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CODE OF ETHICS AND CONDUCT





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## 1 OUR CODE OF ETHICS

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This Code of Ethics and Conduct is integrated into the heart of the **HAFESA GROUP**, and is intended to serve as a reference guide and pillar of the ethical principles of the **HAFESA GROUP**.

It is aimed at all members of the **HAFESA GROUP**, who must assimilate and apply the guidelines included in this Code of Ethics and Conduct in the daily exercise of their business activity, also seeking ethical and responsible behaviour, in accordance with the corporate principles and values.

### 1.1 PURPOSE OF THE CODE

The purpose of this Code of Ethics and Conduct (hereinafter “the Code”) is to establish the principles and values that must inspire and govern the development of the activities and relationships maintained by the **HAFESA GROUP**, as well as each of the employees, managers, administrators, partners and suppliers of the **HAFESA GROUP**.

Likewise, the approval of this Code aims to facilitate the development of daily operations within an ethical, serious, professional and honest environment in accordance with the most basic principles of good faith, as well as full and permanent compliance with current legislation.

At the **HAFESA GROUP**, we have the vocation to promote a corporate culture structured around regulatory compliance, based on integrity, transparency and good corporate governance, with the aim of achieving the prevention of crimes within our organisation in the most effective way possible, as well as compliance with all laws that are applicable to the exercise and development of our activities, while at the same time promoting the protection of computer freedom and privacy related to the personal data that we may process.

### 1.2 SCOPE OF APPLICATION OF THE CODE

This Code is binding and mandatory for all employees, managers, administrators and members at all levels of the **HAFESA GROUP**, comprised of the following companies: HAFESA PARTICIPACIONES, S.L., VIRENA PARTICIPACIONES, S.L.U., GRUPO HAFESA SUMINISTROS PETROÍFEROS, S.L., HAFESA ENERGÍA, S.L.U., TABLAS DIEZ, S.L.U., SECICAR, S.A., HAFESA ESTACIONES DE SERVICIO, S.L.U., GASOLINERAS AMISTAD, S.L.U., HAFESA LOGÍSTICA, S.L.U., DBA TERMINALES Y LOGÍSTICA, S.L., DBA BILBAO PORT, S.L.U., HAFESA MIDDLE EAST GROUP, F.Z. L.L.C., GLOBAL MERIDIAN CONSULTING, S.L.U., ALKAZAR BUSINESS, S.L., MARAL INVERSIONES, S.L.U. and PETRÓLEOS ASTURIANOS (hereinafter jointly referred to as the “**HAFESA GROUP**” or “**The Group**”, interchangeably).

In the same sense, those suppliers, subcontractor companies and intermediaries that contract or collaborate with the **HAFESA GROUP** must respect its content, committing to act under the ethical principles and standards defined in the provisions of this Code.

It is the responsibility of everyone, regardless of the function performed within the organisation, to ensure respect and compliance with this Code. In any case, any breach of the same will not be tolerated or allowed, therefore, any conduct that goes against



the provisions below, whether directly or indirectly, must be reported immediately to the **HAFESA GROUP** through of the mechanisms established for this purpose.

## 2 MISSION, VISION AND VALUES OF THE HAFESA GROUP

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### 2.1 MISSION

We are a leading national group within the energy sector that provides quality service in the midstream stage of the oil life cycle, that wants to lead the transformation process in its field of activity, committed to the environment throughout our entire business activity and considers its employees a strategic asset. All of this, within the framework of our social responsibility strategy and compliance with applicable regulations.

### 2.2 VISION

We are an organisation with the objective of being one of the Spanish national groups of reference in the management of liquid fuels derived from petroleum in the energy sector before 2030.

Our commitment is based on transparency and institutional loyalty, the development of our ethical principles, good corporate governance and reliability, the safety of people and security of supply, quality and operational excellence, care for the environment, client focus and the Sustainable Development Goals approved by the United Nations Global Compact.

