



**CET**  
LOGISTICS

# **Code of Ethics & Business Conduct**

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## **1. Corporate Identity**

### **Mission**

Offering distinguished logistics services worldwide, seeking continuous improvement in every stage of the logistics chain, whether through the development of new techniques to new software and tools so the company can reach a quality level of service ahead of its time.

### **Vision**

Being a logistics reference worldwide able to offer security and credibility in its operations.

### **Value**

Serving our clients with passion, professionalism, loyalty, and transparency.

## **2. Purpose, Target Group, and Foundation**

The purpose of CET LOGISTICS' Code of Ethics is to establish and present standard guidelines regarding personal and business conduct of its employees.

The capacity of this Code of Ethics comprehends all business relations done with CET Logistics Group, including its subsidiaries, board of directors, executive members, managers, employees, interns, and suppliers, establishing an individual and collective commitment of each and every one to comply and promote compliance with this Code of Ethics.

CET Logistics and its employees are committed to comply with regulations and must refrain from any action that violates the Brazilian Legal System, regulations and / or internal and external rules, acting with diligence and corporate responsibility.

This document is based on the company fundamental values of ethical conduct and institutional beliefs with the objective of guiding and ensuring that actions and decisions are in accordance with CET LOGISTICS Policy.

### **3. CET LOGISTICS Commitment**

This Code of Ethics comprehends a variety of business practices and procedures, in the commercial and personal level.

It defines the basic principles that guide CET LOGISTICS employee's proper behavior and avoidance of any improper conduct.

It has the purpose to present to each employee the requirements, responsibilities, and commitments of the company in regard to its operational structure and personal conduct.

In the event of a conflict between this code and the law, the law must be obeyed. As well as in the event of a conflict between local costumes and policies and this code, the law must be obeyed. If any question or concern about such conflicts, management must decide the best approach to resolve the situation.

When facing a difficult situation, one should stop and ask the following:

- Is this the right thing to do?
- Is it legal?
- Does it comply with this code and the company policy & procedures?
- Is it in accordance with CET Logistics Values? Does it seem right?
- Have all consequences been considered?
- Does it expose CET Logistics to any unacceptable risk?
- Would I feel comfortable telling others about my decision?
- Would my supervisor/manager had agreed with my decision?
- CET LOGISTICS pursuits a high-level of recognition in the logistics market due to its posture and ethical standards. Any violation to the law and ethics is a threat to the company's competitiveness and reputation.

#### **3.1. Business Practices**

CET LOGISTICS maintains an open channel of communication on ethical matters, values commitment, trust, and clarity towards its employees, business partners, clients, and suppliers, and always aims for a high ethical standard.

#### **4. Confidential Information**

Employees must keep the confidentiality of information entrusted by the company, customers, or suppliers, except when authorized, in writing, by management or required by law.

The know-how and practices differentiate CET LOGISTICS in the logistics market. Hence, transferring information outside configures a violation of the company's intellectual property. The list includes any information not available to the public, which could be used by competitors or harmful to the company, its clients, and suppliers, if disclosed.

The obligation to confidentiality remains in place even after the end of employment or commercial relationship with the company.

Any conduct or intent to modify information and/or alter data will be considered fraud.

#### **5. Competition**

CET LOGISTICS does its best to surpass the competition in a fair and honest manner, pursuing competitive advantages through higher performance but never through illegal or unethical practices, such as cartels or abuse of power.

Therefore, CET Logistics must:

- a) Maintain relationships based on respect and honesty
- b) Develop, along with the competition, improvements of social and environmental responsibility

#### **6. Fighting Corruption**

CET Logistics conducts its business free from corruption and bribery. Hence, all employees and third parties are expected to be alert by following the law and policies against bribery and corruption everywhere the company does business at.

What does that mean?

No one can offer, make, or accept any payment, present, donation, or favor of any form to obtain or keep any business or to secure any other improper advantage, neither allow anyone else do on his/her behalf, nor facilitate any sort of bribery payment with the purpose of expediting a governmental routine that a public worker is required to do.

All have the responsibility to follow antibribery and anticorruption laws in the countries the company has business relations with.

Through the company's due diligence and internal policies, each relationship and contact, including those with public workers, are examined.

CET LOGISTICS adopted measures to minimize the risk of third parties and/or partners which may not comply with this code and its compliance policy.

### **6.1 Public Agents**

It is defined as a public agent, any public worker or officer or any department of an state owned company or mixed, any individual acting on behalf of the state, governmental entity, international public organization, political party, or any individual involved in the political field or a representative of a political party.

