

ESG

# Code of **ETHICS AND CONDUCT**



ETHICS AND  
WHOLENESS

MULTILOG





# **MULTILOG CODE OF ETHICS AND CONDUCT**

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## Dear Collaborator,

This is the updated version of Multilog's Code of Ethics and Conduct, a document revised periodically to include concepts and standards that guide our business and relationships. Thus, it has the duty of strengthening our ethical and upright position on a daily basis, contrary to any conduct that is not in line with our values.

As determined by this Code, our business is guided by the highest standards of ethics, integrity and compliance with the laws and regulations of Brazil and the markets in which we operate. Growing healthily, contributing to the sustainable development of society and our business, continues to be part of an ever-growing project for our Company.

In order for us to continue to be successful, our Code of Ethics and Conduct must guide the attitudes of all our Employees, regardless of the position held or duty performed. Use this document as support and guidance for best practices in relationships and activities between work teams and business partners. If you are aware of an ethical problem, whether potential or confirmed, it is your responsibility to report it through the Company's Whistleblowing Channel. This Channel is structured to confidentially receive reports of misconduct, perceptions, intolerable actions, deviations, inappropriate behavior or any other situation incompatible with our commitment to carry out our business in a transparent, open, respectful, honest and non-discriminatory manner.

At Multilog, ethics and integrity are non-negotiable. To this end, we advise you to adopt the behaviors recommended in this Code in small and large





decisions. Thus, we will continue to practice ethics in essence, focusing on collective well-being, working with excellence and improving everyone's lives.

**Djalma Vilela**

CEO





## **2. WHAT IS THE MULTILOG CODE OF ETHICS AND CONDUCT**

This is the Multilog Code of Ethics and Conduct, your guide for #NossoJeitodeSer.

Here, you can find out about the ethics and conduct guidelines that guide our culture and inspire our values: RESPECT for people, PASSION for winning, TRUST in relationships and INTEGRITY in practices.

## **3. SCOPE**

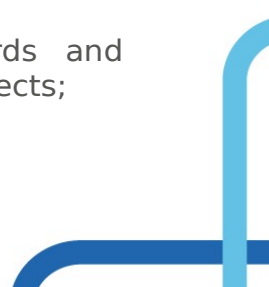
The provisions of this Code of Ethics and Conduct apply to all our operational and administrative units, covering all publics with which we relate, especially Collaborators, suppliers and service providers contracted by any of Multilog's companies, business partners (third parties) and customers.

## **4. CODE OF ETHICS AND CONDUCT RULES**

### **4.1. Practices and Standards of Conduct in the Workplace**

#### **WHAT WE VALUE:**

- Acting in compliance with the laws and regulations in force, based on the provisions of this Multilog Code of Ethics and Conduct, as well as other corporate guidelines defined by the Company;
- Combating discrimination in all its forms, treating all the people with whom we interact with respect, not accepting any manifestation of prejudice or violence;
- Complying with work safety standards and access control in the company in all its aspects;





- Protecting the confidentiality of restricted information, in addition to preventing unauthorized disclosure, not altering or distorting the content of any document, information or data;
- Promoting a healthy balance between work and personal life. Leaders and employees must work together so that such a balance is achieved by all those involved in our activities.
- Respecting the environment, seeking to minimize the negative impacts of Multilog's activities on local ecosystems and on the Planet.
- Respecting society, valuing fair, ethical and upright relationships that allow for the development of all those involved.

## **WHAT WE DO NOT TOLERATE**

### **4.2. Aggression of any nature**

Physical or verbal aggression consists of any behavior that may annoy, disturb or offend, affecting the dignity, integrity or psychological condition of people. In this sense, it is necessary to remain attentive to the content and tone of work discussions, in order to ensure that respect is present in absolutely all conversations held or messages sent through the various communication platforms (such as e-mail, WhatsApp, Teams etc.).

### **4.3. Harassment of any nature**

Harassment (moral, sexual or of any other kind) refers to verbal and physical conduct that embarrasses, humiliates, coerces or harms a person. This practice, repudiated by Multilog, must be avoided both between people who occupy different hierarchical positions (a hierarchical superior) and





between colleagues in the same condition of subordination or that of third parties.

Harassment can be men against women, women against men, men against men and women against women, in other words, regardless of gender or sexual orientation.

