



CODE OF **CONDUCT**



Summary





Message from the Chairman of Prumo's Board of Directors

At Prumo, we believe that integrity is the foundation of everything we build. Our growth only makes sense when it is supported by solid values that reflect who we are and the positive impact we want to create in the world.



Robert Blair Thomas

The Code of Conduct that you hold in your hands is more than a set of policies: it is the expression of our Essence. It translates, into concrete actions, the commitment we have made to ethics, transparency, and respect—pillars that sustain the trust of our employees, partners, and society.

Every decision we make, every interaction we have, is an opportunity to reaffirm that the journey is just as important as the destination. That is why I invite you to read this Code carefully and incorporate it into your daily routine. When we act with integrity, we strengthen not only our company but also the legacy we will leave for future generations.

*Let's do what is right, together. This is our commitment.
This is our strength.*



Introduction

We consider the **Code of Conduct** of Prumo Logística S.A. and Porto do Açu Operações S.A. to be the most valuable reference of our **Essence**. This document demonstrates our commitment to ethics and integrity and clearly translates the expected behaviors in our daily activities to achieve our **Purpose**: helping the world reduce its carbon footprint and accelerate the best of Brazil.

- » **We Are Good People.** We are a diverse, engaged, talented team that works together. We want to make a difference. Therefore, we must always be attentive to putting into practice the guidelines defined in this **Code**.
- » **We Care About People.** We take care of our team, develop the communities where we operate, and protect the environment. We are proud to leave a legacy for society. Therefore, our actions must reflect the care and respect we have for our workplace, our people, and the environment.
- » **We Get Things Done.** We love challenges, make decisions, and take responsibility with ethics and transparency. We are restless and always seeking to go further. We believe that true growth is built on an ethical and honest foundation, generating positive impacts for society over time. And we will not give that up.
- » This is our **Essence**. It will guide us along the way to ensure the sustainability of our business.



We believe **integrity** is a fundamental pillar for building solid and sustainable relationships with employees, customers, suppliers, business partners, and society. Therefore, we have developed a robust **Compliance Program** that guides our practices so that our activities are conducted ethically, transparently, and in compliance with applicable laws and regulations.

The Compliance Department is responsible for implementing and developing procedures and tools that ensure the prevention, detection, and response to integrity risks. Thus, we seek to create a **safe, honest, and responsible environment** that strengthens trust and the longevity of our business.

One of the Compliance Department's roles is to support the development and promotion of internal policies that guide employees and define the expected conduct of the Company. In this context, we highlight this **Code of Conduct**. It translates our **Essence** into practical guidelines, guiding our activities and reinforcing that, for us, the journey is as important as the

Let's do what's right together! That way, we'll be proud to tell our story.

Enjoy your reading!





1. About the Code

This **Code** must be read, understood, and applied by all **employees** of Prumo, Porto do Açu, and their controlled companies that follow its Compliance Program. From now on, we will refer to all of them as “company” or “organization.”

For companies in which Prumo shares or does not hold controlling interest, the content of this document should be presented to **business partners**, encouraging its adoption whenever possible.



In this document, our directors, board members, committee members, employees, interns, and apprentices will be referred to as “employees” or “our people.”



Our business partners, suppliers, service providers, customers, or any other person, entity, or authority we interact with will be referred to as “business partners.”

We also have a document that establishes guidelines for honest and transparent conduct in commercial relationships with business partners, called the **Business Partner Conduct Guide**. This Guide must be included as an annex to all contracts signed by our company with third parties.



2. Whistleblowing Channel

Our Whistleblowing Channel exists to protect and strengthen our work environment. Use the Channel whenever you suspect or know of violations related to this **Code**, laws, regulations, internal policies, and procedures, including issues involving bribery, corruption, and any harmful acts against Public Administration as provided by the Anti-Corruption Law (Law 12.846/13).

