



# CODE OF CONDUCT



**ÉTICA**  
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NOSSA EMPRESA COM TRANSPARÊNCIA  
E RESPONSABILIDADE

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## CHAPTER 1

# MISSION, VISION, AND VALUES



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## CHAPTER 1



# MISSION, VISION, AND VALUES

At BTP, we share a set of mission, vision, and values that conduct the way we do business. This Code of Conduct contains rules that will guide our conduct based on our principles, our commitment to the national and foreign laws applicable to our business and our commitment to our staff, customers, and community.

In the rapidly evolving market, the values remain key to ensuring that we grow for the future in a sustainable way.



### MISSION

To operate a modern port terminal with efficiency and quality, generating value to its customers, employees, and shareholders, contributing to foreign trade growth, social and economic development of the country, of the city of Santos and its region.



### VISION

To be the benchmark in port operations, renowned by its international standard services provided in safe manner, under a responsible social and environmental management.

## VALUES



**Employee's safety and health:** All our activities excel in safety through concrete actions for identification and risk prevention, and we are committed to our employees' well-being.



**Ethics:** The management of our organization and all our relationships are based on ethical principles and transparency in our internal and external communication processes.



**Appreciation of people:** We recognize that our employees are our most valuable and important asset. We encourage a teamwork environment and constant learning. We appreciate and respect diversity in the workplace, where the individual skills are respected. We reward excellence and superior performance of each individual.



**Operational excellence:** We are committed to establishing an excellence standard in each aspect of our business, seeking the achievement of superior results in everything we do. We base our success on generating profits and recognize that we can only achieve this through the satisfaction of our customers.



**Social and environmental responsibility:** We are committed to the sustainability of our enterprise and also to society. We support education and culture, we respect the environment, and in this way, we contribute to social and sustainable development.



CHAPTER 2

# YOUR RESPONSIBILITY



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## CHAPTER 2

# YOUR RESPONSIBILITY

Ask for help whenever you are in doubt whether a decision or action is lawful or inappropriate.

### 2.1. ABIDING BY THE LAWS

As a BTP employee, you must comply with all government laws and regulations in effect everywhere we do business. Allegations of pressure from your manager or another member of BTP or requirements arising from business conditions will not be a justification for you not to comply with the law.

### 2.2. OUR EXPECTATIONS

This Code of Conduct reflects our responsibilities. Its purpose is to explain the guiding principles of our conduct.

### 2.3. ACCOUNTABILITY

This Code of Conduct must be applied in an objective and unbiased manner. Everyone must take appropriate action when any employee fails to meet the required standards or shows a behavior that is or appears to be inconsistent

with this Code of Conduct. Failure to comply with this Code of Conduct will subject everyone to the appropriate measures under the legislation in force, as well as to BTP's disciplinary processes.

### 2.4. SCOPE

This Code of Conduct is intended to all:

- BTP employees, whether permanent or appointed in the articles of incorporation, even where temporarily;
- Interns and apprentices;
- Employees of companies contracted by BTP;
- Legal representatives of BTP in Brazil and abroad;
- Borrowers of funds for social projects, sponsorships, donations, and contributions.

The guidelines in this Code of Conduct also apply to third parties with whom BTP has any business relationship, including suppliers, service providers, agents, customers, and associates.

In no event whatsoever the individuals covered by this Code of Conduct have or will have authorization to violate the requirements herein, whether directly or indirectly, through the use of any third parties.

The Code of Conduct will be given to all employees during the onboarding process, upon signature of the proof of delivery of the Code of Conduct that will be duly filed in the employee's file.

In the case of third parties to whom this Code of Conduct applies, it will be published on BTP's website for their viewing and inquiry, and this document will be mentioned in the Agreement signed by the Parties.

### **As an employee of BTP, you must:**

- 1.** Read, be aware of and comply with this Code of Conduct, as well as other BTP procedures, manuals and policies;
- 2.** Ask for help whenever in doubt as to whether a decision or action is lawful or in compliance with this Code of Conduct, BTP manuals or other policies and procedures;
- 3.** Understand that you have an obligation to promptly report any activity that, in your personal judgment, would violate the Code of Conduct, any BTP procedure, manual or internal policy, as well as any laws applicable to our business.

