



CODE OF ETHICS AND
CONDUCT MANUAL

Message from the Director



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Since it was founded in 2001, AMTRANS has stood out in the market for its dedicated and personalized approach to each client, reflecting our commitment to the unique treatment of each cargo.

Not only have we established a name, but an inspiring model worthy of reference, finding solutions to the most diverse challenges in Foreign Trade.

Our success is the result of the contribution of great specialists committed to delivering excellence, the trust of solid and established clients, and remarkable partnerships that help us and join us in the search for the best results.

Our story is a constantly evolving narrative, based on fundamental values such as dedication to people, simplicity, care, well-being, collaboration, transparency and commitment to sustainability.

We Always Care!

Ivo Antonio Mafra

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1. Introduction

This CODE OF ETHICS AND CONDUCT MANUAL aims to establish the ethical principles and standards of conduct that should guide the internal and external relations of all levels of organization of the company AMTRANS LOGISTICS, including third parties that relate to it.

Compliance with the provisions of this CODE OF ETHICS AND CONDUCT MANUAL by each of the employees, in addition to representing a guarantee of full compliance with the legislation involved, provides a safe and sustainable expansion of the company. This manual contains precise rules on compliance with competition and anti-corruption laws at national and international levels.

It also contains explicit rules of conduct intended for both employees and partners of AMTRANS LOGISTICS, as well as third parties, such as customers and suppliers.

2. Mission, Purpose and Values

PEOPLE

We are aware that our company is made up of people, that's why we cultivate a management that values everyone who is part of it.

SIMPLICITY

Our service is to translate all the knowledge, information and technology in a simple and objective way for our clients. That's why we apply the 'keep it simple' concept on and offline.

CARE

"WE ALWAYS CARE" is not just a slogan. It's the way we treat every customer, every load and every project. With care, flexibility and adaptation.

WELL-BEING

We strive to create the best working environment and encourage healthy behaviors so that our team feels good and enjoy being here.

PARTNERSHIP

We believe in logistics as a tool for promoting business. We are committed to developing markets together with our clients. This results in greater competitiveness with visibility and easy management.

UNION

We invest in our relationships with customers, suppliers and employees. We know that together we are stronger.

TRANSPARENCY

Honest conversations and straight answers are essential for us to make the right decisions quickly. Here we discuss, decide and deliver.

SUSTAINABILITY

A sustainable future depends on each and every one of us. We adopt a positive attitude that takes care today in order to continue taking care tomorrow.

VISION

To achieve a 7% market share in Brazilian freight forwarding by 2027.

3. The internal relationship

3.1 Expected conduct:

The relationships of everyone who is directly or indirectly involved with the activity of the company AMTRANS LOGISTICS (customers, government, suppliers), regardless of the position or function they hold, must be based on the company's Values. Just as positive and constructive conduct will be praised, there will be administrative sanctions for what is considered unacceptable.

3.2 Unacceptable conduct:

Under no circumstances will the following be tolerated in the workplace or outside it: moral and sexual harassment; disrespectful, discourteous, threatening or discriminatory treatment towards any person, regardless of hierarchical level, position or function; discrimination based on social origin,

race, color, gender, age, religion, physical characteristics or sexual orientation.

It is strictly forbidden to use the company's systems and resources to carry out activities other than the specific professional ones established for the employee, or to spread or disseminate rumors, pornography, jokes, games or political party advertisement.

Work under the influence of alcohol or illegal drugs is not allowed, as well as all acts that may cause damage to the company's assets, in addition to the other conduct provided for in article 482 of the Consolidation of Labor Laws . It is also forbidden to speak out on behalf of the company, including on social networks, blogs or any other type of vehicle or media, without prior authorization.

Art. 482 - The following constitute just cause for termination of the employment contract by the employer: a) an act of improbity; b) incontinence of conduct or misconduct; c) habitual trading on one's own account or on behalf of others without the employer's permission, and when it constitutes an act of competition with the company for which the employee works, or is detrimental to the service; d) criminal conviction of the employee, final and unappealable, if the execution of the sentence has not been suspended; e) sloppiness in the performance of the respective duties; f) habitual drunkenness or drunkenness on duty; g) violation of company secrets; h) acts of indiscipline or insubordination; i) abandonment of employment; j) acts damaging to honor or good reputation committed on the job against any person, or physical offenses, under the same conditions, except in the case of self-defense or the defense of others; k) acts damaging to honor or good reputation or physical offenses committed against the employer and hierarchical superiors, except in the case of self-defense or the defense of others; l) constant practice of games of chance.

4. The external relationship

4.1 Customers:

Our customer service must be focused on respect, courtesy and efficiency, providing clear and accurate information when contracting services, in order to achieve the expected results.

4.2 Competitors:

AMTRANS LOGISTICS respects the rules of free market and does not agree with any measure of its employees that results in unfair competition.

Thus, the company bases its performance in defense of the rules provided for in national and international antitrust legislation.

By way of example, here are some prohibited behaviors:

I. Inform competitors about any amounts charged, or any other parameter that determines or influences the competitive behavior of AMTRANS LOGISTICS in order to induce parallel behavior on the part of the competitor;

II. Establish agreements with competitors in order not to compete, restrict business with suppliers, present fictitious offers within the scope of proposals.

Therefore, the primacy of competitive freedom must always prevail in the minds of our employees.

