

CODE OF ETHICS



Asia Shipping



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The leader's words

Dear employee and business partner,

Asia Shipping has always worked hard to help our partners and collaborators achieve their goals. It is no coincidence that “guide through wise ways towards great achievements.” is our motto, our indicator.

By following company policies and ESG practices, we are able to overcome major challenges and contribute to stronger economic and social development. Quality, safety, and ethics are essential pillars of our business and, for this reason, we spare no efforts so that everyone reaches their goals, always with transparency.

To maintain the highest standards of ethics and integrity in all our activities, we have created this code to guarantee the minimum conditions for a healthy, professional and legal coexistence.

Shall We?



Alexandre Pimenta – CEO

Our Philosophy



Why We Do It

PURPOSE

Guide through wise ways towards great achievements



What we do

PUBLIC STANCE

We are the best integrated logistics provider to carry out business between Latin America and the World.
 We spare no effort to generate value for our customers.
 With our knowledge, we are always seeking to unravel information into a clear view, data into recommendation and expertise into solutions. Because we want to go beyond the cargo, we want to guide businesses through intelligent paths.



For whom we do it

AUDIENCE

For companies that understand the value of going beyond ensuring the realization of their logistics operations. For this, they seek an agent who can guide them through wise ways to move business between Latin America and the World.

VALUES

Transparency in all directions.
 Caution in every detail
 Knowledge as an indicator
 Swiftness that shortens distances

PERSONALITY

We are responsible
 We are determined
 We are advisors
 We are connected

DRIVES

Security to guarantee
 Proximity to sort it out
 Expertise to generate value

PROMISE

We guide through wise ways

Definitions and Concepts

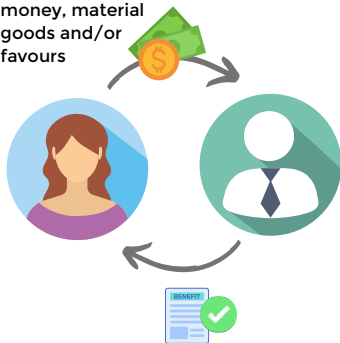
Corruption can be defined as the act committed by someone in a particular professional context for personal gain or for the benefit of a third party.

CORRUPTION

Usually, one of the parties involved offers, promises or grants benefits to a recipient, who demands, accepts the promise or receives these benefits

Remember that corruption can occur with employees and officials in public office as well as with business partners

Offered bribes through the payment of money, material goods and/or favours



Tratamento especial, vantagens indevidas com preferencia em processos, liberações, etc.

Active Corruption

Offering or promising any type of undue advantage to a public official through payment in cash and/or favours, to obtain undue advantages, preferential treatment

Soliciting bribery through the payment of money, material goods and/or favours.



Tratamento especial, vantagens indevidas com preferencia em processos, liberações, etc.

Passive Corruption

Crime committed by a public official, involving the direct or indirect solicitation of any type of undue payment or advantage for the exercise of their functions.

PUBLIC AGENT

It is all those who exercise activities in the public administration, even if temporarily or without remuneration. The expression has a broad meaning, encompassing both political and merely administrative functions

SUPPLIERS AND BUSINESS PARTNERS – ADD PARTNERS

Asia Shipping's business partners are: Customers, suppliers and third parties, necessary for carrying out the company's economic activity.

ANTI-CORRUPTION LAW 12.846/2013

Each country has its own anti-corruption legislation, and in Brazil, it is known as the anti-corruption law or the clean company law.

It deals with objective administrative and civil liability of companies for the practice of acts against the Public Administration, domestic or foreign.

GOVERNMENT AGENCIES

They refer to commercial enterprises, institutions, agencies, departments, and bodies owned or controlled by the State and other public entities (whether the participation or control is total or partial), including research institutions, universities, and hospitals in national or foreign territory.

