



This procedure belongs to **Corporate**

## **Code of Ethics and Conduct**

**CORP-COD-0001**

**Code**

Rev.05 27/08/2020

<b>Revision #</b>	<b>Item</b>	<b>Description</b>	<b>Date</b>
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### MESSAGE FROM THE CHAIRMAN

Our commitment to the development of a more just, balanced and equal opportunity society needs to be reflected in our daily behavior. In this context, our values are essential elements to guide the Company's conduct and business.

This Code of Ethics and Conduct is intended to describe our rules of conduct and disseminate the ethical principles of OceanPact Group.

Each one of you has the responsibility to be familiar with the Code, to practice it on a daily basis and apply it in all work relationships.

If, in the course of your activities you encounter a situation of difficult decision or suspect of any violation of the rules described in the Code, the Compliance area and our Reporting Channel will be available to help you in strict confidentiality.

I hope that the Code of Ethics and Conduct continues to be part of our routine, contributing to the individual growth and maturity of each one of us who form OceanPact Group

The Group's positive image is an asset of its shareholders, managers and Collaborators, as a result of everyone's commitment.

Good reading!

Flavio P. de Andrade

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### 1. OBJECTIVES

Guided by ethical principles, respect, honesty and responsibility, among others, the objective of this Code is to gather guidelines to standardize and guide actions of professional conduct and ethical behavior undertaken by the Directors, employees and third parties acting on behalf of the Company (“Employees”), as well as raising the quality of our services and expanding our market share.

Additionally, this Code of Ethics and Conduct also seeks:

- Guide the relationship between OceanPact Group's employees and the different stakeholders with whom they deal daily, in addition to explain to them the social posture that our employees must maintain;
- Formalize the company's ethical commitments to communicate consistently with all stakeholders;
- Offer individual and collective guidelines to OceanPact Group's employees on how to act in difficult and / or relevant decision-making moments, reducing the risk of subjective interpretations regarding moral and ethical aspects.

Note: Everyone's commitment to this Code is fundamental for the Company to achieve its goals and objectives in an ethical and transparent manner.

### VALUES

Our company's values guide all kinds of conduct during our activities. The basis of this Code of Ethics and Conduct are the following values:

- Yes, We can

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If it can be done safely, we will do it. We are not afraid of the challenges and we do not measure efforts to get it done. We are always available and ready to act quickly.

- **The Right Way**

What needs to be done, we do it well, in a sustainable and fair way. We keep our commitments and deliver what is agreed, respecting people, standards and the environment.

- **We like what we do**

We have initiative, we thrive on successes, work in teams and value the adhesion and breeding of our culture. We want to grow and improve, always.

- **Confidence**

We work ethically and with transparency in an environment of confidence and we cultivate this environment with our employees, our clients, our suppliers and our partners.

- **Innovation**

We incentivize creativity and innovation. We continually seek new solutions, services and processes. We accept mistakes that result in learning and we correct their root cause.

- **Results**

We consistently seek positive results for ourselves, our customers and the environment - always in The Right Way.

Reiterating the commitment of OceanPact Group's Companies, we emphasize the importance of ethical, fair and respectful behavior, according to the guidelines set out in the company's mission and vision.

### INTERNAL CONDUCT

The company requires that its collaborators:

- Adopt a professional, honest and integral conduct, ensuring impartiality, consistency in internal and external decisions and having commitments for the results of your work, which must be fully exercised with the practice of actions in favor of the company's reputation, in a reliable and conscious way;

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- Report any risk to the integrity of people and the environment, business, image, reputation and equity of the company, to their superior or the responsible area, who must take the appropriate measures for analysis and decisions making on the subject matter.
- Preserve cordiality and do not commit any act that can be interpreted as injury, slander, defamation and prejudice;
- Do not practice or condone any form of slavery, child, forced or degrading labor;
- Act honestly, impersonally, respectfully and transparently in your activities, without obtaining undue advantages, in order to ensure the construction of integral, contributory and lasting relationships between the company and its stakeholders;
- Respect the intellectual property developed by the company and by third parties;
- Cultivate a personal appearance and clothing compatible with the institutional and cultural environment in which they operate. In the operational and maritime area; and
- Always follow what is determined by the company's internal procedure.

### RELATIONSHIP WITH INSTITUTIONAL AND BUSINESS PARTNERS

The company requires that its employees:

- Balance the conflict between the priority of ensuring the security of company's information and the importance of promoting transparency in the partnership, seeking, whenever necessary, the guidance of their superior;
- Demand to suppliers' employees respect regarding the ethical principles and commitments of conduct defined in this Code, while the contracts last;
- Do not imply, request, demand, accept, nor offer, promise, give any kind of favor, advantage or benefit, donation, gratification or bribe to yourself or another person, in exchange of your or third parties' activities;

Obs.: If you suspect that your customers or suppliers are involved in illegal activity, promptly inform your immediate superior and the Compliance Department.

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### **HEALTH, SAFETY AND ENVIRONMENT**

The company's operations require full compliance with HSE (Safety, Health, Environment and Safety) rules.

