

#wearelogistics

CORPORATE RESPONSIBILITY POLICY

GRC Area

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1. Purpose

The purpose of this **Corporate Responsibility Policy** (hereinafter, the "Policy") is to reflect BERGÉ's commitment to compliance with internal regulations, applicable legislation in the markets where it operates and the expectations of its main stakeholders on ESG, i.e., environmental (E), social (S) and good governance (G) factors.

BERGÉ is understood to be any legal entity, whatever its nature, of which Bergé Infraestructuras y Servicios Logísticos, S.L. is the direct or indirect owner of a shareholding equal to or greater than 50% of its capital stock, and for which it can exercise control over its governing bodies even without holding such ownership. Bergé, together with its subsidiaries, may be collectively referred to herein as the "Subsidiaries", "BERGÉ", or the "Company".

Bergé's Board of Directors (hereinafter, the "Board") is responsible for Bergé's Corporate Responsibility area as a whole and establishes, through this Policy, the following **specific and fundamental purposes** of the Policy:

- + To favour the fulfilment of BERGÉ's strategic objectives.
- + To respond to the expectations of the Company's main stakeholders (i.e., shareholders and partners, customers, suppliers, employees, and regulatory bodies).
- + To establish minimum corporate responsibility guidelines for its Subsidiaries.
- + To ensure the reliability, timeliness and transparency of the non-financial information reported in the Statement of Non-Financial Information.
- + To preserve the image and reputation of BERGÉ and its brand.

Along these lines, the Board of Directors, as the entity responsible for the Corporate Responsibility area, will entrust BERGÉ's Managing Director with the performance of the aforementioned objectives.

The Managing Director has delegated these functions to the GRC Manager.

2. Scope

This Policy applies to all BERGÉ's directors, officers and employees (hereinafter, "Liable Persons") regardless of their geographic, hierarchical, functional location or the contractual modality that determines their relationship with BERGÉ. The content of this Policy is developed and expanded in policies and procedures specific to the matters detailed in this document. This Policy is the basis for the minimum instructions required of all BERGÉ companies.

In addition, this Policy has considered the following items for making decisions regarding corporate responsibility:

- + International standards and regulations - e.g., United Nations Global Compact, Sustainable Development Goals, Declaration of Human Rights, and principles for corporate governance published by the International Labour Organisation and the OECD for corporate governance.
- + National regulations and legislative trends in Corporate Responsibility, specifically those related to the industry in which BERGÉ operates and its activity.
- + The information provided by stakeholder representatives in the materiality analysis conducted in 2019 which has been updated upon completion of this Policy.

3. General principles of action

Corporate Responsibility management at BERGÉ is aligned with the Company's principles and values and is materialised as follows:

1. Development of a **business model that integrates ESG principles**;
2. **Minimisation** of the possible **negative impacts of the Company's activities**;
3. **Creation of long-term sustainable value**, in line with stakeholder expectations; and
4. **Promoting the Company's social commitment**.

To develop these points, BERGÉ has identified the following general principles applicable to all activities conducted by the Company:

- a) **Continuous Improvement**, reviewing its operations, listening to stakeholders and proposing improvement actions that add value and allow BERGÉ to create sustainable relations.
- b) **Transparency** in its relations with stakeholders, providing truthful and honest information, and promoting communication through information channels.
- c) **Caution and Prevention** in its activities, analysing and reducing as far as possible the negative impacts on the environment and society.
- d) **Legality**, respecting legality in all its activities and rejecting any irregular practice.
- e) **Respect for Persons**, by adhering to the principles set forth in the Universal Declaration of Human Rights, respecting the diversity and dignity of people.
- f) **Alignment**, by dedicating resources aimed at training and raising awareness among its employees to ensure behaviour pursuant to the provisions of this Policy and BERGÉ's values and principles.
- g) **Non-complicity**, in all its activities, refusing to work with any organisation engaged in unethical or illegal practices.

4. BERGÉ's commitments to its stakeholders

BERGÉ is committed to enable mechanisms that allow detecting and responding to the needs and expectations of its stakeholders, aligning its strategy and operations to them.