INFLUENCE PEDDLING

It is practised by a private individual against the public administration in general and consists of requesting, demanding, charging or obtaining, for oneself or another, advantage or promise of advantage, under the pretext of influencing an act practised by a Public Agent in the exercise of his or her function.

BRIBE OR KICKBACK

It is the offer to a public official or a professional from the private sector any amount of money or any other favours (from a bottle of liquor, jewellery, property, or even accommodation plus flight on a holiday trip).

Values and Principles

COMMITMENT TO HUMAN RIGHTS

The United Nations Organisations (UN) Universal Declaration of Human Rights (UDHR), was published in 1948 in the post-World War II period to guide the process and desire for world peace.

To this end, the UDHR proclaims certain inviolable human rights as a means of achieving the desired peace, among them equality, freedom, and dignity: “All human beings are born free and equal in dignity and rights”.

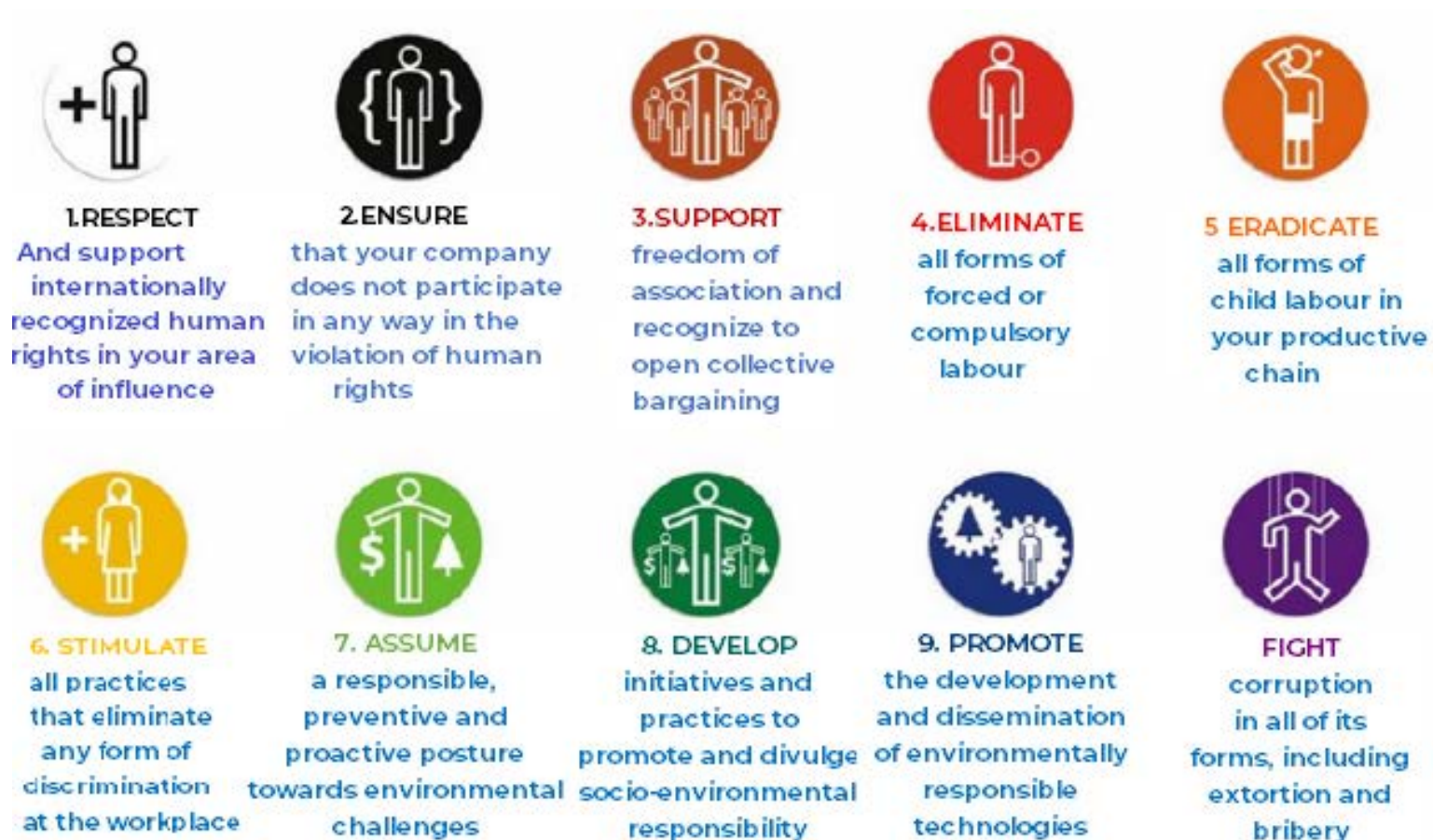
Asia Shipping unconditionally supports and respects the provisions contained in the UDHR/UN and undertakes not to participate, encourage or perform any act that is linked to the deprivation of liberty, security, slave labour, torture, child labour or any other type of act or attitude that disrespects the inviolable principles of the human being.