#### **4.4. Discrimination of any nature**

It consists of any and all types of discrimination, against any person, due to their social condition, race, color, religious belief, political position, sexual orientation, gender, age, origin, physical condition, language, etc.

#### **4.5. Corruption and Fraud**

It consists of paying, promising, offering or receiving bribes or any illegal, undue or immoral advantage, to public agents, representatives of customers, suppliers, Employees, third parties - or any other social agent -, with a view to obtaining or granting undue privileges or guarantee of own business or to the company. The crime of corruption is described in the Brazilian Penal Code in Decree Law N. 2.848/1940 and Law N. 12.846/2013. Known as the Anti-Corruption Law, it provides for various penalties, such as fines, imprisonment and closure of activities.

Fraud, in turn, is any intentional act or omission designed to deceive others, resulting in loss to the victim and/or gain to the perpetrator.

#### **4.6. Sale of external products/activities**

It consists mainly of the following actions:

- Market products and services internally, as well as







carry out leafleting of any nature, except in campaign actions promoted by the Company and in cases of express authorization.

- Carry out external activities, such as providing consultancy or holding positions in organizations with conflicting interests or that do business with Multilog;
- Corporate ties, own or through a spouse or family members, with suppliers or competitors of companies, if the employee's position gives them the power to influence transactions or allow access to insider information;
- Use position, function or information concerning business and issues of Multilog or its customers to influence decisions that generate interests of themselves or of third parties.

#### **4.7. Consumption of alcoholic beverages and illicit drugs**

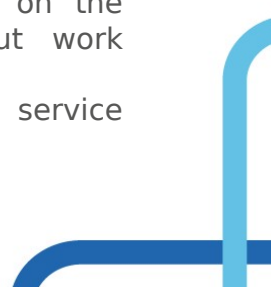
Just as the practices described in the previous items, the following is expressly prohibited:

- Ingesting illicit or licit drugs, carrying or entering the company's premises, including in Company transport vehicles under the influence of narcotics;
- Consuming alcoholic beverages and illicit drugs on the Company's premises;
- Working under the influence of alcohol or illicit drugs;
- Tobacco use is only allowed in places designated by the company.

#### **4.8. Carrying of weapon**

Carrying or keeping any type of weapon on the Company premises or while carrying out work activities is also expressly prohibited.

Carrying of weapon is only allowed to service





providers and employees who use it as a work tool. Such professionals must be duly authorized, identified and technically qualified.

#### **4.9. Exploitation of Child Labor**

No individual under the age of 14 will be employed by the Company.

Apprentices, aged 14 to 24, will have working conditions, hours and wages compatible with their respective age level and with the minimum requirement, in compliance with current legislation.

### **5. CONFLICT OF INTERESTS**

#### **5.1. Hiring family members/affective relationships**

- It is not allowed to hire relatives of up to the 3<sup>rd</sup> degree or people who are in an affective relationship with direct or indirect subordination to the same sector or hierarchical level;
- Relatives or people in an affective relationship must be hired through a regular and impartial selection process, without interference in the recruitment and selection process;
- Cases of affective relationships that begin during the period in which Collaborators are working at Multilog must be immediately communicated to the immediate superiors of each party for submission to the Ethics Committee.

#### **5.2. Hiring former employees**

Hiring a former employee will be possible provided that:

- The dismissal occurred without just cause, in the six (6) months prior to the application process;





- It does not have a history of disciplinary measures and investigations or complaints in the Ethics Committee.

### **5.3. Relationship with third parties (suppliers / service providers / partners and business consultants)**

Relationships with suppliers or service providers must be conducted ethically, respectfully and with integrity.

Suppliers and service providers will be selected based on ethical, technical, social, environmental and cost competitiveness criteria.

It is also essential to comply with the legislation applicable to its activity, labor, environmental and work safety legislation.

The preservation and treatment of information and data must take place in a confidential manner, ensuring the conditions of confidentiality and discretion provided for in the contract.

All suppliers or service providers who carry out work on the Company's premises must have their labor rights assured, as well as the same safety conditions provided to Multilog's own employees.

Suppliers and service providers must observe the guidelines set forth in the internal policies, in the Code of Ethics and Conduct and other documents made available by the Company.

Multilog will not accept service providers without Labor and Social Security Card (CTPS) registration, without the use of PPE and other equipment necessary for worker protection.