Cross-cutting commitments with all stakeholders

BERGÉ's commitment to legality, the environment, contribution to society and respect for human rights is described below. These commitments have a cross-cutting influence on the way in which the Company responds to the expectations of its stakeholders:

- + **Legality**, BERGÉ undertakes to identify and comply with the rules, laws and regulations applicable to its activity and to require its Subsidiaries to do the same. To this end, the Company is committed to developing a GRC Model consisting in the areas of (i) risk management, (ii) financial control, (iii) corporate responsibility, (iv) compliance and (v) GRC assurance. The latter two will be responsible, respectively, for identifying, assessing, prioritising and mitigating compliance risks and independently verifying the correct functioning of the control, prevention and detection mechanisms defined in the compliance area.
- + **Environment**: BERGÉ is committed to making efforts to reduce consumption, manage and reduce waste and minimise the impacts resulting from its activities, in line with the "2030 Agenda", through the use of the technical tools available in the Company, covering the following points:
 - Initiatives for reducing the carbon footprint and emissions.
 - Initiatives for the incorporation of the circular economy into the production chain and the safe and efficient management of the waste generated; and
 - Initiatives and measures to reduce the consumption of water, energy and raw materials.
- + **Contribution to Society**: BERGÉ is committed to contributing to the development of society and local communities through logistics, our core business. We will also promote labour market insertion for young people and adults by collaborating with vocational training entities and universities, to contribute to improving and expanding knowledge of the logistics sector and generate better employability options for people.
- + **Respect for Human Rights**: BERGÉ is committed to respecting human rights, and condemns forced and child labour, modern slavery, in line with the Universal Declaration of Human Rights. To this end, BERGÉ is bound by the following commitments throughout its value chain:

- Rejection of Forced Labour.
- Zero tolerance for child labour.
- Rejection of Modern Slavery (servitude, forced or compulsory labour and human trafficking)
- No discrimination based on race, sex, age or any other condition.

In addition, BERGÉ is committed to maintaining an open dialogue with its main stakeholders, establishing channels for communication, complaints and protection against retaliation.

Specific commitments with stakeholders

In line with the aforementioned transversal commitments, BERGÉ has established a series of specific commitments with its key stakeholders, in order to enable mechanisms that allow it to detect and respond to their demands and needs:

1. **Commitments to the Company's Shareholders and partners:** BERGÉ is committed to developing its activity in accordance with social interest, complying with the law and providing shareholder value with a long-term vision creating sustainable value. To this end, it is committed to making gradual progress over time in the commitments mentioned throughout the document, reconciling the integration of corporate responsibility in the long-term strategy.
2. **Commitments to customers:** BERGÉ is committed to providing quality service and excellence based on efficiency and professionalism, focusing on the creation of sustainable relations with customers, through a treatment based on ethics, respect and honesty. In this regard, this commitment will be detailed in BERGÉ's customer relation model and its commercial policy.
3. **Commitments with Suppliers:** BERGÉ is committed to choosing its suppliers, considering social, environmental, ethical and business criteria. Suppliers will be selected objectively as regulated under the purchasing policy. Likewise, BERGÉ undertakes to approve its suppliers, through an approval procedure, which segments its suppliers according to their criticality for the business, and depending on the level of criticality, they will be required to comply with commitments and responsibilities that are aligned with the sustainability standards established in this Policy.
4. **Commitments with employees:** BERGÉ is committed to guaranteeing equality and non-discrimination in the different processes associated with the human resources area, specifically: (i) selecting and recruiting personnel, (ii) development and training, (iii) equitable remuneration, regardless of the sex of the employee, (iv) and ensuring

working conditions that allow for union organisation, adaptation by disability and other needs, and a work-life balance, measures for the prevention of harassment at work and the right to digital disconnection. Likewise, the company will ensure the safety of all people in the organisation, ensuring the correct implementation of prevention plans and providing safe and healthy working conditions.

5. Acceptance and compliance

This Policy is disseminated to all employees and collaborators, who are obliged to comply with it from the time they join BERGÉ and throughout their professional performance in the firm, and their acceptance must be recorded in writing.

6. Duration

This Policy has been approved by the **Board of Directors** has been incorporated into BERGÉ's internal regulations and shall remain in force until its cancellation or modification is approved.

In line with the spirit of continuous improvement, BERGÉ undertakes to review its contents periodically in order to accurately reflect the Company's current situation.