To learn more about the topic, be sure to access our Adherence to the UN Global Compact, which is available on the following link:
<https://www.asiashipping.co/conquistas>

We take responsibility to contribute to sustainable development, and our entire organisation is influenced by or influences the achievement of these goals for a better world and future throughout the supply chain.

That is why we are committed to the UN Global Compact, applying its 10 universal principles in our day-to-day work.

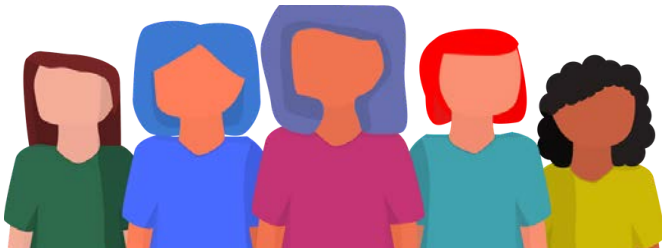
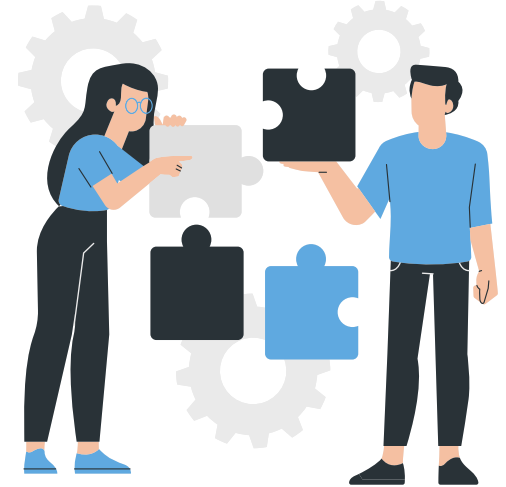


Source: <https://app.phinforgood.com/stories/corporate-social-responsibility-goals>

A WORLD OF OPPORTUNITIES

Asia Shipping recognises that everyone is entitled to work, to career development opportunities, and to an equitable and satisfactory working environment without discrimination.

Asia Shipping supports freedom of association and the effective recognition of the right to collective bargaining.



We maintain a democratic corporate environment, providing opportunities for dialogue to all employees, as well as equal opportunities to all, without discrimination of any kind, whether by gender, creed, ethnicity, age or social position.

The company's workforce is plural, with men and women occupying the most varied positions, in Brazil and around the world.

FREEDOM OF ASSOCIATION



All employees are free to join trade unions and other organizations of their choice, and to engage in collective bargaining in support of their interests (but are prohibited from using our resources or our trademark for this purpose).

Asia Shipping does not discriminate against employees who choose to form or join trade unions or other organisations, or those who choose not to participate in such initiatives.