Ignoring or failing to report inappropriate conduct or suspected irregularities can be as harmful as committing such misconduct. Use the Whistleblowing Channel even if you are unsure or lack evidence. This attitude protects the integrity of our company, our work environment, and Our People. Rest assured: **all information will be verified by the team responsible for the investigation process.**

The Channel is operated by an independent specialized company, allowing reports to be made securely and anonymously. It can be accessed by our employees, business partners, third parties, and the general community, free of charge, in English or Portuguese, **24/7**. Additionally, it is possible to request exclusive assistance from a female representative if desired.

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Or visit

www.canalconfidencial.com.br/prumologistica



Important: We do **not tolerate** any act or attempt of retaliation due to a report. Be assured that this matter will be rigorously addressed as soon as it comes to our attention.

Remember: We Are Good People, and therefore, we do not misuse the Channel or make false allegations to unjustly harm a colleague or anyone else.

Every report registered in the Channel generates a protocol number.
Keep it with you. Besides being important for the whistleblower to track the progress of the report, it is the **only means of contact** investigators will have with the whistleblower to request additional information or clarification when the report is anonymous. Since this number is automatically generated by the Channel, we cannot trace or identify who made the report.





3. Laws and Internal Regulations

All employees must comply with laws, regulations, policies, and internal procedures, including the guidelines in this **Code**. Mandatory training offered by the company reinforces and updates these topics, and it is everyone's duty to participate.



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Important: Our work environment depends on our actions. If you suspect or know that any internal guideline, law, or regulation is being violated, you must immediately report it to the responsible manager or your own manager if comfortable, or file a report through the Whistleblowing Channel.

Questions?
Contact the **Compliance Department**.



4. Workplace Environment

We do not tolerate harassment, discrimination, favoritism, physical, verbal, or psychological violence, threats, or any action that violates human rights. Therefore, we are responsible for maintaining a work environment free from embarrassment, inappropriate insinuations, or discrimination of any kind based on race, color, nationality, origin, religion, gender identity, sexual orientation, social class, marital status, age, weight, height, health condition, physical disability, or any personal or ideological characteristic.

Here, our people must follow guidelines that **support a safe, healthy, honest, and respectful work environment among employees or business partners**, always acting with courtesy and respect, regardless of hierarchical position, role, or activity.

We value an environment based on respect and trust among people. We encourage active listening and recognize the importance of diverse opinions and perspectives. We want our people to **feel free and safe to be who they truly are** and to perform their activities without any situation of embarrassment, intimidation, humiliation, or violence. We believe **psychological safety** is essential to promote healthy relationships, strengthen collaboration, and ensure open and transparent dialogue among people.



4.1. Health, Safety and Environment

When performing your professional activities, you must know and comply with requirements related to environmental protection, workplace safety, and your own health, as well as act responsibly without violating laws, regulations, or standards for environmental, health, and workplace safety protection.

If you identify unsafe conditions for performing any activity or task, **you have the right to refuse it.**

Additionally, any accident must be formally reported to the responsible areas. In both cases, we do not tolerate retaliation against employees.

Important: You must act with honesty and transparency. Therefore, it is essential to use our Whistleblowing Channel to report risk situations, as omission can cost someone's health and safety.





4.2. Social Responsibility

We must safeguard the company's reputation through our duties as citizens and by performing work with ethics, quality, and productivity, always guided by the **Essence** of our company. To achieve this, we must provide good services, avoid waste, and respect the environment, cultural values, human rights, and social organization in communities.

4.3. Diversity and Inclusion

We are proud to offer a work environment that values, respects, and includes differences.

Therefore, we promote a culture of authenticity and collaboration, valuing and encouraging transparency in relationships and different points of view, respectfully and with the genuine intention of continuously contributing to collective growth and development.

We ensure that our people have equal, fair job opportunities always based on meritocracy. Here, people are not discriminated against or favored based on race, gender identity, social class, sexual orientation, religion, belief, disability, political-party position, or participation in any type of association.

