact of the activities and seeking the efficient use of resources.



8. Safety of the facilities

- **High level of control and security of the processes, facilities and services of Plaza Forwarding.**

Plaza Forwarding promotes environmental and safety training in storage facilities, pumping stations, pipelines and work centres, with prevention policies through the identification and management of environmental and safety risks, aimed at each of the areas and jobs, so that this policy can be assumed, disseminated, applied and respected by all employees and by the company's customers and collaborators.

Plaza Forwarding assumes the commitment to comply with the applicable legislation, the specific industrial regulations and the internal regulations on safety and environment in order to achieve a sustainable development of the activity.

FIFTH. Relations with the groups of interest

Plaza Forwarding is committed to maintaining good relations with its different interest groups, trying to inform with transparency and fluidity to facilitate the achievement of the common objectives.

To this end, Plaza Forwarding has a procedure for the management of relations with the groups of interest that is applicable to all the activities and organisational levels of the company.

Shareholders

- **Shareholder value creation policy.**

The criterion that will govern the actions of Plaza Forwarding is the creation of value for the shareholder, based on increasing the value of the company both in the short and long term, ensuring its future viability, growth and competitiveness.

Plaza Forwarding will at all times try to encourage communication with its shareholders and promote their informed participation in the General Meetings.



Clients

- **Policy of achieving the highest levels of quality and excellence in the provision of services.**

In its commitment to quality, Plaza Forwarding maintains the recently updated ISO 9001:2015 quality system for excellence, committed to meeting its economic, financial and customer satisfaction objectives.

All Plaza Forwarding employees must adopt this quality policy, based on the satisfaction of the expectations and demands that our customers transmit to us with the aim of achieving the highest levels of quality and excellence in the provision of service, basing our relationships on trust and mutual respect.

Employees must act in such a way as to ensure the fulfilment of the commitments acquired with our clients, in an honest and responsible manner, receiving any suggestions made by our clients, in order to improve our management on a daily basis.

Collaborators, contractors and suppliers

- **Selection policy for collaborators, contractors and suppliers, based on criteria of quality and cost of goods and services and on compliance with the principles and values set out in this Code.**

Plaza Forwarding will select collaborators, contractors and suppliers that cover the needs of the company, establishing relationships based on mutual trust, transparency of information, the sharing of knowledge, experiences and capacities to be able to satisfy the needs, improving the quality of our service.

To this end, Plaza Forwarding has established procedures for the approval of contractors, which help to select in an impartial and objective way, those who best meet our expectations, complying with the current legislation, and with criteria of efficiency and quality of services, as well as other variables in accordance with the company's policies regarding the environment or corporate responsibility, among others. These criteria must be applied by Plaza Forwarding employees who participate in the contractor selection processes, avoiding the collision of personal interests with those of the company.

Plaza Forwarding will promote among its collaborators, contractors and suppliers knowledge of the Code of Conduct, compliance with which will be considered both in the approval and selection processes, as well as in the subsequent evaluation of professional performance.



Public administrations

- **Institutional respect and collaboration with public administrations. Scrupulous compliance with the law.**

The relations that Plaza Forwarding establishes with the different Public Administrations will be based on collaboration, mutual respect and transparency, as well as on the guarantee of compliance with the law.

The employees of Plaza Forwarding will act with honesty and integrity in the relations with the authorities and public officials and will avoid any conduct that could be interpreted as an attempt to obtain illicitly some consideration or benefit, watching over the image and reputation of the company in any case.

Company

- **Collaboration and involvement of the company in the society in which it operates.**

Plaza Forwarding understands that it must above all contribute to the improvement of the quality of life and the creation of wealth, improving the quality of its services and being sensitive to social changes in order to evolve at the same time as new needs arise in Society in order to be able to anticipate changes.

Plaza Forwarding will establish channels of communication and diffusion of the information and services provided in a truthful way, and in a way that generates in the society a confidence in the quality of our services.

Plaza Forwarding and its employees are committed to respecting the environment, complying with the regulations in force and collaborating in the preservation of the same by using waste treatment for its hazardous or polluting materials, in the most environmentally friendly way.

Environment

Plaza Forwarding will contribute and support the research of new technologies that help to respect the environment, collaborating with all the institutions that contribute with their work to the development of the Society.



Employees

- **Professional development, training and promotion in the company.
Reconciliation of family and professional life.**

Plaza Forwarding will apply public policies for the promotion of equal opportunities in the selection and promotion of its employees. The people in management and command positions must facilitate the professional development of their collaborators, thus promoting the growth of the company.

Plaza Forwarding will promote a safe and healthy working environment, which allows the reconciliation of family and professional life.

SIXTH. Approval and validity

The present Code of Conduct, as well as its modifications, will come into force as soon as it is approved by the Management and will be published on the company's website.

SEVENTH. Supervision and compliance

The values and principles contained in this Code of Conduct have been assumed by Plaza Forwarding with its shareholders, employees, clients, collaborators and with society as a whole. Plaza Forwarding will promote the knowledge of its content among all these groups of interest and especially among its employees, who are the main recipients of the present rules of conduct.

To this end, it will establish channels of communication with the employees to collect or provide information or resolve incidents regarding compliance with the Code, guiding the actions in case of doubt and establishing a channel so that the employees can communicate, in an absolutely confidential manner, the alleged breaches of the Code of which they are aware. Under no circumstances will retaliation of any kind be permitted against employees who, in good faith, make use of the confidential channel.

Failure to comply with the provisions of these rules of conduct, without prejudice to their consideration as an employment offence under the terms established in the applicable regulations, may give rise to the imposition of administrative sanctions and the civil or criminal liability of the offender.



ANNEX. Principles of the United Nations Global Compact

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights, internationally recognised human rights within their sphere of influence.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.
in human rights abuses.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective negotiation.

Principle 4: Businesses should support the elimination of all forms of forced and compulsory labour.

Principle 5: Businesses should support the elimination of child labour.

Principle 6: Businesses should support the abolition of discrimination in respect of employment and occupation.

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should encourage initiatives that promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.