

# CODE OF CONDUCT

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## PRESENTATION

Grupo Cabeza is one of the first freight forwarding and logistics service companies in Spain. Founded in 1880, it is made up of more than 150 professionals.

We have our own infrastructure of warehouses, industrial facilities, equipment and commercial offices throughout Spain. These are at the disposal of our clients and commercial agreements with the main international shipping companies. This allows us to transport any kind of goods from or to any part of the world.

At Grupo Cabeza we differentiate ourselves by offering services during all stages of the process of import and export: customs representation, maritime and air freight forwarders and land-based operators, logistics operators, stevedores and port consignees.

The work of five generations in the field of foreign trade results in more than 135 years providing services to the most important companies in the country. We operate in the area of the Port of Málaga, Algeciras and the “Estecho de Gibraltar”, through of our subsidiary [Grupo Marítima del Estrecho](#).



## OBJECTIVES

This Code of Conduct is the expression of our commitment to always act with diligence, honesty and legality. The objectives we pursue are:

1) To define and regulate the behaviour and actions of all the companies of Grupo Cabeza in its relationship with its main stakeholders, acting within the framework of legality (employees, managers, administrators, customers, suppliers, subcontractors, competitors, authorities, ...).

2) To guide the work of employees, managers and directors of the company.

3) To define the channels and establish the notification mechanisms for any action, behaviour or decision that is contrary to the spirit of this code.

4) We have the main certifications;

- WCA
- AEO
- IATA
- ISO 9001

5) Commitment to the environment, people and social responsibility



## APPLICATION

This Code of Conduct is applicable to all the company's personnel, starting with the Board of Directors of Grupo Cabeza, continuing with the group of directors (and managers) and employees of the different companies of the Group.

The General Principles included in this document constitute the starting point of a way of acting and relating that is guided by the values that the group assumes as its own: honesty, focus on the client, excellence, innovation, care for people, respect for the law, privacy.

This is not an exhaustive list or a closed document. Its content may be expanded in its objectives, scope or principles to cover other situations not included in this code.



## OUR CULTURE

We were founded in 1880. We started as a Customs Broker and Forwarding Agent and today, almost a century and a half later, we are a logistics operator specialized in air, sea and land transport, with tailor-made solutions to move all kinds of goods from or to any part of the world.

In all this time, many things have changed: the rules of the game in our sector, the way companies and countries relate to each other, the laws, and of course, technology... And us. We have also been changing. Yes, we have grown, we have known how to adapt, evolve and respond in each case.

### Vision

Since 1880 we have been working to connect world trade. We connect people, companies, territories and cultures through a comprehensive service that covers every phase of transport.

### Mission

We always work with an absolute focus on the client to provide the best solution, adapted to their needs, with security and diligence.



## Corporate Values

Our performance as a forwarding agent is always conditioned by the following values:

- **Customer focus**

It's one of our trademarks. We design our processes and make decisions to provide the best possible response to the needs of each client and in response to their specific circumstances.

- **Security**

We are motivated to design processes and develop solutions where safety is a must: for operations and for people.

- **Innovation**

It's our source of value. The ability to change processes, improve our services without losing our identity.

- **Excellence**

Our best solution today is the first requirement of tomorrow. It is a transversal path that sets the course for us from day one. These 139 years have had excellence as a main priority.

- **Commitment**

Customer focus generates commitments for us:

- To our companies. We work every day to be better than yesterday. Only in this way will we be at the level required by our customers.
- With the group of employees of Grupo Cabeza for their skill improvement, development and well-being.
- With the sector. Since 1880 we have been contributing to its development, with new ideas, professional practices and a deep knowledge and respect for its rules.
- With the environment. We are part of society. We integrate ourselves into their communities. We respect their cultures and help their development.



## Ethical Principles and Attitudes

Our corporate values guide the services provided by the companies that belong to Grupo Cabeza. The Ethical Principles and Attitudes lead the development of our services by compromising the behavior of all employees and managers of the companies of Grupo Cabeza. These are:

- **Compliance with the law**

All the actions of Grupo Cabeza and the companies that form it are carried out in strict compliance with the law in those territories where we provide services. It is an imperative that allows our clients to operate with guarantees and security.