We do not tolerate any circumstance that places our people in embarrassing, humiliating, intimidating, or hostile situations. Acts of discrimination, racism, homophobia, and harassment of any kind are examples of behaviors we reject and that must be observed and combated daily **by each of us because, after all, we take care of each other.**

We encourage reporting such situations through the Whistleblowing Channel.





4.4. Prohibition of alcohol and illegal drugs

We are committed to maintaining healthy and safe working conditions and an environment free from the influence and consumption of **alcoholic beverages, illegal drugs, or any other substance** that affects an employee's ability to work safely and efficiently.

The misuse of alcohol and other drugs increases the risk of accidents and compromises employee health. Psychoactive substances can interfere with thinking, perception, interpretation of facts, and user behavior, as well as their ability to assess, react, decide, and interact with the environment.

Therefore:

- » It is prohibited to attend or remain in the workplace under the influence of alcohol or any illegal drug, as well as to consume, possess, trade, or distribute alcoholic beverages, illegal drugs, or psychoactive substances in the workplace or on company premises.
- » Driving vehicles under the influence of alcohol or other drugs is prohibited

We encourage employees to seek help in case of dependency.

Important: At corporate events promoted by the company, alcoholic beverages may be offered, and their consumption permitted at the company's discretion.



4.5. Prohibition of weapons

It is not permitted, under any pretext or justification, to carry, use, or keep any type of weapon on company premises. For the purposes of this **Code**, weapons include:

- » firearms, with or without accessories and/or ammunition
- » bladed weapons, such as daggers, knives, razors, machetes, pocket knives, box cutters, or any cutting or piercing instrument inappropriate and incompatible with the employee's activities

4.6. Personal relationships

All romantic or family relationships between employees must be reported to HR and Compliance so they can assess any potential personal influence on professional activities. However, relationships between employees within the same management area, whether romantic or family, are **prohibited** due to the potential or actual conflict of interest these relationships create.

Our company also requires employees to maintain strictly professional relationships within company premises, typical of colleagues, prohibiting intimate and sexual contact, which may constitute a serious disciplinary offense.

It is **forbidden** to grant any preferential treatment to anyone due to personal interest or **relationship**.



4.7. Human rights protection and prohibition of slave-like and child labor

We are committed to respecting human rights in all our activities, business relationships, and value chain. Acting with integrity and social responsibility is part of our **Essence**, promoting practices that respect human dignity and contribute to sustainable community development, always in compliance with applicable laws and international standards, such as the UN Guiding Principles on Business and Human Rights and the UN Global Compact.

We prohibit and condemn any form of work in conditions analogous to slavery and seek to ensure safe, dignified, and respectful working conditions.

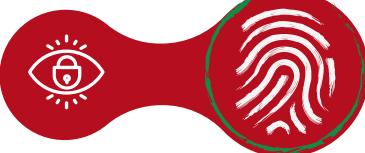




Our company also prohibits the use of child labor and workers under 18 years of age, whether directly or indirectly, through our own hiring or business partners, except under conditions permitted by Brazilian law. This prohibition extends to apprentices under 18 working in harmful environments to their education, physical, psychological, moral, and social development, as well as in hazardous or unhealthy services, during school hours, or at night.

Business dealings, selection and hiring of business partners, as well as selection of entities for donations and sponsorship contracts, must comply with the prohibition of slave-like work and child labor.





5. Confidentiality and privileged information

Our people must maintain confidentiality regarding all company matters not intended for public disclosure, and it is **prohibited** to use such information for personal benefit or for business partners. These details must not be exposed at workstations, printers, or meeting rooms, nor discussed in public places such as elevators, taxis, or meetings with unions, associations, and others.

Finally, the use of credentials (ID, passwords, and badges) is individual and non-transferable, and **sharing them at any level is prohibited**.