COMMITMENT TO DIVERSITY

Among other characteristics, ASIA SHIPPING is marked by cultural plurality. The company is present in several Brazilian states and in several countries and this means that it has employees from the most diverse ethnic groups, orientations, creeds, ages, social positions, etc.



ENVIRONMENTAL CARE

Asia Shipping is committed to protecting the environment. For its part, it seeks to advance in the digital transformation, eliminating the use of paper as much as possible. It also has a policy of selected waste separation in its offices. It has procedures for the management of dangerous cargoes, in order to comply with all the necessary requirements for this operation.



BUSINESS INTEGRITY

Employees and suppliers who represent Asia Shipping, directly or indirectly, must adopt the guidelines and policies presented in this code. In case of irregularities and/or infractions detected, it is expected that the necessary procedures are adopted to ensure the interruption of irregularities and the timely remediation of the damage generated.

We condemn any attitude contrary to the ethical and moral standards of the company or our clients, and will not agree to any deceitful or deceptive act of bad faith.



Rules and Procedures

RESPECT FOR REGULATIONS, BOTH LEGAL AND INSTITUTIONAL

Policy

Comply unconditionally with national and international laws as well as Asia Shipping's established internal policies and procedures.

Statement

All employees must unconditionally comply with the legislation in force and the internal policies, processes, and procedures. If in doubt about the application of a standard, contact the compliance department. In case of doubts related to internal procedures, contact your immediate manager.

Considerations

Foreign trade is a multi-regulated area. Thus, in the performance of its activities, Asia Shipping is subject to several rules issued by various bodies such as ANTAQ, ANAC, RFB among other organs of inspection and control, in addition to having internal policies, processes, and procedures that guide the execution of its activities.

HIRING SUPPLIERS

Policy

Transparency and integrity must be observed in all the processes of hiring suppliers and commercial partners.

Considerations

During the competition process, employees may not receive, offer or ask for any kind of gift from any person or entity that could improperly influence or compensate an act or decision.

Statement

It is strictly forbidden for all employees to contract suppliers or to carry out purchasing processes without due observance of the principles of ethics and compliance. No gifts or advantages shall be accepted and/or solicited to facilitate a hiring and/or purchasing process.



Any kind of gifts or advantages that seek to facilitate the hiring of a supplier must not be accepted.



Always remember that any type of supplier contracting must be in writing.



Any questions, always consult the Compliance team for guidance.

DISCRIMINATION, HARASSMENT, AND BULLYING

Policy

To condemn all acts, intentional or unintentional, that may constitute discrimination of any kind, harassment of any kind, or any type of aggression or hostilities, satire, episodic or repetitive (bullying), in a corporate environment.

Statement

It is strictly forbidden to all employees attitudes contrary to good coexistence. The company repudiates and forbids any kind of discrimination, harassment, bullying (physical, moral, psychological, material, verbal, social, sexual, prejudiced or even cyberbullying), intentional or not in a corporate environment.

Considerations

The company vehemently repudiates any act that goes against corporate principles, the minimum bases necessary for good coexistence, supported by good manners. The company repudiates any intention and act of discrimination, moral harassment, sexual harassment or attitudes that may embarrass, satirize, denigrate, harass or coerce any person who may feel their moral and dignity affected. ASIA SHIPPING requires its employees and business partners to maintain the relationship at the highest level of professionalism.

PSYCHOLOGICAL HARASSMENT

Policy

Asia Shipping does not tolerate any abusive conduct that affects the dignity or the psychic and/or physical integrity of an employee.

Determination

It is strictly forbidden to expose any employee to humiliating and embarrassing situations in their work environment in a repetitive and prolonged manner.

Considerations

Psychological harassment is manifested by behaviour, words, acts, gestures or writings that may cause damage to the personality, dignity or physical and psychological integrity of a person, endangering their employment or degrading the working environment.



WATCH OUT!

