



MARALTO

TERMINAL DE
CONTÊINERES

CODE OF CONDUCT & ETHICS

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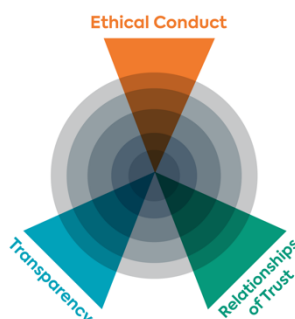
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CODE OF CONDUCT & ETHICS

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Approved by:	Board of Directors
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PURPOSE OF THE CODE OF CONDUCT & ETHICS

The purpose of this Code of Conduct & Ethics is to outline and disseminate all ethical commitments to be complied with and guide the everyday behavior of all staff members (directors, officers, employees, interns, and apprentices) and business partners (all Maralto's business partners, including customers, suppliers, consultants, agents, consortium companies or any other third parties), under all applicable legislation, especially Law 12,846/2013 ("Anticorruption Law").



Additionally, the Code of Conduct & Ethics reflects Maralto's commitment to its employees, business partners, and communities where it operates to build a relationship of mutual trust and cooperation. This is a broad and dynamic topic, and this Code does not aim to exhaust it. Therefore, our actions must always be performed with care, diligence, ethics, good faith, respect, and honesty.

In case of doubts, suspicions, concerns, or situations that may indicate behavior or conduct inconsistent with Maralto's expectations, illegal or unethical conduct, questionable accounting practices, asset control vulnerabilities, or any other concerns that may put our image and reputation at risk, contact a member of the Ethics Committee and/or report to our communication channels.

The confidentiality of your allegation will be ensured. We lead by example at all levels and act with integrity and ethics, thus demonstrating a commitment to our core values.

With everyone's compliance, we aim to ensure that our activities comply with the principles set out in this Code.

SCOPE

O Código de Conduta Ética é aplicável a Maralto e todos os colaboradores (conselheiros, diretores, funcionários, estagiários e aprendizes) e parceiros (todo e qualquer parceiro de negócio da Maralto, inclusive clientes, fornecedores, consultores temporários, agentes, sociedades consorciadas ou quaisquer outros terceiros).

The Code of Ethics & Conduct applies to Maralto and all its employees (directors, officers, employees, trainees, and apprentices) and partners (any and all Maralto's business partners, including customers, suppliers, temporary consultants, agents, consortium companies, or any other third parties).

ETHICS COMMITTEE

Maralto's Ethics Committee is the top governance body responsible for guiding and promoting compliance with the conduct commitments set out in this document. We emphasize that we are all responsible for reading, understanding, and applying ethical commitments in our daily tasks and the Company's policies and procedures.

THE ETHICS COMMITTEE IS RESPONSIBLE FOR:

- 1) Clarifying any questions or doubts related to this Code;
- 2) Analyzing and investigating reports and violations and establishing the necessary and appropriate action plans and disciplinary penalties;
- 3) Providing training on ethical conduct;
- 4) Revising and updating this Code periodically based on Maralto's risks and needs.

The formal meetings of the Ethics Committee are held at least twice a year and whenever necessary.

When in doubt, contact the Ethics Committee through the following e-mail address: contato@maraltoterminalis.com.br or directly to a committee member.

THE ETHICS COMMITTEE IS COMPOSED OF THE FOLLOWING MEMBERS:

Cynthia Sisconetto, Ricardo Sproesser and Gustavo Valente.

RESPONSIBILITIES

IT IS OUR COMMON DUTY

to read, understand and apply the Code of Conduct & Ethics to our daily tasks and follow all corporate policies and procedures;

to always obey the law;

to report situations that indicate or characterize a violation of the expected conduct, values, and/or any other Company's policy;

not to harm or defraud the Company;

to cooperate and maintain absolute secrecy about any internal investigation of which you have become aware or been involved;

not to question, reprimand, or pressure people, whether employees, customers, or suppliers, who raise ethical questions to the people or departments in charge.

PARTNERS, SHAREHOLDERS, BOARD MEMBERS, EXECUTIVES, AND MANAGERS MUST

safeguard our corporate values, expected conduct, and compliance with our policies and procedures;

support and guide those with whom we relate;

encourage teamwork;

set an example in our conduct for our staff members, collaborators, and the community;

encourage attitudes that conform to this Code of Conduct & Ethics.

THIRD PARTIES ("BUSINESS PARTNERS")

This Code aims to disseminate good practices in line with ethical business conduct. We encourage our business partners to contribute to such initiatives through compliance and improvement suggestions. All parties who wish to do business with us must know and comply with our Code of Conduct & Ethics.