4.3 Working with Suppliers:

The principle of AMTRANS LOGISTICS is to work with reputable suppliers and business partners, treating them without privileges, favoritism or discrimination of any kind.

Therefore, compliance officers will be responsible for carrying out the analysis prior to contracting, by sending out a standard form, in which they will check whether the suppliers share the principles outlined below:

- I. Compliance with all applicable laws;
- II. Prohibition of acts of corruption;
- III. Respect for human rights;
- IV. Take responsibility for the health and safety of their employees and;
- V. Act in accordance with applicable local and international standards relating to environmental protection.

All suppliers and business partners must guide their behavior by the principles expressed in this CODE OF ETHICS AND CONDUCT MANUAL.

4.3.1 Private corruption:

The offer, promise, delivery or receipt of a financial advantage with the intention of inducing the improper execution of functions or as a form of reward, as well as by facilitating the contracting of a service or product, will not be admitted in the relationship with private agents.

The same applies to gifts, amounts, commissions or other advantage to companies or their employees, as well as the third person related to them, except in the cases specified in item 7 of this Manual.

In order to prevent and verify such conduct, specific procedures have been adopted with redflag mechanisms provided for in the internal regulations, so that whenever unusual or price-gouging conduct on the part of suppliers appears to be identified outside the market average, it must necessarily be reported to the superior for approval or not of the contract, if applicable.

5. Conflict of interest

Employees must refrain from practicing any act that implies a conflict of private interests with those of AMTRANS LOGISTICS, such as using the prerogatives of their position for their own benefit or selling any products or services of a private nature on the company's premises.

This can also manifest itself in the form of a commercial relationship, corporate participation or acting through a third party in a competitor or customer of AMTRANS LOGISTICS or association in parallel activities that prevent the employee from fulfilling their responsibilities towards AMTRANS LOGISTICS.

It is also forbidden to breach the duty of secrecy, which is manifested by the use for private purposes or in the form of passing on to third parties, of any and all information, whether patented or not, of a technical, operational, commercial, legal nature, know-how, inventions, internal or external processes (administrative or judicial), formulas and designs, whether patentable or not, business plans, accounting methods, accumulated techniques and experiences, documents, contracts, papers, studies, opinions and research to which the member has access:

- a. by any physical means (e.g., express documents, manuscripts, facsimile, photographs, etc.);
- b. by any form registered in electronic media (e-mail, pendrive, etc.);
- c. orally.

Thus, the confidentiality of AMTRANS LOGISTICS is internal or proprietary confidential information that has not been disclosed to the general public must be maintained. The non-public information of suppliers, customers, employees, agents, consultants and other third parties must also be protected in accordance with legal and contractual requirements.

6. Relationship with the government

Everyone's dealings with agents of national or foreign public administrations must be fair, transparent, ethical and moral.

The term "public administration" includes managers or employees of any state or governmental body, agency or legal entity, at any level, including managers or employees of state-owned companies and public international organizations. It also includes candidates for political positions, managers and employees of political parties.

Under no circumstances may employees promise, offer, give or receive, directly or indirectly, undue advantage from or to them, or the related third party.

It is understood as an undue advantage to offer something of value to a public agent, such as: money, fun, travel, gifts, donations, among others.

It is also forbidden to hinder the actions of the supervisory authorities, as well as to finance, fund, sponsor or in any way subsidize the practice of the illicit acts provided for in Law No. 12,846 of 2013.

7. Gifts and entertainment

Gifts, presents and entertainments that do not cost or appear to cost more than a quarter of a minimum wage may be accepted or offered as an act of courtesy or institutional purposes, such as:

- Baskets, panettones, chocolates, wines;
- Calendars, notebooks, pens, or pencils;
- Lunches and dinners.

For any gift, present or entertainment in an amount higher than that established, the approval of the Executive Board will be required.

8. Information processing

AMTRANS LOGISTICS will maintain the control and management of all internal and external procedures in order to show the reality of the operation carried out, safeguarding the confidentiality specified above.

Employees must ensure that the documents and accounting records of AMTRANS LOGISTICS created by them, or for which they are otherwise responsible, are accurate, complete and are generated in due time and in accordance with the applicable accounting rules and standards.

Therefore, you cannot omit illegal commissions or other types of undue payment from the accounting records, or make up accounting records to hide inappropriate or unidentified activity.

9. Environment, safety and health

The protection of the environment and the conservation of natural resources are priorities, and it is up to each of the employees,

in their respective functions, to seek to improve the management and execution of operations in a safe way for the environment.

This also applies to the work environment, where effective accident prevention measures are required, such as technical planning of workplaces, among others.

10. Political contributions, donations and sponsorships

AMTRANS LOGISTICS does not make political contributions (donations to politicians, political parties or political organizations).

The contributions made by its employees or third parties that in any way relate to it, will be their sole responsibility, having no connection with the company AMTRANS LOGISTICS.

11. Reporting Channel

All reports regarding possible non-compliance with the provisions herein may be submitted anonymously or identified through the Reporting Channel (Contact Us section of the website <https://amtrans.com.br/>), and no reprisals of any kind will be tolerated against the complainants.

If the existence of prohibited conduct is verified, sanctions of an administrative nature will be applied, depending on the seriousness and/or recurrence of the conduct, and an administrative procedure will be set up to analyze the facts.

If you have any questions about the criteria adopted, please consult the full Code of Ethics and Conduct on the website <https://amtrans.com.br/>.