### **As a BTP manager, officer or any other holder of a position appointed or not in the articles of incorporation, you must:**

- 1.** Set an example through your actions and words;
- 2.** Promote open and honest communications with your employees, encouraging them to bring up questions and concerns;
- 3.** Recognize and support any employee who contacts you to discuss an issue or report a potential violation, ensuring that there will be no retaliation of any kind for doing so;
- 4.** Ensure that action plans for compliance risks are promptly implemented;
- 5.** Promote BTP policies, manuals and procedures designed to prevent and detect non-compliant or illegal conduct;
- 6.** Discuss this Code of Conduct and BTP values with your team and ensure that employees are trained and informed about the policies, manuals, procedures, and compliance risks that apply to their positions.



CHAPTER 3

# OUR STAFF



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## CHAPTER 3

# OUR STAFF

At BTP, we want to attract and retain the best and most competent people, ensuring that we always select candidates correctly based on merit, skills, and the best profile that suits the position to be filled.

**Equal employment opportunities, compensation and professional development in a workplace free from discrimination and harassment of any kind are basic rights, and BTP is committed to providing a workplace under these conditions for its employees.**

### 3.1. DIVERSITY AND INCLUSION

We provide an inclusive environment and equal opportunities for employment, compensation, and professional development. We value individuals who bring diverse perspectives, skills, and talents to the organization. Diversity of thought makes us stronger.

At BTP, we treat all employees and job applicants equally, fairly, and respectfully, without discrimination as to race, gender, sexual orientation, age, disability, religion, political opinion or cultural background. This applies to all processes involving employees, such as recruitment, selection and promotion decisions.

### 3.2. LABOR RELATIONS

Our employees are an essential component in BTP success. We are committed to establishing constructive and productive labor relations with our employees and their union representatives, resulting in good and fair working conditions. We respect the labor rights of our employees by providing a healthy and safe work environment. We treat employees with respect and dignity and will not tolerate discrimination, child labor or forced labor. We respect freedom of association and the right to collective labor agreements.

### 3.3. CONFLICT OF INTERESTS

We promote transparent and clear business dealings by avoiding conflicts of interest. The employees must, during working hours for which they have been hired, devote all of their time and apply all their efforts to further the business and interests of BTP and may not use their time for other activities. In addition, at any time, an employee may not engage in, be employed by or associate with any other business, enterprise or commercial activity, which may be in conflict with the requirements of their employment or BTP's interests, without obtaining BTP's prior written authorization.

When a close friend or family member is employed by a competitor, major customer or supplier, this could create a potential conflict and must be reported in writing to the Legal & Compliance Manager, who will review the event and forward the report to the Human Resources Manager for proper filing in the employee's file.

Any candidate, regardless of the origin of their nomination, will participate equally in the BTP Recruitment and Selection Process once they meet the criteria for participation in the Selection Processes. A candidate may not have direct relatives in the same line of subordination (supervisory level), working in the area in which the position is open;

#### Examples of actual or potential conflict of interest situations that employees must report:

- Ownership by the employee or member of their family, of any outside business that does or seeks to do business with BTP or is a direct competitor of BTP;
- Serving as officer, executive, partner, consultant, or manager of an outside business that does or seeks to do business with BTP or is a direct competitor of BTP;
- Recommendation that BTP do business with a company where a close friend or family member works, or with which the employee has a personal relationship without disclosing this information to the company, through the Legal & Compliance Manager.

### 3.4. RELATIONSHIP WITH SUPPLIERS AND CUSTOMERS

All purchases of goods and services must be made with BTP's best interests in mind. Those acting on behalf of BTP in these matters must not be influenced by personal interests, those of any family member or interested third parties. If there is a conflict of interest or any doubt about the existence of a conflict of interest, the employee must immediately inform the Legal & Compliance Manager about it.

