

CODE OF CONDUCT

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1. INTRODUCTION

Our Code of Conduct ("Code") guides the way we should conduct our actions in the business environment, to ensure a high level of quality in the relationship with our employees, suppliers, customers, shareholders, competitors, government and society in general.

The Code translates the main and most valuable guidelines of the EAH Trading, presenting our values, principles and guidelines that aim: (a) the continuous development of our excellence in generating sustainable growth conditions, (b) the commitment to "always do the best and best possible" and (c) the appreciation of respect for all people with whom the EAH TRADING Group relates to the accomplishment of its mission.

It is, therefore, a fundamental reference for the maintenance of our success. Therefore, knowledge and acceptance of its content and directions is the first step to ensure our sustainability.

2. SCOPE OF APPLICATION

The guidelines provided for in the Code apply to all employees of the EAH Trading, service providers, directors, board members, suppliers, business partners and customers, whether individuals or legal entities, including public administration agencies/entities that contract EAH TRADING services.

3. MISSION, VISION AND VALUES

3.1. MISSION

Be the best, most innovative and reliable Latin American transport company in the world.

3.2. VISION

Offer our customers high performance logistics solutions based on creativity and constant optimization of operations.

3.3. VALUES

Human Development, Innovation, Integrity, Security, Passion.

4. CODE OF CONDUCT

The Code establishes the values and principles that guide our way of conducting our relationships and business practices, ensuring firmness and uniformity in the healthy and ethically appropriate treatment of the various situations that underpin the trust and credibility of our business.

All guidelines of conduct, valid for all hierarchical levels of the EAH Trading, formalize the ethical guidelines to be sustained, with responsibility and commitment, in the day-to-day of all our business activities, in the various areas of the company's relationship. Its application also extends to our service providers, suppliers, partners and partners.

It is, therefore, of vital importance that everyone knows and accepts the parameters identified in this Code for better harmony and integration into our way of being, and it

cannot be claimed that the ignorance of the guidelines of the Code to avoid any responsibilities can not be claimed.

5. RELATIONSHIP AREAS

5.1. EMPLOYEES

As one of the main forces of our business, our employees must take responsibility for the image and brand of EAH TRADING, not unduly using its name, services and products in activities outside their professional and business duties, honoring their financial commitments to the company itself and as socially responsible citizens.

Our employees are valued with equal opportunities for selection, remuneration, development and promotion, being recognized for their professional skills and performance based on criteria aligned with business objectives.

It is not – and will not be – accepted any discriminatory treatment due to its ancestry, color, sex, religion, nationality, sexual orientation, social origin or political preferences.

We recognize the importance of providing a safe, diverse and healthy work environment in which there is freedom of expression and respect for the integrity and privacy of people, providing an environment free of any kind of threat, moral or sexual harassment, verbal or nonverbal violence, bribery or defamation.

We value safety in the workplace by observing established laws and regulations, directing specific policies and actions to safeguard the health of our employees and adopting measures and conditions necessary to preserve their well-being and the quality of their performance.

Our employees recognize the importance of working primarily for the interests of the company, avoiding any relationship, influence or activity that may jeopardize their behavior, attitude and actions, following all rules and guidelines that aim to prevent situations of conflict of interest, as well as participating responsibly in activities outside the company.

Any act presented as an opportunity for personal gain, both in internal and external negotiations, especially with customers, suppliers, government representatives and competitors, or the exchange of favors through gifts, bonuses and courtesies of any nature that may compromise the integrity of the ethical procedures adopted by the EAH Trading are not accepted and are treated with due rigor in accordance with the company's rules and guidelines.

Our employees are especially careful about their participation in parallel activities that jeopardize their professional responsibilities, not being accepted the use of company goods and working hours for activities outside the scope of employee hiring and during their journey.

5.2. SUPPLIERS

Impartiality and integrity in dealing with our negotiations are fundamental to the continuity and success of our business and our relationship with suppliers, so our suppliers are aware of and adhering to EAH Trading Principles, Values and Code of Conduct, responsibly assuming the standards and conditions that guide our business transactions.

As partners in the development of our business, our suppliers establish with EAH TRADING relationships of mutual commitment in the continuous construction of common interests that strengthen our business practices and the pursuit of excellence of our products and services, always aiming at the best cost-benefit ratio.

