

CODE OF CONDUCT FOR SUPPLIERS AND SERVICE PROVIDERS SHIPPING PROTECTION SHIP SERVICES

1. INTRODUCTION

Shipping Protection Ship Services reaffirms its commitment to ethics, sustainability, and respect for human rights in all of its operations. This Code of Conduct establishes the principles and guidelines that must be observed by all service providers and suppliers acting in partnership with the company.

Suppliers and service providers are expected to align their processes with international human rights standards, labor and environmental regulations, and to fully comply with the applicable laws in the countries where they operate.

2. FUNDAMENTAL PRINCIPLES

All suppliers and service providers must observe the following principles:

- **Ethics and Transparency:** Conduct based on integrity, transparency, and compliance with local and international laws.
- **Respect for Human Rights:** Assurance of decent working conditions free from discrimination, abuse, or exploitation.
- **Sustainability:** Commitment to practices that minimize environmental impacts and promote the responsible use of natural resources.
- **Compliance with Labor Standards:** Full compliance with labor laws in force in the countries of operation.
- **Social and Environmental Responsibility:** Adoption of initiatives that promote sustainable development and environmental preservation.

3. RULES AND GUIDELINES

3.1 Bribery, Corruption, and Fraud

It is strictly prohibited to offer, accept, or solicit any form of bribery, kickback, improper payment, or unlawful advantage in business transactions.

All suppliers must comply with applicable anti-corruption laws and regulations, including Brazilian Law No. 12,846/2013, the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, and any other applicable laws in the countries where they operate.

Any suspicion of corruption or fraud must be reported immediately through Shipping Protection's reporting channels. A reporting channel is available 24 hours a day through the website <http://www.contatoseguro.com.br/shippingprotection>, which allows anonymous reports to be submitted if preferred.

3.2 Working Hours

Suppliers and service providers must ensure that the working hours of their employees are in compliance with the labor legislation applicable in the locations where they operate. Excessive working hours or working conditions that fail to comply with the legal limits on working hours, breaks, and rest periods must not be required.

3.3 Freely Chosen Employment

Shipping Protection does not tolerate any form of forced labor, debt bondage, human trafficking, or coercive practices. Suppliers and service providers must ensure that all employment relationships are established on a voluntary, transparent, and formalized basis, in compliance with the rights and guarantees provided under applicable legislation.

3.4 Compensation

Suppliers and service providers must promote compensation practices that are consistent with applicable legislation and the principles of decent work, ensuring the proper payment of wages and benefits due.

Improper deductions or any practices that compromise workers' rights shall not be permitted.

3.5 Child Labor

The use of child labor in violation of applicable legislation and internationally recognized principles for the protection of children and adolescents is prohibited.

Suppliers and service providers must adopt reasonable measures to prevent, identify, and eliminate any form of child exploitation in their operations and, where applicable, throughout their supply chain.

3.6 Freedom of Association

All workers must be guaranteed the right to freedom of association and collective bargaining, in accordance with local laws and the principles of the International Labour Organization (ILO). Any form of retaliation against employees who exercise these rights is prohibited.

3.7 Health and Safety

Suppliers and service providers must provide a safe and healthy work environment by adopting appropriate measures to prevent accidents, injuries, and occupational illnesses. Compliance with applicable health and safety standards and requirements is expected, as well as the promotion of a preventive culture aimed at protecting the physical integrity and well-being of workers.

3.8 Use of Materials

Where applicable to their activities, suppliers and service providers must seek the responsible procurement and use of materials, raw materials, and supplies, taking into consideration social, environmental, and ethical aspects throughout their supply chain. The sourcing and production of such resources must not contribute to human rights violations, environmental degradation, or other practices that are inconsistent with the principles of this Code.

3.9 Environmental Impact

Suppliers and service providers are encouraged to adopt practices that contribute to pollution prevention, the reduction of environmental impacts, and the efficient use of natural resources.

The activities carried out must comply with applicable environmental legislation, including requirements related to resource consumption, atmospheric emissions, waste management, and environmental protection.

Whenever feasible, the adoption of solutions that promote the use of renewable energy sources, recyclable materials, and sustainable practices is recommended.