Important: information leaks are a highly sensitive matter and can create legal and reputational risks to our company. Therefore, any employee who fails to uphold their duty of confidentiality will be subject to disciplinary actions and any applicable legal penalties.



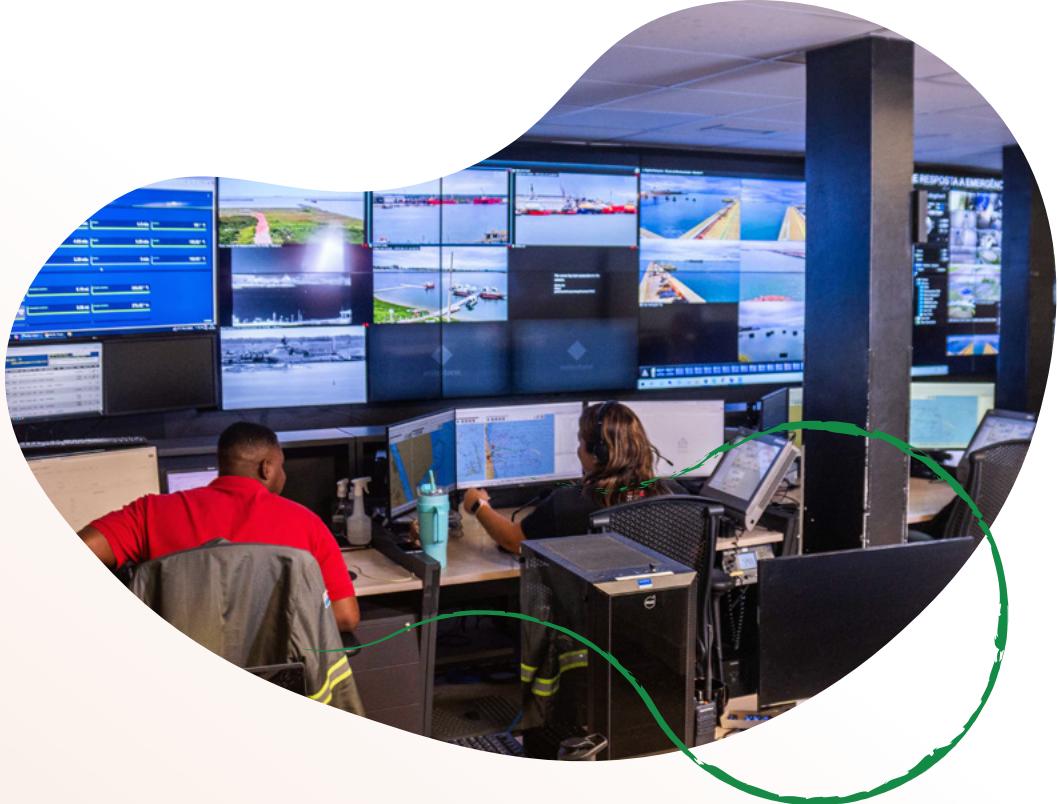


6. Use of Artificial Intelligence

The Company encourages the conscious use of AI, understanding the importance of the competitive advantage its proper application can bring.

However, it is essential that these technologies are used **responsibly, ethically, and securely**, especially when involving corporate information or sensitive data.

Therefore, whenever handling corporate or sensitive information, **employees must use AI tools previously evaluated and authorized by the Company**, complying with the company's data security guidelines. To find out which tools are authorized by the Company or if you have any doubts, **consult the Information Security Department**.