Psychological harassment is configured by the repeated occurrence of aggressions for a prolonged period of time, and with the intention of emotionally damaging the victim



Demanding that work be carried out efficiently and encouraging the achievement of goals is not bullying.



SEXUAL HARASSMENT

Policy

Asia Shipping does not tolerate any conduct of a sexual nature, whether verbal, non-verbal or physical, with the effect of disturbing or embarrassing any employee.

Statement

The practice of any act of sexual connotation in verbal, non-verbal or physical form, manifested by words, gestures, physical contact or other means, is strictly forbidden.

Considerations

Sexual harassment manifests itself by conduct of sexual connotation, which can be by blackmail or intimidation.



WATCH OUT!



Taking advantage of one's position of leadership to coerce the employee in order to obtain sexual favours is characterized as sexual harassment by blackmail.



The persistence, impertinence, hostility practiced individually or in group, is characterized as sexual harassment by intimidation.

ELECTORAL HARASSMENT

Policy

Asia Shipping respects each employee's right to the free exercise of democracy, and the plurality of opinions, and does not engage in any practice that may influence or manipulate votes, demonstrations or political orientation.

Statement

The practice of coercion, threat, promise of advantages or offer of benefits to any employee due to his/her political opinion is strictly forbidden.

Considerations

Electoral harassment manifests itself in the occurrence of any type of coercion, threat, or even offer of benefits to any employee due to his or her political opinion.



WATCH OUT!



The practice of electoral harassment is prohibited by law, under article 301 of the Electoral Code.

COMMITMENT TO INFORMATION

Policy

Managing information under the principles of accuracy, objectivity, in an up-to-date manner, sent in due time to the right recipient, in the right event, in the appropriate manner in line with the corporate objectives.

Statement

The information must always be held in the highest degree of relevance and professionalism. It must be active, subordinated to accuracy and governed by the following characteristics: updated, formalism, presented clearly, with security, objectivity, knowledge, and punctuality.

Considerations

Information is the substance of Asia Shipping. Therefore, managing information is directly related to the company's success. Competence in receiving, processing and making use of information is what gives us the basis for institutional development, so much so that this theme was selected to be present in this code of ethics because for the company, this theme is of vital importance.

It is not efficient to do and not inform. There is damage in case of omission of information. Failure is to inform late or even incompletely. Partial, incomplete information is unproductive.

The quality of the information we receive, process and make available must be observed on a daily basis.

SECURITY

Policy

Attend and continuously improve the processes with a view to fully meeting the safety criteria of the logistics chain.

Statement

Every associate who comes across requests, documents, quotations, contacts or any act that shows an intention to cheat, omit, falsify, alter documents or information, must immediately contact their responsible manager together with the compliance area.

Considerations

ASIA SHIPPING, as a provider of international logistics services, is vulnerably exposed to operations that offer risks to the security of the logistics chain.

To eliminate these threats, the company maintains an active risk management policy and has procedures related to cargo security, physical access control, management of commercial partners, as well as carrying out periodic training and awareness-raising on threats.



Watch out for any improper documentation requests and/or activities that deviate from standard procedure.



At the slightest warning sign, always seek guidance in our policies and procedures.

DATA PRIVACY AND PROTECTION

Policy

Processing personal data only in cases strictly related to the exercise of its economic activity, respecting the principles of purpose, adequacy, necessity, free access, transparency, security, and non-discrimination.

Considerations

All personal data must be treated responsibly, ethically and in accordance.

Statement

Any action, information, direct or indirect, received and/or offered that goes against the real interests of the institution, must be immediately communicated to the responsible managers together with the compliance area.



Watch out for any improper documentation requests and/or activities that deviate from standard procedure.