### 2.3 PRINCIPLES

The **HAFESA GROUP**'s commitment is based on the following guiding principles:

- 1) **Ethics and Corporate Social Responsibility (CSR):** One of the main commitments of the **HAFESA GROUP** is to act with the highest ethical standards, paying special attention to the care of the planet and of the environment, as well as social well-being.
- 2) **Transparency:** The **HAFESA GROUP** is committed to acting with total transparency, in all relationships with third parties and members of the organisation, as well as in its actions and operations in the market.
- 3) **Legal compliance:** The **HAFESA GROUP** promotes compliance with regulatory and legal obligations, especially zero tolerance for corruption.

### 2.4 VALUES

The commitment of the **HAFESA GROUP** is developed and reflected in the following values, which are part of its identity:

**Creation of value and efficiency.** Our initiative is aimed at caring for the relationship with the client, with suppliers, with workers and with shareholders,



using the appropriate methods and means to comply with national and international standards and legislation.

**Social commitment.** The objective of wanting to contribute to the development of a fairer society, with greater equality of opportunities and with maximum respect for the environment.

**Committed team.** The commitment of workers, managers, agents and other collaborators with the feeling of belonging to a benchmark business group and the continued development of the team's capabilities and skills so that people feel involved in giving the best of themselves.

**Excellence.** This is understood as the desire to serve clients, providing them with differentiated treatment and offering them the products and services that are most appropriate to their needs with our continuous effort to improve.

### 3 GENERAL RULES OF CONDUCT

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Preserving the values of the **HAFESA GROUP** requires training professionals in the risks to which they are exposed and establishing specific guidelines for action. Therefore, this Code is applicable in all day-to-day operations and complements the general standards, guidelines and rules existing within the **HAFESA GROUP**.

In general, **HAFESA GROUP** professionals are expected to respect current legislation, as well as the external and internal regulations of the Group as a binding obligation. Workers or people affected by this Code must avoid conduct that, even if it does not violate the law, contravenes any of the values, principles and ethical behaviours established in this Code.

#### 3.1.1 HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

Each and every one of the members that make up the **HAFESA GROUP** are obliged to maintain scrupulous respect for the Fundamental Rights and Civil Liberties included in the International Declarations and Agreements, in the Spanish Constitution and any regulations intended to protect the above.

#### 3.1.2 BALANCE OF PROFESSIONAL AND PERSONAL LIFE

Within the organisational scope of the company, the **HAFESA GROUP** is committed to promoting the balance between personal and professional life in order to facilitate the balance between the professional life and the family needs of its employees, managers and administrators.

Likewise, it recognises the importance for the best performance of the functions of its staff that people can develop comprehensively as workers and as human beings, having a full personal life and active policies for balancing professional and family life to satisfactorily combine work with family.

The **HAFESA GROUP** seeks to promote flexible working conditions and encourage people to have interests and motivations outside of their professional life that support the values of the organisation.



### 3.1.3 INDEPENDENCE AND CONFLICTS OF INTEREST

A conflict of interest exists in those cases in which the personal interests of professionals are directly or indirectly contrary to or collide with the best corporate interests of the **HAFESA GROUP**, and interfere with the fulfilment of their professional duties and responsibilities.

Therefore, professionals must ensure that they maintain a state of impartiality that does not give rise to a possible conflict of interest of any kind and refrain from intervening in decision-making in situations in which they directly or indirectly have a vested interest.

Extreme caution will be taken when personal relationships of any kind exist within the professional activity carried out (for example, friendship or close family) or legal entities where control is exercised thereby.

In addition to the provisions of the **HAFESA GROUP** Anti-Corruption Policy, in the event of a potential conflict of interest, **HAFESA GROUP** professionals will observe the following guidelines for action:

- **Communication:** they will inform their hierarchical superior about the conflicts of interest in which they are involved, prior to carrying out the activity, in order to make the appropriate decisions in each specific case and thus prevent their impartial performance from being compromised.
- **Abstention in decision making:** They will refrain from intervening in decision-making when there is a conflict of interest.
- **Independence:** they will act independently of their own interests or those of third parties at all times.

