Anticorruption and Anti-Bribery Policy

CORP-POL-0001.1	**Política**	Rev.05 02/10/2023

Revision No.	Item	Description	Date
02		Layout change and general spelling revision	10/28/2018
03		Text change and spell checking general	9/21/2020
04		Adaptations to the Company's other governance updates Change of name of the Compliance area	10/29/2021
05		Amendment at the request of the internal audit ISO 37001	02/10/2023

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Our policy is to maintain a global commitment to all the corruption and bribery prevention laws in the countries where we do or intend to do business, prohibiting corrupt payments or other inappropriate conduct.

All employees, as well as all contracted persons or entities, must respect this policy and we expect them to monitor its continued compliance when promoting or conducting Company business.

Definitions:

Public Agent: employees of any governmental entity, or with government participation, at the national, state, regional, municipal level, including their officers; candidates for political office at any level, political parties and their representatives; and directors, officers or official representatives of any international public organization; as well as their respective family members.

Government Authority: The bodies of direct, indirect administration of any of the powers of the Union, States, Federal District or Municipalities, political parties, state entities or diplomatic representations of a foreign country are thus considered.

Collaborator(s): Employees, administrators, suppliers, legal representatives and partners of the Company.

Company: OceanPact Serviços Marítimos S.A., OceanPact Navegação Ltda., OceanPact Geociências Ltda. and OceanPact Logística Ltda.

Corruption: It is the offer or promise of an undue advantage to anyone, to make them do or fail to do something for the benefit of one party and to the detriment of another. It usually involves public officials.

Employee(s): All those employees hired by the Company, including trainees.

Anti-Corruption Laws: Law n 12846/2013 (provides for the administrative and civil liability of legal entities for the practice of acts against national or foreign public administration); Decree n 8.420/2015 (regulates Law n. 12.846/2013); Decree-Law N. 2.848/1940 (Criminal Code); Law N. 8429/1992 (Administrative Impropriety Law); Law n 8.666/93 (Bidding Law); CGU Ordinance N. 909/2015 ; Foreign Corrupt Practices Act (FCPA-USA); UK Bribery Act (UKBA); United Nations Convention against Corruption; Inter-American Convention Against Corruption and the OECD Convention on Combating Corruption of Foreign Public Officials in International Business Transactions.

Bribery – Action of inducing someone to perform a certain act in exchange for money, material goods or other benefits.

Third party: Any person whose decisions may influence, even indirectly, the interests and business of the Company.

Undue Advantage: Any benefit, tangible or not, offered, promised or delivered with the purpose of influencing or rewarding a decision or act of a Public Agent or Third Party (e.g., gifts, airline tickets, personal favors, loans, free consultancy, among others).

Our culture is zero tolerance for corruption.

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Under no circumstances our Directors, employees or third parties, acting as our representative, will offer, pay, make an offer, promise or authorize to pay any amount to governments, to direct or indirect government officials, to persons or entities, private sector's members, with the intention that the gift or payment will induce the recipient to misuse his position to obtain an improper business advantage.

Any Employee is authorized to pay only official service fees published in fee tables and which payment is properly documented.

If an Employee believes that their life, physical safety or liberty is in danger due to a payment requirement, the Employee must protect their life and physical safety and immediately report the incident to the Company's Audit and Compliance Committee;

Violation of any of the provisions contained in this document by an Employee will result in disciplinary action and, if applicable, may give rise to (dismissal and communication of their conduct to the competent authorities. If it is found that a violation of this Policy has occurred by a Third Party, the violation may lead to the suspension or termination of any relevant contract or agreement and/or communication to the competent authorities.

Company Employees will not offer or receive gifts or hospitality with the intention of persuading or rewarding another person for improperly acting or using their authority.