Our negotiations are guided by the ethical meaning of our relationships, which, in turn, are based on respect for equal conditions, justice, compliance with the laws, norms and guidelines established by the company, and no commercial transaction is accepted in which improper practices, such as child and/or slave labor, bribery, bribery or courtesy misuse, may compromise the integrity of the business.

We select our suppliers based on transparent criteria and procedures, and there is no discrimination or privileges of any kind. Gifts that are not purely promotional in nature are not accepted, as well as no commercial transaction involving kinship relationships is accepted, unless due to prior analysis and authorization from the Board of Directors and the ethics committee (non-statutory).

The moral integrity of our suppliers, in compliance with the tax, civil and criminal laws in force in the country, is a fundamental factor for the support of solid and strong relationships with EAH TRADING.

We value the good relationship based on the confidentiality of information of a private or confidential nature and the transparency of information relating to any situation that may present or suggest conflict of interest, in which personal or financial benefits may overtake the interests and objectives of the EAH Trading.

5.3. CLIENTS

The main orientation of our business is excellence in meeting the needs and demands of our customers. We adopt standards of conduct based on promptness, agility and cordiality, offering products and services with honesty and respect for consumer rights.

We prioritize the quality of our customer service permanently aiming at your satisfaction. We follow the best standards of agility and efficiency, guarding the physical and moral integrity of our customers, when in our physical environments.

We guarantee the confidentiality of our clients' personal and banking data and comply with the duty of confidentiality, as determined by complementary law 105/2001. We respect the diversity of our customers, offering impartial and prejudice-free treatment of any kind, as well as clear guidance and information about our products and services to enable the best decision to choose and maintain lasting relationships.

We honor our commitments by clearly, accurately and transparently disclosing all our actions relating to customers, not accepting and not advertising deceptively under any pretext.

5.4. COMMUNITY

We respect the human rights, values and cultural diversity present in each community in which we are inserted working for the development of the country.

We honor our commitment to social actions through correct recognition and due to legal burdens and taxes, recognizing their importance for the maintenance of social, educational, cultural, environmental, health and safety programs implemented by government agencies.

We must pay to the issues of social and environmental responsibility, in the creation of products and services, aiming to minimize any negative impact, direct or indirect, on the living conditions of communities and / or the environment, prioritizing attitudes that seek the perpetuation of the company.

We sponsor or adopt other forms of support for projects and activities aimed at the community, in accordance with the company's internal policies and in accordance with the purposes, criteria and objectives established by the quality and potential of carrying out the proposed actions.

5.5. COMPETITORS

We respect our competitors, establishing ethical competitiveness relationships, based on market rules and criteria, adopting healthy and loyal competitive practices, not being accepted defamatory attitudes or that may denigrate the image of their business, products or services.

We do not disclose comments or rumors that may harm the business or image of competing companies.

In a way that it is healthy, competition must be based on loyalty and mutual respect, thus becoming veiled practices such as manipulation of good faith, espionage and omission of relevant facts.

5.6. GOVERNMENT AND SOCIETY

We conduct our actions in a transparent manner, guided by the cordial and ethical treatment of representatives of public agencies, including in all spheres of the Legislative, Executive and Judicial Branches, continuously observing the maintenance and compliance of current laws regarding the responsibilities of each area of our company. We do not accept any form of granting of advantage or privilege to public agents due to functional or corporate attributions.

We recognize the importance of legally constituted associations and class entities, aiming at common interests for the best performance of our company in all its areas of operation and relationship

Requests from the government or regulatory bodies must be received and met promptly and transparently.

EAH TRADING strictly complies with Law 12.846/2013 that provides for Anti-Corruption, therefore prohibits the offer of privileges or personal advantages to public agents due to the function performed. More information can be found in our Anti-Corruption Policy.

5.7. INFORMATION SECURITY

Our employees recognize that it is their responsibility to preserve and secure data and information, as well as equipment, technologies and computerization resources owned by the company, made available exclusively for communication, storage and registration of activities of interest to the organization.

Further information can be found in our Information Security Policy.

5.8. CORPORATE COMMUNICATION

Our relationship with the media is based on professionalism and social responsibility regarding the specific care of our advertising campaigns, promotional actions and negotiations, providing correct and accurate information in accordance with internal guidelines established for the preservation of the company's assets and image.

Our communication with the market and society has as its principle the support of the clarity and transparency of our actions, based on compliance with the relevant legal standards and the continuous development of processes and procedures aimed at monitoring and monitoring the treatment of information.

