

**PL1.1\_3**

**ETHICS CODE OF SUARDIAZ GROUP**

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		Edition 04
		04/12/2025

## REGISTER OF CHANGES

Edition	Date	Section	Page	Description of the change
01	10/12/2018			Initial Edition
02	19/12/2022			Ratification of Initial Edition
03	27/11/2023			Ratification of Initial Edition and incorporation of the Internal Reporting System Regulations
04	04/12/2025			Ratification of Initial Edition and incorporation of the Ethics Unit Regulations

## LIST OF INTERNAL DISTRIBUTION

Personnel/Position	Date	Shared by
All SUARDIAZ Group personnel	10/12/2018	Email.
All SUARDIAZ Group personnel	19/12/2022	Email and SharePoint. Published on SUARDIAZ Group website.
All SUARDIAZ Group personnel	27/11/2023	Email and SharePoint. Published on SUARDIAZ Group website.
All SUARDIAZ Group personnel	04/12/2025	Email and SharePoint. Published on SUARDIAZ Group website.

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## 1. PURPOSE

The Ethics Code of GRUPO LOGÍSTICO SUARDIAZ, S.L. and Subsidiary Companies (henceforth, SUARDIAZ Group) sets out its values and principles, and highlights its commitment to ethical and compliance business practices, ensuring a framework that backs the SUARDIAZ Group's essential values in everyday work.

SUARDIAZ Group contributes to the United Nations' Sustainable Development Goals (SDG) by means of all its business activities.

SUARDIAZ Group likewise expresses its commitment and association with the human and labour rights recognised in national and international legislation, and with the principles underlying the United Nations' Global Compact and the Rules regarding business' responsibilities in the field of the United Nations' Human Rights, among others.

This Code is aimed at:

- (i) Developing models and guidelines of responsible and ethical professional conduct to guide all the personnel that make up SUARDIAZ Group.
- (ii) Preventing any criminal conduct as well as any illicit behaviour within SUARDIAZ Group.
- (iii) Establishing the monitoring and control measures required to guarantee its correct fulfilment.

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## 2. FIELD OF APPLICATION AND SCOPE

This Code applies, without exception, to all the personnel that make up SUARDIAZ Group, regardless of their position and role, and specifically to:

- Members of the Board of Directors.
- Executive staff.
- Employees.
- Business partners.
- Interested parties and stakeholders.

It likewise applies to any company that forms part of its group of businesses, both present and future. To that end, the concept of groups includes all those companies that, directly or indirectly, are linked to SUARDIAZ Group in accordance with the legislation in force at the time.

When establishing business relations with other companies or professionals, one of the selection criteria to be considered is the existence of principles of behaviour and management that are similar to the ones detailed herein. If there are any discrepancies between local rules, laws, and regulations and this Code, those to whom the latter applies shall comply with the stricter rule.

All of this in strict fulfilment of principles in relation to human rights, labour regulations, sustainability, environment, and fight against corruption, by means of the following principles from the United Nations' Global Compact, which is fully adopted:

- Supporting and respecting the protection of Human Rights.
- Playing no part in the infringement of Human Rights.
- Supporting freedom of association and collective bargaining.
- Supporting the elimination of all types of forced labour or that which is carried out under duress.
- Supporting the eradication of forced labour and child exploitation.
- Supporting the abolition of discriminatory practices.
- Maintaining a preventive approach that favours the environment.
- Encouraging initiatives that promote greater environmental responsibility.
- Favouring the development and dissemination of environmentally friendly technologies.
- Working to prevent all types of corruption.

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## 3. MISSION, VISION, AND VALUES

### 3.1. MISSION

The mission of SUARDIAZ Group is that of supplying all types of logistic services –maritime, road, rail, and air– providing our national and international clients with a quality service, as well as advice and insurance to cover any contingency that may arise during transportation.

In addition, we also provide advice and administration services for third-party companies (subsidiaries and external companies) and “in plants” to our clients.

