

Code of Ethical Conduct

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1. Corporate Identity

Mission

To offer the world a differentiated logistics service, seeking continuous improvement at all stages of the logistics chain, whether through the development of new techniques, or even new software and tools so that the company can achieve a level of service quality ahead of its time.

Vision

To be a world reference as a logistics company, capable of offering safety and reliability in every operation.

Values

To attend the client with passion, professionalism, loyalty, and transparency.

2. Purpose, Target Group and Basis

The purpose of the CET LOGISTICS Code of Ethics is to establish and present guidelines regarding the personal and business conduct of our employees.

The scope of this Code includes all businesses of the CET LOGISTICS Group, including its subsidiaries, members of the Administrative Board, Directors, those in management functions, employees, interns and suppliers of CET LOGISTICS, constituting an individual and collective commitment, assuring every element is in compliance with it, promoting its principles and values, in all actions in the production chain.

CET LOGISTICS and its collaborators undertake to comply with the law and not to take 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 fundamental values of ethical conduct and on our institutional beliefs in order to guide and ensure that the actions and decisions taken are in accordance with CET LOGISTICS policy.

3. CET LOGISTICS's Commitment

This Code of Ethics covers a variety of commercial, business and personal practices and procedures.

It defines the basic principles that guide all CET LOGISTICS employees to behave properly and to avoid or appear to perform any actions in misconduct.

Its purpose is to present to our employees the requirements, responsibilities and commitments of CET LOGISTICS regarding its operational dynamics and personal conduct.

It is clarified that in the event of a conflict between the policy of this Code and the law, the law must be followed. As with any conflict between local policy or custom and this Code, the law must be followed. If there is any doubt about these conflicts, the superior should be contacted in order to decide how to proceed to resolve a given situation

- When faced with a questionable situation, stop and ask these questions:
- Is this the right thing to do?
- Is this a legal action?
- Does it comply with our code, policies and procedures?
- Is it in line with CET values? Does this look correct?
- Have I considered all the consequences?
- Does this expose CET to any unacceptable risk?
- Will it be comfortable to tell others about my decision?
- My supervisor or manager would agree with my decision?

CET LOGISTICS seeks recognition in the market at a high level due to its ethical standards and its correct posture and conduct. Any violation of laws and ethical standards constitutes a threat to the company's competitiveness, integrity and reputation.

3.1 Business Practices

CET LOGISTICS will always maintain an open dialogue on ethical matters, as it seeks a relationship based on commitment, trust and clarity with its employees, partners, customers and suppliers, aiming at maintaining a high ethical standard at all times.

4. Confidentiality of Commercial Information

Employees must maintain the confidentiality of information entrusted to them by the Company, its customers, or suppliers, except when such disclosure is authorized in writing by their superior or required by laws or regulations.

The know-how and execution of the processes and services of CET LOGISTICS differentiate the company in the market. Therefore, the transfer of this information constitutes a violation of the company's intellectual property. Included in the list of confidential information are all those not available to the public, which could be useful to competitors or harmful to the company, its customers, or suppliers, if disclosed.

Even after the end of the employment contract or the end of the commercial relationship the obligation of preservation and confidentiality of the information remains.

Any conduct or intention to modify information and alter data will be treated as fraud.

5. Competitiveness

CET LOGISTICS seeks to outperform the competition fairly and honestly, seeking competitive advantages through superior performance and never through illegal or unethical business practices, such as formation of cartels or abuse of market power.

Ergo, we must:

- a) Maintain a relationship based on respect and honesty; and
- b) Develop together with the competition improvements in the segment focused on social and environmental responsibility.

6. Fight Against Corruption

CET LOGISTICS conducts its business free from the influence of corruption and bribery. Employees and third parties are expected to be alert and follow all laws, regulations and policies in fighting corruption and bribery wherever we do business.

What does that mean?

We may not offer, make or accept any payment, gift, donation or favor in any way or form to obtain or retain business or to secure any other improper advantage. We also cannot allow anyone else to do this in our behalf.

Furthermore, we cannot facilitate any bribery payments with the goal to expedite any government action already usually performed by a public agent.

We have an unwavering commitment to complying with anti-bribery and anti-corruption laws in the countries where we operate.

Through our internal policies and a due diligence procedure, we review all contacts and relationships with anyone, including government officials.

CET LOGISTICS has measures to minimize risks in relation to third parties and/or partners that do not comply with this code and the Compliance Policy.

6.1 Public Agents

A public agent is defined as any employee or official of the government or any other department including state-owned or mixed companies; any individual acting on behalf of the state, government entity, international public organization, political party or any individual involved in the political field and representative of political parties.

