



Port de Barcelona

Code of Ethics and Professional Conduct of Barcelona Port Authority

June 2026



Code of Ethics and Professional Conduct of Barcelona Port Authority

June 2026

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Message from the board of directors

The Code of Ethics and Professional Conduct presented here contains the rules of behaviour that have guided us to where we are today and that have always been the starting point of our mission and highest priority as a public organization.

Proper management of the Port of Barcelona involves establishing mechanisms that help us achieve the goals inherent to our activity while guaranteeing respect for good business practices.

In 2015, the Board of Directors of the Port of Barcelona approved its Code of Ethics. With this update, it bolstered its commitment to these principles and rules of conduct by reviewing and strengthening these commitments.

The main goal of the Code of Ethics and Professional Conduct is therefore to guide our actions in terms of these key values, thus reinforcing integrity in action and helping promote improvements in service and quality while maintaining trust in the organization.

In the current Strategic Plan of the Port of Barcelona, our mission is as follows:

To generate prosperity in the community by increasing the competitiveness of our clients through the efficient and sustainable provision of logistics and transportation services.

This mission is based on our way of doing things and the values that inspire governance of our day-to-day actions, representation and work at the Port of Barcelona and in all commercial and institutional relationships established

Administration and representation of the organization by its top managers and anyone who works or represents the Port of Barcelona shall respond to the ethical values that form part of its corporate nature and the principles of a public organization.

We continue to move forward together with a commitment to work with good practices and transparency while preserving the ethical principles and values of the Port of Barcelona.

Code of Ethics and Professional Conduct of Barcelona Port Authority



01

Introduction and legal framework

Barcelona Port Authority (APB) aims to preserve and set an example of ethical behaviour in accordance with our organization's values.

In this Code of Ethics and Professional Conduct, you will find the performance criteria that governs our day-to-day professional relationships at Barcelona Port Authority, among the people who work at the Port Authority and with any of the companies in which we have a majority stake, and among all third parties with whom we maintain business relationships (e.g. clients, suppliers, affiliated companies, organizations), our stakeholders and society as a whole.



The regulatory framework of reference that guides the employees of the APB and affiliated companies to frame their actions in accordance with ethical principles, is mainly constituted by:

- › Royal Legislative Decree 5 of 30 October 2015, which approves the Law on the Basic Statute of Public Employees.
- › Law 53 of 26 December 1984 on Incompatibilities of Workers Serving in Public Administrations.
- › Law 40 of 1 October 2015 on the Legal Regime of the Public Sector.
- › The III Collective Bargaining Agreement of Ports of State and Port Authorities.

There is also a specific regulation that applies to senior positions, Law 3 of 30 March 2015, which regulates the holding of senior positions in the General State Administration.

This regulatory framework, as well as any updates and regulations applicable to APB personnel, is mandatory for all public employees and senior officials.

However, the aim of drafting this Code of Ethics and Professional Conduct is to go further. It has the following purposes:

- › To strengthen ethical values and state the principles of action and good governance of the APB.
- › To establish the guidelines of professional conduct and clearly outline the mandates and prohibitions that must be observed by recipients.
- › To guarantee comprehensive, efficient and transparent management of the APB when performing its functions.
- › To inform everybody of the professional conduct and treatment they should receive when dealing with the people bound by the Code of Ethics and Professional Conduct.
- › To provide tools for answering questions and resolving conflicts that arise from recipients in accordance with the functions and powers attributed to them.

02 Purpose

The purpose of the Code of Ethics and Professional Conduct of Barcelona Port Authority is to establish the guidelines that should prevail in the ethical behaviour of all the people who work there in their day-to-day operations with respect to the relationships and interactions the APB maintains with all its stakeholders. These stakeholders are the workers themselves, clients, suppliers and external collaborators, public and private institutions and society in general.

Consequently, this Code of Ethics and Professional Conduct is the guide for responsible behaviour of all members of the organization and includes the commitment to collaborators in their activity with respect to the ethical model the APB follows in its management.