### 3.2. VISION

A leading Group recognised as a guarantee of quality, experience, efficiency, and transparency in providing the aforementioned services.

### 3.3. VALUES

The SUARDIAZ Group’s logotype is based on preserving the traditional values of a large family company that is a leader in the field of multimodal logistics, with maritime transport as its “alma mater.”

The corporative symbol is still the pennant that is displayed in all our vessels and offices. It is a symbol that is closely linked to the SUARDIAZ Group’s marine origins and extensive history, and that uniquely identifies the founding families: Riva and Suardiaz.



The symbol features a five-pointed star that represents the following corporative values:

- Integrity.
- Commitment.
- Responsibility.
- Excellence.
- Sustainability.

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The symbol acts as a representative entity per se, and guarantees the recognition of our brand, with a design adapted to our time –modern, simple, and compact.

This Code has been prepared by following GRI (Global Reporting Initiative) Standards and taking into account the SUARDIAZ Group’s internal plans, policies, procedures, and protocols in relation to Personnel, Quality, Environment, and Health and Safety in the Workplace, Action Protocol for the Purposes of Crime Control and Prevention and Anti-fraud, Internal Reporting System Regulations, Equal Opportunities Policy and Plan between Women and Men, Protocol for Preventing and Acting Against Sexual and Gender-Based Harassment in the Workplace, Protocol in Support of Victims of Gender-Based Violence in the Workplace, approved by the Board of Directors.

A relevance analysis has been carried out to identify the stakeholders and impacts of the business activity in each Sustainability / ESG area (Environment, Social and Labour Matters, Human Rights, Corruption and Bribery, and Society) (GRI 102 – 46 and 102 – 56).

In accordance with the SUARDIAZ Group’s business model, the following are the main aspects with regard to each area mentioned in the point above:

- **Environment:** SUARDIAZ Group has an Integrated Environmental Policy, and it is committed to respecting the environment and minimizing the impact that its activity may have on it.
- **Social and Labour Matters:** The most important aspect of labour and social matters for SUARDIAZ Group is its relationship with its workers, with whom it has an optimum communication channel. In this regard, SUARDIAZ Group has advanced in work-life balance policies (flexible worktime and a study to introduce teleworking), has established Works Committees for collective bargaining, has a training plan that includes, among others, occupational hazards, and safety courses in the workplace.
- **Human Rights:** SUARDIAZ Group mainly operates in European Union countries, which are not considered to be a risk in relation to Human Rights since they are subject to international and European regulations, especially the Charter of Fundamental Rights of the European Union (2000/C 364/01), which encompasses all individual, civil, political, economic, and social rights enjoyed by everyone in the common European area.
- **Corruption and Bribery:** It is a relevant aspect for SUARDIAZ Group, and therefore in its Code of Ethics and in Action Protocol for the Purposes of Crime

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Control and Prevention and Anti-fraud it establishes a policy of good practice in order to avoid bribery, misappropriation of funds, corruption, in short, practices that do not comply with the proper functioning of companies.

- **Society**: The corporate procedure of the Integrated Management System (IMS) of SUARDIAZ Group for the election, selection, and approval of suppliers, takes into account the degree to which the selected suppliers, in their activity related to the Group, comply with, and implement and apply ethical standards and values that protect equality and diversity rights, social responsibility, and sustainability.



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## 4. PRINCIPLES OF ACTION

### 4.1. RESPECT FOR THE LAW

Everyone that works in SUARDIAZ Group must, while carrying out their professional activities, strictly and rigorously observe the legal regulations in force in all territories in which the Group operates. In this regard, infringement of the law cannot be justified by claiming that such illegal acts are generalised or permitted by the authorities.

A manager's illegal conduct, or any indications and orders that may be given in this regard, do not absolve workers of their responsibility if they follow such indications.

No order that infringes what is stipulated in a legal regulation or in this Code should be obeyed. Workers can confidentially communicate the existence of this type of directives by means of the channel established to that end.

Anyone bound by this Code that is charged or put on trial, due to actions related to their professional activity, must inform the Ethics Unit as soon as possible.

