

Multitrade Spain Code of Ethics



Table of Contents

1. Introduction to our Code of Ethics

2. Recipients

3. Our mission

4. Our values

5. Commitments

6. Our compliance system

7. Our principles of action

8. Validity



1. Introduction to our Code of Ethics

Dear members and partners of MULTITRADE SPAIN, S. L.,

This Code of Ethics is an essential part of our compliance system as a business management model that brings into play our values, commitments and principles of action.

The Board of Directors of MULTITRADE SPAIN, S. L. is confident that the only way to conduct business is to consider our role as a corporate citizen. It is entirely committed to complying with this role, beyond strict compliance with the legislation and regulations that bind the company.

For this reason, in this document – which we consider to be the primary and fundamental rule of our compliance system – we would like to express and publicise our distinctive features as a business organisation, all of which are focused on promoting a business culture based on ethical and regulatory compliance.

2. Recipients

The RECIPIENTS of this Code of Ethics are all those individuals who are part of the MULTITRADE organisation – its governing body, managers, and employees.

Together with the LEADERSHIP and SUPPORT of the Board of Directors of MULTITRADE SPAIN, S. L. – as its governing body – the main responsible for supervising compliance with the provisions of this Code is the company's compliance body.

Compliance with the provisions of this Code is MANDATORY for all members of MULTITRADE SPAIN, S. L., both in their relationships inside the company and with third parties.

3. Our mission



As a logistics company, our mission is to provide transport by land, sea or air with the utmost diligence, professionalism, quality, and efficiency. Our broad experience in all types of transport-related projects allows us to define ourselves as “architects of transport”.

At MULTITRADE SPAIN, S. L., we know that our business activities impact social reality and the environment. Therefore, it is part of our corporate mission to conduct our business in full compliance with regulations.

4. Our values

Our values guide the attitude of all those who are part of MULTITRADE SPAIN, S. L., and also reflect our mission in society. More specifically, our values are as follows:

- 1. Excellence of our human resources and customer service:** Respect for people is an essential value in MULTITRADE SPAIN, S. L. Our staff's human qualities and their relationships with our customers are the best expression of this.
- 2. Quality and professionalism in the provision of services:** Our business is always conducted in line with maximum quality parameters. We always seek top efficiency in our services and customer satisfaction.
- 3. Corporate social responsibility:** At MULTITRADE SPAIN, S. L., we believe that excellence is not only achieved by offering the best service but also by taking part in social projects to help people.
- 4. Problem solving:** Thanks to our interest in constant evolution and improvement, we can face any problems that cross our path and have mechanisms for their fair and efficient resolution. Therefore, at MULTITRADE SPAIN, S. L., we encourage conversation among its members and collaborators, and solution-oriented thinking.

5. Commitments



5.1. Commitments to ethical and regulatory compliance

Our business is carried out with the utmost respect for the laws in force and other regulations applicable to our sector of activity.

This commitment to ethical culture and regulatory compliance is not only reflected within our company. It can also be seen externally in our relationships with business partners, employees and customers.

At MULTITRADE SPAIN, S. L., we are committed to ethically and legally compliant corporate management, which is evidenced thanks to our various accreditations and certifications.

5.2. Commitments to our company's members and employees

The relationships between all the people who form part of MULTITRADE SPAIN, S. L. are based on absolute professional and personal respect. Our staff's excellence is one of our core values.

Our absolute regard for individuals explains why MULTITRADE SPAIN, S. L. rejects all types of discriminatory behaviour or any conduct that violates their rights. The promotion of our employees is based on professional merit.

Additionally, our organisation rejects any unlawful conduct in the administration or management of the company's resources, and any other conduct that could create a business environment outside the law.

5.3. Commitments to third parties

MULTITRADE SPAIN, S. L. is firmly committed to rejecting any corrupting behaviour in the framework of the relationships with third parties. This applies both to relationships with various public administrations and with companies of the private sector.

