



ROYAL CARGO

— B R A S I L —

Code of ethics and conduct manual

Year 2024

Message from the Director

CODE OF ETHICS AND CONDUCT MANUAL



Focused on Simplifying Foreign Trade, Royal has consolidated its presence over 11 years as a truly exceptional truly exceptional, standing out for ethical principles, reliability and the delivery of high quality services.

All this recognition is the result of our excellent reputation in the international market, solid practices, and strategic partnerships through the adoption of cutting-edge technology to make our name a standard of excellence in the sector.

We are a company that continually strives to uphold our core values, such as transparency, information security, valuing people, flexibility, and customization.

All of this is possible thanks to the tireless dedication of our highly qualified team, who work to ensure the continued success of our company.

Ivo Antonio Mafra

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1. Introduction

This CODE OF ETHICS AND CONDUCT MANUAL aims to establish the ethical principles and standards of conduct that should guide the internal and external relations at all levels of the organization of the company ROYAL CARGO DO BRASIL, including third parties that relate to it.

Compliance with the provisions of this CODE OF ETHICS AND CONDUCT MANUAL by each employee, in addition to representing a guarantee of full compliance with the legislation involved, provides a safe and sustainable expansion of the company.

This manual contains precise rules on compliance with competition and anti-corruption laws at national and international levels. It also contains explicit rules of conduct intended for both employees and partners of ROYAL CARGO DO BRASIL, as well as third parties, such as customers and suppliers.

2. Mission, Purpose, Values and Vision

Mission:

Developing efficient and innovative logistics solutions to make foreign trade accessible.

Purpose:

Simplify Foreign Trade.

Values:

- *Transparency;*
- *Information security;*
- *Valorization of people;*
- *Flexibility and customization.*

Vision:

To achieve a 7% market share in Brazilian freight forwarding by 2027.

3. The internal relationship

3.1 Expected conduct:

The relationships of everyone who is directly or indirectly involved with the activity of the company ROYAL CARGO DO BRASIL (customers, government, suppliers), regardless of the position or function they hold, must be based on the company's Values.

Just as positive and constructive conduct will be praised, there will be administrative sanctions for what is considered unacceptable.

3.2 Unacceptable conduct:

Under no circumstances will the following be tolerated in the workplace or outside it: moral and sexual harassment; disrespectful, discourteous, threatening or discriminatory treatment towards any person, regardless of hierarchical level, position or function; discrimination based on social origin, race, color, gender, age, religion, physical characteristics or sexual orientation.

It is strictly forbidden to use the company's systems and resources to carry out activities other than the specific professional ones established for the employee, or to spread or disseminate rumors, pornography, jokes, games or political party advertisement.

Work under the influence of alcohol or illegal drugs is not allowed, as well as all acts that may cause damage to the company's assets, in addition to the other conduct provided for in article 482 of the Consolidation of Labor Laws .

It is also forbidden to speak out on behalf of the company, including on social networks, blogs or any other type of vehicle or media, without prior authorization

Art. 482 - The following constitute just cause for termination of the employment contract by the employer: a) an act of improbity; b) incontinence of conduct or misconduct; c) habitual trading on one's own account or on behalf of others without the employer's permission, and when it constitutes an act of competition with the company for which the employee works, or is detrimental to the service; d) criminal conviction of the employee, final and unappealable, if the execution of the sentence has not been suspended; e) sloppiness in the performance of the respective duties; f) habitual drunkenness or drunkenness on duty; g) violation of company secrets; h) acts of indiscipline or insubordination; i) abandonment of employment; j) acts damaging to honor or good reputation committed on the job against any person, or physical offenses, under the same conditions, except in the case of self-defense or the defense of others; k) acts damaging to honor or good reputation or physical offenses committed against the employer and hierarchical superiors, except in the case of self-defense or the defense of others; l) constant practice of games of chance.

4. The external relationship

4.1 Customers:

Our customer service must be focused on respect, courtesy and efficiency, providing clear and accurate information when contracting services, in order to achieve the expected results.

4.2 Competitors:

ROYAL CARGO DO BRASIL respects the rules of free market and does not agree with any measure of its employees that results in unfair competition.

Thus, the company bases its performance on the defense of the rules provided for in national and international antitrust legislation.

By way of example, here are some prohibited behaviors:

I. Inform competitors about any amounts charged, or any other parameter that determines or influences the competitive behavior of ROYAL CARGO DO BRASIL in order to induce parallel behavior on the part of the competitor;

II. Establish agreements with competitors in order not to compete, restrict business with suppliers, present fictitious offers within the scope of proposals.

Therefore, the primacy of competitive freedom must always prevail in the minds of our employees.

4.3 Working with Suppliers:

ROYAL CARGO DO BRASIL's principle is to work with reputable suppliers and business partners, treating them without privileges, favoritism or discrimination of any kind. Therefore, compliance officers will be responsible for carrying out the analysis prior to contracting, by sending out a standard form, in which they will check whether the suppliers share the principles outlined below:

- I. Compliance with all applicable laws;*
- II. Prohibition of acts of corruption;*
- III. Respect for human rights;*
- IV. Taking responsibility for the health and safety of their employees and;*
- V. Acting in accordance with applicable local and international standards relating to environmental protection.*

All suppliers and business partners must guide their behavior by the principles expressed in this CODE OF ETHICS AND CONDUCT MANUAL.