### 4.2. RESPECT FOR HUMAN RIGHTS

SUARDIAZ Group is committed to human rights and the public freedoms recognised in the United Nations' Universal Declaration of Human Rights, avoiding any complicity in the violation of any precept included therein, and adopting international standards and directives by default whenever no specific legal framework exists.

SUARDIAZ Group recognises the need for respecting human rights, starting from the acquired commitment to guarantee that its activities are carried out in accordance with the law in force in the country where it is operating at each moment.

### 4.3. NON-DISCRIMINATION IN EMPLOYMENT AND OCCUPATION

SUARDIAZ Group, in relation to employment and occupation, promotes the professional and personal development of all its employees, ensuring equal opportunities by means of action policies that encourage a business culture based on merit and that complies with all applicable local, regional, state, European, or international regulations in force, in order to promote equal opportunities.

Direct and indirect discrimination is not acceptable in relation to accessing a certain post or in the way employees are treated after being hired. This involves avoiding:

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- **Direct discrimination:** Avoiding rules or practices that are aimed specifically at age, race, colour, gender, religion, political opinion, nationality, social origin, or physical or mental disability. Distinctions made strictly in accordance with a job's inherent requirements are not considered discriminatory.
- **Indirect discrimination:** Not even informal indirect discrimination is acceptable in employees' attitudes and practices.

SUARDIAZ Group strictly adheres to the following:

- Recruitment is based on the candidates' merit and potential, in accordance with the SUARDIAZ Group's needs.
- Promotion is based on capacity and experience, based on individual and collective professional performance.
- Training is based on the development of one's professional career, helping SUARDIAZ Group to attain its objectives.
- Non-discrimination in the recruitment of employees with psychophysical disabilities, in the adaptation of installations, and in contracting with companies that comply with social integration legislation.
- Respect for the principle of equality in relation to the clauses and conditions included in employment contracts.

SUARDIAZ Group is likewise committed to the following:

- Providing equal opportunities in accessing employment and in professional promotion, always ensuring the lack of situations of unjust discriminations due to reasons of gender, religions, race or ethnic group, origin, marital status, or social condition
- All employees participating in hiring, recruitment, or professional promotion processes shall display objectivity in their actions and decisions, with an attitude open to diversity and with the objective of identifying those who are best suited to the profiles and needs of the post to be filled, always promoting equal opportunities.
- Upholding an objective recruitment policy, based solely on the candidates' academic, professional, and personal merits, and the SUARDIAZ Group's needs.
- Evaluating its employees rigorously and objectively, considering their individual and collective professional performance.

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- Promoting the training of its employees, favouring equal opportunities and the development of their professional careers, helping SUARDIAZ Group to attain its objectives.

#### 4.4. RESPECT FOR PEOPLE

SUARDIAZ Group cares about generating and promoting work environments characterised by trust, communication, collaboration, and respect for people's dignity.

SUARDIAZ Group expressly rejects any abuse of authority, as well as any conduct that may generate an intimidatory, offensive, or hostile work environment.

Each person that makes up SUARDIAZ Group must help to promote and maintain a cordial and safe work environment that moves them to give their best.

- **Balancing work and family life:**

SUARDIAZ Group, aware of the importance of a person's comprehensive development, shall ensure that its employees can enjoy their personal and family life, promoting policies that balance their work and family life.

- **Respect for employees' intimacy and confidential data:**

SUARDIAZ Group is committed to solely requesting and using the employee data that is required for the efficient operation of its business activities, or as required by applicable regulations.

It shall likewise take all necessary measures to uphold the confidentiality of the personal data available to it and to ensure that the confidentiality displayed in transferring such data, when required for business reasons, complies with current legislation.

Employees that, due to the nature of their professional activity, have access to other employees' data, shall respect and promote the confidentiality of such data, while using it in a responsible and professional way.

