

CODE OF ETHICS AND CONDUCT SHIPPING PROTECTION SHIP SERVICES

CHAPTER I – INTRODUCTION

Article 1 – Objective

This Code of Ethics and Conduct sets out the principles and guidelines that guide the activities of Shipping Protection Ship Services, a maritime agency operating in Brazil and abroad, committed to global expansion, socio-environmental responsibility, and ethical practices in the sector.

Article 2 – Scope

It applies to all employees, management, third parties, clients, and service providers, regardless of location, ensuring that all follow the ethical principles established herein.

CHAPTER II – PRINCIPLES AND VALUES

Article 3 – Integrity and Transparency

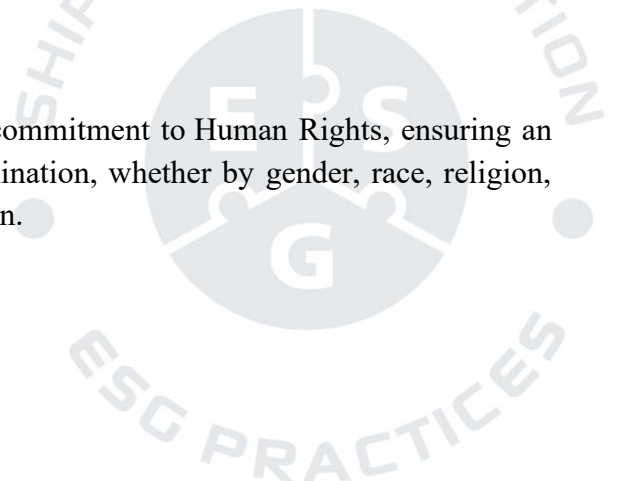
Everyone must act with honesty, transparency, and responsibility in all business interactions, preventing and reporting any unlawful practice. Commitment to ethics and compliance must guide all company actions, ensuring fair relationships aligned with the principles of the UN Global Compact.

Article 4 – Environmental Sustainability

We are committed to promoting environmental preservation, strictly respecting environmental laws and regulations, especially in maritime and logistics operations. We work to minimise environmental impacts, investing in sustainable practices and fostering socio-environmental awareness in our activities and 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 by gender, race, religion, age, disability, sexual orientation, or any other criterion.



In addition, we recognise and respect the rights of traditional peoples, including indigenous communities, quilombola communities, and other populations with historical and cultural ties to their territories. Our commitment includes:

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

Article 6 – Combating Bribery and Corruption

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

Breaches of this policy will be addressed with strict internal sanctions and, when necessary, will result in appropriate legal measures.

CHAPTER III – EXPECTATIONS OF BEHAVIOUR

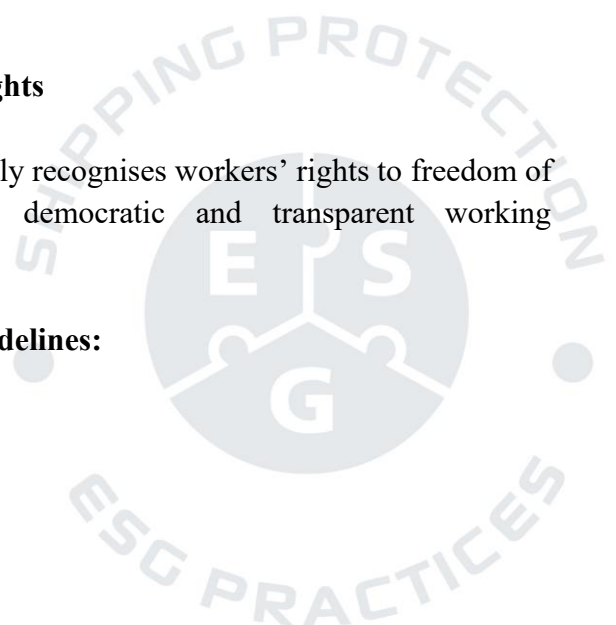
Article 7 – Personal and Professional Conduct

Everyone must maintain an ethical stance, respect colleagues, protect confidential information, and safeguard the company's assets.

Article 8 – Freedom of Association and Labour Rights

Shipping Protection Ship Services respects and formally recognises workers' rights to freedom of association and collective bargaining, ensuring a democratic and transparent working environment.

Accordingly, the company adopts the following guidelines:



- **Right to Association:** All employees are free to join trade unions, professional associations, or other representative entities, without any form of retaliation or discrimination.
- **Trade Union Neutrality:** The company adopts a neutral stance, neither interfering in nor encouraging practices contrary to unionisation or collective agreements.
- **Recognition of Collective Agreements:** The company recognises the validity of collective labour 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 labour rights, in line 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 made anonymously or with identification, at the whistleblower's discretion, via the platform below, available 24 hours a day, 7 days a week, at:

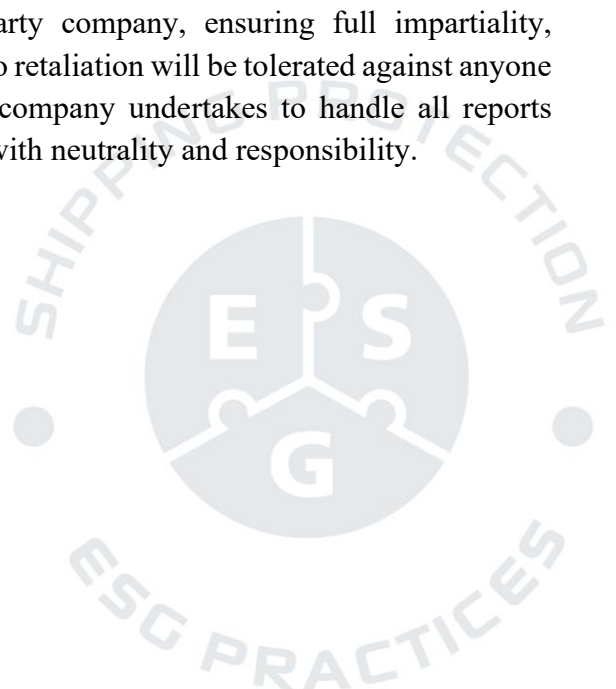
www.contatoseguro.com.br/shippingprotection

The platform is operated by a specialised third-party company, ensuring full impartiality, confidentiality, and protection of the whistleblower. No retaliation will be tolerated against anyone who makes a report in good faith. In addition, the company undertakes to handle all reports seriously, carrying out the appropriate investigations with neutrality 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 will be carried out to ensure compliance with this Code, strengthening our global ethical conduct.

DETAILED EXPANSION

Definitions:

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

Specific Guidelines:

- **Relationship with Third Parties:** Prohibition of favours 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;
- Dismissal for cause;
- Legal action in severe cases.

Reporting Channel:

- Dedicated email;
- Investigation within 30 days;
- Guaranteed protection for the whistleblower.

Continuous Commitment:

- Annual review of the Code;
- Broad dissemination;



- Ongoing monitoring.

VALIDITY AND REVIEW

- **Implementation Date:** March 2025.
- **Review Periodicity:** This Code of Ethics will be reviewed annually, with the next review scheduled for February 2026, unless adjustments are required earlier.
- **Responsible for Review:** The review will be conducted by Company Management, together with areas responsible for compliance and corporate governance.

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

Management Approval:

Approval Date: 24/02/2025

Last Revision: 17/04/2025

Responsible Party's Name: Kledilton Cutrim Pinto

Position: Executive Director

Signature: _____