4.3.1 Private corruption:

The offer, promise, delivery or receipt of a financial advantage with the intention of inducing the improper execution of functions or as a form of reward, as well as by facilitating the contracting of a service or product, will not be admitted in the relationship with private agents.

The same applies to gifts, amounts, commissions or other advantage to companies or their employees, as well as the third person related to them, except in the cases specified in item 7 of this Manual.

In order to prevent and verify such conduct, specific procedures have been adopted with redflag mechanisms provided for in the internal regulations, so that whenever unusual or price-gouging conduct on the part of suppliers appears to be identified outside the market average, it must necessarily be reported to the superior for approval or not of the contract, if applicable.

5. Conflicts of Interest

Employees must refrain from practicing any act that implies a conflict of private interests with those of ROYAL CARGO DO BRASIL, such as using the prerogatives of their position for their own benefit or selling any products or services of a private nature on the company's premises.

This can also manifest itself in the form of a commercial relationship, corporate participation or acting through a third party in a competitor or customer of ROYAL CARGO DO BRASIL or association in parallel activities that prevent the employee from fulfilling their responsibilities towards ROYAL CARGO DO BRASIL.

It is also forbidden to breach the duty of secrecy, which is manifested by the use for private purposes or in the form of passing on to third parties, of any and all information, whether patented or not, of a technical, operational, commercial, legal nature, know-how, inventions, internal or external processes (administrative or judicial), formulas and designs, whether

patentable or not, business plans, accounting methods, accumulated techniques and experiences, documents, contracts, papers, studies, opinions and research to which the member has access:

- a. by any physical means (e.g., express documents, manuscripts, facsimile, photographs, etc.);
- b. by any form registered in electronic media (e-mail, pendrive, etc.);
- c. orally.

Thus, the confidentiality of ROYAL CARGO DO BRASIL's internal or proprietary confidential information that has not been disclosed to the general public must be maintained. The non-public information of suppliers, customers, employees, agents, consultants and other third parties must also be protected in accordance with legal and contractual requirements.

6. Relationship with the government

Everyone's dealings with agents of national or foreign public administrations must be fair, transparent, ethical, and moral.

The term "public administration" includes managers or employees of any state or governmental body, agency or legal entity, at any level, including managers or employees of state-owned companies and public international organizations. It also includes candidates for political positions, managers and employees of political parties.

Under no circumstances may employees promise, offer, give or receive, directly or indirectly, undue advantage from or to them, or the related third party.

It is understood as an undue advantage to offer something of value to a public agent, such as: money, entertainment travel, gifts, donations, among others.

It is also forbidden to hinder the actions of the supervisory authorities, as well as to finance, fund, sponsor or in any way subsidize the practice of the illicit acts provided for in Law No. 12,846 of 2013.

7. Gifts and entertainment

Gifts, presents and entertainments that do not cost or appear to cost more than a quarter of a minimum wage may be accepted or offered as an act of courtesy for institutional purposes, such as:

- *Baskets, panettones, chocolates, wines;*
- *Calendars, notebooks, pens, or pencils*
- *Lunches and dinners.*

For any gift, present or entertainment in an amount higher than that established, the approval of the Executive Board will be required.

8. Information processing

ROYAL CARGO DO BRASIL will maintain the control and management of all internal and external procedures in order to show the reality of the operation carried out, safeguarding the confidentiality specified above.

Employees must ensure that the documents and accounting records of ROYAL CARGO DO BRASIL created by them, or for which they are otherwise responsible, are accurate, complete and are generated in due time and in accordance with the applicable accounting rules and standards.

Therefore, you cannot omit illegal commissions or other types of undue payment from the accounting records, or make up accounting records to hide inappropriate or unidentified activity.

9. Environment, safety and health

The protection of the environment and the conservation of natural resources are priorities, and it is up to each of the employees, in their respective functions, to seek to improve the management and execution of operations in a safe way for the environment.

10. Political contributions, donations and sponsorships

ROYAL CARGO DO BRASIL does not make political contributions (donations to politicians, political parties or political organizations).

The contributions that may be made by its employees or third parties that, in any way relate to it will be their sole responsibility, having no connection with the company ROYAL CARGO DO BRASIL.

11. Reporting Channel

All reports regarding possible non-compliance with the provisions herein may be submitted anonymously or identified through the Reporting Channel (Contact Us section of the website www.royalcargo.com.br), and no reprisals of any kind will be tolerated against the complainants.

If the existence of prohibited conduct is verified, sanctions of an administrative nature will be applied, depending on the seriousness and/or recurrence of the conduct, and an administrative procedure will be set up to analyze the facts.

If you have any questions about the criteria adopted, please consult the full Code of Ethics and Conduct on the website www.royalcargo.com.br.