



# Code of Ethics

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# 1. Purpose

The BPA Shipping Agency Group Code of Ethics aims to ensure that the company's values are effectively communicated, clearly understood, and consistently respected by all employees, clients, suppliers, and stakeholders, promoting a consistent conduct of integrity aligned with the concepts, rules, and guidelines of this document. BPA and its staff are committed to conducting business legally, ethically, transparently, and professionally, based on the company's mission, vision, and values, and this Code.

## 2. The Company



We deliver maritime agency solutions with efficiency, reliability, and personalization. BPA acts as a strategic link between vessels, terminals, and logistics operators, always focused on operational excellence and sustainable sector development.



To be recognized as a benchmark in maritime agency by guiding with innovation, excellence, and responsibility, leaving a legacy of trust wherever we operate.



- Operational Excellence
- Ethics and Transparency
- Customer Focus
- Innovation
- Sustainability
- Collaboration and Respect
- Commitment to Safety

### 2.1 Scope and Responsibilities

This code contains general rules of conduct and ethics that must be followed by all those who work for and provide services to BPA, establishing a commitment to comply with it and to promote its enforcement in all actions and stages of the process.

It is the responsibility of all employees, clients, suppliers, and other stakeholders to guide and monitor the practical application of this Code with their employees and subcontractors.

### 2.2 Principles and References

The practice of ethical and responsible conduct in business is essential to our success and long-term sustainability. Mutual respect and exemplary behavior in all circumstances are essential values for all members of the BPA team.

The core values upheld by BPA can be summarized as follows:

**Customer Focus:** Placing the needs and interests of clients first in all decisions and operations. This includes a deep understanding of our clients, recognizing their values, and meeting their needs effectively and efficiently.

**Socio-environmental Responsibility:** Promoting sustainable and responsible practices that bring benefits and minimize the impacts on society and the environment.

*These principles guide all actions of BPA, whether in interactions with employees, clients, suppliers, competitors, financial institutions, partners, the community, public authorities, unions, or society in general.*

## 3. Work Environment

BPA promotes a work environment based on safety and health. The company strictly follows hygiene, health, and workplace safety standards, adopting all necessary precautions, including working hours, compensation and benefits, health and safety—always respecting labor laws.

### 3.1 Standards of Conduct

#### **Ethical Conduct**

BPA respects, complies with, and enforces the laws in effect. It is the responsibility of all employees, regardless of position, to follow Brazilian legislation to ensure the proper functioning of the organization. All commercial activities and operations must be aligned with the current laws, regulations, and BPA's internal policies.

#### **Working Conditions**

To create a proper work environment and promote professional development and engagement, BPA has a dedicated Human Resources department focused on developing leadership skills that enable effective people management. It also provides decent working conditions for employees, including working hours, compensation and benefits, health, and safety, while always in compliance with labor laws.

#### **Discrimination and Harassment**

BPA considers any form of discrimination unacceptable, whether based on origin, customs, gender, disability, sexual orientation, color, age, appearance, or political or religious beliefs. Any form of harassment, whether moral or sexual, is strictly prohibited in the workplace.

#### **Child and Forced Labor**

BPA has zero tolerance for any practice of child, forced, or compulsory labor. Any relationship with suppliers who engage in irregular and/or illegal practices involving children or adolescents, or practices analogous to slave or forced labor, is strictly prohibited. The company strongly condemns child and forced labor in any form, whether in its own operations or those of its partners, clients, or suppliers, regardless of the country in which such practices occur.

#### **Health and Safety**

All employees must strictly follow operational and safety procedures when performing their duties. BPA promotes care for quality of life, health, and safety, ensuring the development of a safety-focused culture in the workplace. It provides all necessary conditions and resources to avoid exposing employees to occupational risks that could compromise their health or safety.

## 4. Anti-Corruption Policy

This policy provides guidelines aimed at ensuring that BPA and all those acting on its behalf understand and act in compliance with anti-corruption laws.

It is important to mention that Law 12.846/13 (Anti-Corruption Law) defines bribery as illegal, and BPA, in accordance with this law, explicitly expresses and reaffirms zero tolerance for fraudulent and corrupt acts in all their forms, whether directed at the public or private sector, regardless of the amount involved. We ensure that all procedures are carried out with high standards of ethics, transparency, and professionalism.