Employees or third parties acting on behalf of CET Logistics or its clients are strictly prohibited from soliciting, demanding, requesting, agreeing to receive, or receiving any sort of compensation or sum with the intention to influence or reward any of CET Logistics' businesses.

### **6.2 Gift, Expense, and Lodging**

When handled properly and reasonably, gift and hospitality, including meals and drinks, may strength business relations; nevertheless, when abused, such practices may damage the company's reputation and even considered illegal.

Gift or hospitality may only be given if considered a reasonable complement to the business relations, has modest value, and does not cross the law or company policy.

Although, this subject may be complicated, at CET LOGISTICS, the principle is very clear: do not give or accept gift or hospitality from anyone, including public agent,

governmental entity, or client if the intention is to unduly influence a business transaction or a recipient. Such practices are strictly prohibited independent of the value of the gift or hospitality.

### **6.3 Payment or Refund for Travel Expenses**

Travel Expenses include airfare, accommodation, meals, and transportation expenses. Payment or refund for travel expenses, including the ones offered to a public agent in connection with our operations, must comply with specific guidelines and undergo preapproval processes.

### **6.4 Record Keeping, Financial Records, and Disclosures**

CET LOGISTICS requires an honest, precise, and periodic record keeping to make responsible business decisions.

Every expense must be documented and periodically recorded. Any question regarding the validity of an expense must be directed to a supervisor.

All CET Logistics books, records, and financial statements must be kept with a reasonable level of detail to properly reflect the company's transactions.

Furthermore, if required, such records must be promptly disclosed in accordance with the applicable law and comply with both legal requirements and CET LOGISTICS internal control policy.

### **6.5 Relationship with Suppliers, Clients and Partners**

CET LOGISTICS utilizes clarity and trust as the base of its business relations. It is essential that CET LOGISTICS partners adhere to the same ethical and quality standards and ensure compliance with the applicable law to avoid conflicts.

The company offers its clients worldwide service, respects trade laws, and applicable domestic and international regulations that may prohibit or restrict the company business activities in specific countries or with specific individuals or entities. The company's due diligence, in all third parties, supports the efforts and guarantees compliance with the above-mentioned laws and regulations.

## **6.6 Political Party**

CET LOGISTICS does not support or is involved in any political activity and is against any payment or donation to any politician or political party.

An employee may participate in any democratic activity as long as it does not involve or has any sort of relationship with CET LOGISTICS. This subject requires a special care to avoid any conflict of interest.

CET LOGISTICS prohibits political contributions, direct or through associations, including:

- a) Any contribution from CET LOGISTICS funds or assets for political purposes;
- b) Encouraging employees to make such contributions;
- c) Reimburse an employee for any contribution;

## **7. Equal Opportunities, Diversity, and Mutual Respect**

CET LOGISTICS makes its best effort to guarantee a fair, diverse, and equal work environment, with respect to all individuals;

The company treats, recruits, hires, employs, and promotes individuals based solely on their qualifications and skills to perform the job. It offers equal opportunities to everyone and does not tolerate any type of discrimination based on race, color, ethnic origin, nationality, social origin, religion, age, sex, sexual orientation, disability, union affiliation, or political party. The diversity of CET LOGISTICS employees represents a great asset, and harassment or any humiliating, intimidating, or hostile behavior is not tolerated.

For further information, consult the respective policy with the Department of Human Resources.

## **8. Conflict of Interest**

Employees must avoid conflict of interest between the company's and their own private interest as well as avoid behaviors that may lead to questions about their integrity and the company's. A conflict of interest may arise when personal relationships,

participation in outside activities, or financial interests influence an employee's decision or when seen by others as an influencer.

## **9. Confidentiality**

Information is an asset, and it may serve as a competitive advantage. Memos, meetings, reports, or any other document, shared among employees related to the company, are expected to be kept confidential. This applies unequivocally to documents clearly marked as confidential.

Confidential information is a privilege; it may contain data clients, business partners, and suppliers have entrusted the company, such as personal information from partners and employees. Everyone is responsible to protect confidential information and use only for approved purposes. Furthermore, information received from on illegal means must never be used.

Private information includes intellectual property, commercial secrecy, patents, trademarks, business not yet published, marketing and sales records, physical and digital files, salary, wages, financial or yet any other report not disclosed.

Unauthorized use or disclosure of such information it is a violation of CET LOGISTICS Policy, except when required by law. Unauthorized disclosure of information may be considered illegal and result in civil and criminal penalties. For additional information, consult the Information Security Policy.