### **5.4. Relations with the public sector**





The Company's activity requires compliance with tax and regulatory obligations, as well as compliance with inspections and subpoenas with the public authorities. This relationship must be guided by transparency, respect and integrity, by acting ethically, complying with applicable laws and regulations.

This includes special requirements associated with contact with public officials and public administration codes of conduct, in addition to Law N. 12.846/2013, also known as the Anti-Corruption Law.

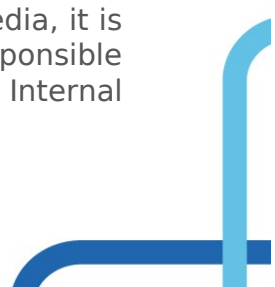
### **5.5. Relations with competitors**

Multilog strives for respect, integrity and ethics in all its relationships, including with competitor companies in our markets. This premise leads us to value fair competition in all our business segments. Under no circumstances, therefore, should confidential (non-public) information, business decisions or internal matters of the Company be discussed with competitors.

In case of doubt, contact the Ethics Committee or the Company's legal area.

### **5.6. Relationship with the press**

All contact with the press must only be carried out by professionals duly authorized by the Company. No other Collaborator is authorized to disclose confidential information or make any type of statement that may reflect on the company's position. When verifying any type of incorrect information regarding our activities in the media, it is the duty of the professional to inform the responsible areas, such as Marketing and Internal





Communication.

## **5.7. Use of social media, image and reputation**

All actions carried out on the Company's social networks are public and directly affect Multilog's image in society.

Manifestation acts on behalf of the Company can only be carried out by the responsible area (Marketing or Internal Communication), whereby manifestation without authorization is prohibited.

In your private social networks, avoid posting images wearing a Multilog uniform outside the work environment, especially carrying alcoholic beverages or in environments such as pubs, parties and the like. Avoid expressing your political position on social networks using Multilog's images or uniform, in order to ensure that your personal position - which is respected by the Company - is not confused with the Company's position.

## **5.8. Political campaign**

Making any contribution in the name of the Company, in monies, goods or services to campaigns, parties or political houses is not allowed, except upon resolution of the Executive Board;

Carrying out political campaigns on Multilog's premises, as well as appearing at work wearing or carrying materials from candidates for elected office is prohibited.

## **5.9 Giveaways and gifts**

Multilog's collaborators must not receive from





suppliers, service providers or customers, any gift or giveaway that constitutes a direct or indirect personal advantage. **Exceptions** to this rule are objects of low monetary value - valued at a maximum of BRL 100.00 - distributed as advertising with the institutional brand, which do not characterize benefits in negotiations and which respect the Company's Giveaways and Courtesies Policy.

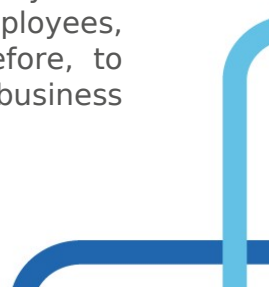
Gifts of greater monetary value, valued at more than BRL 100.00, must be returned or refused, informing that this is the Company's standard of conduct. When this is not possible, gifts should be directed to the Ethics Committee, which will deal with them.

Participation in fairs, visits and events can be paid for by the suppliers, provided that the Director of the area is aware of it and gives the due approval, being a practice of cordiality and kindness, accepted within the real opportunity of developing a commercial relationship.

The relationship with our suppliers must be guided by respect and by the permanent search for the development of products and services that add value to Multilog and strengthen its competitive position among suppliers. Just as in the relationship with suppliers, the policy for gifts related to our customers follows the precepts of ethics and integrity of the Company.

## 6. INFORMATION SECURITY

Protecting Multilog's confidential information is everyone's duty. Confidential information is any non-public data regarding our business, employees, customers and suppliers. They refer, therefore, to numbers and internal reports, such as business





plans, prices, costs, internal financial information, personal data, research and development, technologies, marketing plans or other information of a competitive nature.

In this sense, the following constitutes serious misconduct:

- Misuse, manipulation, sharing and disclosure of the Company's private information on customers, suppliers, Employees (personal and health data), market, processes, programs, technologies, business trends, among others;
- Sharing passwords and individual users to access systems and other work tools used by the company;
- Copying documents, in paper or electronic means, that contain confidential information of Multilog;
- Exchange, redemption, storage or use of obscene, pornographic, violent, discriminatory, racist, defamatory content;

## **7. GENERAL DATA PROTECTION LAW**

The company complies with the General Personal Data Protection Law, and adopts the necessary practices for the adequate treatment and protection of the data of its employees, suppliers and service providers contracted by any of Multilog's companies, business partners (third parties) and customers.

