

**SUSTAINABILITY POLICY**  
**OF LOGISTA HOLDINGS AND ITS SUBSIDIARIES**

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## SUMARIO

<b>1. PREAMBLE.....</b>	<b>4</b>
<b>2.- OBJECTIVE AND PURPOSE .....</b>	<b>4</b>
<b>3. SCOPE.....</b>	<b>4</b>
<b>4. SUSTAINABILITY COMMITMENTS.....</b>	<b>5</b>
4.1. Environmental Commitment .....	6
4.2. Commitment to society (employees, customers and suppliers) .....	7
4.3 Commitments to good governance .....	7
<b>5. FUNCTIONS AND RESPONSABILITIES. REPORTING AND SUPERVISION     SYSTEMS.....</b>	<b>9</b>
<b>6. LANGUAGE AND ADVERTISING .....</b>	<b>12</b>
<b>7. DEROGATION .....</b>	<b>12</b>
<b>8. ENTRY INTO FORCE.....</b>	<b>12</b>

## 1. PREAMBLE

The Board of Directors of Compañía de Distribución Integral Logista Holdings, S.A. ("Logista" or the "Company") has, by law, among its non-delegable powers, the power to approve a sustainability policy that reflects the Company's commitment on this matter, which will contribute to the objective of creating a sustainable economic system, generating stability, social commitment, growth and sustainable investment.

Logista's Code of Conduct also reflects Logista's commitment to conducting its business in a sustainable and environmentally friendly manner, applying the most environmentally friendly technologies and promoting maximum environmental responsibility among its members. As a responsible of sustainability, Logista seeks, develops and applies best available practices to control and manage the current and foreseeable impacts of its activities on the environment and to address key environmental issues.

In terms of corporate governance and social commitment, Logista promotes, in the exercise of its activity and as a central axis of its corporate governance, behaviour based on ethics, transparency and active communication with all its stakeholders, including the promotion of best corporate governance practices.

Furthermore, for Logista, people are the force that guarantees the results and growth of the business, which is why safety, talent development and diversity and inclusion are a fundamental part of the people strategy at the Company. In addition, Logista is committed to the integration of socially vulnerable groups, which is materialised through collaboration with foundations and associations.

## 2.- OBJECTIVE AND PURPOSE

The purpose of this Policy is to define and establish the main management and control commitments and guidelines to be followed in sustainability matters, in order to promote the creation of long-term value for all stakeholders and to favour stability and transparency, beyond the economic scope, with a view to contributing to the achievement of the Sustainable Development Goals (SDGs) approved by the United Nations (UN).

It also establishes a framework for action that supports Logista's sustainability management in coherence with its corporate strategy, and from which all initiatives and projects in this area shall emanate. This Policy will contribute to set the pillars for the preparation, approval, implementation and monitoring of strategic sustainability plans, as well as a system of governance, an information reporting system (both internal and external) and a system for risks and opportunities management in this area.

## 3. SCOPE

This Policy shall apply to Logista which shall mean:

- i) Each and every one of the Logista Businesses, whether integrated, together with others, into any of the Logista companies, or incorporated on their own as trading companies,

provided that, in the latter case, they are directly or indirectly majority owned by Logista ("the Business" or, in the plural, "the Businesses").

- ii) The Corporate Directorates of Logista

In those subsidiaries' companies in which Logista does not have the effective control, the Company will promote principles and guidelines consistent with those set out herein. In addition, Logista undertakes to promote its sustainability objectives by involving, to the extent possible, any other individual and/or legal entity other than those mentioned above with which the Company has contractual or commercial relations.

#### 4. SUSTAINABILITY COMMITMENTS

Logista has established commitments that seek to contribute to the development of a sustainable business model and to provide the maximum possible value to its stakeholders. To this end, Logista's commitments take into account the needs and expectations of these stakeholders through different communication mechanisms, which allow it to maintain an active dialogue and generate the most appropriate response at all times.

To determine the sustainability commitments under ESG (Environmental, Social and Governance) criteria, Logista has taken as a starting point the different values on which its business model is based:

- **Initiative:** seen as a key driver of change, it fosters progress and prepares for the future.
- **Respect:** As a multicultural group, respect and tolerance are inherent to the group and to the attitude of its employees.
- **Professionalism;** integrity in management, and transparency in Logista's actions and relations of all kinds with its stakeholders, and especially with its employees.
- **Transparency:** the Company regularly prepares and publishes financial and non-financial information, subject to independent verification, to present a true and fair view of the Company's assets, financial position and results, as well as the Company's environmental, social and governance performance.
- **Commitment** to diversity, inclusion and equal opportunities.
- **Compliance:** with regulations through responsible practices in key areas such as the prevention of illegal conduct or respect for human rights or diversity, among others, and in the preparation and reporting of non-financial information, all through the implementation of an internal compliance system.