In view of the repercussion that may generate and the confidentiality of the information processed within the company, the contact with any means of communication should have provided for approval of the Board of Directors.

The institutional image of the company is its most valuable asset, and must be built and preserved permanently by all. Thus, any action or attitude on the part of employees, individual or collective, that may harm this image, may be considered serious misconduct.

5.9. BE ETHICAL: DAILY ATTITUDE

Being ethical is a personal and collective responsibility, and with this Code we express to all our audiences the established standards of conduct, valid for all hierarchical levels of the EAH TRADING Group, recognizing that our principles and values are formed and strengthened in our daily attitude.

5.10. CHANNELS OF INFORMATION AND GUIDANCE

The observation of the ethical principles and values of the EAH Trading is made through the proactive development of practices, policies and procedures appropriate to each situation, ensuring that our executives, leaders and employees know and sustain in their activities and relationships the directions established in our Code.

We recognize the integrity and moral suitability of all who, in the responsible exercise of their duties, cooperate to support the ethical principles and values of the EAH Trading, preserving their individualities and ensuring that our ethical guidelines are respected in all our actions.

Every employee, as an example of the integrity of EAH TRADING, assumes its commitment to fully know the ethical guidelines and guidelines, as well as all complementary policies and regulations, and comply with all necessary measures for its proper support.

Any attitude, conduct or situation that may be configured as contrary to the principles, values and guidelines established in this Code, must be informed to the company, to continuously support the ethical alignment of our actions. Therefore, no form of retaliation or persecution against those who have freely reported any transgression of the principles and guidelines of this Code will be accepted.

Any doubts about the contents and practices assumed in our Code are dealt with directly with the immediate managers, according to the specific directions of the company. We consider that each one is responsible for respecting and complying with the values and principles of the Code, recognizing that it is part of its activities with the Group's companies to be committed to the guidelines established herein.

In order to meet and guide possible situations not contemplated in this Code, EAH TRADING constitutes an ethics committee (non-statutory) to analyze, evaluate and implement actions, measures and programs aimed at the development of Ethical Education in the company, as well as to monitor, advise and instruct ethical decisions related to the support of the principles, values and guidelines established in this Code , in addition to its own review when necessary.

And to better meet the diversity of the audiences with which it relates, the EAH Trading provides the channel, which with precision, security and confidentiality, will serve those who prefer this form of communication. Dial Complaint: info@eahtrading.com

All information will be treated by the Ombudsman with confidentiality and confidentiality, and whistleblowers/ claimants, when identified, will receive a response from the actions taken in relation to the complaint/complaint.

The complaints will be analyzed by the Ethics Committee, composed of representatives of the areas. The Committee shall collect all necessary information to ascertain the facts.

The Code is accessible to other interested audiences, who have some kind of relationship with the companies of the EAH Trading.

6. SANCTIONS

Any violation or non-compliance with the Code will be treated, cleared and deliberated by the Ethics Committee. If confirmed, the person responsible will be subject to applicable legal and disciplinary measures, as set by examples:

- a) Reinforcement of training;
- b) Verbal warning;
- c) Written warning;
- (d) suspension;
- e) Shutdown without cause;
- f) Shutdown with just cause;
- (g) termination of the service contract; or
- g) Opening of civil and/or criminal proceedings.

7. SITUATIONS NOT CONTEMPLATED

This Code presents general guidelines, and some specific situations may not be contemplated.

What is expected in these cases is that each one act with responsibility, prudence and ethical awareness, evaluating the best way forward with the certainty that the appropriate solution will always be governed by common sense and the values we value.

Any questions not specified in this document and related to ethical and conduct issues, shall be submitted for evaluation by the Board of Directors.

It is up to the Human Resources area to keep this document up to date, in accordance with what is disclosed by the group internationally, bringing its content to the attention of all of the EAH Trading.

8. DURATION

This Code shall enter into force on the date of its publication, revoking and replacing any prior communication on the subject and shall remain in force for an indefinite period.

Annex I - Terms of Receipt and Commitment

I declare that I have received the Code of Conduct, I am aware of its guidelines and provisions and, by signing this Term, I express my commitment to fully comply with it in conducting my activities in EAH TRADING and to disseminate its content.

I also declare that if I identify a risk situation related to the Code of Conduct or a situation in which the conduct required or expected by this Policy has not been expressly followed, I will inform the Senior Management of EAH TRADING.

Location and date	
full name	
CPF	
signature	



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