The Personal Data Protection Officer (DPO) is responsible for implementing policies and procedures for the security and protection of personal data, in addition to being the official contact for holders of personal data and for the National Data Protection Agency (ANPD).

For information and requests related to the General Data Protection Law (LGPD), please, contact





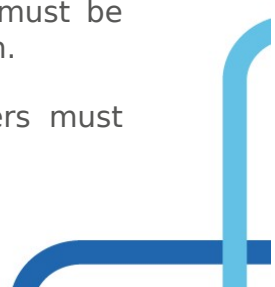
dpo@multilog.com.br.

## 8. PROPERTY SAFETY

The following rules refer to the company's property security for all accesses:

Guidelines for accessing the Customs areas:

- The search of all individuals (without discrimination), as well as materials (handbags, bags or equipment) and vehicles is mandatory, access to the premises is prohibited in case of refusal and subject to disciplinary action in the aforementioned case, inciting refusal to collaborators or employees and inconvenience caused by the indisciplinary action in the act of accessing the facilities;
- Access to bonded areas is only allowed upon registration in the system of each unit. Access to work with a corporate cell phone, notebook and other equipment provided by the company is only allowed if duly identified by a sticker or pursuant to Property Security definitions;
- Access with adornments/personal objects, such as watches, bracelets, rings, chains, sunglasses, electronics, etc., will not be allowed. As for the use of earrings, only small and discreet models will be allowed.
- Access with caps, hats and bonnets will not be allowed, with the exception of those provided by the company and characterized as PPE, which must be removed at inspection stations for verification.
- Outsourced workers and service providers must







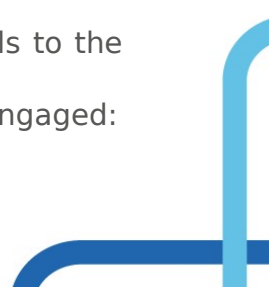
be duly wearing uniform;

- Access to the bonded area must be done with the use of closed safety shoes. The use of closed shoes without heels is only allowed for visitors/dispatchers;
- In the operational customs areas, no bags are allowed, except for those terminals where the changing rooms are within the operational area.
- Personal objects of agents and visitors, which will not be used during visits, must be stored in their vehicles to speed up access to the customs area;
- Searches will be carried out in all vehicles according to the needs of each facility, with the driver of the vehicle instructed to open doors and trunk, whereby opening or closing the vehicle by third parties is forbidden.
- Vehicle access is authorized only to those holding a permission duly authorized by Multilog.
- Access needs for other types of objects must be reported to the SECURITY area for prior assessment. These rules aim to improve the safety of the Customs Area and employees, as well as to follow the guidelines of the Brazilian Federal Revenue Service, guaranteeing the protection of our customers' properties and maintaining the commitment to Property Security.

## 9. HEALTH AND LABOR SAFETY

Multilog is committed at all hierarchical levels to the SAFETY and HEALTH of its employees.

Basic and inviolable principles that must be engaged:





- No activity is so urgent that it cannot be carried out safely;
- Perform activities wearing the mandatory PPE properly;
- Routinely inspect the condition of equipment, machines or tools under their responsibility, before starting work;
- Analyze the risks of activities and comply with appropriate prevention and protection measures;
- Issue preliminary risk analysis and work permit for high-risk activities;
- Carry out activities after being trained, licensed, qualified, certified and authorized;
- Immediately report all accidents at work to the leader and the person responsible for work safety.

Recommendations for driving vehicles:

- Company vehicles can only be driven by authorized employees;
- The use of seat belts by all occupants of the vehicle is mandatory;
- The use of telephones or headphones while driving the vehicle is prohibited;
- Respecting the speed limits is mandatory;
- Park only in reverse and in permitted places, not obstructing the passage, safety lanes and emergency equipment.

## **10. RESPECT FOR THE ENVIRONMENT**

Respect for the environment is an ethical commitment by Multilog. For this reason, all of the Company's activities must be carried out in compliance with current environmental legislation, with a focus on reducing risks and negative impacts on ecosystems, in addition to promoting the





conservation of natural resources.

