POLICY

Conflict of Interest Policy

Overview

Palma Logistics' Conflict of Interest Statement was designed to ensure objectivity and independence in the development of our standards and validation of company goals. This means that decisions made are based on objective criteria, rather than based on bias or preference of one party over another.

Palma Logistics will not accept or provide any advantage that may affect, or be viewed or presumed to affect, the independence and impartiality of Palma Logistics' standard setting or goal evaluation and validation work.

No representative or employee of Palma Logistics shall attempt to influence Palma Logistics' position on the development of standards or validation assessments by acting on its own behalf or by acting on behalf of another person, company, organization, or group without, at a minimum, full disclosure of such non-Palma Logistics interest in any discussion or deliberation of such matters.

Conflict of interest occurs in any situation that can prevent impartiality or create biases towards a person. This lack of objectivity exists when there is a possible conflict between personal interest and the interest of a company or the public.

It can also occur in a situation where a person derives personal benefits as a consequence of actions or decisions taken about the same situation. This does not mean that the person has committed a wrong action or decision in the specific situation addressed; It means that there is an opportunity for that person to become biased due to the conflict of interest.

Palma Logistics requires its employees to make informed and impartial decisions in the workplace. Conflicts of interest can affect decision-making and consequently affect Palma Logistics and its partners.

Conflicts of interest can arise as a result of outside employment, financial participation in business, customer and supplier relations, gifts, and entertainment. Conflict of interest happens when your actions or your private interests interfere in some way - or even seem to interfere with the interests of Palma Logistics.

Conflicts of interest expose our judgment and that of the PL to increased scrutiny and criticism and can compromise the credibility and trust placed in us. A conflict situation can also arise when the person concerned acts or has an interest that makes it difficult to carry out his or her work objectively and effectively.

Conflicts can arise not only when there is a personal benefit or gain, but also when other people (including family members) or organizations with which there is a partnership tend to gain.

In general, in the event of a potential conflict of interest, the person concerned should refrain from making any decision on the issue at hand, disclose the relevant facts in writing and explain the possible conflict to their direct supervisor or Human Resources, legal or Compliance personnel and obtain all necessary approvals before taking any decision or action that may appear to be a conflict of interest.

REQUIREMENTS:

Avoid all activities that may conflict or appear to conflict with the interests of the Company and disclose those existing interests/situations.

Suppose that the person concerned or any of his immediate family members has any financial participation directly or indirectly in a business competing with the employer.

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Suppliers of goods or services, or you are a customer of Palma Logistics or one of its partners! In such a case, the person concerned must disclose that dispute to Palma Logistics and obtain appropriate written approval from management before conducting any business.

CUSTOMERS AND SUPPLIER'S RELATIONS.

Any relationship between the person concerned and a customer or supplier must in no way compromise their ability to achieve business in a professional, impartial and competitive manner or influence the commercial decisions made on behalf of Palma Logistics

GIFTS AND ENTERTAINMENT.

For the purposes of our Code of Ethics and our Gifts and Hospitality Procedure, gifts and entertainment have the broadest possible meaning, including gifts, travel, services, entertainment and any other free item, event, benefit or object of value. You must not give or receive gifts of any value in circumstances that are unlawful or that may appear to be an attempt to unduly influence a decision, which may affect Palma Logistics' business and/or reputation.

CORPORATE OPPORTUNITIES.

Employees are prohibited from taking personal advantage or gaining opportunities discovered through the use of Palma Logistics' property, information, or business relationships.

CONTRIBUTIONS.

Suppose you are involved in the decisions to donate Palma Logistics assets, including cash, goods in kind or services. In this case, you should report any personal benefit that you or your family members may receive. Generally, all Palma Logistics donations must be characterized as charitable, industrial, or political contributions in Palma Logistics' books and records and duly approved in advance.

Conflicts of interest tend to be specific; Therefore, it is difficult to define all possible conflict situations.

If you notice a potential conflict of interest, please consult your compliance supervisor/manager or legal department. And disclose any potential conflicts immediately.
Violation of this policy will subject you to disciplinary action up to and including termination.

RECOMMENDATION

1. Please refer to the Code of Ethics and Conduct, Human Rights Policy Statement and Anti-Bribery & Corruption Policy at Palma Logistics offices to ensure full compliance.
2. Avoid any situation, activity, or investment that may affect or appear to affect your ability to exercise impartial judgment about work or negatively affect the interests of Palma Logistics.
3. The use of Palma Logistics information that is not available to the public for personal gain or in a way that adversely affects Palma Logistics is strictly prohibited.
4. Avoid dedicating time to an external activity, which affects or may negatively affect your performance at work.
5. It is strictly forbidden to conduct business for personal gain using Palma Logistics' property, information, or business relationships.
6. Avoid gains or gains realized at Palma Logistics' expense through other parties or entities.

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