



# montepino

## supplier code of ethics

DECEMBER 2023

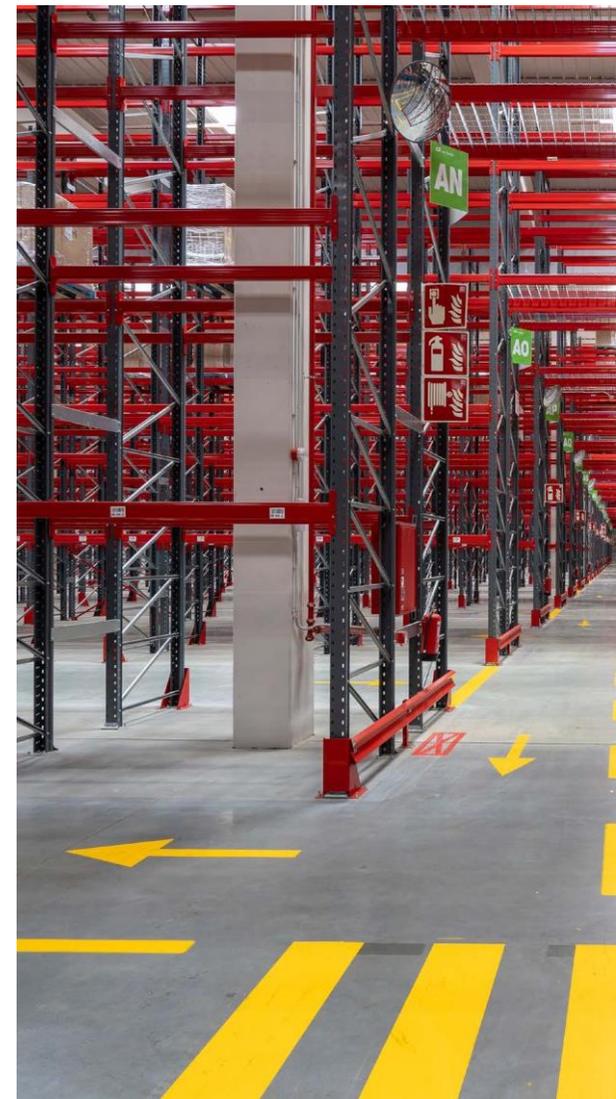


# target

MONTEPINO LOGÍSTICA SOCIMI, S.A., considers its suppliers as subjects that intervene in its value chain, therefore, it is essential, in order to maintain and reaffirm its ethical standards in the development of its business activity, the business activity of the companies in which it participates and that of Valfondo Gestión, S.L. as management company (all of them hereinafter **Montepino** as this is the commercial brand under which the group of operates), the preparation of this Suppliers' Code of Ethics (the "Suppliers' Code").

The purpose of this Supplier Code is to determine the minimum standards of ethical and responsible conduct that suppliers must comply with and enforce on the companies with which they establish commercial relations in their daily decision making and in their daily activities.

To this end, **Montepino** undertakes to provide the necessary means for suppliers to know and understand this Supplier Code. Suppliers will assume their compliance by adhering to .



# scope of application



This Supplier Code is applicable to all suppliers of **Montepino**, regardless of their geographical location, being understood as those third parties, natural or legal persons, who act for or together with **Montepino** supplying or providing products or services (the "Suppliers").

# 1

## Compliance with the law

Suppliers must comply with the applicable laws of the countries in which they operate, avoiding any conduct that is contrary to the law or that, even without violating the law, may prejudice the reputation of **Montepino** and produce adverse consequences for the company or its environment.

In this way, all Suppliers must avoid unfair competition or actions that restrict free competition in the market, the giving or accepting of bribes of any kind and any other form of fraudulent activity.

In particular, Suppliers must respect the internationally recognized human rights set forth the Universal Declaration of Human Rights of 1948.

They shall also act at all times honest, fair and ethical manner, committing to act with integrity and relying on with zero tolerance policies for the aforementioned behaviors.

# 2

## Professionalism and ethical integrity

Suppliers undertake to maintain the highest professional standards in all their actions, focusing on acting with integrity and excellence in the provision of services.

In particular, they commit :

1. Maintain the utmost confidentiality in relation all actions carried out and prevent the unauthorized disclosure and use of confidential information.
2. Avoidance of conflicts of interest.
3. Do not give or receive business courtesies, gifts, kickbacks or other inducements to obtain and/or retain business with **Montepino** .
4. Guarantee the truthfulness and transparency of the information provided in relation to its performance.
5. Comply with current labor and tax regulations.

Professionalism and integrity ethics

6. Comply with all anti-corruption, anti-trust and fair competition laws and adopt mechanisms to combat all forms of corruption and bribery in the conduct of its business.

7. Comply with data protection regulations and ensure information security.

8. Respect intellectual and industrial property rights.

# 3

## Internships

In line with the duty to respect the law in force and in the interest of **Montepino** to carry out labor practices that comply with the regulations and are respectful of labor rights, Suppliers commit to:

1. Do not use and prohibit the use of child and involuntary labor.
2. Do not use and prohibit inhumane or intimidating treatment.
3. Guarantee the dignity and respect of all employees.
4. Respect the provisions of the collective bargaining agreements regarding working conditions, overtime, holidays and minimum wage.
5. Ensure a work environment free of discrimination and harassment.
6. Promote a safe and healthy work environment.
7. Guarantee free association and collective bargaining.



# 4 Environment

Suppliers undertake to carry out their activities with respect for the environment and adhere to the commitment of **Montepino** to act preventively and actively, minimizing the possible environmental impacts that the activity they carry out could cause and promoting the following as the main areas of action:

- Reducing emissions, waste and consumption of resources.
- The increase and promotion of reuse and recycling.



# 5 Compliance with the code of ethics

The content of this Supplier Code of Ethics is mandatory for Suppliers of **Montepino** .

In this regard, a Compliance Officer has been appointed as a supervisory body, which is responsible, among other functions, for periodically verifying effective compliance with this Suppliers' Ethical Code.

Supplier conduct contrary to the principles contained in this Supplier Code of Ethics, as well as in the rest of the internal rules in force at **Montepino** , may give rise, on the part of **Montepino** , to the termination of the contract binding the Supplier to **Montepino** or to a demand for liability from the Supplier.

In addition, the directors, officers, employees and collaborators of the Suppliers undertake to identify and communicate to the Compliance Officer any inappropriate, irregular conduct, and/or conduct that could violate the contents of this Supplier Code of Ethics or the

Compliance  
with the code  
of ethics

internal regulations **Montepino** regardless of whether they cause benefit or detriment to the companies.

For this purpose, the Head of the Internal Information System has set up a complaints channel available to all Suppliers through the following complaints form available on the website **Montepino Canal ético (montepino.net)**. In addition, complaints may also be communicated by mail addressed to the attention of the Head of the Internal System (Calle Felipe Sanclemente nº26, 3ª Zaragoza) and/or by means of a face-to-face meeting with the Head of the Internal System, which must be held within seven (7) days from the request of the complainant.

This channel is adapted to the requirements of Law 2/2023 on whistleblower protection, providing **Montepino** with all the guarantees for the protection of whistleblowers. It also enjoys maximum confidentiality and guarantees anonymity and confidentiality and the prohibition of retaliation among other guarantees agreed in the Internal Reporting System in the Internal Reporting System, which is published on the website [www.montepino.net](http://www.montepino.net). Complaints may be made anonymously and shall list the details of the events that occurred.

**Montepino**, the Management Company, its subsidiaries and the Management Company undertake to treat these data in strict compliance with the legislation on the protection of personal data.

