

ANTI-CORRUPTION POLICY

When we refer to ALIANZA LOGISTICS, we include all the group's operating divisions:

GALADTRANS 2009, S.L.

ALIANZA GALADTRANS, S.L.

GRUPO ALIANZA MULTISERVICIOS, S.L.

The success of ALIANZA LOGISTICS is based on a reputation of honesty and seriousness that has been steadily built over the years. The benefits derived from a business obtained by improper means will lose all their value when compared to the damages it would cause for both the long-term commercial objectives and the image and reputation of ALIANZA LOGISTICS.

Our group adheres to the ten principles included in the United Nations Global Compact. Specifically in accordance with the provisions of the tenth principle, it assumes the commitment to fight against corruption in all its forms and to develop specific policies regarding this issue.

To prevent corruption, any form of bribery or fraud, extortion, money laundering and illegal financing of political parties, ALIANZA LOGISTICS conducts all its activities in accordance with the legislation in force, in all areas of action and in all the countries in which it operates, following the spirit and purpose, and is committed to:

- Abiding by the principle of “zero tolerance” against corruption, any form of bribery or fraud, extortion, money laundering and illegal financing of political parties. ALIANZA LOGISTICS prohibits these behaviours in all their forms and modalities, which are considered absolutely unacceptable.
- Avoiding influence over the objectivity of people outside the company (including government workers) to obtain any benefit or advantage through practises that are unethical and/or contrary to the applicable law.
- Abstaining from making or offering, directly or indirectly, any payment -in cash or of any other type and under any contractual form-, or any other benefit or advantage to any person or entity:
 - i. at the service of any authority, entity, public or private, political party or candidates for public office, with the intention of obtaining or maintaining, illegally, business or other advantages;
 - ii. with the intention that they abuse their influence, real or apparent, to obtain from any authority, entity, public or private, any business or other advantage;
 - iii. or when it is known that all or part of the money or in kind will be offered or delivered, directl or indirectly, to any authority, entity, public or private, political party or candidates for public office, for any of the aforementioned purposes.
- Never financing or showing support of any kind, directly or indirectly, to any political party, its representatives or candidates.
- Never using donations to cover up improper payments.
- Avoiding requesting or recieving unduly, directly or indirectly, commissions, payments or benefits, from third parties on the occasion of or due to the investment, divestment, financing or expense operations carried out by the company.
- Promoting the knowledge of this policy and the adoption of behaviour guidelines consistent with it among partners, suppliers and collaborating companies.

- Paying special attention to those cases in which there are indications of lack of integrity of the people or entities with which business is carried out, in order to prevent and avoid money laundering from criminal or illicit activities
- Reflecting faithfully and adequately all the actions, operations, and transactions of the company in its records and systems.
- Acting under the principle of information transparency, reporting all the Company's actions, operations and transactions in a truthful, clear and verifiable manner.
- Avoiding conflicts of interest – ALIANZA LOGISTICS is committed to avoiding conflicts of interest and managing them properly within the framework of its Conflict of Interest Policy.
- Protecting privileged information - All employees must keep the strictest confidentiality regarding all reserved information that they access as a result of the performance of their professional activity and must refrain from using it improperly for their own benefit or that of third parties.
- Restraining from market abuse – ALIANZA LOGISTICS must safeguard the exercise of free competition in their functions, with their business practices being ethical and legal at all times. In this regard, unfair competition will be avoided.
- Following the gift policy - All employees must respect at all times the prohibition of soliciting or offering gifts, favours or services on advantageous terms to suppliers, customers, intermediaries, agents, consultants or others who have any business relationship with ALIANZA LOGISTICS:
 - It is forbidden to make/accept any kind of service in exchange for anything.
 - Only gifts, favours, services or invitations that are within the social uses, considered as courtesy or that have a promotional character may be accepted. Courtesies and pleasantries shall not be excessive, either qualitatively or quantitatively, as to avoid that they are reasonably perceived by a third party as a bribe. Their economic value must be considered reasonable and moderate in the scope of the circumstances (setting a maximum threshold for this at 50 euros in value).
 - The regularity or repetition of this type of attention by the same individual or legal entity to the same recipient could lead to the surpassing of their character of mere courtesy at the decision of the Ethics Committee.
 - It is not allowed to accept any other kind of gifts, compensations, favours or services in advantageous conditions from clients, suppliers, intermediaries, agents, advisors or other third parties that maintain a business relationship with ALIANZA LOGISTICS.
 - Under no circumstances is it permitted to offer or accept a gift consisting of money or any equivalent under any form (cheques, transfers, gift cards, etc.).
 - In the above cases, any gift, favour, service or invitation will be politely refused by an ALIANZA LOGISTICS administrator, officer or employee, explaining that he/she is doing so in compliance with the rules set forth in this Anti-Corruption Policy.
 - The administrators, officers and employees of ALIANZA LOGISTICS must inform by e-mail to the Ethics Committee of all gifts, favours or advantages they have offered or received along with their estimated value and, if applicable, whether or not they have been refused.
 - The Ethics Committee shall create and maintain a register of gifts, favours, invitations and services in advantageous conditions received by ALIANZA LOGISTICS' administrators, managers and employees whose value exceeds 50 euros.
- Providing adequate ongoing training on ethics and compliance, in person or remotely, to all administrators and employees of the Group, paying special attention to the fight against fraud and corruption.

The above commitments and the conduct guidelines associated with them are developed in the "Code of Ethics at ALIANZA LOGISTICS."

ALIANZA LOGISTICS, through the Internal Audit department and through integrated budgetary control systems, performs the prevention, surveillance and control of the accounting records that reflect the payments, expenses, transactions and disposal of assets by the company, ALIANZA LOGISTICS identifies and controls any sensitive action in breach of regulations.

The group has an Ethical Channel for employees and third parties as a way to report any of the behaviors mentioned in this policy, promoting integrity and responsibility in the face of corrupt events, allowing employees and any third party to submit, with complete confidentiality, any queries about these and other issues related to our code of ethics and its possible violations or defaults.

Date of approval: 1 March 2022

Approved by: Vicente Aguilar Galindo