Therefore, gifts or hospitality can be offered and received only if all the following conditions are met:

I) **Gift**: A gift is understood to be a gift distributed as a courtesy, advertisement, usual dissemination or on the occasion of events or commemorative dates of a historical or cultural nature. In addition, its distribution must be generalized, it is not intended exclusively for a specific person. Traditional examples of gifts are: agendas, calendars, notebooks, pens (simple), key chains, etc., which contain the Company's logo. Gifts must be limited in value to the equivalent of US$100.00, offered openly and transparently;

II) **Hospitality**: The term includes entertainment, receptions, transportation, accommodation and similar items that are in accordance with normal business practices, whether of modest value and in such case, does not generate in the grantor or recipient, the impression of seeking to obtain undue advantages or exercising undue influence on the activity and/or decisions of the other party. We consider that interested parties are allowed to invite and participate in social events promoted in public or private places, as long as they are openly and transparently disclosed, and the cost of accommodation and air transport for participation in such events is not allowed.

As a general rule, Hospitalities must meet criteria such as:

(i) reasonableness and direct relationship to a legitimate purpose;

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(ii) moderation,

(iii) transparency,

(iv) good faith; It is

(v) not be prohibited by local law or internal regulations of entities to which the recipient(s) belong.

Invitations to academic or technical events (e.g. congresses, seminars, forums, technical visits, demonstrations, etc.) may be accepted, including the cost of accommodation and transportation (air or land), as long as they are openly and publicly disclosed. transparently, and that the offeror is not participating in the selection process for a supplier or partner of the OceanPact Group.

III) **Meals**: Meal-related expenses that involve the receipt or payment from/to Public Agents and from/to Third Parties, such as business lunches or dinners, are allowed as long as they meet the following requirements:

• The purpose is strictly professional and/or institutional (such as, for example: business meetings with meals or meals offered by customers or partners for the purpose of training or informational talks related to the market);

Funding is limited to Public Agents or Third Parties, not including expenses related to their family members or guests;

• Comply with professional ethics;

• Do not involve the expectation of something in return;

• Do not exceed the amount equivalent to US$ 100.00 per person, being offered openly and transparently; and also respect the lower limitation, if provided for in the recipient's Anti-Corruption or Anti-Bribery Policy, when available for consultation.

All exceptions to these rules, especially in the case of receiving gifts and hospitality, must be brought to the attention of the Compliance, Risks and Internal Controls department of the Company.

The anti-bribery Compliance function has the authority and independence to supervise the anti-bribery management system, provide advice and guidance related to the subject, as well as report the system's performance to senior management, the Audit and Compliance Committee and the Board of Directors.

All OceanPact members shall be responsible for understanding, complying with and applying this Anti-Bribery and Corruption Policy and the ESMS requirements that relate to their roles at OceanPact.

It is the duty of managers to ensure compliance with this Policy and the Anti-Bribery Management System, supervise and guide their subordinates, in order to guarantee the correct understanding and application of anti-bribery and anti-corruption control measures.

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We recognize that business practices vary regionally and culturally. It is mandatory that all Employees comply with this Policy and the Code of Ethics and Conduct at all times. If you have any questions about whether any conduct constitutes a violation of this Policy, contact the Compliance, Risks and Internal Controls department of the Company.

COMPLAINT CHANNEL

Complaints of non-compliance with this Policy and the Code of Ethics and Conduct must be made through the channel indicated in the Company's Code of Ethics and Conduct and will follow the procedures established therein.

APPLICABLE LAWS AND STANDARDS

Nationals:

• Law No. 12,846, of August 1, 2013 (provides for administrative and civil liability of legal entities for the practice of acts against national or foreign public administration);

• Decree n. 8.420, of March 18, 2015 (regulates Law n. 12,846, of August 1, 2013);

• Decree-Law No. 2,848, of December 7, 1940 (Criminal Code);

• Law of Administrative Misconduct;

• Law of Bidding (Law N. 8,666/93);

• CGU N. 909/2015;

• NBR ISO 37001: 2016.

International:

• Foreign Corrupt Practices Act (FCPA);

• UK Bribery Act (UKBA);

• United Nations Global Compact (UN);

• OAS Inter-American Convention against Corruption;

• Organization for Economic Cooperation and Development (OECD

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