### 3.1.4 RELATIONS WITH MEMBERS OF PUBLIC ADMINISTRATIONS

In their relations with authorities and public institutions, employees and members of the **HAFESA GROUP** will behave lawfully and in line with national and international provisions for the prevention of corruption and bribery. Relations with public bodies will be guided by institutional respect and compliance with the law and internal regulations.

Likewise, its professionals undertake not to request, accept or offer any type of benefit or advantage of any unjustified nature that favours the organisation, the professional themselves or a third party over others.

With regard to illegal activities, maximum diligence will always be taken to detect and report them. To this end, the **HAFESA GROUP** requires an unwavering commitment to collaboration with the judicial, administrative and supervisory authorities, carrying out scrupulous compliance with their orders and resolutions at all times.

### 3.1.5 RELATIONS WITH CLIENTS



All company employees must act with integrity towards clients, aiming to achieve the highest quality standards, excellence in service provision and the long-term development of relationships based on trust and mutual respect.

In relationships with clients, the independence of the **HAFESA GROUP** will always be safeguarded, preventing professional actions from being influenced by economic, family or friendship ties.

In relationships with clients, transparency will be encouraged and the information or advice (if applicable) provided to them must always be truthful and appropriate. Under no circumstances may clients be provided with erroneous, ambiguous or incomplete information that could mislead them or lead them to make the wrong decisions.

### **3.1.6 RELATIONS WITH SUPPLIERS AND THIRD PARTIES**

The **HAFESA GROUP** promotes the development of external professional relationships in a broad sense, with organisations, professionals and suppliers, as long as they contribute to preserving one of the most valuable assets, the corporate image and reputation of the **HAFESA GROUP**.

Therefore, **HAFESA GROUP** workers and all other participants and members of the organisation will ensure the good image and reputation of the **HAFESA GROUP** so that they will not participate in negative comments or activities aimed at damaging the good credit of the Group, or of outsourced professionals or organisations, notwithstanding the defence of the corresponding legitimate interests. In particular, special caution will be maintained in the use of the image and corporate identity of the **HAFESA GROUP** in the format and content of the documents that are issued.

The **HAFESA GROUP** considers its suppliers and collaborating companies an indispensable part of achieving its objectives of growth and improvement in service quality, seeking to establish relationships with them based on trust and mutual benefit. Consequently, the **HAFESA GROUP's** supplier selection processes will be conducted with impartiality and objectivity, for which its professionals must apply quality criteria, avoiding any conflict of interest or favouritism in their selection.

The information provided by professionals to suppliers will be truthful and not projected with the intention of misleading.

### **3.1.7 CONDUCT IN THE MARKET AND TRANSPARENCY**

All members of the **HAFESA Group** undertake to comply with the competition protection regulations in force and applicable to the organisation.

At the **HAFESA Group**, there is a firm commitment to free competition and legal behaviour in the markets and all actions that aim to reach agreements that seek to prevent, restrict or distort competition or trade and are contrary to the freedom of enterprise as provided for in the applicable legislation are rejected outright.

The commercial policy and prices in the different companies will be established completely independently and based on criteria of transparency, exemplary nature and



impartiality. In this sense, those members of the Group linked to sales or purchase processes will observe exemplary behaviour, promoting competition in the market in a fair manner and rejecting deceptive or fraudulent conduct.

In any case, the members of the organisation who have associated functions will ensure that the content of the accounting records and financial information is complete, clear and accurate, being a faithful reflection of reality.

Financial records will be available for inspection by the General Management and auditors.

### **3.1.8 CONFIDENTIALITY OF INFORMATION**

#### **1. Privileged and confidential information of the HAFESA GROUP.**

All employees of the **HAFESA GROUP** have the duty and obligation to keep secret all information related to the company that could be classified as privileged, confidential, reserved and / or secret. Therefore, it cannot be revealed and, much less, used for personal benefit.

Confidential information means:

- All information that, because it is not in the public realm, affects the activity and details of the **HAFESA GROUP** market, financial data, methods or processes, and it may not be disclosed under any circumstances, without the express authorisation of the person heading the organisation.
- Information provided by third parties to the **HAFESA GROUP** and that is subject to confidentiality commitments.