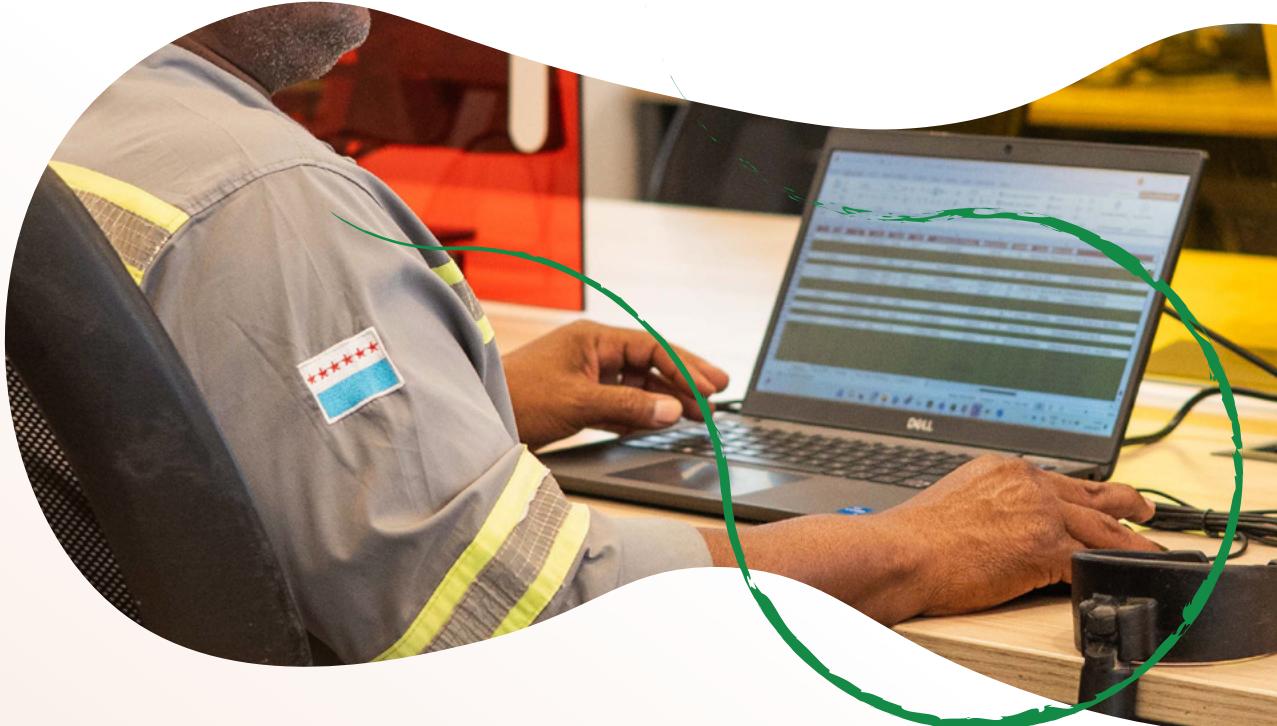




It is important to remember that AI can also generate incorrect data (due to hallucination, for example). Therefore, we must recognize the limitations of these tools and always verify the presented result and the source of the data used.

Use AI ethically, avoiding any use for illicit purposes, such as spreading misinformation or discriminatory practices, and ensure that applications promote integrity, transparency, and fairness.

Remember: The final decision must be made by people. AI is a support resource and does not replace human judgment.





7. Personal data protection

Our company is committed to protecting and securing personal data processed within its activities, guided by the principles established in legislation, especially Law 13.709/2018 (General Data Protection Law – LGPD): purpose, adequacy, necessity, free access, quality, transparency, security, non-discrimination, responsibility, and prevention.

During their activities, employees may process third-party personal data for which Prumo is the controller or operator, committing to follow the principles listed above and **implementing appropriate security measures according to the company's internal regulations.**





Additionally, employees must immediately notify the **data protection officer** in case of any failure or suspected breach of data security or integrity, including cases of accidental destruction or loss, alteration, disclosure, or unauthorized access to personal data, and are responsible for assisting in identifying and resolving the incident when necessary.

Before sharing any personal data with third parties, employees must observe all applicable security measures and assess the necessity, verifying whether the recipient has the required approval and authority, truly needs the requested information to perform their activities and contractual obligations, and is capable of handling the information securely and in compliance with applicable legislation.