ETHICAL COMMITMENTS

Ethical commitments refer to the behavior expected from all staff members and, in practical terms, reflect our values in our everyday activities.

Below are some ethical commitments to clarify what conduct we should adopt or reject.

Once again, it is important to emphasize that this Code of Conduct & Ethics does not intend to exhaust the subject since it is broad and dynamic. Therefore, in case of doubt, please use our communication channels.

Zero-tolerance Approach to Discrimination and Promotion of Diversity and Inclusion

We respect diversity; we do not support discrimination by any means, whether based on race, gender, religion, national origin, special need, age, sexual orientation, or physical or mental disability. We believe that all our employees, third parties, and customers have a duty to treat people fairly, with dignity and respect. We do not promote, reward, or favor workers for any reason other than their technical competence or performance.

Zero-tolerance Approach to Harassment and Abuse of Authority

We treat people fairly, with dignity and respect. We will not tolerate any form of harassment, discrimination, physical or verbal abuse that constitutes pressure, intimidation, or threats with anyone we relate to, regardless of hierarchical or social level or commercial interest.

Non-retaliation and Mutual Respect

We will not tolerate retaliation against anyone who raises ethical concerns in good faith at any level. We will always listen to your suggestions, concerns, suspicions, and questions. After all, communication is vital in a healthy and productive workplace and business relationship.

In this context, the term “good faith” refers to a sincere attempt to confirm the principles and values guiding our Code of Conduct & Ethics, as well as our internal rules and policies, contributing to a healthy, transparent workplace.

Utilization and Protection of Assets and Resources

Everyone who acts on our behalf must ensure the proper utilization and protection of our assets and resources, which must be used for business purposes.

Maralto's assets and resources are the Company's legal property. Therefore, unless legally required, they cannot be loaned, granted, and/or donated without prior approval.

Utilization of IT Systems and Computing Resources

Our information technology systems and computing resources are intended primarily for business purposes. Therefore, all equipment and data stored in our computers and servers, as well as messages, including those sent or received from mobile devices, are Maralto's exclusive property and shall not be considered private.

Access passwords to Maralto's computers and technical systems are personal and non-transferable since the information entered, generated, or modified in these systems and respective approvals are the sole responsibility of the electronic user accessing the systems. Computer programs protected by copyright developed internally and/or by licensing contracts must not be copied. Similarly, software must not be installed on our computers without the prior approval of the competent departments.

Confidentiality

We are responsible for understanding and protecting the confidentiality of the information to which we have access as a result of our professional activities. Accordingly, such information must not be disclosed without the prior consent of the Company's executives.

Personal Data Protection

We are committed to protecting and keeping personal data private, striving for maximum compliance with the applicable legislation, especially the General Data Protection Law ("LGPD").

Our actions are guided by the firmest adherence to legal provisions, especially the following topics: (i) respect for the principles, good faith, and the foundations of the LGPD; (ii) processing of personal data according to legal provisions; (iii) caution with the sharing and storage of personal data; and (iv) compliance with requests from data subjects within legal limitation periods.

Any processing of personal data in disagreement with these premises, whether by any Maralto staff member or supplier, shall be reported to our Data Protection Officer:

Ricardo Sproesser

E-mail: dpo@maraltoterminalis.com.br

Conflicts of Interest Policy

Individual interests must not be confused with the Company's interests. We will always avoid situations that could create or appear to entail a conflict between our private interests and the Company's. Therefore, our business decisions should be based on the Company's policies and procedures and be **ethical**, fair, and impartial. They must also be guided by common sense, objectivity, loyalty, and transparency with the Company's interests.

Private interests refer to those concerning our family members, friends, or organizations to which people we are related belong to. As Maralto staff members, we must avoid and report situations that appear to conflict with our interests, even if the circumstances are unprovoked or unintentional.

Relationship by Kinship or Affinity

We hire people based on their talent, vision, qualifications, professional performance, competence, and mutual respect. Therefore, we may hire employees or third parties who are related, even immediate family members (parents, siblings, spouses, and children), as long as these people do not perform activities, functions, or responsibilities in the same department, report to the same manager directly or indirectly, or may affect the hiring, evaluation, promotion, dismissal, or termination of an agreement involving the other party. We must remain alert to any situation involving staff members' relatives and companies managed or established by former employees or their relatives that could or will place us in a real or apparent conflict of interest.

Participation in Parallel Professional Activities

Staff members and third parties with professional activities parallel to the functions performed in Maralto must ensure that this does not conflict or compete with their attributions and the professional commitments agreed with us. Accordingly, no Company's resources, tools, facilities, or benefits can be used for this parallel activity, nor the agreed working hours agreed.

Any situation or incident that may incur a real or apparent conflict of interest must be reported to your immediate manager and the Ethics Committee to avoid misinterpretations or risks for the Company.