Employees and third parties acting on behalf of CET LOGISTICS, or its clients are strictly prohibited from soliciting, demanding, requesting, agreeing to receive, receiving any amount with the intention of influencing or rewarding CET LOGISTICS' business.

6.2 Gifts, Expenses and Accommodation

When handled properly, appropriately, and reasonably, gifts and hospitality (including gifts, meals, and beverages) can strengthen business relationships. But when abused, they can damage our reputation, our business, and may even be illegal. Gifts or hospitality may only be given if they are reasonable additions to the business relationship, are of modest value, and are not against the law or policy of the recipient's company or country.

Although this area can be complicated, at CET LOGISTICS the principle is clear: we do not give or accept gifts or hospitality to anyone, including any public official, government entity or commercial customer, if the intention is to improperly influence a business or the recipient. Such activities are prohibited regardless of the value of the gift or hospitality.

6.3. Payment or Reimbursement for Travel and Expenses

Travel expenses include airfare, accommodation and meals, and transportation expenses. Payment or reimbursement of travel expenses, including those offered or provided to government officials in connection with our operations, must comply with specific guidelines and pre-approval processes.

6.4 Record Keeping, Financial Controls and Disclosures

CET LOGISTICS requires honest, accurate and periodic recording, as well as the reporting of information, so it can achieve responsible business decisions.

All bills and expenses must be documented and recorded periodically and accurately.

If there are any doubts about the legitimacy of an expense, the superior should be consulted.

All books, records, accounts, and financial statements of CET LOGISTICS must be maintained with a reasonable level of detail, duly reflecting the transactions of CET LOGISTICS.

In addition, they must be promptly disclosed in accordance with any applicable standard or law and comply with both legal requirements and CET LOGISTICS' system of internal controls.

6.5 Relationship with Suppliers, Customers and Partners

CET LOGISTICS uses clarity and trust as the basis of its business relationships. It is essential that CET LOGISTICS partners adhere to the same ethical and quality standards to ensure compliance with applicable laws and regulations and to avoid conflicts. We provide services to our customers worldwide, complying with all applicable national and international trade laws and regulations that may prohibit or restrict business activities in specific countries or with specific individuals and entities. Our third-party due diligence supports our efforts to ensure our compliance with these laws and regulations.

6.6 Political Party

CET LOGISTICS does not support and is not involved in any type of political activity being completely contrary to any payment or donation to any political party or individual politicians.

Employees can participate in any democratic political activity as long as they do not have any kind of involvement and relationship with CET LOGISTICS. Special care must be taken in this matter so that there is no conflict of interest.

CET LOGISTICS prohibits political contributions, whether made directly or through associations. This includes:

- a) Any contribution of CET LOGISTICS funds or other assets for political purposes,
- b) Encouragement of employees to make such contributions, or
- c) Reimburse the employee of any contribution.

7. Equal Opportunities, Diversity and Mutual Respect

CET LOGISTICS will always strive for a fair work environment with diversity and equality, respecting individuals at all times.

We treat, recruit, hire, employ and promote people solely on the basis of their qualifications and skills for the job. We provide equal opportunity for everyone and do not tolerate any discrimination based on race, color, ethnic origin, national origin, social origin, religion, age, gender, sexual orientation, disability, union membership or political affiliation. The diversity of CET LOGISTICS employees represents a great asset. We do not tolerate harassment or any action or behavior that is humiliating, intimidating or hostile.

For more information, consult the respective HR policy of CET LOGISTICS.

8. Conflict of Interests

Our employees must avoid any conflict of interest between the company's interests and their private interests, as well as avoid any behavior that could raise doubts about their integrity or the company's integrity. Conflicts of interest can arise when your personal relationships, participation in external activities or financial interests may influence (or be seen by others as an influence on) your decisions at CET LOGISTICS.

9. Confidentiality

Information is an asset; it may represent competitive advantage or other value. We share some information in press releases, meetings, reports or other public documents. Employees are expected to ensure the confidentiality of any other information that comes to them in relation to their work. This unequivocally applies to documents clearly marked as confidential. Confidential information is a privilege. It may also include information that customers, partners or suppliers have entrusted to us. It also includes the personal data of employees and business partners. It is our responsibility to protect confidential information and use it only for permitted purposes. Likewise, we do not use information that has been provided to us for illegal reasons.

Proprietary information includes intellectual property, trade secrets, patents, trademarks, as well as unpublished businesses, marketing and sales records, physical and digital documentary files, salary information, and any undisclosed financial or other data and reports.

Unauthorized use or distribution of this information constitutes a violation of CET LOGISTICS policy, except when disclosure is authorized or required by law. Unauthorized disclosure may be illegal and result in civil and criminal penalties. For more information, consult the respective Information Security Policy.