Compliance with the Code of Ethics and Professional Conduct establishes the principle of due diligence for prevention, detection and eradication of irregular conduct.



03

Scope of application

This Code of Ethics and Professional Conduct is directed at the Board of Directors, the Presidency, General Management, the management staff and, in general, all staff members of Barcelona Port Authority, regardless of their job or where they perform it.

The guidelines of conduct contained in this code affect all affiliated companies in which the Barcelona Port Authority has management control.

Furthermore, Barcelona Port Authority shall promote and provide incentives for its suppliers and collaborating companies to adopt consistent behavioural guidelines, as defined in this Code of Ethics and Professional Conduct.

The first level of management of Barcelona Port Authority shall use all the means at its disposal to spread its mission, vision, values and principles, and enforce the guidelines of conduct included in this code. Likewise, it shall provide a reference model in its behaviour and level of compliance with the code.

The conduct criteria set out in this code do not intend to describe all the situations and circumstances encountered by staff members of Barcelona Port Authority, but to establish general guidelines of conduct that guide them in how to act when carrying out their professional activity.

All staff members of Barcelona Port Authority can consult the Compliance Body through the Ethical Channel about any questions regarding interpretation of the guidelines of conduct included in this code.

Each of us shall personally take responsibility for complying with it, setting an example, ensuring that it is complied with in our area of action, and behaving with integrity.

04

Values we believe in

THESE VALUES SHALL BE THE BASIS OF THE BEHAVIOUR
OF ALL APB COLLABORATORS:



People's worth
and commitment



Ethical and professional
management



Client-centric
approach



Social
responsibility



Innovation

05

Governing criteria of conduct

Barcelona Port Authority understands that the trust of its clients, suppliers and external collaborators, as well as the social environment in which it carries out its activity, is based on the integrity and responsibility of the professional performance of each person who works at the Port of Barcelona.

Integrity is understood to mean acting ethically, honestly and in good faith.

Professional responsibility is understood to mean acting proactively and efficiently with a focus on excellence, quality and a willingness to serve.

Barcelona Port Authority expects all the people who work in the organization to behave responsibly and with integrity when performing their duties.

Barcelona Port Authority also expects the companies and people with whom it works, suppliers and external collaborators to always behave in accordance with these criteria.



06

Guidelines of conduct

We guarantee compliance with legal regulations and policies, and the integration of ethical values

We promote a safe work environment and respect for individuals

THE CODE OF ETHICS AND PROFESSIONAL CONDUCT ESTABLISHES SPECIFIC GUIDELINES FOR ACTION IN THE FOLLOWING AREAS:

1. Respect for legal regulations, policies (especially the Compliance Policy and its complementary rules) and ethical values

- › All employees working at the Port Authority shall refrain from knowingly collaborating with third parties in violation of any law, and shall not participate in any action that compromises respect for the law.
- › They shall respect internal regulations and policies while ensuring compliance.

2. Respect for people and human rights

- › Barcelona Port Authority rejects harassment in all its forms and expressions.
- › The staff members of Barcelona Port Authority shall treat each other with respect, promote cordial relations and maintain a pleasant, healthy and safe work environment.
- › All staff members shall treat their colleagues, superiors and subordinates fairly and with respect. Likewise, the relationships between staff members and those of affiliated companies and external collaborating organizations shall be based on professional respect and mutual collaboration.
- › Barcelona Port Authority considers the comprehensive development of each person to be important. It therefore facilitates the necessary balance between professional and personal life.
- › Besides the Collective Bargaining Agreement that regulates the items in this section, the Port Authority also has a harassment protocol to guarantee and ensure respect for people.
- › Barcelona Port Authority respects internationally recognized human rights.