In view of the above, Logista's sustainability commitments are as follows:

## **4.1. Environmental Commitment**

Logista's Quality, Environment and Energy Efficiency Policy establishes the guidelines and best practices to contribute to the fight against climate change, prevent pollution in processes, promote the circular economy, the appropriate use of water resources, and the protection of biodiversity, all in accordance with strict regulatory compliance and the voluntary objectives subscribed to. Specifically, Logista works to control and manage the current and foreseeable effects of our activity on the environment and, also those which such effects have on the Company, addressing significant environmental aspects, all of which are based on the following:

### ***Environmental Commitments***

- *Integrate the fight against climate change into the Company's strategy, mitigating its effects by reducing the carbon footprint and actively contributing to the transition to a low-carbon economy.*
- *Implement measures to promote the circular economy and to prevent and reduce pollution in Logista's activities.*
- *Comply with the obligations imposed by applicable environmental regulations, as well as those to which the Company voluntarily subscribes.*
- *Proactive management, in the short, medium and long term, of risks and opportunities related to climate change, pollution, circular economy, biodiversity and water resources.*
- *Define, calculate, consolidate and monitor the main environmental indicators, including greenhouse gases, and quality indicators for sustainable development, which will be monitored and evaluated in accordance with Logista's sustainability governance system.*
- *Collaborate with organisations and stakeholders, participating in and supporting national and international initiatives aimed at environmental protection, as well as adopting and disseminating the principles that emanate from these initiatives.*
- *Systematically incorporate energy efficiency criteria, developing measures aimed at reducing consumption and increasing energy efficiency.*
- *Promote respect for the environment among our employees, customers, suppliers and society in general and integrate environmental sustainability criteria in the supply chain.*
- *Promote respect for the environment among our employees, customers, suppliers and society in general and integrate environmental sustainability criteria into the supply chain.*

## **4.2. Commitment to society (employees, customers and suppliers)**

Logista is committed to ongoing dialogue and the creation of sustainable value over time, adapting to the demands of society and its stakeholders, taking care of business profit as one of the bases for the future sustainability of society in general and of Logista in particular, all of this on the basis of the following:

### ***Commitment to society***

- *Establish channels for relations, dialogue and participation with Logista's stakeholders (shareholders, employees, customers and suppliers) and the local environment in which it operates, in order to facilitate Logista's integration in these environments.*
- *Contribute to the socio-economic development of society through specific models of sustainable social action.*
- *With regard to our employees, to encourage the creation of employment opportunities, providing training and development for our professionals and to ensure equal treatment for all, including gender equality, avoiding any type of discrimination, and promoting measures for work-life balance, as well as all activities aimed at the inclusion of people with different abilities. Logista is also committed to creating a safe and healthy working environment through its own Health, Safety and Well-being at Work (HS&W) policy, which establishes the principles in this area, adapted to the particular circumstances of each Business in which Logista operates.*
- *With regard to our suppliers; guaranteeing maximum transparency in the contracting process, preventing risks of fraud in the purchasing processes, establishing the basic elements of internal control necessary for this purpose. Likewise, in order to guarantee our commitments in the value chain, suppliers must be made aware of and apply the Code of Conduct and the principles on which Logista's Purchasing Policy is based, and criteria must be established for the consideration of ESG criteria when contracting and selecting suppliers.*
- *Identify the potential impacts that the operations and activities carried out by Logista may generate in terms of human rights, and thus have a due diligence system that identifies the situations and activities with the highest risk of contravention of human rights, with the aim of developing mechanisms to prevent, mitigate and remedy such impacts.*
- *Ensure the implementation and maintenance of mechanisms that guarantee the right to data protection for all individuals who interact with Logista companies.*

## **4.3 Commitments to good governance**

Logista's corporate governance model, under the Logista's Corporate Governance Policy, aims to generate value in the short, medium and long term for all its stakeholders, based on best corporate governance practices. Therefore, ethics, transparency and active communication are the cornerstones of Logista's governance model, which is pursued through the following:

