



Code of ethics for third parties

1. PURPOSE

The strategy of **Grupo HAFESA** is based on the ethical and responsible management of the activities of all the companies that make up the **Group**. Its objective is to achieve profitable growth through diversification, excellence in projects, and talent management, all with the ultimate goal of creating value for its stakeholders.

Grupo HAFESA is committed to the United Nations' Sustainable Development Goals, aligning its priorities and actions with the 2030 Agenda. In this regard, the **Group** establishes basic guidelines for its third parties, defined as its business partners, clients, suppliers, consultants, advisors, or any other individual or legal entity with whom it enters into a contractual relationship of any kind (hereinafter, the "Third Party"), in areas such as anti-corruption, human and labor rights, and environmental matters.

Grupo HAFESA upholds the highest ethical standards in its business activities and expects the same from its Third Parties. For this reason, it has developed this Code based on cooperation, with the aim of establishing general guidelines for conduct and integrity that all Third Parties of the Group must apply without exception.

2. SCOPE OF APPLICATION

This Code is mandatory for all Third Parties with whom any company of **Grupo HAFESA** enters into a contractual relationship of any kind. **Grupo HAFESA** is understood to be the group of companies formed by **HAMLYN PARTICIPACIONES S.L.**, as the parent company, along with all its subsidiaries at any given time (hereinafter, "**Grupo HAFESA**" or the "**Group**").

Specifically, **Grupo HAFESA** expects its Third Parties, including their administrators and professionals, to respect the content of this Code and commit to acting in accordance with its principles and ethical standards, adhering to the general principles of conduct outlined below.

3. GENERAL PRINCIPLES OF CONDUCT

Compliance with the Law

Grupo HAFESA strictly complies with all applicable laws, regulations, and standards and expects the same from its Third Parties. Third Parties must not engage in practices that jeopardize legality in their business processes. They must also avoid any conduct that, even if not violating the law, could harm the reputation or negatively affect the image of **Grupo HAFESA** due to its lack of ethics or integrity.

Fight Against Bribery and Corruption

Grupo HAFESA does not tolerate any form of corruption and expects its Third Parties never to engage in or allow any form of corruption, bribery, coercion, or extortion in their business dealings.

Third Parties must always act with integrity in their commercial relationships, maintaining ethical, honest, and upright behavior in dealings with their own third parties, whether public or private in nature. They must uphold a zero-tolerance policy for any form of corruption, bribery, or extortion.

The behavior of Third Parties toward public officials must demonstrate the utmost respect for the institutions they represent. **Grupo HAFESA** does not allow any irregular actions in the relationships Third Parties may have with public officials, whether on their behalf or representing any company within the **Group**.

In this regard, Third Parties' administrators and professionals must refrain from making, promising, or offering, **either directly or indirectly**, any type of payment in cash, in kind, or any other benefit that could be considered a bribe to influence the actions or decisions of any third party, whether public or private, to obtain an undue advantage.

Respect for Human Rights

In this area, Third Parties must respect:

- ① The values upheld in the Universal Declaration of Human Rights.
- ② The ten principles established in the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.
- ③ The OECD Guidelines for Multinational Enterprises.
- ④ The Declaration on Fundamental Principles and Rights at Work by the International Labour Organization (ILO), with particular attention to the eradication of child labor.

Consequently, **Grupo HAFESA** expects its Third Parties to strictly respect human and labor rights and comply with all applicable labor regulations, whether local or national, in the countries where they operate, produce, or conduct their business activities.

By way of example, but not limitation, Third Parties must:

- Refrain from using child labor, always adhering to the standards set by the International Labour Organization.
- Take the necessary measures within their organization to eliminate all forms or modalities of forced or compulsory labor.
- Respect the basic principles of equal opportunity and non-discrimination.

Occupational Health and Safety

Grupo HAFESA is firmly committed to occupational health and safety and imposes strict standards to protect its direct and indirect workforce. For this reason, its Third Parties must comply with all obligations derived from occupational health and safety regulations and promote safe and healthy workplaces, undertaking necessary actions to reduce the risk of accidents, injuries, or exposure for their workers.

