

COMPLIANCE POLICY

Effective date: 3rd May 2021

First approval: 3rd May 2021

Gimeno Logística Portuaria S.L.U. is dedicated to providing services related to the MARITIME TRANSPORT OF GOODS, which includes acting as a vessel consignment agency, as well as loading and unloading services, and accessory or complementary services to these, like storage and other port logistics services, charters, etc. It has developed a culture of compliance in line with its mission, vision and values, through which Management declares its visible, consistent, enduring commitment based on the following principles:

- Develop, implement and maintain a Code of Ethics as a guide for the behaviour of our employees and collaborators, including the decision-making process.
- Develop, implement, maintain and continuously improve a criminal compliance management system in accordance with the UNE 19601 standard.
- Portsur has zero tolerance for criminal offences and will establish measures for prevention and detention within the commercial, stevedoring, unstowage, handling, warehousing and yard activities of the port facility to minimise and prevent exposure to criminal risks.
- Comply with applicable criminal legislation and the Criminal Compliance policy.
- The commission of criminal acts is prohibited and it is obligatory to report through the established channels any suspicious acts or conduct relating to criminal risks, guaranteeing that the informant will not suffer reprisals.
- Breaches of this policy, as well as of the requirements of the Criminal Compliance management system, may be punished on the basis of the disciplinary procedure in force.
- Create a Compliance function body with direct and immediate access to the Board of Directors as the ultimate guarantor of the supervision, monitoring and control of the Criminal Compliance obligations, with sufficient resources and with competent personnel and appropriate status, authority and independence.

This policy will be the reference framework for the establishment of Compliance objectives and is communicated to all staff and collaborating personnel in order to achieve the defined principles.

The Criminal Compliance policy is reviewed periodically to ensure its effectiveness and adequacy.

Castellón, 3rd May 2021

The Director
Julio Bolos Agut

