



# Code of Ethics and Behavior

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## 1. Our Code of Ethics

This Code of Ethics and Behavior is integrated within the GRUPO HAFESA and is aimed to be used as a reference Guideline and a pillar of the ethical principles of GRUPO HAFESA.

It is addressed to all members of the GRUPO HAFESA, who must adopt and apply in the daily exercise of their business activity, the guidelines contained in this Code of Ethics and Behavior, seeking ethical and responsible behavior, in accordance with the principles and corporate values.

### 1.1 Purpose of the Code

The purpose of this Code of Ethics and Behavior (hereinafter “the Code”) is to establish the principles and values that should inspire and govern the development of the activities and relationships maintained by GRUPO HAFESA, as well as the activity of each of the employees, managers, administrators, members, and suppliers of GRUPO HAFESA.

Likewise, the adoption of this Code is intended to facilitate the development of daily operations in 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 law.

From GRUPO HAFESA we have the vocation of promoting a corporate culture based on regulatory compliance, integrity, transparency and good corporate governance, in order to achieve in the most possible effective way, the prevention of the commission of crimes within our organization, as well as compliance with all applicable legislation for the exercise and development of our activities, promoting the protection of computer freedom and privacy related to the personal data that we may process.

### 1.2 Scope of application

This Code is binding and mandatory for all employees, managers, administrators and members of all levels of any of the companies that make up GRUPO HAFESA.

In this regard, those suppliers, subcontractors and intermediaries that contract or collaborate with GRUPO HAFESA must respect its content, committing themselves to act under the principles and ethical standards defined in the provisions of this Code.

It is the responsibility of all, regardless of the role played within the organization, to ensure respect and compliance with this Code. In any case, any breach of the same will not be tolerated or allowed, and therefore, any behavior that goes against the provisions below, either directly or indirectly, must be reported immediately to GRUPO HAFESA through the mechanisms established for that purpose.

## 2. Mission, vision and values of Grupo Hafesa

### 2.1 Mission

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

### 2.2 Vision

We are an organization which aims to be one of the national reference groups, concerning the management of liquid petroleum fuels in the energy sector before 2030.

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

### 2.3 Principles

The commitment of GRUPO HAFESA is based on the following guiding principles:

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

### 2.4 Values

The commitment of GRUPO HAFESA is based on the following guiding principles::

- 1. Value creation and efficiency:** Our initiative is aimed at caring for the relationship with the customer, suppliers, employees and shareholders, using the appropriate methods and means to comply with national and international standards and legislation.
- 2. Social commitment:** The objective is to contribute to the development of a fairer society, with greater equality of opportunities and with maximum respect for the environment.

- 3. Committed team:** The commitment of employees, managers, agents and other collaborators to the feeling of belonging to a reference business group and the continuous development of the abilities and skills of the team, so that people feel involved to give the best of themselves.
- 4. Excellence:** It is understood as the willingness to serve customers, offering them an outstanding treatment and the products and services most suitable to their needs, trying to obtain continuous improvement.

### 3. General rules of behavior

To protect the values of GRUPO HAFESA, professionals are trained on the risks to which they are exposed and specific guidelines for action are established. Therefore, this Code applies to all day-to-day operations and complements the general rules, guidelines, and rules existing in GRUPO HAFESA.

In general, the professionals of GRUPO HAFESA are expected to respect current legislation, as well as the external and internal regulations of the Group as an unavoidable obligation. Employees or persons affected who must comply with this Code must avoid behavior that, even if it does not infringe the law, contravenes any of the values, principles and ethical behaviors established herein.

#### 3.1 Human rights and fundamental freedoms

Each and every one of the members of GRUPO HAFESA are obliged to scrupulously observe the Fundamental Rights and Public Freedoms contained in the International Declarations and Covenants, in the Spanish Constitution, and any regulations intended to protect them.

#### 3.2 Reconciliation of professional and personal life

GRUPO HAFESA is committed to promoting, within the organizational scope of the company, the balance between personal and professional life to facilitate the reconciliation of professional life with the family needs of its employees, managers and administrators.