8. Media relations

We have specialized areas to handle contact with press outlets. **No employee is authorized to give interviews or transmit information about the company and its activities, directly or indirectly, to any media outlet** unless duly authorized by the Communication and Press Department. Likewise, participation in external events representing the company must be previously informed to the department.

On the other hand, photos or information that have already been officially disclosed by the company on its external communication channels may be shared by employees.

Important: photos taken by employees of facilities and operations at the Port cannot be disclosed without prior approval from the responsible department.





8.1. Internet and social media

The inappropriate use of social networks and other communication channels can seriously impact the image and reputation of the people involved. The images of the employee and the company are naturally linked, and care must be taken with what is shared.

Ensure that all content posted on your personal profile is exclusively private: do not express opinions or imply that you represent the company's official positions, especially political opinions. Posts you make on your personal profile must always be disconnected from the Company and your position or functions.

Important: sharing discriminatory, malicious, defamatory, intimidating, threatening messages, misinformation, or content that violates the law does not reflect our Essence and is subject to punishment.

When authorized, before making any communication or disclosure related to the company, ensure that the guidelines of this Code and other internal regulations, especially those concerning information confidentiality, are being followed.



9. Use of company assets

Company assets and resources must be used responsibly and for professional purposes.

Therefore, employees should not expect privacy regarding devices and systems provided for professional activities. Our company may monitor these devices and systems whenever necessary, within the limits of the law.

Under no circumstances may company assets and resources be diverted for illicit purposes.

10. Financial books & internal records

Accounting and financial books and records must be rigorously updated, accurate, and complete. It is everyone's duty to ensure the accuracy of recorded information.

All information and internal records produced, circulated, or maintained in our systems and equipment are company property and must not be used for personal purposes. Additionally, these data must be stored according to legal deadlines and internal procedures. Therefore, employees are prohibited from deleting, destroying, or taking any document.

Upon termination, employees may not copy or take any documents or assets owned by the company without prior authorization from the Information Security Department.



11. Anti-corruption and Anti-bribery

We do not tolerate corruption or bribery in any form, nor any harmful acts against Public Administration. Here, we commit to acting ethically and with integrity in everything we do, and complying with the Anti-Corruption Law and other applicable legislation is a fundamental part of this commitment.

Employees must understand that, for the purposes of this **Code**, the term Public Agent means anyone who, in Brazil or abroad, holds a position, job, or public function in government bodies, state entities, diplomatic representations, legal entities controlled directly or indirectly by the government (such as autarchies, public companies, mixed-capital companies, and public foundations), in international public organizations, in political parties, even temporarily or without remuneration, or who is a candidate for elective office.

The following must receive the same treatment as Public Agents:

- » family members: spouses, partners, grandparents, parents, siblings, children, nephews/nieces, uncles/aunts, and first cousins
- » spouses of any person mentioned above
- » any other individual sharing the same household





All employees are prohibited from offering, promising, giving, or receiving, directly or indirectly, whether personally or through third parties, any undue advantage to Public Agents, third parties related to Public Agents, or Private Agents (whether in money, goods, services, or any other means) to influence decisions affecting Prumo's business or involving any personal or third-party benefit.

Example: facilitation payment, which refers to small amounts of money or promises of advantages to a Public or Private Agent to expedite the issuance of an official document, such as licenses or certificates.

If a request for undue payment is accompanied by coercion through violence or even threats, prioritize your safety. Then, report the incident through the Whistleblowing Channel or contact the Compliance Department.

11.1. Relationship with public administration

We require that interactions between our employees and business partners with Public Agents occur ethically and in compliance with the law. Only employees previously authorized may interact with Public Agents, and when these contacts are mediated by service providers such as lawyers, consultants, or agents, the business partner's role must be formalized in a contract with a well-defined scope and activities and compliance clauses compatible with the nature of the activity, in line with the company's internal regulations.