In addition, parallel professional activities may not be related to our competitors or the functions performed by them, nor incur in real or apparent conflict of interest with the activities performed in our companies.

Private Investments and Insider Information

We may have access to confidential and privileged information that could influence investment decisions or give us an unfair advantage. Regardless of our level of seniority or position, we should not use this information to take advantage or obtain any improper benefits, personally or for anyone else, nor should we disclose such information to third parties, even if they are relatives or close friends.

Relationship with Governments

Relationship with governments refers to any interaction of the Company or third parties acting on its behalf with public agencies or officials. It is our duty to protect the Company's image and reputation; therefore, our actions must reflect the guidelines in this document and not give rise to suspicions or interpretations about our true intentions.

In our relationship with governments, we must avoid privileges of any kind, conduct business transparently, not make promises we cannot keep, are not under the Code of Conduct & Ethics, or violate the law.

Our Anticorruption and Anti-Fraud Policy is available on the Company's website and sets out the guidelines and procedures to be followed by our employees.

Gifts and Entertainment

We understand that exchanging gifts and presents and participating in corporate events are part of Maralto's business routine. Therefore, the offer or acceptance of gifts, presents, and entertainment must be inserted in the business context to avoid situations that may appear or compromise our professional conduct, influence our decisions, or somehow incur a counterpart or retribution.

To avoid the impression of improper relationships, our Gifts and Entertainment policy is available on the Company's website and sets out the guidelines and procedures to be followed by our employees.

Political Activities and Contributions

Employees, partners, and shareholders may individually decide to support political parties, campaigns, or candidates running for public office. These actions should be regarded as isolated, personal, and independent and should not be confused with Maralto's interests. We must note that according to Brazilian law, companies must not make political donations. Therefore, we do not contribute financially to candidates or political parties anywhere in the world where Maralto conducts business directly, through third parties, or its partners.

Corporate Books & Records

Maralto ensures the accuracy and transparency of all financial and accounting records; this is every staff member's duty. Such records contain all details regarding transactions and necessary supporting documents, as well as any and all payments made directly or indirectly on our behalf, without exceptions.

We take all due precautions to safeguard, protect, and appropriately access all confidential and proprietary information concerning our activities, and we file all physical and electronic documents with proper care and attention.

It is our responsibility

1) To ensure that all accounting records and financial statements are

- true;
- complete; and
- detailed.

2) To ensure that all transactions

- are transparent;
- are accurate;
- reflect financial reality; and
- include clear information and supporting documentation to identify all transactions and leave no doubt about the nature of payments, expenditures, or reimbursements.

Our Image and Reputation

Everyone who acts on our behalf must ensure the image, values, and reputation inside and outside the context of their professional activities, including on websites and social media. Therefore, to comply with the law, our Code of Conduct & Ethics, and our policies and procedures, some precautions must be taken:

- When outside the workplace, you must act according to our values while wearing the Company's uniform and/or badge;
- When publishing information or expressing opinions on websites and social media, our staff members must adopt ethical and respectful conduct, keep professional secrecy, and preserve the Company's reputation, in addition to emphasizing that their statements are personal opinions, which in no way relate to the Company's;
- Avoid dealing with work matters in inappropriate environments and in the presence of third parties. If this should occur, do not disclose information that may violate professional secrecy and ethics.

External Communications

Maralto's management board must approve all professional contact with any press agency of Directors.

No staff member is allowed

- **to give any interview or to consent to the collection of an image of oneself or the workplace**, whether in video, audio, or photographic format, without the prior approval of the Company's management board.
- **to embarrass or expose the Company and other employees on social media**, whether through comments, disclosure of photographs, video or audio, or any other form of visual or audible record;
- Disclose information regarding Maralto's business and operations.

When interacting with neighboring communities, the staff members must

- foster respectful and transparent communication, providing information for monitoring activities, enabling decision-making, and ensuring that accountability is based on qualitative and quantitative elements;
- maintain open dialogue channels to receive claims and ensure that any demands are answered in a timely manner.

Labor Standards

We will comply with all applicable labor laws, codes, standards, and conventions regarding compensation, working hours, and safety. We will not tolerate or condone forced labor and child labor, either in the context of our business activities or those by our business partners.

Fraud and Corruption

We will not tolerate fraud, whether motivated by corruption (conflict of interest, bribery, illegal gratuities); fraudulent financial records, accounting, and internal controls; or misappropriation of assets for public officials or agencies or any private party. Our daily commitment to ethics and our reputation is incompatible with fraudulent and dishonest behavior at any level.

Our business relationships, assignments, agreements, and dealings with third parties must be clear, transparent, and contractual and go through all necessary approval steps.