This Code of Ethics includes the Anti-Corruption Policy, as together represent the company's commitment by demonstrating guidelines focused on integrity. Failure to comply with these documents and laws may result in severe penalties for both BPA and any employee involved in unethical or corrupt activities.

This policy applies to BPA employees as well as third parties acting on behalf of the company—such as consultants, service providers, business partners, and suppliers. Each of these parties must be informed of this policy and shall commit to adhering to all relevant anti-corruption policies as a condition to act on behalf of BPA. These guidelines and procedures are valid for all individuals and institutions, including government bodies, public servants, private companies, and their employees:

### Bribery

Through this Anti-Corruption Policy, we establish behavioral standards for employees facing situations that could involve or constitute bribery and/or corruption. It is strictly forbidden to offer, promise, make, authorize, or provide—directly or indirectly—any undue advantage to any person, organization, government agency, public official, private company, or their employees (including their family members) with the intent to influence or reward any action that benefits BPA.

No employee shall be penalized due to delay or loss of business resulting from their refusal to pay a bribe. The same standards apply to third parties, who must not, under any circumstance, tolerate, permit, or engage in bribery or corruption in any form.

### Gifts, Presents, and Offers

To avoid potential conflicts of interest in business activities, contract managers and all employees negotiating directly with suppliers or clients may only accept institutional gifts upon prior approval by Management. All such cases must be submitted for review.

### Donations to Charities or Political Causes

Employees are prohibited from using BPA resources—or their own funds on behalf of the company—to make any donations to charitable or political causes, campaigns, or candidates without prior approval from Senior Management. Donations in exchange for preferential treatment or favors are strictly forbidden.

### Accurate Books and Records

In accordance with the FCPA and UKBA, BPA is required to:

- Maintain accurate and transparent records that fully reflect all transactions, ensuring adequate accounting controls are implemented to reasonably assure proper transaction documentation.
- Properly document all transactions, including not only accounting entries but also supporting documents such as invoices, receipts, and payment records.
- Ensure that all expenses, regardless of amount or purpose, are meticulously recorded with accuracy and integrity.
- Under no circumstances allow false or misleading documents to be reflected in books and records.
- Strictly prohibit the use of inappropriate, ambiguous, or fraudulent accounting entries or any procedure or accounting trick aimed at hiding or disguising illegal payments.

## 5. Client Relations

At BPA, complying with laws and regulations must be a top priority in all business negotiations.

Our employees are strictly prohibited from exposing our clients to any unethical or illegal situations. Furthermore, they are not allowed to propose or accept offers that serve personal interests or benefit BPA without express authorization from Senior Management. Any acceptance of meals, travel, or entertainment must align with our company's commercial strategy and be pre-approved.

## 6. Employee Relations

BPA is committed to fostering a respectful and welcoming work environment, free from any type of abuse or harassment, whether moral, sexual, or discriminatory. Such behavior is strictly prohibited and will result in appropriate disciplinary action.

Employees who feel disrespected are encouraged to promptly report the incident to their immediate supervisor or to BPA's Human Resources department. Their safety and well-being are our top priorities.

### 6.1 Employee Responsibilities

**Avoid Conflicts of Interest:** Ensure that your personal interests do not interfere with your professional responsibilities.

**Prohibit Abuse of Power:** Any abuse of authority is strictly prohibited.

**Prioritize Health and Safety:** Do not compromise your own well-being or that of others.

**Maintain Integrity:** Act honestly and uphold ethical standards in all situations.

**Optimize Work Time:** Focus on your tasks during working hours, leaving personal matters for later.

**Promote Respect:** Treat all colleagues with professionalism and courtesy.

**Protect Company Assets:** Use company resources responsibly and efficiently.

**Protect Confidential Information:** Do not share confidential company data with unauthorized individuals.

**Report Misconduct:** Notify your manager or Human Resources about any behavior that violates this policy.

## 7. Social Responsibility

BPA is committed to social responsibility, fostering healthy relationships with all stakeholders:

- We ensure transparent and informative communication on social media, reaching our employees, clients, suppliers, and the broader community.

- All employees are treated fairly, regardless of race, religion, gender, sexual orientation, or gender identity, while receiving safe and fair working conditions.

- BPA does not associate with third-party suppliers who engage in child or forced labor, nor does it support subcontractors or suppliers who do. This is ensured through our rigorous Supplier Approval process.

