

## COMPLIANCE POLICY

Effective date: 14<sup>th</sup> July 2020

First approval: 14<sup>th</sup> July 2020

Portsur, a leading company in the stowage and unstowage of bulk cargo in the port of Castellón, has developed a culture of Compliance, aligned with its mission, vision and values, in which the Board of Directors demonstrates its visible, consistent and sustained commitment over time, through 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, 14<sup>th</sup> July 2020



**Javier Herrera Vilar**  
Chief Executive Officer