Under no circumstances should an employee or any member of their family give, offer, request or receive any payment, donation or favor (i) from/to any customer or supplier of BTP, or (ii) from/to any public or political body, as this may be seen, even indirectly, as an act of corruption.

### **3.5. DATA PROTECTION**

Computers, smartphones, emails, and all other tools made available, whether physical or virtual, are the exclusive property of BTP and, as such, may be requested and/or inspected at any time, regardless of advance notice to the employees. Such information will only be used for specific and legitimate purposes and will be stored securely and only as long as necessary.

### **3.6. COMMUNICATION AND SOCIAL MEDIA**

We work proactively with the media to promote BTP's image and reputation. All media communication on behalf of BTP must be accurate and reliable. Our goal is to build and maintain relationships with the local press. We protect our brand while fostering transparency. We act according to our values and demonstrate respect and inclusiveness in our social media interactions. We recognize the importance of interaction through social media and promote its responsible use.

All posts on personal social media or on platforms such as LinkedIn, Facebook, and Twitter should be considered public and not disclose confidential information. It should be made clear that social media posts and comments reflect personal views and not those of the company unless posted by an authorized BTP representative. We expect everyone working for or with BTP to consider the impact on our brand and avoid harmful or derogatory communications. Comments on existing postings should be constructive and reflect our values.

### **3.7. CONTACT WITH THE MEDIA ON BTP ISSUES**

The employee, through the employment contract, is bound by a confidentiality obligation and under no circumstances whatsoever can give or confirm any information or comment, as well as respond to the media, officially or otherwise. The company will only communicate with the media through duly qualified spokespersons and with the express delegation of the Chief Executive Officer. In all cases, the media should be forwarded to the Corporate Communications Manager.



# To think about:

## RELATIONSHIP WITH SUPPLIERS AND CUSTOMERS

- 1) Do I fully and promptly disclose to my manager as well as to the Legal & Compliance Manager any potential situation that may involve a conflict of interest or appear to be a conflict?
- 2) Am I basing all business decisions on objective business criteria? Am I being biased towards people close to me?
- 3) Am I selecting suppliers following BTP's supplier evaluation procedure?

## CONTACT WITH THE MEDIA ON BTP ISSUES

- 4) Can my posting harm BTP's brand and image?
- 5) Do I report information that is confidential or only that which is for internal use?
- 6) Is my posting consistent with BTP's values and this Code of Conduct?
- 7) Would I make the comment in the same way if the person were in front of me?

### **3.8. CONFIDENTIALITY**

All information relating to BTP, including all financial information, data, records, and documents relating to company activities, must be considered confidential and treated with discretion at all times. This data may only be discussed with superiors or colleagues at the relevant levels and in the appropriate places. Information considered confidential to BTP must also be treated as such in its dealings with third parties. Without limitation to this restriction, suppliers to whom confidential information is passed on must be expressly advised of the need for confidentiality at all times.

### **3.9. COPYRIGHTS AND INTELLECTUAL PROPERTY**

Ownership and rights to any inventions, projects, designs, trademarks, copyrights (including the development of any computer program or software) or any form of intellectual property rights, which relate in any way to BTP's service, business or operations, written or produced by BTP employees during their period they are bound to BTP, are owned by BTP.

### **3.10. PROTECTION OF THE COMPANY'S ASSETS**

The use, by an employee, of any BTP asset, facility or services for any illegal, improper purpose or unauthorized personal use is strictly prohibited.

Equipment, systems, and facilities may only be used for conducting legitimate business or for other purposes specifically authorized by management. These limitations apply to all BTP assets, including the Internet, intranet, email, telephone, and fax system. BTP assets in the possession of an employee must be properly cared for, maintained and protected.

Software that can be installed and used on your computer is licensed software purchased by BTP from licensed vendors. This software may not be copied, unless authorized and in accordance with the license agreement. The employees may not violate any equipment or software license agreement executed by BTP. Passwords used to access BTP computer systems are the responsibility of each employee – such passwords must not be shared. The password is similar to an electronic signature and any abuse or unauthorized use of passwords is unacceptable.