We know corruption has significant harmful impacts on the company and society. In addition to prohibiting the offering or receipt of undue advantages to Public Agents or third parties, employees are prohibited from committing any unlawful act against national or foreign Public Administration, including:

- » financing or funding illicit acts, as well as concealing or disguising interests or beneficiaries of illicit acts
- » manipulating or defrauding bids or administrative contracts
- » hindering investigation or inspection activities by bodies, entities, or Public Agents, or interfering with their actions

Interactions with Public Agents must occur in the presence of at least two people authorized for this activity. Additionally, the meeting must have a defined agenda, and employees must comply with other provisions of the company's internal regulations. Refer to these documents for more detailed guidance.

Our company also prohibits making any donation to political parties or candidates for public office in the name of or with company resources, as well as engaging in political-party activities during working hours or on company premises.

Furthermore, if an employee wishes to run for elective office, they must notify the Compliance Department in advance.

Hiring or retaining employees and business partners who are also Public Agents (e.g., professors and doctors) may occur provided their activities do not conflict with the company's interests and are compatible with their working hours. In all cases, hiring must be preceded by a specific analysis by the Compliance Department, which will assess potential conflicts of interest, corporate integrity risks, and the need for measures to reduce exposure to risks.



Important: hiring former Public Agents, in cases defined by Law 12.813/13, will only be allowed with proper authorization or after the legal waiting period, observing other rules and guidelines in internal regulations..

12. Activities requiring special care

12.1. Hiring suppliers and business partners, donations and sponsorships

Due to higher legal and integrity risks, some activities require special care:

» **Suppliers and service providers:** selection, hiring, and payment must be based on legitimate need and technical, professional, ethical, and sustainable criteria, ensuring the best cost-benefit for our company without interference from personal interests





- » **Business partners:** In line with our **Essence**, we seek partners committed to conducting their activities ethically and honestly.
- » **Donations:** must be made for legitimate purposes to entities institutionally defined by our company, based on technical criteria and issuance of a donation invoice, except when exempted by law
- » **Sponsorships:** allowed if they have a legitimate purpose and fair market value, aiming to promote the company's brand, through lawful and appropriate institutional consideration, selected based on technical criteria

These situations must be formalized through appropriate contractual instruments and a diligent risk assessment process (called background check). Responsible areas must obtain prior approval from the Compliance Department before engagement and observe other rules and guidelines in the company's internal regulations.

12.2. Offering and receiving business courtesies

We allow offering and receiving business courtesies provided they are not excessive, illegal, or inappropriate, even if they may favor our company, respecting the following limits and conditions:

- » Institutional gifts with the name or logo of our company or third parties, such as pens, notebooks, calendars, caps, bottles, among others
- » Hospitality with a clear business purpose or when the employee officially represents our company



- » Invitations to lectures, conferences, and other corporate and academic events
- » Cultural or sports entertainment with a clear business purpose or institutional representation of our company

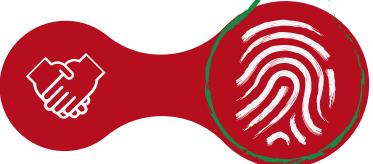
We set the limit at R\$350 per person.

Important: to receive or offer business courtesies and cover expenses exceeding the allowed limit, prior formal approval from the Compliance Department is required through a specific form, observing other internal guidelines.

Remember: regardless of the amount involved, offering or receiving business courtesies or any expenses involving Public Agents must always be reported to the Compliance Department.

General guidelines for offering business courtesies:

- » Payment must be made directly to the service provider (e.g., hotel, airline, etc.)
- » If contractual payment of expenses is provided, payments must be made by bank transfer to an agency or another company. The process must be documented, and receipts filed. Cash payments are prohibited under any circumstances



- » Coverage of lodging, meals, and transportation must be limited and cannot include expenses related to family members or guests.
- » Offering hospitality or travel invitations to Public Agents must consider the institutional interest of the agency or entity they represent.