We promote professional development and equality of opportunity, and we reject any form of discrimination

We encourage cooperation and teamwork, ensuring the availability of skills and resources

We promote health and safety policies for staff, ensuring healthy working conditions and the performance of duties in accordance with current legislation

3. Professional development and equal opportunities

- › Barcelona Port Authority promotes the professional and personal development of all its staff members and guarantees equal opportunities through its action policies.
- › It does not accept any kind of discrimination in the work or professional environment for reasons of age, race, gender, sexual orientation, religion, political opinions, social origin, disability, nationality or family responsibilities.
- › People who hold positions of management or responsibility shall act as facilitators of the professional development of their collaborators in order to promote their professional growth in the company.
- › Barcelona Port Authority is committed to internal promotion and offering both our male and female collaborators the professional opportunities that arise within the organization.
- › In fact, the Port Authority has an Equality Plan and an Equality Committee, as well as policies on training and skills development.

4. Cooperation and dedication

- › Barcelona Port Authority fosters an environment of cooperation and teamwork for the best use of all skills and resources.
- › All staff members shall act in a spirit of collaboration and make knowledge and resources available that can facilitate achievement of the organization's goals and interests to the other departments and people who make up the organization.
- › Staff members of the Port of Barcelona shall work efficiently during the working day, make the most of the time and resources made available to them by the company and try to provide maximum value in all the processes in which they participate.

5. Occupational health and safety

- › Barcelona Port Authority promotes the adoption of occupational health and safety policies and the preventive measures established in current legislation.
- › It also encourages the application of its occupational health and safety rules and policies by its affiliated companies, suppliers and, in general, the collaborating companies with which it operates.
- › All staff members shall be familiar with and comply with occupational health and safety protection rules and ensure their own safety, that of other people in the organization, clients, suppliers, collaborators and, in general, all people affected by the performance of their work.
- › For its part, Barcelona Port Authority shall provide its staff members with the resources and knowledge they need to perform their duties safely in a healthy environment.
- › The APB shall guarantee all collaborators fair and dignified working conditions in accordance with the current legislative framework.

We make responsible, efficient, and appropriate use of the resources available to staff

Gifts or compensation that may unduly influence commercial or professional relationships, or those that fall outside the usual norms of courtesy, will not be accepted

- › The Port of Barcelona has an Occupational Risk Prevention Plan and annual health programmes for its staff members. Barcelona Port Authority's occupational health and safety management system is certified in accordance with standard ISO 45001:2018. It also has a Self-Protection and Safety Plan for the Port of Barcelona.

6. Asset use and protection

- › Barcelona Port Authority makes available to its staff members the resources they need to carry out their professional activity and undertakes to facilitate the means to protect and keep them safe.
- › All Port staff members shall use the company's resources in a responsible, efficient and appropriate way in the context of their professional activity. Likewise, staff members shall protect and preserve them from any inappropriate use that could harm the organization's interests.

7. Corruption and bribery

- › Corruption and bribery arise when people use unethical practices to obtain benefits for the organization or themselves. Corruption and bribery fall into the category of fraud.
- › Barcelona Port Authority applies the principles of good governance and rejects all forms of corruption for personal gain or the benefit of third parties or the organization itself.
- › Barcelona Port Authority hereby states that it is against influencing the will of people outside the organization to obtain benefits using unethical practices. Nor shall it allow other people or organizations to use these practices on its staff members.
- › Staff members of Barcelona Port Authority may not directly or indirectly accept gifts or compensation of any kind, or gifts or presents that fall outside the usual social or courtesy usages or that, due to their value or characteristics, may have the purpose of inappropriately influencing staff members' commercial, professional or administrative relationships with both public and private organizations.
- › Likewise, staff members shall not make direct or indirect payments, gifts or compensation of any kind not considered part of the normal course of business and in compliance with internal regulations in an attempt to improperly influence their commercial, professional or administrative relationships with public and private organizations.
- › The Port of Barcelona does not receive or offer money or other non-financial incentives with the intention of obtaining an advantage in exchange for an illegal transaction. The Port does not tolerate illicit collections or payments made with the intention of committing a fraudulent action.