- **Health and Safety in the workplace:**

SUARDIAZ Group promotes an appropriate Integrated Policy of Health and Safety in the Workplace, encouraging the adoption of preventive measures, providing a work environment that respects its employees' safety, and ensuring the fulfilment of each country's current regulations.

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All the SUARDIAZ Group's members must know and fulfil the regulations that protect health and safety in the workplace, and ensure, within the scope of their functions, their own safety as well as that of other employees, clients, suppliers, business partners and, in general, of everyone that may be affected by their activities.

- **Harassment and violence:**

SUARDIAZ Group shall not tolerate any type of harassment and is committed to providing a harassment-free work environment, regardless of the legal definition that may be applicable at any moment or place. To that end, harassment includes any kind of undesirable behaviour towards another person that:

- Creates a hostile, intimidating, humiliating, degrading, or offensive work environment, which affects another person's dignity, or physical or psychological wellbeing.
- Unjustifiably interferes with or disturbs another person's performance at work or employment opportunities.

Harassment may be verbal, written, physical, visual, or sexual, a gesture, a word or expression, a single or repeated action.

SUARDIAZ Group shall not tolerate any type of sexual harassment. Sexual harassment includes sexual insinuations, requests for sexual favours, or any other verbal, physical, written, or visual harassment of a sexual nature.

Likewise, SUARDIAZ Group shall not tolerate any kind of violence.

#### **4.5. RESPONSIBLE BUSINESS RELATIONS**

SUARDIAZ Group and its employees shall base their relations with clients, suppliers, competitors, and business partners, as well as with its shareholders, investors, and other market agents, on principles of integrity, professionalism, and transparency.

To that end, we comply with current legislation in relation to our suppliers, ensuring that they respect Human Rights and fulfil our Ethics Code. Therefore:

- Our purchases are made with objectiveness and transparency, selecting our suppliers in harmony with objective criteria, in a transparent way, and following established purchasing procedures.

We likewise endeavour to provide quality services, being aware of our clients' needs, and establishing relations based on integrity, commitment, and respect. Therefore:

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- We centre on excellence, quality, and responsibility, providing complete and transparent information, meeting agreed deadlines, and assigning the appropriate resources in each case.
- We communicate and avoid conflicts of interest in business relations, informing the responsible persons in SUARDIAZ Group about any professional or personal action or situation that may cause such conflicts.
- We reject illegal or inappropriate procedures.
- We appropriately safeguard information regarding files, projects, and clients. This information shall be considered confidential, and the SUARDIAZ Group's professionals must return to the company any original documents or copies, databases or computer applications, as well as any information related to any client or supplier in their possession once their employment has been terminated.
- None of the SUARDIAZ Group's business partners shall reveal or make public, during the time of their professional relationship and once it has terminated, information regarding the structure of the business, procedures, products, brands, clients, projects, or any other matter under the Group's responsibility.

#### **4.6. ENVIRONMENTAL PROTECTION**

Environmental preservation is essential for SUARDIAZ Group, being guaranteed by an appropriate Integrated Environmental Policy.

All employees, within the scope of their functions, must know and accept the said policy, and always act in accordance with the criteria of respect and sustainability that it inspires, adopting habits and behaviours related to good environmental practices, contributing to the established objectives, endeavouring to minimise the environmental impact derived from its activities and the use of the installations, equipment and means of work placed at its disposal, striving to use such efficiently.

#### **4.7. MONEY LAUNDERING**

SUARDIAZ Group shall only establish business relations with clients, business partners, and suppliers in accordance with their professional competence. This measure is aimed at avoiding money laundering.

Any sale or provision of services paid for with funds from illegal activities may be considered money laundering.

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In those operations or activities in which a risk of money laundering is detected, SUARDIAZ Group shall adopt compliance measures based on identifying the client and collaborating with the competent authorities.

#### **4.8. ANTI-CORRUPTION**

SUARDIAZ Group rejects trying to influence third parties to benefit itself by employing non-ethical practices. Neither shall it allow other individuals or entities to use such practices with the organisation's employees.