All files must be carefully archived in accordance with current legislation and the internal policies and procedures of the **HAFESA GROUP**.

It is the obligation of all **HAFESA GROUP** personnel to communicate any incident that occurs in the information systems to which they have access via the mechanisms established internally.

#### **2. Personal data.**

The **HAFESA GROUP** complies with current legislation regarding the protection of personal data, respecting the right to privacy and protecting the personal data entrusted to it by its employees, suppliers and external collaborators, candidates undergoing selection processes or other people. For the same reason, the Group makes available to third parties the possibility of accessing, rectifying, deleting or cancelling the personal data stored in its files via the address Calle Orense 34, Edificio Norte, Planta 1ª Izda., (28020, Madrid), or via the email address: [rgpd@grupohafesa.com](mailto:rgpd@grupohafesa.com).

In its commitment to information security and the protection of personal data, the **HAFESA GROUP** has appropriate measures to oversee and preserve the security of information.





#### 4 COMPLIANCE WITH THE LAW

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All administrators, directors, partners and employees of the **HAFESA GROUP** are obliged to comply with and abide by current legislation, regardless of their rank and scope of application, in the implementation of their respective jobs and activities, especially when they involve operations of clear social impact or when people from the political establishment are involved.

The **HAFESA GROUP** is committed to maintaining honest and upright behaviour in all of its actions, avoiding all forms of corruption and at all times respecting the specific circumstances and needs of all subjects involved in the Group's business and professional activities.

#### 5 OBLIGATION TO REPORT NON-COMPLIANCE

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It is the responsibility of all administrators, managers and employees of the **HAFESA GROUP** to comply with the principles, values, guidelines and directives contained in this Code and to ensure correct compliance therewith.

In the event that there is any suspicion of a violation of the provisions of this Code, and in accordance with the provisions of the **HAFESA GROUP Procedure for the Ethical Channel**, this fact must immediately be brought to the attention of the Group's Compliance Officer / Compliance Body through the Ethical Channel:

**<https://channel.globalsuitesolutions.com/grupohafesa>**

The Ethical Channel has the necessary guarantees to maintain the security of communications and guarantees the mandatory confidentiality. In any case, the reporting employee will be protected against any form of retaliation, and his or her identity will be safeguarded.

#### 6 DISCIPLINARY MEASURES FOR NON-COMPLIANCE

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The **HAFESA GROUP** may, when appropriate and to the extent determined, sanction employees, suppliers or business partners who violate the provisions of this Code.

In any case, failure to comply with the provisions provided for in this document - as well as those protocols or procedures that develop and complement it - may give rise to: (i) the corresponding disciplinary sanctions in accordance with the statutory regime, Collective Agreement, labour legislation; and / or (ii) liability for non-compliance with any civil and commercial obligations that the offender may have contracted with the **HAFESA GROUP**.

If these are events that may reach a criminal level, the **HAFESA GROUP** will offer maximum collaboration to the relevant authorities and public bodies in those judicial and / or administrative procedures that may be initiated due to them.



## 7 APPROVAL OF THE CODE

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This Code will be approved by the Administrative Body of the **HAFESA GROUP**, which will approve as many implementation rules as are necessary for the effective development of what is stipulated in the text thereof.

## 8 DISSEMINATION OF THE CODE OF ETHICS AND CONDUCT

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The Code of Ethics will be communicated and disseminated among the members of the **HAFESA GROUP**. The internal dissemination of the Code of Ethics and Conduct is the responsibility of the Compliance Officer / Compliance Body of the **HAFESA GROUP**, with the support of the Department of People and Communication.

The Code of Ethics and Conduct will be related to the Prevention System implemented within the organisation and with the Corporate Social Responsibility commitments.

## 9 REVIEW OF THE CODE OF ETHICS AND CONDUCT

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The **HAFESA GROUP** will carry out a periodic update of this document, adapting it to both the regulatory and operational reality of the organisation.