We apply the utmost rigor in preventing money laundering and avoiding improper tax practices

8. Fiscal responsibility and prevention of money laundering

- › Barcelona Port Authority applies the utmost care in preventing and avoiding money laundering from criminal and illegal activities, as well as the financing of terrorism.
- › All Barcelona Port Authority staff members shall comply with applicable legal provisions and pay special attention to cases in which there are indications of a lack of integrity on the part of the people or organizations with whom the Port maintains commercial relations. Likewise, the APB shall collaborate with the competent authorities by providing all the information requested in accordance with current legal rules and regulations, and also by reporting suspicious operations.
- › In tax matters, the APB follows the good practice commitments defined by the tax authorities. It avoids the evasion of payments and obtaining undue tax advantages. The APB also provides any tax information requested by the authorities. The APB ensures that public aid, grants and other funds it receives are used exclusively for the purpose for which they were granted.

We ensure the proper use of our corporate image, one of our most valuable assets

9. Image and corporate reputation

- › Barcelona Port Authority considers its image and corporate reputation to be one of its most valuable assets for maintaining the trust of its clients, members of the organization, public authorities and society in general.
- › All staff members of the Port Authority shall take the utmost care to preserve the image and reputation of the organization in all their actions and professional relationships when they represent the APB.
- › Staff members shall also monitor respect for and proper and appropriate use of its corporate image and reputation by the personnel of contractors and collaborating companies.
- › Port Authority staff members shall be particularly careful in any public intervention and shall have the necessary authorization to appear in the media, participate in professional conferences, seminars and any other event that may be publicly disseminated whenever they appear as a staff member of Barcelona Port Authority or of the affiliated companies in which the Port of Barcelona has a majority stake.
- › No financial or in-kind consideration shall be accepted for intervening or participating in professional conferences, seminars or events that are publicly disseminated when they are carried out within the working day and/or in representation of Barcelona Port Authority.

We will report any relationship that may generate a conflict of interest, avoiding situations that may affect the entity

10. Company loyalty and conflicts of interests

- › Conflicts of interest appear under circumstances in which the personal interests of the people in the organization go directly or indirectly against or enter into conflict with the interests of the organization and interfere with strict compliance of their professional duties and responsibilities or personally involve these people in one of the organization's transactions or economic operations.
- › Barcelona Port Authority understands that the relationship with its staff members should be based on loyalty arising from common interests.
- › Staff members of the Port Authority shall inform the organization if they themselves or their close relatives participate or have to participate in the governing bodies of other companies that may come into conflict with the interests of Barcelona Port Authority.
- › During the performance of their professional responsibilities, the people who work at the Port Authority shall act with loyalty and in defence of the organization's interests. They shall also avoid situations that could give rise to a conflict between their own interests and the organization's.
- › For this reason, Barcelona Port Authority staff members shall refrain from representing the company or influencing decision-making in any situation in which they directly or indirectly have a personal interest.

We will truthfully convey information in our communications, while always preserving confidential information

11. Processing information and knowledge

- › Barcelona Port Authority considers information and knowledge to be one of its main essential assets for business management, which is why it must be subject to special protection.
- › The APB hereby states that the veracity of information is a basic principle of all its actions and that its staff members shall truthfully provide all the information they have to report, whether internally or externally. Under no circumstances shall they knowingly provide incorrect or inaccurate information that may mislead the recipient.
- › Staff members who enter any kind of information into the organization's IT systems shall ensure that it is truthful and reliable.
- › In particular, all the organization's financial transactions shall be clearly and accurately reflected in the relevant records. Specifically, all accounts shall be properly reflected in the records, as well as all transactions carried out and all income and expenses incurred.
- › Staff members of Barcelona Port Authority shall refrain from any practice that goes against the commitment to clearly and accurately reflect all financial transactions in the accounts.
- › All staff members shall maintain the strictest confidentiality regarding any classified information they have access to as a result of the performance of their professional activity.