It also recognizes the importance, for a better performance of the functions of its staff, to allow people to evolve as workers and human beings, with a full personal life, and the need for active policies to reconcile work and family life in a satisfactory way to combine work with the family.

GRUPO HAFESA seeks to promote flexible working conditions and encourage people to have interests and motivations outside their professional life, which support the values of the organization..

### 3.3 Independence and conflicts of interest

There is a conflict of interest in cases where the personal interests of professionals, directly or indirectly, are contrary to or collide with the best corporate interests of GRUPO HAFESA and interfere with the fulfillment 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 taking part in decision-making in situations in which they, directly or indirectly, have a personal interest.

Extreme caution is to be taken when there are personal relationships of any kind (e.g. friendship or close relatives) or when the relation is with legal entities, whose control is exercised by them in the professional activity carried out.

In addition to the provisions of the Anti-Corruption Policy of GRUPO HAFESA, faced with a situation of possible conflict of interest, GRUPO HAFESA professionals will observe the following guidelines of action:

- 1. Communication:** they shall inform their immediate superior of any conflicts of interest in which they are involved, prior to the completion of the activity, to take the appropriate decisions in each specific case, and thus avoid potential compromise of their impartial action.
- 2. Abstain from taking decisions:** they shall refrain from intervening in decision-making when there is a conflict of interest.
- 3. Independence:** they shall always act without taking into account their own or third-party interests.

### 3.4 Relations with members of public administrations

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

Likewise, its professionals undertake not to request, accept or offer any type of unjustified benefit or advantage of any nature that favors, over others, the organization, the employee or third parties.

Regarding illicit activities, every effort will be made to ensure that they are detected and reported. For this purpose, GRUPO HAFESA requires an unavoidable commitment of collaboration with judicial, administrative and supervisory authorities, always carrying out a scrupulous fulfillment of its orders and resolutions.

### **3.5 Relationships with customers**

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

In relations with customers, the independence of GRUPO HAFESA will always be safeguarded, avoiding the influence of financial, family, or friendship ties on professional performance.

Relations with clients will be ruled by transparency, and the information or advice provided (if appropriate) must always be truthful and appropriate. Under no circumstances may customers be provided with misleading, ambiguous or inaccurate information that may lead them to error or to take wrong decisions.

### **3.6 Relations with suppliers and third parties**

GRUPO HAFESA promotes the development of external professional relationships in a broad sense, with organizations, professionals and suppliers, if they contribute to preserving one of the most valuable assets: the image and corporate reputation of GRUPO HAFESA.

Therefore, the employees of GRUPO HAFESA and the other participants and members of the organization will ensure the good image and reputation of GRUPO HAFESA, and they will not participate in negative comments or activities aimed at damaging the good credit of the Group or of professionals or external organizations, notwithstanding the defense of the corresponding legitimate interests. In particular, special caution will be exercised concerning the corporate image and identity of GRUPO HAFESA in the form and content of the issued documents.

GRUPO HAFESA considers its suppliers, sub-contractors and collaborating companies an indispensable part for achieving its growth and improve the service quality, seeking relationships based on trust and mutual benefit. Consequently, the supplier's selection processes of GRUPO HAFESA will be carried out with impartiality and objectivity, and the professional must apply quality criteria, avoiding any conflict of interest or favoritism in the selection.

The information provided by professionals to suppliers will be truthful and avoiding the intent to mislead.

### **3.7 Behavior in the market and transparency**

All members of GRUPO HAFESA commit themselves to comply with the rules of protection of competition in force and that may be applicable to the organization.

GRUPO HAFESA has a firm commitment to free competition and legal behavior in the markets. Any actions aimed at reaching agreements to prevent, restrict or distort competition or trade, contrary to the freedom of business are rejected, according to applicable legislation.

Commercial policy and prices in the different companies will be established fully separately and based on criteria of transparency, exemplarity and impartiality. In this regard, those members of the Group linked to sales or purchasing processes will have an exemplary behavior, encouraging fair competition in the market and rejecting deceptive or fraudulent behavior.

In any event, the members of the organization with associated functions shall ensure that the content of the accounting records and financial information is complete, clear and accurate, reflecting reality.