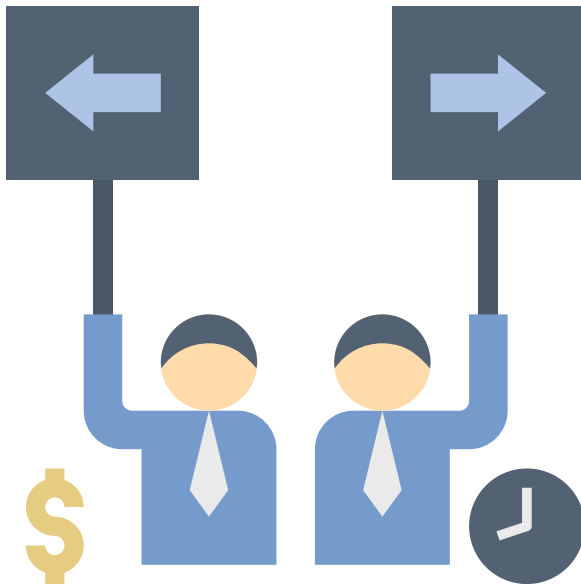


At the slightest warning sign, always seek guidance in our policies and procedures.

CONFLICT OF INTEREST

Policy

Corporate interests must take exclusive precedence over private interests.



Considerations

ASIA SHIPPING has as its economic activity the provision of services. Therefore, its biggest and best raw material is people. Every day, our employees and business partners represent the institution in different companies and public administration bodies, with access to new businesses, projects and opportunities. Such characteristic may eventually generate a scenario of threat to the organization's final interests, being superimposed by private interests.

Statement

Any action, information, direct or indirect, received and/or offered that goes against the real interests of the institution, must be immediately communicated to the responsible managers together with the compliance area.

ACCOUNTING AND FINANCIAL RECORDS

Policy

All records and accounts must reflect in a detailed, accurate and correct manner all financial transactions of the company, considering the standards established by regulatory bodies.

Statement

It is strictly forbidden for all employees to register false documents, obscure financial transactions/operations or improper accounting entries of expenses that have not been incurred.

Considerations

Financial transactions must be transparent, fully documented and correctly classified to ensure the security and reliability of all operations.



Watch out for any record without proper substantiation and/or activities that deviate from standard procedure.

ANTI-CORRUPTION

Policy

Do not promise, offer or give, directly or indirectly, any undue advantage to any public administration, national or international, by any means, for any justification.

Statement

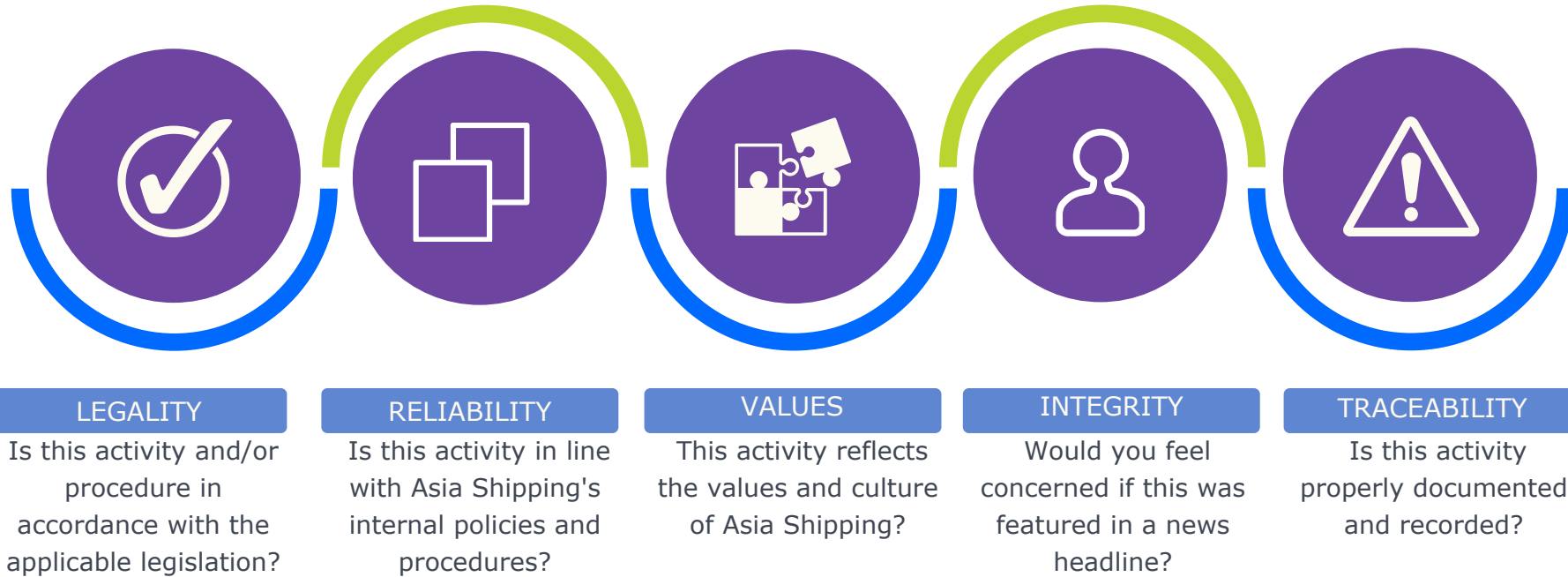
It is strictly forbidden for all employees, suppliers, third parties, national or foreign, on behalf of the institution, directly or indirectly, to promise, finance, fund, sponsor, or offer an undue advantage to any office, server, department, secretariat that directly or indirectly integrates the public administration, national or international.

