

CODE OF ETHICS AND CONDUCT SHIPPING PROTECTION SHIP SERVICES

CHAPTER I – INTRODUCTION

Article 1 – Purpose

This Code of Ethics and Conduct establishes the principles and guidelines that govern the activities of Shipping Protection Ship Services, a maritime agency operating in Brazil and abroad, committed to global expansion, social and environmental responsibility, and ethical practices within the industry.

Article 2 – Scope

This Code applies to all employees, management, third parties, clients, and service providers, regardless of location, ensuring that all parties adhere to the established ethical principles.

CHAPTER II – PRINCIPLES AND VALUES

Article 3 – Integrity and Transparency

All individuals must act with honesty, transparency, and responsibility in all business interactions, preventing and reporting any unlawful practices. Commitment to ethics and compliance shall guide all company actions, ensuring fair relationships aligned with the principles of the UN Global Compact.

Article 4 – Environmental Sustainability

We are committed to promoting environmental preservation, strictly complying with environmental laws and regulations, especially in maritime and logistics operations. We work to minimize environmental impacts by investing in sustainable practices and fostering social and environmental awareness in our activities and in the communities where we operate.

Article 5 – Commitment to Human Rights

Shipping Protection Ship Services adopts a formal commitment to Human Rights, ensuring an inclusive environment free from any form of discrimination, whether based on gender, race, religion, age, disability, sexual orientation, or any other criterion.

Furthermore, we recognize and respect the rights of traditional peoples, including Indigenous communities, *quilombola* communities (*quilombolas*) and other populations that maintain historical and cultural ties to their territories.

Our commitment includes:

- Respect for the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights (Ruggie Principles);
- Ensuring dignified and safe working conditions for our employees and partners;
- Supporting initiatives that promote social inclusion, sustainable development, and improved quality of life for communities impacted by our operations;
- Implementing practices to assess and mitigate social and environmental impacts, ensuring that our activities do not harm traditional peoples or their way of life.

Article 6 – Anti-Bribery and Anti-Corruption

It is strictly prohibited to offer, request, or accept any undue advantage, whether on behalf of the company or for personal interest. Shipping Protection Ship Services follows the standards established by SDG 16 – Peace, Justice and Strong Institutions, promoting corruption-free business practices.

Violations of this policy shall be subject to rigorous internal sanctions and, when necessary, will result in appropriate legal measures.

CHAPTER III – BEHAVIORAL EXPECTATIONS

Article 7 – Personal and Professional Conduct

All individuals must maintain ethical conduct, respect colleagues, protect confidential information, and safeguard company assets.

Article 8 – Freedom of Association and Labor Rights

Shipping Protection Ship Services formally respects and recognizes workers' right to freedom of association and collective bargaining, ensuring a democratic and transparent work environment.

Accordingly, the company adopts the following guidelines:

- **Right to Association:** All employees are free to join labor unions, professional associations, or other representative entities, without any form of retaliation or discrimination.
- **Union Neutrality:** The company adopts a neutral position, neither interfering with nor encouraging practices contrary to unionization or collective agreements.
- **Recognition of Collective Agreements:** The company recognizes the validity of collective labor agreements, negotiating conditions collectively whenever applicable.
- **Open Dialogue:** We maintain open communication channels to ensure that working conditions and employees' rights are always respected.

These guidelines reinforce our commitment to fundamental labor rights, in compliance with the principles established by the International Labour Organization (ILO) and the UN Global Compact.

CHAPTER IV – REPORTING CHANNELS

Article 9 – Reporting Violations

Shipping Protection provides secure, independent, and confidential channels for reporting violations of this Code of Ethics and Conduct or any irregular practice. Reports may be submitted anonymously or with identification, at the reporting party's discretion, through the platform below, accessible 24 hours a day, 7 days a week, at:

www.contatoseguro.com.br/shippingprotection

The platform is operated by a specialized third-party company, ensuring complete impartiality, confidentiality, and protection for the reporting party. No retaliation shall be tolerated against anyone making a report in good faith. Furthermore, the company is committed to treating all reports seriously, conducting appropriate investigations with impartiality and responsibility.

CHAPTER V – SANCTIONS AND PENALTIES

Article 10 – Disciplinary Measures

- Formal reprimand;
- Suspension;
- Contract termination;
- Legal measures.

CHAPTER VI – IMPLEMENTATION

Article 11 – Training and Monitoring

Periodic training and annual reviews shall be conducted to ensure compliance with this Code, strengthening our global ethical performance.

DETAILED EXPANSION

Definitions:

- **Bribery:** Offering or receiving any benefit to influence decisions.
- **Conflict of Interest:** When personal interests interfere with those of the company.

Specific Guidelines:

- **Relationship with Third Parties:** Prohibition of favors or gifts that may influence decisions.
- **Data Protection (LGPD):** Protection of client and employee data.

Training:

- Quarterly sessions on ethics and ESG.

Detailed Sanctions:

- Verbal or written warning;
- Temporary suspension;
- Termination for cause;
- Legal action in serious cases.

Reporting Channel:

- Dedicated email;
- Investigation within up to 30 days;
- Guaranteed protection for the reporting party.

Ongoing Commitment:

- Annual reviews of the Code;
- Broad dissemination;
- Continuous monitoring.

EFFECTIVE DATE AND REVIEW

- **Implementation Date:** March 2025.
- **Review Frequency:** This Code of Ethics shall be reviewed periodically, whenever necessary, in order to reflect relevant legal, regulatory, or strategic updates.
- **Responsible for Review:** The review shall be conducted by the Company's Executive Board, together with the departments responsible for compliance and corporate governance.

Shipping Protection – Commitment to Ethics, Social Responsibility, and Sustainability.

Approval Date: 24/02/2025

Revision 01: 17/04/2025

Revision 02: 25/03/2026

Management Approval:

Approval Date: 25/03/2026

Name of Responsible Person: Kledilton Cutrim Pinto

Position: Chief Executive Officer

Signature: KLEDILTON CUTRIM
PINTO:72477245368

Assinado de forma digital por
KLEDILTON CUTRIM
PINTO:72477245368
Dados: 2026.05.26 16:25:48 -03'00'