The financial records shall be available for inspection by the Senior Management and the auditors.

## 3.8 Confidentiality of information

### 3.8.1 Privileged and confidential information of GRUPO HAFESA

All employees of GRUPO HAFESA have the duty and obligation to keep secrecy about all information relating to the Company that could be classified as privileged, confidential, reserved and/or secret, and which, therefore, cannot be disclosed and, much less, used for personal benefit.

The following is considered as Confidential information:

1. Everything that, not having public character, and affects the activities and market, financial, methods, or procedures of GRUPO HAFESA, may not be disclosed under any circumstance, without the express authorization of the person responsible for the organization.
2. Information provided by third parties to GRUPO HAFESA and subject to confidentiality commitments.

All files must be very carefully kept in accordance with current legislation and the internal policies and procedures of GRUPO HAFESA.

HAFESA GROUP personnel must communicate, through the mechanisms established internally, any incident that occurs in the information systems to which they have access.

### 3.8.2 General data

GRUPO HAFESA complies with current legislation on the protection of personal data, respecting the right to privacy and protecting the personal data entrusted by the employees, suppliers and external collaborators, candidates in selection processes or others to GRUPO HAFESA. Therefore, the Group makes available to third parties the possibility of accessing, rectifying, deleting, or cancelling the personal data stored in their files at the address Calle Orense 34, Edificio Norte, Planta 1ª Izda., (28020, Madrid), or through the email address [rgpd@grupohafesa.com](mailto:rgpd@grupohafesa.com).

GRUPO HAFESA, in its commitment to ensuring information security and protection of personal data, has adequate measures to control and preserve the security of information.



## 4. Compliance with legal provisions

All administrators, managers, members, and employees of GRUPO HAFESA are obliged to comply with and abide legal provisions in force, regardless of their rank and scope of application, in the execution of their respective work and activities, especially concerning operations of clear social impact or when people of the same political environment are involved.

GRUPO HAFESA is committed to maintaining honesty and integrity in all its actions, avoiding all forms of corruption and respecting, always, the circumstances and particular needs of all the subjects involved in the Group's business and professional activities..

## 5. Obligation to report non-compliance

It is the responsibility of all administrators, managers and employees, members of GRUPO HAFESA, to comply with the principles, values, patterns and guidelines contained in this Code and to ensure their correct compliance.

In the event that there is any suspicion of infringement of the provisions of this Code, and in accordance with the **Procedure of the Ethical Channel of Grupo Hafesa**, this fact must be made immediately known to the Compliance Officer / Compliance Body of the Group through the Ethical Channel:

**<https://whistleblowersoftware.com/secure/hafesa>**

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

## 6. Disciplinary measures for non-compliance

GRUPO HAFESA may impose sanctions, when appropriate and to the extent determined, employees, suppliers or business partners who infringe this Code.

In any case, failure to comply with the provisions set forth in this document, as well as the protocols or procedures that develop and complement it, may result in: (i) the corresponding disciplinary penalties in accordance with the statutory regime, collective agreement, labor legislation; and/or (ii) liability for breach of any civil and commercial obligations of the infringer towards GRUPO HAFESA.

In the case of acts which might attain criminal character, GRUPO HAFESA will offer the maximum collaboration to the relevant authorities and public bodies in judicial and/or administrative proceedings that, as a result, might be initiated.

## 7. Adoption of the code

This Code shall be approved by the Administration Body of GRUPO HAFESA, which shall approve as many implementing rules as may be necessary for the effective development of the provisions of the Code.

## **8. Communication of the ethics and behavior code**

The Code of Ethics will be communicated and disseminated among the members of GRUPO HAFESA. The internal dissemination of the Code of Ethics and Conduct must be carried out by the Compliance Officer / Compliance Body of GRUPO HAFESA, with the support of the People and Communication Department.

The Code of Ethics and Behavior will be related to the Prevention System implemented in the organization and the Corporate Social Responsibility commitments.

## **9. Communication of the ethics and behavior code**

GRUPO HAFESA will carry out a periodic update of this document, adapting it to the regulatory and operational reality of the organization.



 **GRUPO HAFESA**