BTP reserves the right to monitor, access, and intercept all electronic communications, including internet, intranet, emails, email attachments, and electronic files, whenever it deems necessary in the protection of its interests and assets. In this sense, employees must not harbor any expectation of privacy.

When an employee leaves BTP, they must return all assets in their possession in good condition, and may be charged for misuse or neglect.



## CHAPTER 4

# ABIDING BY THE LAW AND ACTING WITH INTEGRITY



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## CHAPTER 4



# ABIDING BY THE LAW AND ACTING WITH INTEGRITY

### 4.1. ANTI-CORRUPTION

We do not tolerate corruption and bribery, regardless of the amount involved. We will not offer, promise, authorize or accept bribes, kickbacks or anything of value for the purposes of obtaining or retaining business or any other improper advantage for BTP. We do not make payments of any kind to Brazilian or foreign government agents.

**This also means that our employees and representatives must never accept, give or promise anything that could be construed as an intention to improperly influence a government or business decision. Corruption can happen in many ways, including ways that do not necessarily involve money.**

Certain gifts or entertainment may be considered a bribe, which is why we have specific internal policies, manuals and procedures.

### EXAMPLE:

- Do not enter into a secret agreement with a government agent to contract a company requested by the government agent;
- Do not give a secret bonus to someone in exchange for any business;
- Providing a voucher is the same as providing money.

## To think about:



- 1) Do I always refrain from offering or accepting anything which may improperly influence decision-making?
- 2) Do I take steps to ensure that we do not do indirectly what we cannot do directly?
- 3) Do I require third parties to follow our Global Anti-Corruption Policy and monitor their performance?
- 4) Do our accounting records correctly describe the nature of the transaction?

## 4.2. INTERACTION WITH GOVERNMENT AGENTS

We promote transparent and lawful interaction with government agents. Many times, interacting with government agents is part of business deals at BTP, as the Government regulates our activities. It is your responsibility to ensure that you and your team are familiar with any procedures, policies, manuals or requirements of recipient and BTP before interacting with government agents.

### Example of concrete situations when interacting with government agents:

- Do not agree to provide a benefit such as a gift or monetary value to a government agent personally involved with the granting or maintaining any BTP-related license or permission;
- If a government agent requests any improper advantage, the immediate response should be that BTP forbids this practice. Never leave any impression that you will "talk to your superiors about it";
- Do not agree to hire a relative of a government agent or a supplier that is close or related to a government agent on their recommendation or demand;
- Do not give gifts or provide entertainment other than a business meal to government agents.

## To think about:



- 1) Understand all the specific rules applicable to the interaction with government agents in the market where you operate.

## 4.3. WORKING WITH THIRD PARTIES

We are responsible for what others do on our behalf. We must not use third parties, such as agents, consultants, advisors or brokers, to do what we are not allowed to do. BTP shall engage third parties only in cases of legitimate business needs.

Our policy is to conduct business with third parties based on clear, objective and lawful business criteria. We require honesty, fairness and propriety in our dealings with customers, suppliers, contractors and government bodies, and we prohibit illegal or unethical business practices, whether by BTP employees or anyone acting on our behalf. We expect everyone to avoid and report any conflict of interest or the appearance of improper bias or misconduct.



Any third-party representing BTP in any context must comply with the principles of this Code of Conduct and any applicable specific rules.

All labor suppliers and service providers must be advised of this Code of Conduct and agree to make it (or their own comparable code) available and apply it to any of their employees performing services contracted by BTP.

All agreements executed with third parties, partners, service providers, suppliers, and legal representatives of BTP must be in writing and contain the anti-corruption clause. Subcontracting is only allowed after express authorization from BTP.

**EXAMPLE:**

- Ensure that services provided by contracted third parties have been properly documented so that BTP can prove the provision of the service versus their payment;
- Do not hire third parties that have been recommended by government agents unless compliance area has reviewed and approved the hiring in a properly documented manner, so that BTP can keep it in its records.