## **Commitments to good governance:**

- *Promote best corporate governance practices through ethical, responsible and integrity-based business management, promoting compliance with and continuous improvement of Logista's governance standards.*
- *Integrate into corporate governance policies due diligence policies for the identification, prevention and resolution of adverse impacts on human rights and on the environment.*
- *Promote a culture of regulatory compliance in all areas applicable to Logista's activities, establishing the necessary compliance control mechanisms.*
- *To have the necessary regulatory structure in place to have an organisational and management model for the prevention of corruption, fraud and bribery, as well as a total commitment against money laundering and the financing of terrorism.*
- *Ensure the existence of a tax compliance model based on good tax practices, transparent and in accordance with the requirements of each of the markets and countries where Logista operates.*
- *Establish the necessary internal control and risk and opportunity management systems for the Company, including those related to sustainability.*
- *With respect to our shareholders and investors; create long-term sustainable value, promote integrity and transparency of information and ensure equal treatment in the exercise of shareholder rights.*
- *Ensure that effective grievance and complaint mechanisms are in place, with adequate safeguards and appropriate resolution procedures, to address potential adverse human rights and environmental impacts. These mechanisms must be widely communicated both to Logista company employees and to external individuals and organisations. In addition, appropriate internal procedures shall be established to report on reported issues in order to assess the implementation of due diligence systems.*

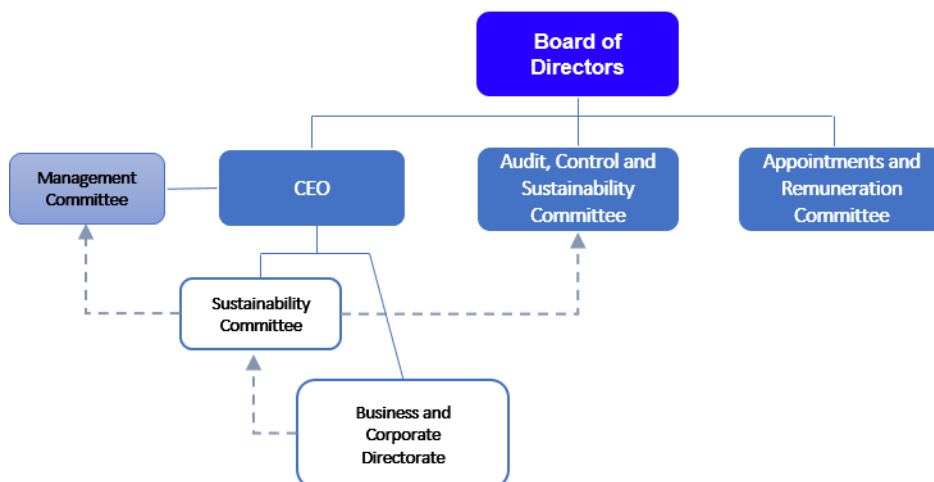


## **5. FUNCTIONS AND RESPONSABILITIES. REPORTING AND SUPERVISION SYSTEMS**

Logista has designed a sustainability governance model based on the following principles:

- Logista's Board of Directors, following the report from the Audit, Control and Sustainability Committee, shall be the body responsible for approving the Sustainability Policy, which defines the Company's main lines of action in the area of sustainability.
- Based on this Sustainability Policy, the Company will define, at Management Committee level, Logista's strategic sustainability plans. A Sustainability Committee will be set up to assist the Management Committee in drawing up these strategic plans and will report to it on all matters relating to sustainability.
- These strategic plans will contain specific actions to be implemented in the different areas and will be prepared by the Sustainability Committee in coordination with Logista's Businesses and Corporate Directorates. The Businesses and Corporate Directorates will implement these objectives in a decentralised manner and report to the Sustainability Committee on the execution of these action plans.
- The Sustainability Committee shall report to the Management Committee and the Audit, Control and Sustainability Committee, as often as required or appropriate, and at least twice a year, on the results of the implementation of these plans, so that both the Management Committee and the Audit, Control and Sustainability Committee can exercise their functions in these matters.

The integrity of the governance model will be ensured through Logista's existing co-ordination mechanisms and the Company's sustainability issues will be reported in accordance with reporting requirements. To this end, Logista will ensure the implementation of reporting systems that allow for adequate oversight and integrity of the information necessary to understand Logista's impact on sustainability issues, as well as the information necessary to show how these issues affect Logista's performance, results and position, and will establish mechanisms to monitor sustainability-related risks and opportunities in coordination with Logista's overall Risk Management Policy. The reporting and monitoring system will be developed by the corresponding procedure.