## **10. Responsible Use and Protection of Company's Assets and Information System**

All employees must protect and ensure proper use of CET LOGISTICS assets. Theft, carelessness, and waste have a direct impact on CET LOGISTICS profitability.

CET LOGISTICS assets must be used for legit purposes only. Suspicion of fraud or theft must be reported immediately for investigation.

CET LOGISTICS assets must be used for business purposes only. Each employee is responsible to protect CET LOGISTICS assets.

The use of data, internet, and IT Systems are governed by the company's needs and not by personal interest. Any information generated and stored at CET LOGISTICS; it is for the exclusive use of the company.

In case of a possible violation or risk to the IT System, the responsible supervisor must be immediately informed.

### **11. Human Resources**

Each company activity is conducted in a way to respect human rights. Procedures are created to support such rights, guided by the United Nations Universal Declaration of Human Rights, the principles of the United Nations Guiding Principles on Business and Human rights, and the main conventions of the International Labor Organization.

Child Labor – The company does not practice child labor or demand excessive work hours from its employees.

Slave Labor – The company does not practice slave labor. It seeks fair labor practices and positive work environment, establishing a fair and competitive wage policy recognized by performance and respecting each employee's rights of freedom of association and negotiation under applicable laws.

Sexual Services - The company condemns the practice of purchasing sexual services. Any CET LOGISTICS employee, either at work or business trip, is expressly prohibited from purchasing sexual services.

### **12. Managerial Responsibility**

Managers must ensure that the activities performed within their areas of responsibility comply with the company policies. Managers are also responsible for providing the correct information and offering advice regarding interpretation and application of policies.

### **13. Health, Safety, and Environment**

CET LOGISTICS provides a clean, healthy, and pleasant work environment for its workers and visitors and expects everyone to cooperate in maintaining a positive environment.

Each employee is responsible to keep the workplace safe, clean, and healthy for all employees and to follow environmental, health, and safety standards, reporting any accidents, bodily injuries, environmental damages, dangerous practices, or conditions in general.

All employees must follow the security recommendation and be aware of emergency procedures.

Employees are expected to perform their work activities in a safe way, free from alcohol, drugs, or illegal substances. The use of illegal drugs in the workplace will not be tolerated.

Disagreements are expected to be resolved peacefully through conversation, and in case of a more severe conflict, a supervisor must be informed to advise of best resolution. Violence or threatening behavior is not permitted.

CET LOGISTICS makes its best effort to implement environmentally friendly solutions to reduce the company impact on environmental preservation.

Employees are expected to have knowledge and comply with CET LOGISTICS procedures and applicable environmental standards to avoid damages to the environment.

#### **14. Social Media**

Social media has been increasingly used as a self-expression instrument, and CET LOGISTICS respects the right to use this means of communication. Nevertheless, it is expected from each employee to understand that any information or news posted on social media may affect CET LOGISTICS image. Thus, it is important for one to be aware of social media conduct and to act with respect and responsibility.

Publications on social media must be of personal nature and must not involve the company. It is solely responsibility of the Marketing Department to act on behalf of CET Logistics in public spaces.

Under no circumstance should personal publications on social media disclose any confidential information or be made on behalf of CET LOGISTICS or its business partners, subcontractors, clients, or suppliers.

## 15. Violation of the Code of Ethics

Employees are encouraged to approach their supervisors given any observed behavior believed to be illegal or in violation of this Code of Ethics or CET LOGISTICS Policy.

CET LOGISTICS Policy forbids retaliation against any employee that in good faith reports a misconduct by another employee or anyone referred on this code. CET LOGISTICS expects that employees cooperate in any internal investigation of alleged misconduct behavior.

Conducts in violation to the Code of Ethics will always be analyzed and properly addressed. CET LOGISTICS will take appropriated measures to any employee that does not adhere to this code; such measures may include a verbal warning, suspension, disciplinary action, up to dismissal and charge with reparation for damages. Violation of the law may also implicate in criminal charges.

If an employee is unable to contact his/her direct supervisor, report through the Reporting Channel or, anonymously, through CET LOGISTICS Website.

## 16. Revision History

Revision	Issued	Prepared	Verified	Approved	Recent Updates
00	01/Dec/2018	Bruna Leta	Alyne Brito	Danielle Grandini	First Edition
01	19/Jun/2020	Bruna Leta	Danielle Grandini	Alex Antunes	Procedures