MULTITRADE SPAIN, S. L. carries out its business fairly and is committed to not participating in market practices that involve unfair competition.

Likewise, MULTITRADE SPAIN, S. L. assumes social commitments. In this regard, MULTITRADE SPAIN, S. L. participates in social projects such as the paediatric oncology campaign “#paralosvalientes” of the Sant Joan de Déu Hospital in Barcelona.

5.4. Environmental and social commitment

At MULTITRADE SPAIN, S. L., we are aware of the social and environmental impact that comes with the development of our business activities, which is why we are committed to the sustainable development of our business. To this end, we hold the ISO 14001:2015 certificate on Environmental Management Systems.

We also pay special attention to updating and improving the measures to prevent these risks.

6. Our compliance system

At MULTITRADE SPAIN, S. L., we understand the compliance system as a form of management that improves our business and allows us to interact with other organisations that also practice ethical and regulatory compliance. In this sense, the company's Management is aware of the importance of its leadership role for the proper development of the compliance system.

The Board of Directors of MULTITRADE SPAIN, S. L. is ultimately responsible for the supervision and development of the company's compliance programme. It also acts as the company's compliance body. Together with the Board of Directors, MULTITRADE SPAIN, S. L. has an internal compliance officer.

We have identified our potential risks of non-compliance and consequently implemented the necessary control and surveillance measures to prevent them.

Our compliance system is based on a regulatory framework with this Code of Ethics as its cornerstone. For these purposes, this Code of Ethics is mandatory for all persons who are part of MULTITRADE SPAIN, S. L. Our business partners and employees must also be aware of it and accept it.

We also have a Crime Risk Prevention Manual that serves as documentary support for the standards for action in risk prevention and a communication channel – open to third parties – for any potential ethical or regulatory non-compliance.

7. Our principles of action

7.1. Use of resources and assets

The duties of those who are part of MULTITRADE SPAIN, S. L. are carried out with absolute respect for the organisation's resources, means and assets. Their use for any private purposes is not allowed.

In particular, the technological and information resources of MULTITRADE SPAIN, S. L. must never be used to access digital content that is prohibited by law and/or may be of a criminal nature.

7.2. Use of information

Another of our guiding principles is ensuring that the information arising out of our business is safeguarded and properly managed.

To this end, MULTITRADE SPAIN, S. L. complies with the regulations on data protection, which encompass confidentiality and the use of the information accessed in performing professional duties in observance of the law and the internal rules on the matter.

7. Our principles of action

7.3. Rejection of all forms of corruption

Our business was created in a way that makes it free of any form of corruption. In this regard, we reject all behaviour that may involve corrupt actions by any authority, civil servant or person engaged in the exercise of public duties.

Our relationships with the private sector are also conducted free of any kind of corrupt behaviour.

7.4. Rejection of all forms of fraudulent behaviour

Our business is based on the quality and transparency of our services. Therefore, MULTITRADE SPAIN, S. L. rejects all types of fraudulent behaviour in our relationship with customers and employees.

7. Our principles of action

7.5. Transparency in financial management

The Management of MULTITRADE SPAIN, S. L. implements transparent and rigorous financial and administrative management, respecting the right to information of partners and shareholders. This transparent and rigorous financial management is also conducted in compliance with the company's tax and social security obligations. Our principles of action include avoiding any risk associated with money laundering or fraudulent management of assets and taking effective measures to prevent it.

7.6. Rejection of any behaviour linked to drug trafficking

The transport activities carried out by MULTITRADE SPAIN, S. L. are performed outside and with absolute rejection of trafficking in illegal substances. To this end, in addition to strict compliance with the requirements of the public authorities, we also adopt preventive measures.

8. Validity

This Code of Ethics has been approved by the Board of Directors of MULTITRADE SPAIN, S. L.

The Code of Ethics is in force from the date of its approval by the administrative body of MULTITRADE SPAIN, S. L.