## To think about:



- 1) Did I receive the necessary approval before engaging the supplier?
- 2) Have I performed the necessary background check to ensure that the engagement does not present any potential compliance risks?
- 3) Do I have appropriate and sufficient documentation regarding the service provided to BTP by the third party?

#### 4.4. GIFTS AND ENTERTAINMENT

We recognize that limited and appropriate gifts and entertainment are often used to maintain business relationships, but this can be a problem if they are used to influence decision-making.

It is important that no gifts or entertainment give the appearance of inappropriate behavior, especially in the relationship with government agents. Brazil's anti-corruption laws are very restrictive in this regard.

Before agreeing to any gift or entertainment, make sure that you comply with this Code of Conduct and other BTP policies, manuals and procedures, as well as any local rules that may apply to BTP and the intended recipient.

Some recipients will have more restrictive policies than BTP. Regarding government agents, promotional gifts that (i) have no commercial value, (ii) or are distributed by entities of any nature as a courtesy, advertisement, usual disclosure or on the occasion of special events or commemorative dates and do not exceed one hundred reais (BRL100.00) are not deemed gifts.

The gifts and hospitalities given or received that exceed the amount mentioned above must be approved by the officer in charge before being accepted and registered in the "Hospitality, Entertainment, Gifts, Donations, and Sponsorships Book," kept at the Legal and Compliance Department.

Cash gifts are strictly prohibited.

#### EXAMPLE:

- Do not provide tickets to a customer or their family during the bidding process or contract renewal;
- Inviting a customer to a meal for business purposes at a local restaurant is welcomed and is not considered entertainment. On the other hand, this is not permitted for government agents;
- Do not provide tickets to an event to a customer or government agent when there are no BTP employees at the event to welcome the guests.

## To think about:



- 1) Have I received necessary prior approval before giving or benefiting from gifts and entertainment?
- 2) When giving a gift or entertainment, use the "shame" test: would you feel comfortable if it were reported on television?
- 3) To determine if a meal or entertainment for business purposes is appropriate, apply the same "shame" test as described above.

## 4.5. COMPETITION LAW

We compete fairly and promote competition. We support free and fair competition in our industry while striving to deliver superior commercial solutions to our customers.

Our interactions with competitors are limited. When we do interact with competitors, we do not exchange commercially sensitive information or discuss specific markets or opportunities with them. New business opportunities are explored independently from competitors, unless a joint bid or acquisition is contemplated. In such cases, the Legal & Compliance Manager should be inquired before any discussions take place.

### Situations that may occur:

- Do not discuss or agree, even informally, with competitors on pricing, capacity, customers, markets, decisions to bid or not to bid on a project, or other business plans or commercial strategy. If you believe there is a legitimate reason, always contact the Legal & Compliance department first.
- Do not exchange, receive or share commercially sensitive information on, for example, prices or commercial strategies with potentially competing companies;
- Make an immediate objection if commercially sensitive topics come up in a meeting with competitors and leave the meeting if the discussion continues. Make sure your departure is recorded in the minutes and notify your Legal & Compliance manager immediately.

## To think about:



- 1) Did I have legal advice prior to interaction with competitors?
- 2) Did I ensure that no commercially sensitive information was shared with a competitor or other third-party who might share it with a competitor?
- 3) Did I seek the instructions of the Legal & Compliance Manager when considering new business initiatives?

## 4.6. TRADE CONTROLS

We respect international trade sanctions and embargoes.

Foreign trade controls restrict business transactions with certain countries, organizations and individuals. They may take the form of controls on the export or import of certain products or technology, or they may prohibit all dealings with certain countries or individuals. Our policy is to comply with these restrictions wherever we seek to establish business.





CHAPTER 5

# OUR FINANCIAL INTEGRITY

Dolar	3,1464	3,1556
Euro	3,7064	3,7085
Ibovespa	67,671	67,639
CDI	9,14%	9,06%
Selic	9,15%	9,08%



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## CHAPTER 5

# OUR FINANCIAL INTEGRITY

Financial integrity is key to our business and our reputation. To ensure financial integrity, we implement and maintain strong and robust internal controls.