For this reason, the company requires that its employees:

- Protect their life, the physical integrity and safety of themselves and the people with whom they relate with, the facilities they use, as well as the preservation of the environment; and
- Carry out their business and activities with social and environmental responsibility, contributing to sustainable development.

### **RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS**

The commitment to the customers and suppliers' satisfaction must be based on actions of courtesy, speed and efficiency, establishing partnerships based on real commitment and flexibility.

The company leads its negotiations with honesty and ethics, reflecting respect and in the search for solutions that meet corporate needs, in line with the company's strategic objectives.

Preferential treatment is not allowed for any customer or supplier based on personal criteria.

Relations with business partners are characterized by impartiality and transparency. The employee cannot offer and accept a reward, advantage, bribe or other types of benefits.

In case of complaints, request or suggestion by the customer and / or supplier, this communication must be forwarded through the Company's Whistleblowing Channel for analysis and investigation.

The Company's Employees and / or legal representatives must report to the Compliance Department or through the Whistleblowing Channel any conduct or behavior contrary to the guidelines established in this Code.

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### **RELATIONSHIP WITH GOVERNMENT, AUTHORITIES AND PUBLIC AGENTS**

When in contact with government authorities and national or foreign public agents, employees are prohibited:

- From promising, offering or receiving, directly or indirectly an undue advantage from a public agent, or a third person related to him/her, to obtain or maintain business or any commercial advantage;
- To finance, fund, sponsor or subsidize the practice of illegal acts in any way;
- To use an individual or legal entity to conceal or dissimulate his/her real interests or to conceal or dissimulate the identity of the beneficiaries of the performed acts.

### **CONTRIBUTIONS TO POLITICAL PARTIES, CHARITY ENTITIES AND SOCIAL PROGRAMS**

Even when permitted by law, the Company does not make contributions to any political campaign, political party, candidate or any of its affiliated organizations.

If any employee and / or Collaborator intends to engage in community activities, including, but not limited to, public positions, he / she must inform the Company about the candidacy and potential conflict of interest with his activities.

In this case, it is important to highlight that the political opinions expressed by the employee and / or Collaborator in question do not represent the opinion of the Company.

For the purposes of this Code, “political contribution” includes not only monetary contributions to political parties, candidates for public office or any persons related to them, but also any donations and sponsorships to similar events. It is company policy that none of its resources, assets, services or facilities are made available to any candidate for public office in any jurisdiction, to a political actions committee and party, or to charities and social programs linked to political activities.

The company's resources, assets, services or facilities cannot be made available to any candidate for public office in any jurisdiction, to a party or political party committee, or to charities and social programs linked to political party activities.

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Donations to charities or other entities must be devoid of any political party interests or which could compromise or jeopardize the company's management and results and must be submitted to the Compliance Committee for approval.

### RESPECT FOR DIVERSITY AND EQUALITY

Diversity and inclusion in the workplace are encouraged in all departments and dependencies of the company, which employs and treats its employees in a non-discriminatory manner with respect to gender, color, race, religion, age, limitations and / or disabilities sexual orientation, nationality, political opinion and union affiliation.

Therefore, no discriminatory discourse or practice is tolerated.

Respecting and guarding everyone's rights, the company requires its employees to:

- Do not promote or participate in political party activities during working hours or use the company's resources for this purpose, or even the association of your brand;
- Do not promote or participate in religious activities during working hours or make use of company resources for this purpose, or even the association of your brand, except in cases authorized by the Company; and
- Do not carry out any type of political, party or religious propaganda on the company's premises.

### INFORMATION TREATMENT

The Company is committed to the privacy and confidentiality of information from customers, suppliers, employees and any other public with which it may eventually relate.

To preserve information security, the company requires that its employees:

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- Do not disclose, pass on, use or comment on any company information, strategic or related to relevant acts or facts, with commercial, economic or financial repercussions not made public for your own benefit or that of third parties.
- Not damage the image and reputation of the Company and its workforce through undue and/or improper acts, including on social networks, the Internet or other electronic means;
- Observe the security protocols related to the use of Information Technology Systems and equipment, according to our Information Security Policy;
- Do not share passwords or allow unauthorized access to company systems;
- Immediately report any disappearance or suspected loss of information and/or equipment that contains company information to the Information Technology Manager;
- Not change or destroy the original documents of probatory value, keeping them on file for the periods defined by law.

### SUPPLEMENTARY PROVISIONS

- The employees shall be formally informed about this Code, which will be widely disseminated through printed and electronic media. The access to this code will be guaranteed to everyone.
- The company will disclose this Code in the process of familiarization of new employees.
- Failure to comply with the guidelines provided for in this Code may result in disciplinary and administrative measures, as described in the Consequences Procedure<sup>1</sup>, available in the Management System and must be informed through the Reporting Channel or the Compliance Department.
- This Code will be periodically reviewed and updated, with transparency and stakeholder participation.

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<sup>1</sup> The Procedure can be found on the Softexpert System through the number OCP-PSGI-009-CONSECUENCIAS