We promote integrity in our relationships with clients, guaranteeing quality and excellence in service

We apply impartiality, objectivity, and quality criteria in the selection processes of suppliers and external collaborators

- › Staff members who have confidential information about the organization or important aspects of the organization's strategy, policy, plans or assets shall safeguard it so that it cannot be used inappropriately and shall refrain from using it improperly for their own benefit or the benefit of third parties.
- › In the event of doubts about the nature of any information, it shall be considered confidential until proven otherwise.
- › All information and knowledge (understood as the conceptual result of the integration of different information) generated within the context of the organization is the property of the organization pursuant to the terms of current legislation.
- › Barcelona Port Authority complies with current legislation on the protection of personal data, respects the right to privacy and protects the personal data disclosed to it by its clients, staff members, suppliers and external collaborators, candidates in selection processes and other people.

12. Client relationships

- › All the people who work at the Port Authority shall act honestly with the organization's clients and its internal clients with the aim of achieving the highest levels of quality and excellence when rendering services and the long-term development of relationships based on trust and mutual respect.
- › Staff members of the Port Authority shall act in such a way as to ensure compliance with the commitments made with clients.
- › With this aim of ensuring the quality of operations with clients, the Port of Barcelona has a quality label, the Efficiency Network, whose aim is to provide clients with dependability and security.

13. Relationships with affiliated companies, collaborating companies and suppliers

- › Barcelona Port Authority assumes the commitment to promote the guidelines of conduct included in this Code of Ethics and Professional Conduct among its suppliers and external collaborators without prejudice to compliance with contractual terms and conditions.
- › All Port Authority staff members who participate in the selection processes of suppliers and external collaborators shall act with impartiality and objectivity by applying quality and cost criteria and avoiding conflicts between their own interests and the organization's.
- › Barcelona Port Authority offers its contractors, suppliers and external collaborators the opportunity to contact the APB confidentially through its existing channels (listed in Section VIII. Ethical Channel) to report any information deemed necessary.

We maintain collaborative and trusting relationships with public administrations and official organizations

14. Relationships with other public authorities and official organizations

- › Barcelona Port Authority maintains relationships based on collaboration and trust with public authorities and official organizations with legal capacity in their area of activity. The APB is a neutral organization in its relationships with governments, public authorities, institutions and political parties.
- › All Barcelona Port Authority staff members shall properly comply with the legal obligations applicable at any time to which the APB is subject as an organization that forms part of the state-owned port system.
- › All Barcelona Port Authority staff members shall collaborate in good faith with all organizations with powers over APB activity and shall respond, by the deadline and in the appropriate form, to the information requirements specified. They shall also scrupulously respect the activities of the other public organizations that work in the service area of the Port.

We prioritize preserving the environment and minimizing environmental impact

15. Respect for the environment

- › Preservation of the environment is one of the basic operating principles of Barcelona Port Authority, which is why it has implemented an environmental management system.
- › Port of Barcelona staff members shall also strive to minimize the environmental impact of their activities and the use of the work facilities, equipment and resources made available to them, and shall aim to make efficient use of them by taking on the commitment to use energy efficiently in Port facilities and activities with the purpose of preserving natural resources, reducing atmospheric emissions and helping mitigate the effects of climate change.
- › In their relations with contractors and external collaborating companies, the organization's staff members shall transmit these principles and demand compliance with the environmental procedures and requirements applicable in each case.
- › The Port of Barcelona has an Environmental Policy, as well as Environmental Emergency Plans. Its Environmental Management System has been operating since 2014. It is certified in accordance with ISO 14001:2015 and registered in the EU Eco-Management and Audit Scheme (EMAS) under registration number ES-CAT-000430. Furthermore, the Port's Environmental Management System has been recognized since 2017 by the Port Environmental Review System (PERS) standard drafted by the European Sea Ports Organization (ESPO).