Considerations

Corruption always aims to favour one and harm another, so in addition to moral deviation, its practice may constitute a crime. Acts of corruption against the public administration are normally characterized by bribery, influence peddling, use of privileged information, among others.

The corporate objectives are linked to the institutional principles, laws, policies, procedures and other internal controls, which means that corruption against the public administration has no place in Asia Shipping.

Ask Yourself



ALWAYS USE THE QUESTIONS ABOVE TO HELP YOU DETERMINE THE BEST COURSE OF ACTION.

Whistleblowing Channels

WHISTLEBLOWING CHANNEL

Employees and/or business partners who come across, become aware of or even suffer any act that violates this code, must immediately report the fact through our ethics channel, reporting the fact in great detail and if possible, attaching any evidence.

Our whistleblowing channel operates 24 hours a day / 7 days a week, available to all employees and business partners, through our portal <https://www.asiashipping.co/compliance> on the “Report” button.



WHISTLEBLOWING

Transparency In all directions! Asia Shipping makes this reporting channel available and encourages its use by any person, employee, client, public administrator, business partner. Your right to anonymity is guaranteed!

Report



Every employee or supplier who has of any breach of this code must immediately report the fact through our whistleblowing channel.



At this point, provide as much detail as possible about the fact and if possible, attach evidence.



When registering the occurrence, the user will receive a protocol number for consultation at any time.



When registering, you can choose to keep your report anonymous. This guarantees the responsibility and confidentiality of each report.



Compliance will begin the investigation process of the occurrence within a maximum period of 30 days for its conclusion.



Our whistleblowing channel operates twenty-four hours a day / seven days a week.

Disciplinary Measures

PENALTIES

Employees who violate this code of ethics or fail to comply with or abide by its determinations may be subject to the following penalties:

- **Written warning;**
- **Suspension; and**
- **Just cause termination.**

Commercial partners and suppliers who eventually infringe this code of ethics may, without prejudice to the other penalties provided by law, be subject to the following penalties:

- **Suspension of activities; and**
- **Termination of the Contract.**

Final Considerations

FURTHER QUESTIONS AND SUPPORT

In addition to this code of ethics, Asia Shipping's employees can find further information in the company's internal regulations and other corporate policies.

In case of questions and/or clarifications, contact the company's compliance department:
compliance@br-asgroup.com



compliance@br-asgroup.com

<https://www.asiashipping.co/compliance>



CODE OF ETHICS

01/2023