(\*) The dashed lines represent the reporting channels between the different bodies. The solid lines identify the hierarchical dependence of some bodies on others.

In view of the above, the roles and responsibilities of each of Logista's bodies involved in the management of its sustainability model are as follows:

## a) Board of Directors

Pursuant to the provisions of the Logista's Board of Directors' Regulations, in connection with the Capital Companies Act, the Board of Directors is responsible, among its non-delegable powers, for approving this Policy and supervising its implementation through the Audit, Control and Sustainability Committee.

Likewise, the Board of Directors shall take into consideration sustainability issues with regard to the determination of the risk control and management policy and the supervision of the internal information and control systems.

## b) Audit, Control and Sustainability Committee

The Audit, Control and Sustainability Committee, as set out in the Logista's Board of Directors' Regulations, supervise and assess the preparation process and the integrity of financial and non-financial information, as well as the control and management systems for financial and non-financial risks relating to the Company and its group, including operational, technological, legal, social, environmental, political, reputational and corruption-related risks, reviewing compliance with regulatory requirements, the appropriate delimitation of the scope of consolidation and the correct application of accounting criteria.

## **c) CEO and the Management Committee**

The Management Committee, on the basis of the provisions of this Policy, shall define the specific strategic sustainability plans that serve to implement this Policy. These plans shall be drawn up at the proposal of the Sustainability Committee mentioned below and must be approved by the Chief Executive Officer following a report from the Audit, Control and Sustainability Committee.

Likewise, within the scope of the Management Committee and with the support of the Sustainability Committee, it will periodically monitor the degree of compliance with the commitments acquired in the strategic plans, as well as the execution of the specific action plans by the Corporate Directorates and Business Divisions.

## **d) Sustainability Committee**

The Sustainability Committee, which will report to the Management Committee for these purposes, will assume the following responsibilities:

- Communicate to all Businesses and Corporate Directorates the Sustainability Policy approved by the Board of Directors.
- To prepare, with the collaboration of the Businesses and Corporate Directorates, proposals for Logista's sustainability strategy plans, which will contain specific sustainability objectives and the actions to implement them. The strategy plan proposals will necessarily contain an analysis of sustainability risks and opportunities and the specific actions required to implement these plans.
- Coordination of the implementation of the strategy plans by the business areas and corporate management of the different actions included in the strategic sustainability plans.
- Propose suggestions for improvement that, where appropriate, they deem necessary in the area of sustainability.
- Report, as often as required to do so, and at least twice a year, on the progress of said implementation both to the Management Committee and to the Audit, Control and Sustainability Committee.

The Sustainability Committee shall be chaired by the head of the Investor Relations Department, as well as by a member of the Resources, the Human Resources and the Corporate Legal Directorates. The Corporate Internal Audit Department, in its capacity as head of the Risk Management Unit, and the Compliance Officer will appear as non-permanent representatives when dealing with matters affecting their respective areas of competence. Any other Logista employee may also be invited to attend meetings.

## **e) Business and Corporate Directorates**

The responsibilities of the Corporate and Business Directorates will be as follows:

- Collaborate with the Sustainability Committee in the development of Logista's strategic sustainability plan.
- Establish, under the coordination of the Sustainability Committee and in line with the strategic plan, specific sustainability action plans.
- Report to the Sustainability Committee on the fulfilment of the quantitative and qualitative objectives linked to each of these action plans.
- Report to the Sustainability Committee on the monitoring indicators (KPIs) associated with them.

## **f) Corporate Finance Directorate**

Without prejudice to the supervisory powers of the Audit, Control and Sustainability Committee, the Corporate Finance Directorate shall also be responsible for implementing mechanisms to ensure the integrity of the financial and non-financial information of the Company and its subsidiaries, as well as the adequate control of the risk associated with the financial and non-financial risks.

## **6. LANGUAGE AND ADVERTISING**

This Policy is published in Spanish and English, the former prevailing in case of divergences between the two.

## **7. DEROGATION**

Policy 4/2021 of 26 May 2021, "Sustainability Policy of Logista Holdings and its subsidiaries", is hereby repealed as of the entry into force of this Policy.

## **8. ENTRY INTO FORCE**

This Logista's Sustainability Policy will come into force on 20 July 2023.

This Policy corresponds exactly to that approved by Logista's Board of Directors on 20 July 2023.

Leganés, 20 July 2023

The Secretary-Director of the Board of Directors,

María Echenique Moscoso del Prado