## 11. ETHICS COMMITTEE

The Ethics Committee is responsible for managing this Code of Ethics and Conduct, a document that proposes actions related to Multilog's principles and values.

### 11.1. RESPONSIBILITIES OF THE ETHICS COMMITTEE

The Ethics Committee is responsible for:

- Proposing actions regarding compliance with and dissemination of Multilog's Code of Ethics and Conduct, in order to ensure its efficacy and effectiveness;
- Managing Multilog's ethical culture and monitor activities related to its dissemination and multiplication;
- Evaluating manifestations received via the Whistleblowing Channel and other applicable means, define a working group for inquiries and respond to the complainant;
- Analyzing potential infractions and violations under the company's Policies and Procedures.

### 11.2. CONTAQUI - Multilog Whistleblowing Channel

Multilog maintains a Channel dedicated to receiving manifestations concerning infractions and violations of this Code of Ethics and Conduct.

For reports in case of suspected breach of Conduct, please contact:

**Confidential Web Channel**





<https://www.compliance-office.com/multilog/>

## **Confidential Voice Channel: 0800 580 0832**

In order to ensure impartiality and confidentiality of information, the Channel is monitored and managed by a specialized third-party company.

Whenever you prefer, the whistleblower can also remain anonymous.

Complaints related to the Ethics Committee will be handled as follows:

- When related to one of the members of the Ethics Committee, the person involved will not have access to the protocol and content of the complaint. The analysis of the complaint will be conducted by the other members of the Committee.
- When related to the President of the Company or any other member of the Board of Executive Officers, the investigation process will be taken for analysis by the Chairman of the Board of Directors of Multilog.

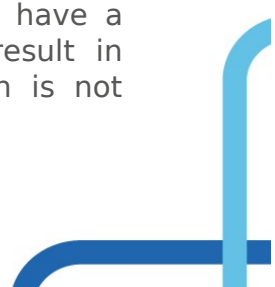
### **11.3. Whistleblowers' Protection**

All those who blow the whistle or express a complaint, suspicion, doubt or concern regarding potential violations of the guidelines of this Code are protected from retaliation.

Everyone must preserve the confidentiality of the information provided or received regarding investigations of potential violations.

## **12. PENALTIES**

The guidelines and provisions of this Code have a guiding nature and non-compliance may result in penalties, even if the situation or violation is not





described.

Violations to the guidelines of this Code of Ethics and Conduct are not tolerated and are subject, without prejudice to other applicable judicial and administrative measures, to disciplinary measures, such as:

- Verbal warning;
- Written warning;
- Suspension;
- Termination for just cause;
- Dismissal without just cause;
- Termination of current contracts, in the case of service providers in general and customers.

## **KEEP TUN@D!**

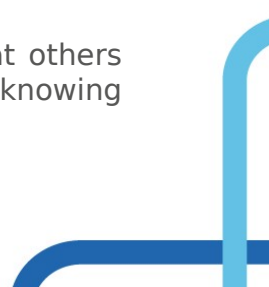
When you are faced with a question or dilemma on how to proceed concerning a matter, refer to this Code and answer the questions below:

- 1) Is my decision based on this document and Multilog's values?
- 2) Will my decision contribute to the company and the employees?
- 3) Would I be able to publicly justify my decision?
- 4) Would I recommend this decision to someone else who were in a similar situation?

If your answer is **YES**: Right on! Are you acting according to **#NossoJeitodeSer**.

If your answer is **NO** for some of the questions, consider if:

- 1) I am making this decision based on what others have said, without knowing the rules or even knowing





that I run the risk of not complying with the internal and external standards;

2) The decision to be taken is aimed solely at my own interests or those of third parties related to me;

3) If I make this decision, I will have some embarrassment in communicating it to my boss, co-workers, family and friends;

4) The decision is being taken on impulse and individually;





## **TERM OF COMMITMENT (Collaborator's copy)**

I hereby declare that I have accessed and read the Multilog Code of Ethics and Conduct in full and I do declare that I am aware of my obligations as a collaborator in order to comply with the standards and precepts contained in the referred to document.

I am aware that, in case of any doubt concerning the correct conduct or attitude to be taken, I will immediately contact my leader or the Ethics Committee for guidance.

Full Name:

Registration:

Date:

Signature:



## **TERM OF COMMITMENT (Company's copy)**

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