Anti-Money Laundering

We will not offer financial support or assistance to anyone involved in criminal activities. Likewise, we will not assist, execute, share, or collude with procedures whereby individuals or companies attempt to hide unlawful proceedings or make them appear lawful or legitimate. Therefore, we are committed to complying with the anti-money laundering law and related regulations.

Free Competition

We do not enter formal or informal agreements with our competitors to manipulate public or private bids or tenders. We comply with all competition laws and other legislation protecting free competition.

Health and Safety

We promote a healthy and safe workplace without violence or negative influences that can **distract us** from our responsibilities, valuing life and preserving physical and mental health, and human integrity, in compliance with work safety and environment standards.

We aim to minimize potential hazards through the proactive performance of our employees and suppliers. Likewise, we expect our third parties to provide their employees with a healthy and safe work environment and deliver high-quality products and services according to the best market practices.

We will not risk our safety or that of others by working under the influence of

- illegal substances;
- narcotics;
- alcohol;
- prescription drugs that may affect one's consciousness and judgment.

We will not tolerate such behaviors during working hours and on our premises.

Likewise, to bear weapons of any kind is not allowed on our premises, except by persons authorized by law to carry a certain weapon due to their professional condition. Also, selling merchandise on the company premises is prohibited except upon prior approval.

Sustainability

We are committed to initiatives that minimize our operations' social and environmental impact and strictly comply with applicable legislation, guidelines, and market standards. In addition, we actively support the initiatives of our third parties and customers to keep their services and products compliant with sustainable business standards.

Continuous Improvement

We encourage all who work for the excellence of our business to express themselves and identify improvement actions in our companies' premises and achieve the highest performance, thus encouraging our continuous improvement and efficiency.

Staff members who fail to observe or comply with the provisions of this Code or Maralto's policies and procedures will be subject to the following disciplinary penalties, according to the seriousness of their conduct and if they repeat the violation of the Code:

- 1) Verbal warning;
- 2) Written warning;
- 3) Suspension for a maximum period of 30 calendar days;
- 4) Termination of the existing agreement between the Company and the offender.

The application of any of the disciplinary penalties described above will be decided by the Ethics Committee and/or another responsible party, considering its independence and according to the seriousness of the infraction.

The application of a single disciplinary penalty does not depend on another penalty. For example, the agreement between the Company and the offender may be terminated without a previous warning.

In case Maralto becomes aware of any illegal activity, the Company may decide to report such conduct to the relevant authorities, depending on the circumstances.

Any suspicion regarding activities in disagreement with this Code, the Company's policies, procedures, and core values, and/or the applicable legislation in force at the time of the allegation shall be immediately reported to the Ethics Committee, which will investigate the facts according to the complaint handling procedures in force.

The Ethics Committee encourages the reporting of eventual incidents to our whistleblowing channel, which can be accessed through the link: <https://canal.aliant.com.br/maraltoterminal>

If the complainant wishes, reports can be filed to the whistleblowing channel confidentially and anonymously. The anonymity and protection necessary for the full performance of the complaint must be safeguarded.

Any staff member who reports an instance or suspected instance of inappropriate conduct in good faith will be protected against any acts of retaliation by Maralto.

We appreciate the help of staff members in identifying possible issues requiring investigation and ensuring the confidentiality of the matters in question. In addition, Maralto protects staff members against any kind of retaliation for reporting an allegation in our compliance channels in good faith.

Our Complaint Handling Policy sets forth the guidelines and procedures to be followed when reporting and handling complaints.

All Maralto's employees and business partners must know, accept, disseminate, and comply with this Code of Conduct & Ethics and safeguard compliance with its provisions by others.

They must also remain attentive to preventing and detecting instances of conduct incompatible with the practices outlined in this document by reporting any violations to our whistleblowing channel.

All staff members must ensure compliance with this Code by engaging their teams to adopt exemplary behavior, actively investigating violations of it, and disseminating and demanding compliance with good ethical behavior practices.

The Declaration of Compliance must be signed upon implementing this Code, and the commitment of the staff members to abide by it must be reinforced annually.

DECLARATION OF COMPLIANCE WITH THE CODE OF CONDUCT & ETHICS

I hereby declare that I have received a copy of the current Code of Conduct & Ethics and am aware of its content. I commit to fully comply with its guidelines during the performance of my duties and to keep all and any information received in the scope of the execution of my activities confidential, even upon termination of my formal agreement with Maralto.

This Code of Conduct & Ethics is also available at Maralto's website: www.maraltoterminalis.com

Name: _____

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Member:

Partner

Registration Number: _____

CPF: _____

Company Name/CNPJ: _____

Date: _____

Signature: _____