### 5.1. FINANCIAL CONTROL AND REPORTING

We maintain a strong financial reporting and control framework. Financial integrity is fundamental to our reputation, and as such, we have put in place a strong culture of honesty, propriety and compliance. We have a strong control structure to ensure reliable financial reporting, both internally and externally, as well as compliance with laws and accounting standards. We also develop and foster good and transparent working relationships with tax authorities and other government bodies.

We are all responsible for all records in our area. This means that records must be accurate, complete, processed, retained and destroyed in accordance with laws and our internal policies.

### EXAMPLE:

- Do not send or approve business records that do not accurately and completely reflect the nature of the underlying transaction;
- Do not agree to charge an expense to an unrelated account.

## To think about:



- 1) Do we have a system of internal controls for all cash transactions? Am I familiar with them and do I follow them?
- 2) Are my accounting entry documents accurate?
- 3) Do I submit all business transactions for recording by our finance and accounting professionals?

## 5.2. ANTI-MONEY LAUNDERING

We do not accept revenues from illegal activity. Consequently, if we do not know our prospective clients, we carry out a due diligence to check their background. We should seek guidance if there are any concerns about the source of its revenues.

## 5.3. FRAUD

- We do not tolerate fraud.
- Fraud is a problem for many businesses.
- Fraud can take many forms, for example, theft, embezzlement and misrepresentation; It is a crime that exposes us to significant financial, legal, and reputational risk.
- We seek to prevent, detect, and investigate any dishonest behavior that may affect us. We require all employees to report suspected fraud.

### EXAMPLE:

- Do not accept photocopies of documents where our procedures, manuals, or policies require originals.
- Do not process payment requests without the required internal authorizations and do not split an expense into multiple, smaller payments in order to avoid authorizations;
- Do not approve any goods or services transaction that is not in line with the documentation and contracts.

- Only make cash payments if your manager has agreed to make an exception in accordance with company policy.

## To think about:



- 1) Is the amount charged for goods or services in line with those of the market?
- 2) Have I verified that expenses in expense reports are properly classified?
- 3) Do I always promote and improve an environment of transparency and deliver on our commitment to prevent and detect fraud?





CHAPTER 6

# HEALTH AND SAFETY



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## CHAPTER 6

# HEALTH AND SAFETY

We are committed to excellence with regard to overall health and safety during our activities.

Equally important, overall health and safety performance are key factors in the evaluation and selection of contractors and business partners. We also take responsibility for promoting awareness and responsible behavior among our suppliers and customers.

BTP is committed to creating and maintaining a safe and healthy work environment for all. The use of alcohol, drugs, or illegal substances creates serious safety risks in our workplace. Therefore, the possession or use of drugs or illegal substances, or being under the influence of alcohol, drugs or illegal substances during working hours or at any time on company premises is strictly prohibited. To ensure the well-being of all employees and third parties working inside our terminal, BTP will conduct random breathalyzer tests at the beginning of shifts.

We should all be and remain aware of potential issues involving health and safety, raising our concerns when we notice something that threatens health, safety or well-being.

### EXAMPLE:

- Do not hire a supplier that does not implement safety standards consistent with ours;
- Do not perform tasks such as operating equipment for which you are not trained, competent, physically fit and sufficiently rested;
- Do not come to work under the influence of drugs or alcohol, and inform your occupational physician as well as your direct manager of any prescribed medications that may impact your ability to perform your job safely.

## To think about:



- 1) Do I immediately stop any activity that may be unsafe and seek advice?
- 2) Do I understand the potential safety risks we are likely to face at work and comply with the relevant standards that apply to my job?
- 3) Do I report all accidents, "near accidents," unsafe practices and situations immediately to the person responsible for health, general safety and the environment?



CHAPTER 7

# SUSTAINABILITY



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## CHAPTER 7

# SUSTAINABILITY

We wish to achieve long-term business success through enabling positive economic and social development that contributes to a healthy environment and a fair society.