3.10 Relationship with Public Authorities

All service providers and suppliers acting on behalf of Shipping Protection Ship Services—whether directly or indirectly—before public officials, government agencies, or public administration entities, at any level of government (municipal, state, national, or international), and in any country where the company operates, including Brazil, Panama, and Colombia, must

conduct themselves in accordance with the principles of integrity, legality, transparency, and accountability.

It is essential that such partners adopt an ethical, professional, and responsible approach in all interactions with representatives of the public sector, observing the following commitments:

- Act in compliance with local and international anti-corruption legislation, including, but not limited to, Brazilian Law No. 12,846/2013 (Anti-Corruption Law), the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, as well as equivalent regulations in force in the countries where they operate;
- Refrain from any unlawful or unethical practice, such as active or passive corruption, influence peddling, undue favoritism, bribery, or any other conduct that compromises the integrity of relations with public authorities;
- Avoid and report potential conflicts of interest, adopting measures to ensure impartial decisions based on the public interest and legitimate business interests;
- Ensure that any and all actions carried out on behalf of Shipping Protection with public authorities are guided by good faith, clarity, proper documentation, and institutional responsibility;
- Safeguard the company's reputation and legal responsibility, recognizing that their actions directly reflect on Shipping Protection's image and compliance before authorities and third parties.

The supplier or service provider declares that it understands and agrees with the guidelines established herein regarding relations with public authorities and undertakes to comply with them in full in all jurisdictions where it may act on behalf of Shipping Protection.

4. MONITORING AND ASSESSMENT

Shipping Protection may conduct audits, technical visits, and periodic assessments to verify suppliers' and service providers' compliance with this Code of Conduct.

Suppliers are expected to:

- Maintain records demonstrating compliance with the principles set forth herein;
- Authorize audits and provide requested information;

- Implement corrective measures within the agreed timeframes in cases of nonconformities.

5. GUIDANCE AND EXPECTATIONS

This Code of Conduct represents more than a set of rules—it is a commitment to a more ethical, sustainable, and responsible future. Our initial objective is to raise awareness among and engage our suppliers and service providers, encouraging the adoption of social and environmental policies that contribute to a positive transformation.

We recognize that the implementation of these guidelines may present challenges, especially at the outset. Therefore, we make ourselves available to support our partners, encouraging dialogue and continuous improvement. We believe that, together, we can build a fairer and more sustainable business environment.

5.1 Monitoring and Continuous Improvement

Shipping Protection may conduct periodic assessments to monitor partners' alignment with the guidelines of this Code. If opportunities for improvement are identified, we will seek solutions jointly, in a collaborative and progressive manner.

5.2 Actions in Cases of Nonconformity

Although the focus is on guidance and joint development, serious or repeated cases of noncompliance may require more stringent corrective actions, such as:

- Formal notification with recommendations for adjustments;
- Implementation of improvement plans with defined timeframes and support;
- Temporary suspension of contracts if the nonconformities persist;
- As a last resort, contract termination and removal of the supplier from the partner base.

Our commitment is to build a responsible supplier network aligned with the growing expectations of the market and society.

6. FINAL PROVISIONS

This Code of Conduct shall enter into force on the date of its publication and shall remain valid for an indefinite period, and may be revised whenever necessary as a result of legal, regulatory,

strategic, or organizational changes, with the purpose of ensuring its alignment with best practices and applicable legislation in the locations where Shipping Protection operates.

By accepting and commencing the provision of services, the supplier or service provider declares that it understands, agrees with, and undertakes to observe the guidelines established in this Code of Conduct.

DOCUMENT HISTORY

Revision	Date	Description of Change	Responsible Party
00	04/01/2025	Initial issuance of the document.	Management
01	08/05/2025	Update and content revision of the Code of Conduct for Service Providers and Suppliers.	Management
02	06/02/2026	Update of the corporate letterhead, comprehensive review of the structure, and revision of the Code of Conduct content.	Management

Management Approval:

Approval Date: 06/02/2026

Name of Responsible Person: Kledilton Cutrim Pinto

Position: Managing Director

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