



Compliance Program of the CET Logistics Group

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1. Introduction

This Compliance Program provides all the resources and means that the CET LOGISTICS Group uses to strengthen and consolidate the ethical principles and rules of conduct of the organization and the activities it carries out with customers, partners and suppliers, so that the rules of Compliance are followed and respected by all those involved in the day to day of the company.

2. Presentation of Compliance Policy

The Compliance function is performed by all employees and departments of the Group. All employees are Compliance agents and must observe the applicable norms and regulations, as well as to watch over the Values and the Code of Ethics and Conduct of the CET LOGISTICS Group. Employees rely on the Complaints Channel for the safe communication of conducts that violate our Code of Ethics and Conduct, good practices or current legislation.

2.1 Internal Code of Conduct

All employees of the CET LOGISTICS Group, when starting their activities in the company, receive from the Human Resources Sector a presentation of the Code of Internal Conduct, so that it is possible to know the main values of the company. The Code of Internal Conduct is composed of the following topics:

- Integration of the Individual Contract of Employment;
- Basic Guiding Principles of The CET LOGISTICS Group;
- Duties, Obligations and Responsibilities of the Employee;
- Working Hours;
- Electronic Time Card;
- Absences and delays;
- Payments;
- Vacations;

- Prohibitions;
- Human Relations;
- Unfair Competition and Confidentiality;
- Compliance;
- Politics of Gifts, Presents, Entertainment and Hospitality;
- Public Agent Relationship Policy;
- Practices not accepted by the CET LOGISTICS Group;
- Child Labor, Sexual Exploitation of Children and Adolescents and Human Trafficking;
- Channel for Assessing Complaints;
- Penalties;
- Disciplinary Policies and Measures;
- Environment, Safety and Health Policy;

2.2 Certification of CET LOGISTICS with Trace International

Trace International is a globally renowned anti-bribery business organization that provides multinational companies with risk management solutions and support for Anti-Bribery Compliance rules.

CET LOGISTICS, recognizing the seriousness of Trace International, has been affiliated to this organization since the year 2010, annually being evaluated for its internal anti-bribery and anti-corruption policies to renew its certification.

The employees of CET LOGISTICS, along with the company, also undergo an evaluation process with Trace International, regarding the applicability of anti-bribery and anti-corruption policies to the main activities of the company, which in the end, if they reach the maximum score, receive a certificate of course completion and examination for the Trace Anti-Bribery Compliance Course.

2.3 CET LOGISTICS Group Compliance Training

Each year, the Legal Department of CET LOGISTICS prepares and presents to all employees a Compliance Training with the purpose of conveying the values of the company and the expected behavior of its employees against the representation of the company in the provision of the services object of the company. In addition, CET LOGISTICS Group employees are expected to follow the company's high ethical standards to carry out their functions, always following the Group's Principles and the Internal Rules of Conduct.

2.4 CET LOGISTICS Group Code of Ethics

In order to present the guidelines of the CET LOGISTICS Group regarding the professional conduct of each employee, as well as suppliers, subcontractors, and any person who may represent or act on behalf of the company, the Code of Ethics was developed to ensure that actions and decisions are taken in accordance with CET LOGISTICS Group policy.

In this way, the CET LOGISTICS Group Code of Ethics is composed of the following topics:

- Target group;
- Presentation of the Code of Ethics;
- Applicable Business Practices;
- Personal Conduct;
- Management Responsibility;
- Compliance Procedure;
- Consequences of Transgressions.

2.5 CET LOGISTICS Group's Complaint Channel

The CET LOGISTICS complaint channel is an instrument designed to combat any abusive practices that contradict the company's internal policies, ethical conduct and rules of Compliance.

The complaint channel is easy and safe to access on the CET LOGISTICS website (www.cet-logistics.com), which allows anyone to report on misconduct of the company and its professionals, as well as third parties as representatives and third parties in commercial relations with the CET LOGISTICS Group.

The fact reported in the complaint channel will be sent to an independent and specialized company, ensuring the absolute secrecy and the proper treatment of each situation by independent committee, without conflicts of interest and considering the concepts of independence.

All information will be verified during the inquiry process.

Pathway to the CET LOGISTICS Group's Complaint Channel:

- 1 - Access the CET LOGISTICS website: www.cet-logistics.com;
- 2 - Click on "CET"> "Who We Are"> "Mission, Vision and Values"> "Complaint Channel";
- 3 - Accessed the Channel of Denunciation click on "Report".

2.6 Supplier Hiring Management Policy and the Code of Ethics for Suppliers

The CET LOGISTICS Group, which strives for excellence and seriousness in its commercial relations, requests its suppliers to follow the norms and principles of the company consolidated in the Code of Ethics, as well as in the Code of Conduct for Suppliers.

The Code of Conduct for Suppliers deals with the following matters:

- Introduction on the Code of Conduct;
- Coverage;
- Business Practice;
- Fighting Corruption;
- Gifts, Expenses and Accommodations;

- Health, Safety and Environment;
- Practices not accepted by the CET LOGISTICS Group;
- Penalty.

2.7 Due Diligence Procedure for Suppliers

The CET LOGISTICS Group has a Management Policy for Business Partners with the expectation of several steps that must be fulfilled before choosing and hiring a supplier.

First, CET LOGISTICS chooses suppliers with the three best proposals to ensure impartiality in choosing and obtaining the best price.

Once the supplier with the best price and quality has been chosen, it will undergo a Due Diligence process managed by the Legal Department of the CET LOGISTICS Group, which will carry out a careful analysis of specific documentation that must be sent by the supplier.

From the analysis of the documents sent by the supplier, the Legal Department will issue a Supplier Analysis Report, where each of the documents sent will be punctuated, being able to provide services to the CET LOGISTICS Group those that have at least 80% of the valid documents and without any restriction.

Once the Supplier Analysis Report has been completed, it will still be reviewed by the Board of Directors, which will give the final decision on whether the supplier will be hired or not.

2.8 Ensuring Contractual Provisions of the Compliance Rules

Once the hiring of the supplier has been approved, the Legal Department will formalize the provision of services in a specific contract for each type of supplier, which will include certain clauses that are mandatory in supplier contracts to ensure respect and enforcement of the rules of Compliance, which are:

- Anti-Bribery, Anti-Corruption Clause;
- Secrecy and Confidentiality Clause;

- Acceptance and receipt of the CET LOGISTICS Group Code of Ethics;
- Acceptance and receipt of the Code of Conduct for Suppliers.

Thus, at the moment the service contract is sent to the supplier, the Code of Ethics and Code of Conduct for Suppliers will also be forwarded.

2.9 Free Access by Compliance Documents Officials

The Quality Sector of CET LOGISTICS Group, responsible for the management of documents related to Internal Policies and Codes, controls and makes available to company employees the procedures that reflect all the rules related to the Compliance Rules.

3. Evidence Documents of the CET LOGISTICS Group Compliance Program

- a) Code of Internal Conduct;
- b) Trace Due Diligence Report CET LOGISTICS – CUSTOMS DISPATCH;
- c) Certificates of key employees of CET LOGISTICS – CUSTOMS DISPATCH;
- d) Trace Due Diligence Report CET LOGISTICS – CARGO AGENT;
- e) Certificates of key employees of CET LOGISTICS – CARGO AGENT;
- f) Presentation of the Compliance Training of the CET LOGISTICS Group;
- g) List of Attendance of Employees;
- h) Photo of Compliance Training;
- i) Code of Ethics;
- j) Code of Conduct for Suppliers;
- k) CET LOGISTICS Complaint Channel.