Environment

At **Grupo HAFESA**, we believe that an integrated approach to sustainability is crucial for our continued success. This approach benefits our stakeholders, clients, and the environment in a sustainable way over time.

For this reason, the **Group** promotes practices that support the fight against climate change, circular economy principles, biodiversity conservation, sustainable water resource management, and the use of the latest available technologies to minimize air emissions. Similarly, the Group expects its Third Parties to adopt practices that reduce the environmental impact of their activities.

In this regard, Third Parties must maintain an active and responsible commitment to the protection and preservation of the environment, always respecting applicable environmental legislation or regulations and striving for the sustainable development of their activities.

Security and Protection of Personal Data

Third Parties must comply with all obligations derived from Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the Protection of Personal Data of Natural Persons (GDPR), as well as with the Spanish data protection regulations in force at any given time when collecting, using, and protecting personal information. Similarly, they must also adhere to any data protection obligations incorporated into the contracts signed with any of the companies within the **Group**.

Third Parties must implement appropriate mechanisms to ensure the security of any information they may access or manage during their relationship with **Grupo HAFESA**. They must guarantee that any confidential information provided to them or acquired during their relationship with the **Group** will not be disclosed or transferred to other third parties unless such disclosure or transfer is expressly authorized in writing.

For these purposes, confidential information includes any unpublished information found on the **Grupo HAFESA** website or its subsidiaries, as well as personal data under its responsibility, to which the Third Party may have access. Such information may be disclosed verbally, in writing, or by any other means.

Finally, when applicable, suppliers must have business continuity and technological contingency plans to ensure the continuity of the services provided.

Prevention of Money Laundering and Terrorism Financing

Third Parties commit to always implementing appropriate measures to prevent and stop operations related to money laundering or the financing of terrorism. They must inform the relevant company within the **Group** if, within the scope of their contract, they detect any irregular payment or suspicious transaction related to money laundering that could directly or indirectly affect **Grupo HAFESA**.

Defense of Competition

Every Third Party must operate in the market by respecting fair competition and promoting free competition with their competitors. They must avoid deceptive, fraudulent, or malicious practices that lead to obtaining inappropriate advantages or illegally or unfairly restricting trade or competition.

Conflicts of Interest

Conflicts of interest can arise in a variety of situations and can reduce a Third Party's credibility, even leading to prohibited practices. Therefore, as soon as a Third Party identifies a situation where their business interest could affect the interests of **Grupo HAFESA**, it is their responsibility to inform the **Group** in advance, justifying their reasons. The most common cases include: companies owned by family members of employees of **Grupo HAFESA**, family members in decision-making positions in businesses with third parties, etc.

4. ACCEPTANCE AND COMPLIANCE WITH THE THIRD PARTY CODE OF ETHICS

Third Parties must accept and comply with the general principles of conduct established in the Third Party Code of Ethics, which can be accessed at any time via the Group's website:

Grupo Hafesa | Commercialization and Distribution of Petroleum Products

Failure to comply with the provisions of this Code by the Third Party may have various consequences in the contractual relationship with the corresponding company within **Grupo HAFESA**, depending on the severity of the breach. These consequences may range from contract termination to disqualification as an approved Third Party or collaborator of any company within the **Group**, without prejudice to other legal or administrative actions that may apply.

If the Third Party's activities are carried out through subcontractors, it must be ensured that these subcontractors also have ethical commitments comparable to those outlined herein.

5. OBLIGATION TO REPORT BREACHES

Third Parties must proactively report any breach of this Code of Ethics or of the law to **Grupo HAFESA** through the ethics channel:

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



GRUPO HAFESA



X-Tren Wash	
HAFESA POLSKA 750€	Wash
LUXURY 600€	Wash
ACTIVO 100€	Wash
EXPRESS 100€	Wash