We act with transparency in information as a fundamental principle of our actions

16. Society and transparency

- › Relations with companies, regulatory organizations and public authorities shall be considered in accordance with the principles of cooperation and transparency.
- › As a public organization serving clients and citizens, the Port Authority of Barcelona shall provide truthful, appropriate and useful information about the programmes and actions it carries out. Transparency with regard to information is a basic principle governing the organization's actions.
- › The Port Authority expresses its firm commitment to the goals and action lines established in relation to Corporate Social Responsibility in its programmes and actions with all its staff members, clients, suppliers and stakeholders it has relations with. The APB generates a positive impact on society through its social action.



We make responsible, transparent, and supervised use of artificial intelligence, ensuring the accuracy of information, data protection, and respect for people's rights

17. Responsible use of artificial intelligence and automated systems

- › The Port Authority of Barcelona promotes the responsible use of artificial intelligence and automated systems as support tools to improve efficiency and service quality, always in accordance with applicable law and the Information Security policies and procedures that may be established for the use of these applications and systems.
- › Personnel working at the Port of Barcelona must use these technologies with professional judgment, ensuring the accuracy of information, data protection, confidentiality, and respect for individuals' rights, and must verify the reliability of results before their use or dissemination.
- › Under no circumstances does the use of automated systems exempt individuals from personal responsibility in decision-making, which must always remain under human supervision, especially when significant impacts may arise.
- › Transparency must be ensured in the use of these technologies, providing disclosure whenever it is relevant for understanding the content or for decision-making, especially when the content has been predominantly generated using artificial intelligence.
- › The use of algorithms or automated criteria that introduce biases or discrimination, whether direct or indirect, based on birth, origin, race, sex, religion, opinion, or any other personal or social circumstance is not permitted.
- › The use of artificial intelligence to generate misleading information, manipulate decision-making processes, or carry out actions contrary to the principles of integrity, transparency, and good governance is not permitted.
- › These requirements also apply to clients, suppliers, and partner or affiliated companies in their relations with the Port Authority of Barcelona.
- › In case of any doubt regarding the appropriate use of these technologies, the Compliance Body and/or the Information Security Committee must be consulted.
- › Any improper use, risk, or incident related to these systems must be reported without delay to the Compliance Body through the designated channels.

07

Acceptance of and compliance with the code

Barcelona Port Authority expects a high level of commitment from all the people who form part of its team for compliance with its Code of Ethics and Professional Conduct.

This Code of Ethics and Professional Conduct is mandatory for all people who work at Barcelona Port Authority and at the affiliated companies in which it has a majority stake.

Barcelona Port Authority shall report on and disseminate the contents of this Code of Ethics and Professional Conduct among all its staff members. All people who join or become part of the organization shall expressly accept the values, principles and rules of action established in this code.

Any questions that arise concerning the interpretation or application of this Code of Ethics and Professional Conduct shall be consulted through the Ethical Channel or the email address: codietic@portdebarcelona.cat

No staff members, regardless of their level or position, are authorized to request that any person be hired by the Port Authority, as this practice goes against the provisions of this code. Employees working at the Port Authority may not justify improper conduct by blaming it on the orders of superiors or a lack of awareness of this code.

Any breach of the Code of Ethics and Professional Conduct can put the reputation of Barcelona Port Authority at risk. For this reason, all staff members of the organization shall inform the Compliance Body through the Ethical Channel (which is available on the website and the intranet) of any breach or misconduct observed in the performance of their professional activities.

"The Port Authority of Barcelona expects from all the people who are part of its team a high level of commitment in complying with its Code of Ethics and Conduct"

08

Ethical channel

We guarantee the anonymity and confidentiality of individuals who report through the channels established in the Internal Information System

Barcelona Port Authority makes a communication channel available to all staff members for internal matters. The channel is also available to any persons with whom the organization has professional or commercial relations so they can comment on any situation that involves unethical behaviour or non-compliance with this code, the law or internal regulations.

The Channel can also be used to make inquiries on how to interpret the Code of Ethics and Professional Conduct and the APB Compliance Policy, and to submit queries on situations that arise during activity with respect to this code.