The SUARDIAZ Group's decisions are based on the merit system. Therefore, the members of its organisation cannot accept or award –either directly or indirectly– payments, gifts, loans, compensation, or special treatment of any kind that are not considered appropriate in normal business operations and consistent with good business practices, with the objective of influencing its business, professional, or administrative relations.

This obligation results in:

- The complete prohibition to offer any employee, directly or indirectly, any type of undue advantage, so as to infringe his/her obligations to favour SUARDIAZ Group.
- The prohibition to undertake any type of behaviour or activity –different from the above– in order to illicitly influence the behaviour of a civil servant, so that he/she adopts, or not, a decision favouring SUARDIAZ Group.

This prohibition and its derivations also extend to persons with close family members or friends.

In order to prevent any illicit payments, every operation that is carried out with funds belonging to SUARDIAZ Group:

- Must be related to the company's purpose or with an initiative included in the social responsibility activities.
- Must be duly authorised.
- Must be duly documented and registered; the declared purpose of the transaction and its actual purpose must fully match.
- The economic sum paid must be reasonably commensurate with the service received or the product acquired.

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Special attention shall be paid to extraordinary payments that are not contemplated in the corresponding agreements or contracts.

When faced with a doubtful situation, the person involved must report the matter or seek guidance through the Ethics Unit.

SUARDIAZ Group shall establish the appropriate procedure for preventing, monitoring or, where applicable, sanctioning behaviours that involve corruption or bribery.

#### **4.9. GIFTS AND PRESENTS**

The SUARDIAZ Group's professionals cannot accept gifts or presents while carrying out their professional activities.

As an exception, giving and accepting gifts and presents is permitted when all the following circumstances are satisfied:


- a) They are of insignificant or symbolic economic value,
- b) They correspond to tokens of courtesy or normal business customs, and
- c) They are not forbidden by law or generally accepted business practices.

The SUARDIAZ Group's professionals cannot, directly or by means of a related party, offer or award, or request or accept, unjustified advantages or benefits whose immediate or ultimate objective is obtaining a benefit –present or future– for SUARDIAZ Group, for themselves, or for a third party.

In particular, they cannot give or receive any type of bribe or commission from, or made by, any other involved party, such as Spanish or foreign civil servants, personnel of other companies, political parties, authorities, clients, suppliers, or shareholders.

Acts of bribery, which are expressly forbidden, include the offer or promise –direct or indirect– of any type of improper advantage, any instrument for covering it up, as well as influence peddling.

Neither may they receive, on a personal level, money from clients or suppliers, not even as a loan or advance.

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#### **4.10. RESPECT FOR FREE COMPETITION AND MARKET BEHAVIOUR**

SUARDIAZ Group competes fairly in the markets, promoting free competition, with full respect for current regulations and avoiding any conduct that may constitute an abuse or restriction of the former, such as fixing prices or other sales conditions, dividing up or assigning sales territories, or similar practices.

The professionals that make up SUARDIAZ Group shall avoid all type of conduct that may constitute an abuse or illicit restriction of competition.

#### **4.11. LOYALTY TO THE COMPANY**

SUARDIAZ Group promotes loyalty to the Company, bringing its employees into a participative relationship in which the Company and the Worker cooperate and take responsibility for attaining common interests, in an efficient way and contributing maximum value in the processes in which they participate.

SUARDIAZ Group avoids conflicts between personal interests and those of the Group. If such conflicts do arise, they shall be communicated to the corresponding persons in charge, so that they can adopt measures ensuring partiality, and our employees and business partners shall abstain from intervening or making decisions in any situation in which they have, directly or indirectly, a personal interest.

#### **4.12. CONFIDENTIALITY**

In accordance with current legislation, SUARDIAZ Group shall guarantee the confidentiality of its clients' data, promising not to reveal such to third parties, except if the client gives his/her approval, when legally obliged to do so, or in fulfilment of legal or administrative rulings.

It likewise guarantees third parties' right to alter or rectify their data, whenever necessary.

Employees shall keep the aforementioned data confidential when carrying out their professional activities and abstain from any inappropriate use of such.

