

CODE OF CONDUCT FOR SERVICE PROVIDERS AND SUPPLIERS

1. INTRODUCTION

Shipping Protection Ship Services reaffirms its commitment to ethics, sustainability, and respect for human rights across all its operations. This Code of Conduct sets out the principles and guidelines that must be followed by all service providers and suppliers working with the company.

Suppliers and service providers are expected to align their processes with international human rights standards, labour and environmental regulations, and comply fully with applicable legislation 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:** Ensuring dignified working conditions, free from discrimination, abuse, or exploitation.
- **Sustainability:** Commitment to practices that minimise environmental impact and promote the responsible use of natural resources.
- **Compliance with Labour Standards:** Full adherence to labour laws in countries of operation.
- **Social and Environmental Responsibility:** Implementation of initiatives that support sustainable development and environmental protection.

3. RULES AND GUIDELINES

3.1 Bribery, Corruption and Fraud

- Offering, accepting, or soliciting any form of bribe, kickback, undue payment, or illicit advantage in business transactions is strictly prohibited.



- Suppliers must comply with anti-corruption laws, including Brazil's Law No. 12.846/2013, the United States Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant international regulations.
- Any suspicion of corruption or fraud must be reported immediately via Shipping Protection's whistleblowing channels. Our reporting channel is available 24/7 at www.contatoseguro.com.br/shippingprotection, and anonymous reports are accepted.

3.2 Working Hours

- Working hours must comply with local labour laws.
- Suppliers must not require excessive working hours beyond legal limits for shifts and rest periods.

3.3 Freely Chosen Employment

- Forced labour, debt bondage, human trafficking, or any form of coercion is strictly prohibited.
- All employment contracts must be voluntary and clearly documented.

3.4 Remuneration

- Workers must receive fair wages, at or above the legal minimum, and sufficient to cover basic living needs.
- Unjustified deductions from salaries are not permitted.

3.5 Child Labour

- Employing underage workers contrary to local laws is strictly forbidden.
- Measures must be in place to prevent and eliminate child exploitation in the supply chain.

3.6 Freedom of Association

- Workers must have the right to form and join trade unions or representative associations, in accordance with local laws and ILO principles.
- There must be no retaliation against employees exercising their right to collective bargaining.

3.7 Health and Safety

- Suppliers and service providers must ensure a safe and healthy working environment and adopt preventive measures against accidents and occupational diseases.
- Full compliance with applicable health and safety regulations is required.

3.8 Use of Materials

- Where applicable, materials used must be sourced responsibly and sustainably.
- Extraction and production of materials must not cause social or environmental harm.

3.9 Environmental Impact

- Suppliers must adopt sustainable practices that reduce the environmental impact of their operations.
- Waste disposal, air emissions, and resource use must comply with environmental laws.
- Whenever possible, renewable energy sources and recyclable materials should be prioritised.

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 agents, authorities or entities at any level of government (local, regional, 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.

These partners are expected to maintain ethical, professional and responsible behaviour in all interactions with public officials, by complying with the following commitments:

- **Act in accordance with local and international anti-corruption laws**, including, but not limited to, Brazil's Law No. 12.846/2013 (Clean Company Act), the United States Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and any equivalent legislation in the countries where they operate;
- **Refrain from engaging in any unlawful or unethical practices**, such as active or passive corruption, influence peddling, bribery, or any conduct that may compromise the integrity of public relations;



- Avoid and report potential conflicts of interest, and adopt measures to ensure impartial decision-making based on legitimate public and business interests;
- Ensure that all actions involving public authorities on behalf of Shipping Protection are conducted in good faith, with full transparency, proper documentation, and institutional responsibility;
- Protect the company's reputation and legal standing, acknowledging that their actions directly affect Shipping Protection's image and compliance performance before authorities and third parties.

The provider declares that they understand and agree with the guidelines set out for interactions with public authorities and undertake to fully comply with them in all jurisdictions where they may act on behalf of Shipping Protection.

4. MONITORING AND EVALUATION

Shipping Protection may conduct audits, facility visits, and periodic evaluations to ensure supplier compliance with this Code of Conduct.

Suppliers must:

- Maintain records to demonstrate compliance with the principles outlined herein;
- Permit audits and provide requested information;
- Implement corrective actions within agreed deadlines if non-compliance is identified.

5. GUIDANCE AND EXPECTATIONS

This Code of Conduct is not just a set of rules but a commitment to a more ethical, sustainable, and responsible future. Our goal is to raise awareness and encourage suppliers and service providers to adopt socio-environmental policies that drive positive transformation.

We recognise that implementing these guidelines may initially pose challenges. Therefore, we are committed to supporting our partners, promoting open dialogue, and fostering 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 carry out regular assessments to monitor suppliers' alignment with this Code. If improvement opportunities are identified, we will work collaboratively to implement corrective measures progressively.

5.2 ACTIONS IN CASE OF NON-COMPLIANCE

While our focus is on guidance and joint development, serious or repeated breaches may require firmer actions, such as:

- Formal notifications with recommendations for adjustments;
- Implementation of improvement plans with deadlines and necessary support;
- Temporary suspension of contracts if non-compliance persists;
- As a last resort, contract termination and removal from our supplier database.

Our aim is to establish a responsible and sustainable supplier network that meets the evolving expectations of the market and society.

6. FINAL PROVISIONS

This Code of Conduct comes into force on its publication date and will be periodically reviewed to ensure alignment with best practices and applicable legislation in the locations where we operate.

By accepting and commencing the provision of services, the supplier or service provider affirms that they understand and agree with the guidelines set forth herein.

VALIDITY AND REVIEW

- **Implementation Date:** June 2025.
- **Review Frequency:** This Code of Conduct for Service Providers and Suppliers will be reviewed annually, with the next review scheduled for June 2026, unless earlier revisions are deemed necessary.
- **Responsible for Review:** The review will be conducted by the Company's Board of Directors, in collaboration with the teams responsible for compliance and corporate governance.



Approval Date: 01/04/2025

Review Date: 05/08/2025

Management Approval:

Name of Responsible Person: Kledilton Cutrim Pinto

Position: Executive Director

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