- We continuously monitor and meet the needs and expectations of our clients and partners.

## 8. Environmental Responsibility

BPA is committed to adopting measures that promote the conservation of natural resources, efficient waste management, and compliance with applicable laws.

We actively engage our employees and suppliers in initiatives that encourage the responsible use of natural resources, proper waste disposal practices, and compliance with legal requirements applicable to BPA operations.

Our goal is to achieve positive results through sustainable and conscious practices in our processes.

## 9. Ethics Management and Code

The management, oversight, and enforcement of the Code of Ethics are the responsibility of the Human Resources, Quality, Directors, and Managers teams. Employees are encouraged to report any situations that violate the principles of this Policy to the Ethics Committee.

Employees are encouraged to report issues such as:

- **Human Resources:** Discrimination, Moral and Sexual Harassment, Drug Use, Possession of Weapons, among others.
- **Governance:** Theft, Bribery, Corruption, Information Leaks, Failure to Comply with Ethical Standards, among others.
- **Finance:** Tax Evasion, Financial Misconduct, Overbilling, Misuse of Resources, Reimbursement Overpricing, among others.

Any questions or violations regarding this Code of Conduct and applicable legislation should be reported to our quality department: [qualidade@bpa.com.br](mailto:qualidade@bpa.com.br)

## 10. Code of Ethics Manual

This Manual was developed by **BPA – Brazilian Port Agency** to guide the actions and decisions of all employees, partners, and stakeholders of our maritime agency company. Our commitment is to uphold the highest ethical standards in all our operations, promoting integrity, respect, and responsibility.

This document serves as a guide to ensure that our business practices are aligned with ethical principles and current legislation.

## How to Make Ethical Decisions?

### Reflect

Consider the company's values and applicable legislation.

### Consult

Refer to this code or other internal resources for clarification.

### Assess the Consequences

Ask yourself whether the decision respects the rights of all parties involved and how it may impact them.

### Seek Guidance

In case of doubt, consult your manager or the company's compliance team.

## Anti-Corruption Policy

### Bribery Prohibition

The company does not tolerate any form of bribery or corruption, including payments, gifts, or favors.

### Reporting

If you suspect corrupt practices, report immediately via the ethics channel.

### Training

All employees must participate in periodic training on anti-corruption prevention.

## Privacy Policy

### Confidentiality

Protecting clients' and partners' information is a priority.

### Compliance

The company follows all personal data protection laws, such as LGPD.

### Restricted Access

Only authorized personnel have access to sensitive data.

## Child and Forced Labor

### Absolute Prohibition

The company repudiates and does not tolerate forced labor, child labor, or any form of exploitation.

### Audits

We conduct periodic audits to ensure our suppliers and partners are also in compliance.

### Social Commitment

We promote decent working conditions and development opportunities.

## Client Relationships

### Transparency

All information provided to clients must be clear and accurate.

### Respect

Treat all clients with courtesy, empathy, and professionalism.

### Confidentiality

Ensure the security of information shared by clients.

## Social and Environmental Responsibility

### Sustainability

We adopt sustainable practices in our operations to minimize environmental impact.

### Engagement

We participate in initiatives that promote social well-being and environmental preservation.

### Environmental Compliance

We strictly follow environmental laws and regulations.

## Harassment and Violence Prevention

### Zero Tolerance

The company does not tolerate moral, sexual, or any form of violence.

### Reporting

We provide secure and confidential channels to report inappropriate behavior.

### Training

We carry out awareness campaigns and training to foster a respectful environment.

## Employee Responsibilities

### Ethical Conduct

Employees are expected to act with integrity and follow this code.

### Violation Reports

Any violation of the code must be reported immediately.

### Commitment

We carry out awareness campaigns and training to foster a respectful environment.

## Marketing

### Transparency

Todas as campanhas devem ser honestas e não enganosas.

### Respect for Competitors

Evitar práticas antiéticas ou desleais contra concorrentes.

### Social Responsibility

O marketing deve promover valores éticos e contribuir positivamente para a sociedade.

## Ethics Management

### Ethics Committee

We maintain a dedicated team to ensure compliance with this code.

### Monitoring

We conduct regular reviews to ensure practices align with ethical standards.

### Reporting Channels

We provide accessible and confidential tools for anyone to report code violations.

**Your vessel, Our willpower**