#### **4.13. PROTECTION OF CORPORATE HERITAGE**

SUARDIAZ Group and the people that make it up shall also endeavour to protect all the assets and rights that constitute the Group's heritage, keeping the



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corresponding information confidential and only using it in relation to the Group's activities.

Employees are responsible for looking after the SUARDIAZ Group's assets entrusted to them and protecting them from any loss, damage, theft, or illegal or dishonest use.

The use of the computer equipment, systems, and programmes that SUARDIAZ Group makes available to professionals in order to carry out their work, including access to and operations on the Internet, must comply with criteria of security and efficiency, excluding any computer use, action, or function that is illicit or contrary to the SUARDIAZ Group's rules or instructions, as established in the Group's Protocol on the Use of Information Technology and its Control.

Employees shall protect and take care of the resources at their disposal or to which they have access, only using such as required to carry out their work correctly, in a responsible, efficient, and appropriate way in harmony with their professional activity.

Specifically, computer resources cannot be used to surf the Internet or participate in electronic communications that:

- May harm the normal functioning of computer resources.
- May expose computer systems to viruses.
- Involve contents or contacts that, due to their nature, are illegible or may harm the image, interests, or good reputation of SUARDIAZ Group.
- Involve accessing, processing, or communicating data, files, or contents in relation to illicit Internet sites.
- Significantly involve devoting worktime to activities or purposes unrelated to SUARDIAZ Group's own activity, or harm its normal performance and/or, in general, are not appropriate for professional purposes.
- Involve using, for professional purposes, an e-mail account different from that which SUARDIAZ Group has made available as part of its computer systems.
- The use of direct messaging systems that are not authorised or controlled by SUARDIAZ Group.

Likewise, SUARDIAZ Group considers its information and knowledge as one of its main assets, which should therefore receive special protection.

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The SUARDIAZ Group's information shall, in general, be considered reserved and confidential information.

It is the responsibility of SUARDIAZ Group and all its employees to use sufficient security means to protect its reserved and confidential information. No information about the Group shall be shared with any third parties.

The disclosure of reserved and/or confidential information, or the use of such by employees for private purposes, contravenes this Business Ethics Code and may be considered an infringement contemplated in current legislation, as well as in the SUARDIAZ Group's internal regulations.

Examples of confidential information are data that is not publicly known regarding clients, suppliers, distributors and potential acquisitions of the Group, its business operations and its structure, prices and processes, plans, and strategies.

Likewise, all the SUARDIAZ Group's professionals shall respect the good name, reputation, and honourability of SUARDIAZ Group, in meetings, words, gestures, personal appearance, behaviour, in documents and notifications, and any other type of message issued while carrying out their work.

#### **4.14. RELATIONSHIP WITH PUBLIC ADMINISTRATIONS**

The SUARDIAZ Group's relations with Public Administrations shall be guided by institutional respect, fulfilling any rulings decreed by them, without prejudice to them being appealed, where applicable, when they are not in conformity with the law.

SUARDIAZ Group does not interfere or participate in political processes in the country where it operates. It therefore does not make contributions –direct or indirect– to political or trade union organisations, committees, and parties, to their representatives and candidates, and to media professionals, except as required by law.

The SUARDIAZ Group's employees must truthfully convey all the information that they have to communicate, both internally and externally, and in no case shall they

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knowingly provide incorrect or inexact information that may lead to errors or confusion.

The SUARDIAZ Group's economic-financial information shall truthfully reflect its economic, financial, and patrimonial reality, in accordance with generally accepted accounting principles and applicable international financial information standards.

SUARDIAZ Group ensures that any aid or subsidies requested or received from Public Administrations are used appropriately, and the request of such is transparent, avoiding falsifying conditions in order to obtain such or using such for purposes other than those for which they were granted.

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## 5. ACCEPTANCE AND COMPLIANCE

SUARDIAZ Group shall adopt the necessary measures in order to implement this Code, distributing it among its employees and answering any queries that may arise regarding its application.