13. Respect for competition rules

We prohibit any conduct aimed at harming free competition, in accordance with current legislation.

Specifically, our company prohibits employees from agreeing with competitors, in any way, on price fixing or commercial conditions, division of clients, markets, territories, or products, or terms related to participation in public or private bidding processes.

Consult the Legal Department before undertaking, on behalf of our company, any commercial operation that may involve:

- » Merger or acquisition of companies
- » Formation of consortia or joint ventures
- » Any type of associative contract between companies



14. Preventing money laundering

We condemn any act of money laundering, terrorist financing, and any criminal activity involving simulation or concealment of financial resources. Therefore, if circumstances indicate evidence of third-party involvement in acts related to money laundering and terrorist financing, the company will adopt restrictive measures regarding business dealings and maintaining the relationship.

Circumstances that may indicate involvement in such activities include:

- » Concealing the ultimate beneficiaries of companies when not permitted by the legislation of the company's country of origin
- » Use of cash resources
- » Requesting payment to a company different from the service provider

Note: These situations may occur legitimately. Therefore, in case of doubt, employees should contact the Compliance Department.



15. Preventing conflicts of interest

These are situations where an employee's personal interests may conflict or actually conflict with those of the company, compromising their professional duties and potentially causing internal harm.

We do not allow our employees to obtain personal advantages or be influenced in their professional duties by the existence of conflicts of interest.

Our company must be immediately informed when an employee's personal interests conflict or appear to conflict with those of the company, whether due to a past event or a circumstance that has not yet materialized.

Important: If your spouse works for a company that provides services to the Prumo Group, you must report this to the Compliance Department. This way, the company can take measures to protect the employee from involvement in a potential conflict of interest.



Acting in conflict of interest may be illegal and result in serious consequences for the employee and our company. Therefore, it is important that everyone is transparent with the Compliance Department.

Examples:

- » Using or sharing confidential or privileged information for personal gain or for family members, such as profiting from buying and selling shares of company clients
- » Hiring a friend or family member as a supplier under less favorable conditions for the company compared to those practiced in the market by third parties with equivalent capacity
- » Accepting an external personal responsibility that may affect your performance at the company or assist competitors
- » Taking advantage of company resources or a business opportunity learned through your work, harming the company's interests or generating personal favoritism

All employees must inform the Compliance Department annually or whenever their situation changes about personal relationships with Public Agents, clients, or suppliers/service providers, observing the provisions of the company's internal regulations.



16. Disciplinary measures

Employees who violate this **Code** or applicable laws and regulations, as well as the company's internal regulations, will be subject to disciplinary measures compatible with the conduct practiced, in accordance with applicable legislation and internal regulations.

Additionally, allowing a team member to violate company guidelines or failing to act will also result in disciplinary measures.

Depending on the nature of the violation, our company reserves the right to report it to the competent authorities, which may result in legal penalties.

Any attempt to obstruct or persuade employees not to report what they believe in good faith to be a violation of this **Code**, applicable legislation, or any other internal regulation of our company is prohibited.





17. Final provisions

All employees must declare that they have received, read, and agreed to the provisions of this **Code**.

This document is not intended to cover all possible situations involving ethical and integrity conduct. Therefore, we require all employees to know and comply with other internal regulations of the company, which provide detailed guidance on processes, and exercise vigilance and careful judgment at all times during their professional activities.

Any situation not covered in this **Code** must be formally reported to the Compliance Department for appropriate handling.

Employees who wish to receive additional guidance or make a suggestion regarding the Code should contact the Compliance Department at [**compliance@prumologistica.com.br**](mailto:compliance@prumologistica.com.br).

To learn more about our actions, visit our page <https://www.prumologistica.com.br/pt/compliance/> and learn about our commitment, integrity program structure, certifications, and other important information on Ethics and Integrity.