This Ethical Channel complies with Law 2 of 20 February 2023 on the protection of any person who reports regulatory violations and fights against corruption.

WHAT KINDS OF SITUATIONS CAN I REPORT?

You can use the Ethical Channel to report any situation that you believe fits any of the following examples:

- › If you detect that one of the premises identified in the Code of Ethics and Professional Conduct is not met.
- › If you suspect any malicious, illegal, unethical or criminal behaviour.
- › If you discover that internal laws or regulations are not being complied with.

Complaints can be made anonymously or by identifying yourself as a whistleblower. They shall always be made in good faith in accordance with the provisions of this document and shall be based on facts or indications of unethical, irregular or illegal behaviour.

REPORTING A BREACH OF COMPLIANCE

- › Breaches should preferably be reported using the website form made available by the APB through its Internal Information System: <https://www.portdebarcelona.cat/en/known-port/port-authority/about-us/code-ethics-and-professional-conduct>
- › Breaches can also be reported directly to the head of the Internal Information System at the APB facilities.
- › By email: codietic@portdebarcelona.cat
- › By addressing the report by post to the attention of the Compliance Body (which is responsible for the Internal Information System) at the following postal address:

BARCELONA PORT AUTHORITY

Information Channel (Compliance Body)
World Trade Center
Edifici Est, 7a Planta
Moll de Barcelona, s/n
08039 - Barcelona

Whistleblowers shall also be able to access external information channels of the competent authorities and, as applicable, European Union institutions, bodies and organizations.

CHANNELS ESTABLISHED IN THE INTERNAL INFORMATION SYSTEM

Within its Internal Information System, the APB has established the following channels, which are accessible on the intranet and the website through the link: <https://www.portdebarcelona.cat/en/known-port/port-authority/about-us/code-ethics-and-professional-conduct>

- › **Ethical Channel.** Its purpose is to receive and manage reports of breach of the Code of Ethics and Professional Conduct, the Anti-Fraud Measures Plan, the Compliance Policy and other legal and internal regulations of the APB and its affiliated company, Gerència Urbanística Port Vell. This channel is managed by the APB Compliance Body.
- › **Activation channel of the APB harassment protocol.** Its purpose is to receive and manage complaints motivated by conduct constituting sexual harassment, harassment due to sex, moral harassment, cyber-harassment, harassment due to LGBTI-phobia and other conduct contrary to sexual freedom and moral integrity in the workplace. This channel is managed by the APB equality officer in coordination with the APB Harassment Committee.

- › **Queries Channel.** Its purpose is to enable any APB employee and/or related third party to submit a query (not a complaint) about application or interpretation of the Code of Ethics and Professional Conduct, the Anti-Fraud Measures Plan and the Compliance Policy and its annexes. This channel is managed by the APB Compliance Body.

The principles of the Internal Information System implemented by the APB are the following:

- › The presumption of innocence.
- › The right to challenge.
- › Confidentiality.
- › The ability to make anonymous complaints.
- › No retaliation against whistleblowers. This concept includes the conduct described in Article 36 of Law 2 of 20 February 2023 on the protection of any person who reports regulatory violations and fights against corruption.
- › The right to information of interested parties.

The Internal Information System guarantees the confidentiality of the identity of whistleblowers, the people reported on and third parties about whom reports are made.

In addition, it is guaranteed that there will be no retaliation against or negative consequences for whistleblowers for making a report unless the internal investigation decides that the report was made with the knowledge that it was false or with reckless disregard for the truth, bad faith or abuse of rights.

The procedure and terms of use of the System are regulated in the APB's Internal Information System Policy, as well as the Regulations of the Compliance Body.





Port de Barcelona

Barcelona Port Authority
World Trade Center Barcelona

Edifici Est, Moll de Barcelona, s/n
08039 Barcelona
T 93 306 88 00
www.portdebarcelona.cat