At Grupo Cabeza we understand corruption as an attack on human rights, an element of disruption of the legal and social order, a contemptible source of social inequality, political disrepute and institutional illegitimacy.

We therefore combat corruption with scrupulous respect for the law, the development of impeccable procedures, full cooperation with the competent authorities and a total rejection of any corrupt practice.

- **Respect**

In Grupo Cabeza:

We develop our business activities from a commitment to respect the Universal Declaration of Human Rights.

We reject any manifestation of moral, psychological, authority or physical harassment, as well as any type of conduct that generates an intimidating and offensive effect on a person, that attempts against his or her rights, that restricts his or her freedom and that harms his or her personal and professional development.

We work to build safe and healthy working environments that encourage the generation of pleasant, positive and productive interpersonal relationships. This is a responsibility of each person who is part of Grupo Cabeza.

- **Honesty**

It is a principle that marks, in a transversal way, the relationships that we establish from Grupo Cabeza with clients and suppliers; and, of course, with employees. We do this through direct and transparent communication.

Because we understand that only from an honest attitude we can achieve our objectives and goals.

- **Privacy**

Information is specially protected in Grupo Cabeza and its companies. Confidentiality is an obligatory principle in its actions and relations with clients and suppliers, as well as with managers and employees.

Likewise, know-how is one of the main assets of a company that has been operating since 1880, so its protection is a strict requirement that must rule every process of Grupo Cabeza.



## CODE ENFORCEMENT

The Code of Conduct is a model of behavior and attitude that commits Grupo Cabeza's human team and its companies in their decisions, actions and relationships. The following considerations arise from this.

- **Commitment**

The companies of Grupo Cabeza and the human team of all of them (directors, managers and employees) are committed to the principles and requirements included in this Code of Ethics and ensure compliance with them in the relations they establish with any of their stakeholders.

Any person who is part of Grupo Cabeza will notify those cases in which he or she has known or has a justified suspect of non-compliance with this Code. They may do so through:

[incidencias@cabeza.com](mailto:incidencias@cabeza.com)

The Company commits itself to handle the information with absolute discretion and will establish the mechanisms it considers appropriate to avoid negative repercussions derived from good faith notifications made by employees.

- **Legality**

The business and professional activities of the companies of Grupo Cabeza and each employee, manager and administrator:

- shall strictly comply with the applicable legislation.
- shall avoid any type of corruption.
- shall be carried out with absolute respect for Human Rights and Public Freedoms.
- will be developed through practices that are affected by the corporate principles.

- **Respect, security and equality**

The relationship of Grupo Cabeza and its companies with their members, as well as between them, will be established based on the following conditions:

- The Company assumes the responsibility of maintaining a work environment free from any discrimination and from any abusive or harassing behavior.
- Employees will be treated on the basis of principles of fairness and respect.
- All employees shall be given equal opportunities for the development of their professional career regardless of their age, sex, race, beliefs, marital status or nationality. Their professional activity will be based on the principle of merit and the assessments and promotion criteria will always be objective.

The Company shall provide its staff with a safe and stable working environment, with up-to-date occupational risk prevention measures and strict compliance with the applicable regulations in this area wherever they carry out their business activity.

The employees are committed to actively contribute to the maintenance of a safe and stable environment, will ensure strict compliance with health and safety standards, and will make a responsible use of the equipment provided by the Company for the performance of their professional activity.

- **Privacy**

Respect for privacy and confidentiality will rule the collection and processing of personal information by the Company and its staff. This will always be done in accordance with the applicable legislation and applying the necessary measures to preserve the confidentiality of the data obtained and its possible transmission when appropriate.

Customer's, supplier's and subcontractor's data will be treated by the Company and its staff will be treated confidentially.

- **Customers**

Grupo Cabeza's vocation for service and its focus on the client is a priority in the professional performance of the team.

The company's employee activity must always be focused, directly or indirectly, on solving the client's needs by providing the highest possible quality service.

The services are provided in accordance with the legislation in force, through honest communications and seeking innovative solutions to satisfy the client. The ultimate goal goes beyond providing a specific service and is specified in the establishment of lasting relationships of trust over time.