### 7.1. COMMITMENT TO SUSTAINABILITY

We strive to improve the ways in which we contribute directly or indirectly to the sustainable development of the communities in which we operate and society at large.

We are all responsible for all records in our area. This means that records must be accurate, complete, processed, retained and destroyed in accordance with laws and our internal policies.

**Our goal is to ensure that our investments have a sustainable benefit and address the key social, environmental, health and safety, education, and economic development issues of local communities.**

### EXAMPLE:

- Proactively relates with local communities, to understand their true needs, taking into consideration meaningful actions that will have a positive impact on both the community and BTP.
- The contribution to causes linked to government agents and/or institutions and/or entities that have interaction with BTP shall be previously approved by the Executive Committee.

## To think about:



- 1) Are my actions aligned with our policies on corporate sustainability, donations and community investment?
- 2) Can the donation investments in the community harm the brand?
- 3) Do I have all necessary approvals before making a donation?

## 7.2. SPONSORSHIPS AND DONATIONS

We encourage direct engagement with the communities in which we operate through lawful and transparent means, in accordance with BTP's internal policies, manuals and procedures. Donations and sponsorships should not be made where they could be viewed by third parties as an attempt to buy influence or a means of disguising illegal payments to private individuals or government agents – thus, the rules on "Working with Third Parties" (item 5.3 above) apply to donations to non-governmental organizations (NGOs) of any nature, and one should carefully monitor how such donations are being spent. When BTP receives any request for a donation or contribution to a non-governmental organization (NGO), the request shall be directed to the Ethics and Compliance Committee. The transaction on any donation and sponsorship made by BTP must be formalized in a written agreement, the Legal & Compliance Manager must be informed, and the data must be recorded in the "Hospitality, Entertainment, Gifts, Donations, and Sponsorships Book."

It is BTP's policy not to make any donations for political-partisan purposes, whether through political parties or for election campaigns. This limitation applies even to those made through its officers, managers, employees, business partners or any other third parties.

## 7.3. ENVIRONMENT

We are committed to protecting the environment. This is reflected in the emphasis we place on the environmental aspects of managing our business operations.

A strong economy depends on a healthy environment. We constantly strive to reduce our environmental impact through the responsible use of natural resources and the reduction of waste and emissions from our operations.

### EXAMPLE:

- Always dispose of the waste generated by our operations in a way that is lawful and not harmful to the environment.
- For services, facilities, and equipment, do not engage a supplier that does not support environmental standards.

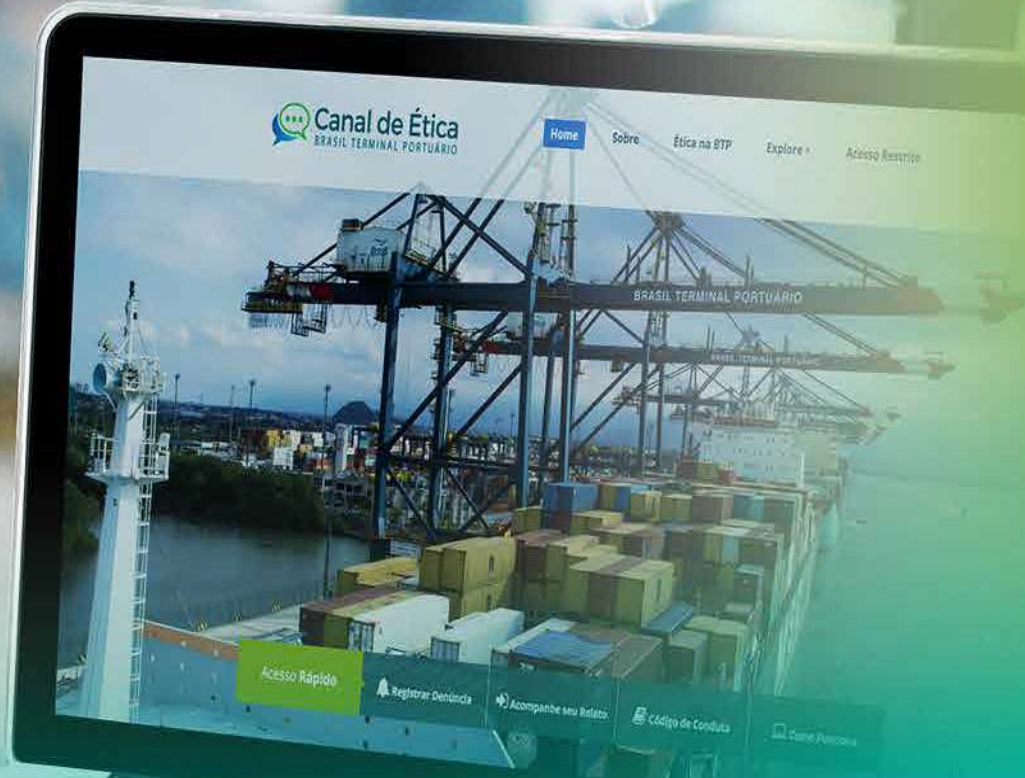
## To think about:



- 1) Do we enforce environmental laws locally and regularly renew our local permits/licenses?
- 2) Do we immediately report all unsafe incidents and procedures to the person in charge of environment?

## 7.4. HUMAN RIGHTS

We respect human rights and strive to ensure that we do not contribute to violations of these rights. Internationally proclaimed human rights are acknowledged and respected through our policies. All employees have a shared responsibility to respect these human rights and to raise our concerns when we see things that indicate a human rights violation.



CHAPTER 8

# WHERE TO FIND HELP OR INSTRUCTIONS



**ÉTICA**  
*sempre*

NOSSA EMPRESA COM TRANSPARÊNCIA E RESPONSABILIDADE

**Jurídico**  
digital  
acessível  
simples





## CHAPTER 8

# WHERE TO FIND HELP OR INSTRUCTIONS

### 8.1. WHOM TO ASK

More information is available in BTP policies, manuals, and procedures that can be found in our files. If you have questions, ask your immediate manager or Legal & Compliance Manager. Often, this person is the best resource and is the most familiar with your day-to-day responsibilities. If you do not feel comfortable talking with your immediate manager, or if the conversation has not had any practical outcome or result, here are some other available resources that you can use:

- Legal and Compliance Manager;
- Another manager or officer in the company;
- Human Resources (especially workplace issues such as compensation, benefits, discipline or promotions);
- Our Ethics Channel, through the BTP website, our intranet or directly by typing <https://www.canalintegro.com.br/btp>

### 8.2. WHOM TO REPORT AN INCIDENT OR SUSPICION?

a) In the case of acts against anticorruption and/or anticompetition laws and/or fraud, report it through our Ethics Channel, which can be accessed through the BTP website, our intranet or directly at <https://www.canalintegro.com.br/btp>;

b) The employee may also communicate directly to the Audit Departments of BTP shareholders, either from TIL through email to [compliance@tilgroup.com](mailto:compliance@tilgroup.com) or from APMT through email to [satish.hariharan.lyer@apmterminals.com](mailto:satish.hariharan.lyer@apmterminals.com) or through the channel [secure.ethicspoint.eu/domain/media/pteu/gui/102833/index.html](https://secure.ethicspoint.eu/domain/media/pteu/gui/102833/index.html) or the telephone number **+1866 307 5672**.

### 8.3. NO RETALIATION

BTP expressly prohibits retaliation against anyone who reports a violation of this Code of Conduct in good faith, even if the person making the report is mistaken. This protection also extends to anyone who cooperates with the investigation of the possible violation.

All BTP employees must provide accurate information when requested and cooperate with misconduct investigations carried out by the Committees mentioned herein.

The identity of any person who reports any act of corruption, fraud or threat to free competition shall be protected, and his anonymity shall be respected, if requested. Retaliation acts must be immediately reported to the Ethics and Compliance Committee, and these will be investigated and, if necessary, the appropriate and necessary disciplinary measures will be applied at the end of the investigations.





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