This Code of Ethics is mandatory for all members of the Board of Directors, executive staff, employees, business partners, and other interested parties and stakeholders of SUARDIAZ Group, as well as for future incorporations that shall accept the contents of this Ethics Code, and particularly the vision, values, and regulations established therein. Nobody is authorised to ask an employee to infringe what is stipulated in this Code or to justify any conduct that contravenes the Code.

Any employee that is aware of, or has a solid basis for suspecting, an infringement of this Code shall be obliged to inform his immediate superior, or to report it by means of the mechanisms that SUARDIAZ Group has established for making suggestions or complaints.

SUARDIAZ Group shall take the necessary measures to avoid adverse consequences due to any communications that employees send in good faith, in accordance with what is stipulated herein. It guarantees the confidentiality of the information supplied and the identity of the informant. In any case, SUARDIAZ Group promises not to take any reprisals –directly or indirectly– against any professionals that report a supposed irregularity.

Controlling the application of this Code is the responsibility of the Ethics Unit. Any doubt arising regarding its interpretation and application should be consulted with one's immediate superior or, if required, by contacting the Ethics Unit.

Likewise, the Code shall also be applicable to suppliers and other groups of people that interact with SUARDIAZ Group, to the extent that the values, principles, and regulations contained therein apply to them. SUARDIAZ Group shall ask its suppliers, voluntarily in the tender/purchasing process, to accept the commitment to apply, in their relationship with SUARDIAZ Group, its Ethics Code or any other, more restrictive one that it may have.

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## 6. ETHICS UNIT

The Ethics Unit is the collegiate body responsible for overseeing compliance with this Ethics Code and also serves as the body responsible for the Internal Reporting System of SUARDIAZ Group, in accordance with its specific Regulations.

The Ethics Unit shall consist of a minimum of two (2) and a maximum of five (5) members. In any case, the individuals holding the positions of Human Resources Director and Internal Audit & Sustainability (ESG) Director shall be ex officio members of the Ethics Unit.

The Board of Directors may appoint up to three (3) additional members from among persons holding key positions in the organization (for example, legal counsel, finance, operations, or other control functions), taking into account independence, experience, and professionalism.

The appointment, removal, and replacement of members of the Ethics Unit shall be the responsibility of the Board of Directors, without prejudice to the CEO's right to propose candidates and submit recommendations for appointment and removal.

The detailed organization and functioning of the Ethics Unit, including the internal distribution of responsibilities among its members and the rules for adopting decisions, are established in the Ethics Unit Regulations of SUARDIAZ Group.

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## 7. ETHICS CHANNEL

The e-mail [unidadetica@suardiaz.com](mailto:unidadetica@suardiaz.com) shall be the communication channel enabling any of the SUARDIAZ Group's interested parties and stakeholders (employees, clients, suppliers, and representatives of society in general) to communicate doubts, suggestions, possible irregular behaviours, or any infringement of the regulations included in this Code, in the Action Protocol for the Purposes of Crime Control and Prevention and Anti-fraud, and in the Internal Reporting System Regulations.

The Ethics Unit shall take care of the queries and investigate potential infringements of the Code under the commitment of strict confidentiality.

The queries received will be managed directly by SUARDIAZ Group Ethics Unit through the systems established for this purpose in this Code of Ethics. For these purposes, the Ethics Unit will try to respond to the query or doubt received within a maximum period of 10 days from its receipt and/or acknowledgment of receipt.

In the event that the query or doubt received indicates the need to proceed with the opening of an investigation procedure, it will be processed in accordance with the Complaints Process of the Internal Reporting System Regulations of SUARDIAZ Group (see Section 8.3. Complaint Management).

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## 8. VALIDITY

This Ethics Code was initially approved by the SUARDIAZ Group's Board of Directors at its meeting on December 10, 2018.

Any updates made to the Ethics Code must be approved by the SUARDIAZ Group's Board of Directors after receiving a non-binding proposal from the Ethics Unit.