10. Conscious Use and Protection of Company Assets and Information Systems

All employees must protect CET LOGISTICS assets and ensure their efficient use. Theft, recklessness, and waste have a direct impact on the profitability of CET LOGISTICS.

All assets of CET LOGISTICS must be used for the legitimate purposes of the company. Any suspected fraud or theft must be reported immediately for investigation. CET LOGISTICS assets must not be used for the company's non-commercial purposes. It is the employees' obligation to protect the assets of CET LOGISTICS, which includes its own information.

The individual use of data, internet and IT system will be governed by the company's needs and not by personal interests. Any information generated and stored in CET LOGISTICS is considered information for the exclusive use of the company.

If any possible violation or risk to the IT system is noticed, the responsible superior must be immediately contacted.

11. Human Rights

We conduct our activities in a way that respects human rights. The company's procedures are created to support these rights, guided by the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the main conventions of the International Labor Organization.

Child Labor - We do not use child labor or require our employees to work excessive hours.

Slave Labor - We do not use slave labor. We strive for fair labor practices and a positive work environment. We establish a fair and competitive compensation policy with due recognition for performance. We respect our employees' rights to freedom of association and collective bargaining under applicable laws.

Sexual Services - We condemn the practice of purchasing sexual services. Any CET LOGISTICS employee on business or on business trips is prohibited from purchasing or performing sexual services.

12. Managerial Responsibility

Managers must ensure that activities carried out within their area of responsibility comply with all standards established by the company. Managers are skilled and responsible for providing the correct information and offering advice regarding interpretation and application.

13. Health, Safety and Environment

CET LOGISTICS provides a clean working environment for its employees, aiming to maintain the health of everyone who attends and works at its facility, in addition to ensuring a pleasant working environment. Thus, everyone must collaborate and not act contrary to the maintenance of this purpose.

Each employee has the responsibility to maintain a safe, clean and healthy workplace for all other employees following environmental and safety standards and practices, health and environment, reporting accidents, physical and environmental damages and the existence of hazardous equipment, practices or conditions.

Therefore, it is necessary for everyone to follow the safety recommendations and be aware of the procedures in case of an emergency.

Employees are expected to carry out their activities related to CET LOGISTICS in a safe manner, free from the influence of alcohol, drugs/illegal substances. The use of illegal drugs in the workplace will not be tolerated.

It is expected that any disagreement will be resolved peacefully through conversations, and in the case of serious conflicts, the superior must be called to assist in the resolution. The use of violence or threatening behavior is not allowed.

CET LOGISTICS strives to implement environmentally correct and efficient solutions to avoid impacts deriving from the company's activities and to collaborate with the preservation of the environment.

Therefore, it is expected that its employees and collaborators know and act in accordance with CET LOGISTICS procedures to avoid damage to the environment, and act in accordance with all applicable environmental laws and regulations.

14. Social Media

Social media has been increasingly used as a mechanism for self-expression, so CET LOGISTICS respects the right to use this means of communication. However, it is expected that every employee understands that any information or news posted directly affects the image of CET LOGISTICS, therefore, one must pay attention to the conduct taken in social media and act with responsibility and respect.

The conduct taken on social media must be of a personal nature, as it is solely the responsibility of the marketing sector to act on behalf of CET LOGISTICS in public space.

Under no circumstances should personal publications expose confidential data, information or be made on behalf of CET LOGISTICS or on behalf of another partner, contractor, subcontractor, supplier, customer, or any other party related to CET LOGISTICS' business relations.

15. Violation of the Code of Ethics

Employees are encouraged to contact their superiors in the event of any behavior observed that they believe to be illegal or in violation of this Code of Ethics or any other policy of CET LOGISTICS.

CET LOGISTICS policy does not allow retaliation against employees who report, in good faith, misconduct committed by other employees or persons targeted by this code. It is expected by CET LOGISTICS that employees cooperate in internal investigations of alleged misconduct.

Conduct in violation of the Code will always be analyzed and dealt with. CET LOGISTICS will take appropriate measures against employees who do not comply with the Code. These measures may include verbal warning, written warning, suspension, disciplinary action, and even termination, dismissal for cause and claims for damages. Violation of the law can also lead to criminal prosecution.

If you are unable to contact your superior, report it through the reporting channel, including anonymously, through the CET LOGISTICS website.

16. Revision History

REV.	DATE OF ISSUANCE	ELABORATED BY	AUDITED BY	APPROVAL	CHANGES SINCE THE LAST REVISION
00	01/12/2018	Bruna Leta	Alyne Brito	Danielle Grandini	Initial issuance
01	19/06/2020	Bruna Leta	Danielle Grandini	Alex Antunes	Procedures revision
02	28/07/2021	Bruna Leta	Danielle Grandini	Alex Antunes	Revision