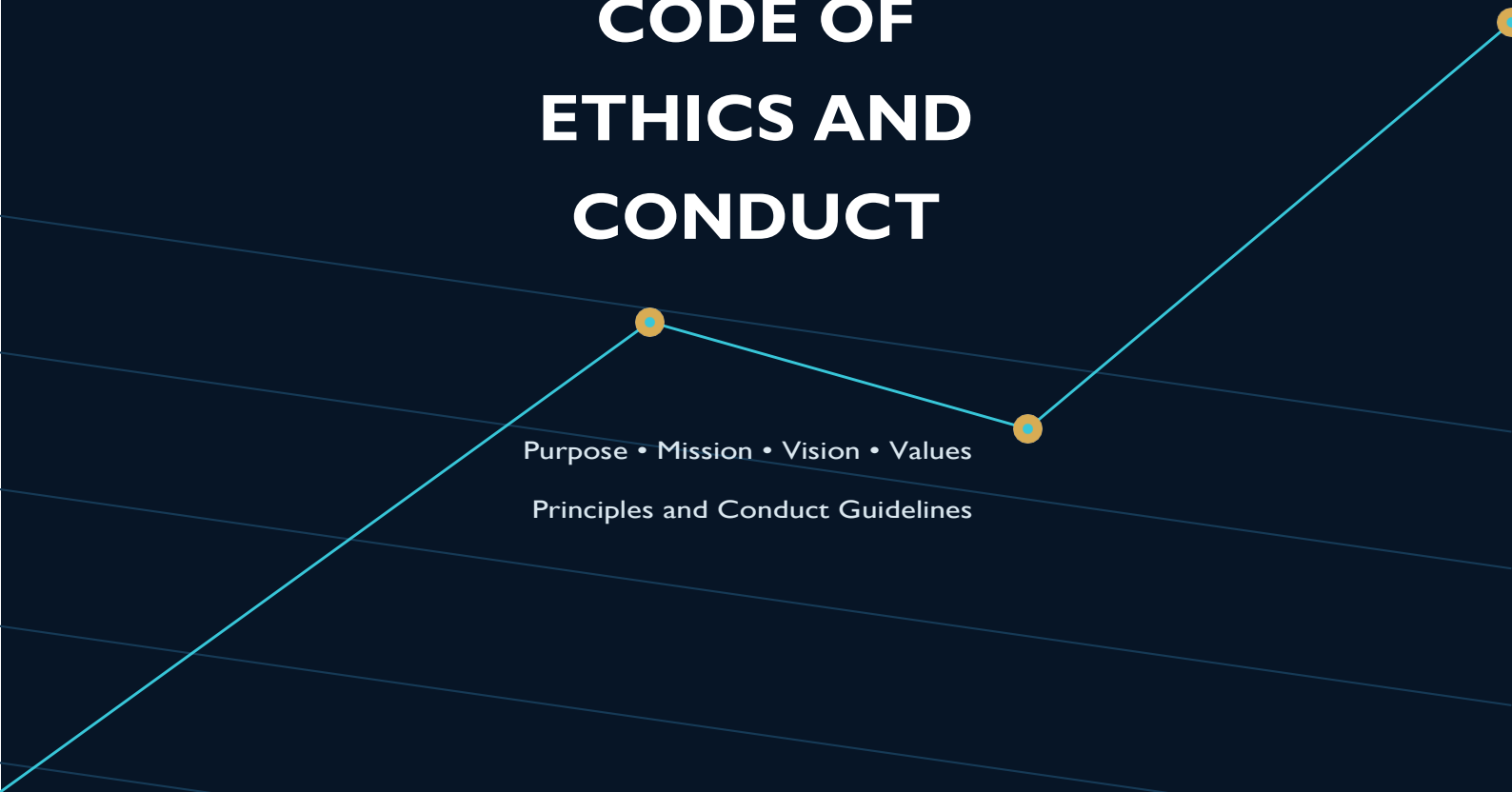

GGR ANDRADE

LOGÍSTICA E TRANSPORTES LTDA

CODE OF ETHICS AND CONDUCT



Purpose • Mission • Vision • Values

Principles and Conduct Guidelines

“We do not merely transport passengers. We transport trust.”

Institutional Document • Version 1.0 • September 2026

1. Introduction

This Code of Ethics and Conduct establishes the principles, values, and standards of behavior expected of everyone acting on behalf of GGR Andrade Logística e Transportes Ltda., including partners, directors, employees, drivers, service providers, representatives, business partners, and any other individuals who may represent the company.

This document has been designed to foster a culture of safety, respect, integrity, quality, and excellence, particularly in executive transportation and passenger logistics operations serving corporate clients and the oil and gas, offshore, maritime, port, and other sectors in which trust and operational discipline are essential.

2. Purpose

To connect people with their destinations safely and provide trust, respect, and excellence, making every journey a comfortable and reassuring professional experience.

3. Mission

To provide executive transportation and passenger logistics solutions with safety, punctuality, comfort, and operational excellence, meeting the needs of clients in the corporate, oil and gas, offshore, maritime, and other sectors that require reliable mobility.

4. Vision

To be recognized as a leading company in executive transportation and passenger logistics, distinguished by safety, reliability, quality, discretion, punctuality, and excellence in customer service.

5. Our Values

- SAFETY — The lives, physical integrity, and well-being of people always come first.
- ETHICS — We do what is right, transparent, and responsible, even when no one is watching.
- TRUST — We honor our promises and treat every commitment as a responsibility.
- PUNCTUALITY — We respect our clients' time and understand the impact a delay can have on an entire operation.
- RESPECT — We treat clients, colleagues, partners, suppliers, and communities with courtesy, dignity, and professionalism.
- EXCELLENCE — We pursue continuous improvement and quality in every service, journey, and customer interaction.
- RESPONSIBILITY — We take care of the people, vehicles, equipment, information, resources, and assets entrusted to the company.
- HUMAN-CENTERED SERVICE — We recognize that every passenger is an individual with their own history, needs, and expectations.

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6. Fundamental Principles

- Safety takes precedence over commercial, operational, or time-related pressures.
- Integrity guides our decisions, relationships, and business dealings.
- Every person deserves respectful and professional treatment, free from harassment or discrimination.
- Information concerning clients, passengers, contracts, and operations must be handled discreetly and responsibly.
- Company resources and assets must be used properly, economically, and responsibly.
- Irregularities, risks, and incidents must be reported promptly and responsibly.
- The company seeks business relationships based on transparency, fair competition, and compliance with applicable laws.

7. Professional Conduct

Everyone acting on behalf of GGR must:

- Maintain a professional, courteous, and discreet attitude in all circumstances.
- Observe schedules, procedures, and commitments.
- Protect the company's image and reputation.
- Act honestly and in good faith.
- Immediately report any circumstances that could compromise safety or service quality.
- Never conceal relevant information concerning accidents, damage, delays, incidents, or deviations.
- Comply with internal policies, contracts, legislation, and the requirements of the locations served.
- Seek guidance from management whenever there is uncertainty about the appropriate course of conduct.

8. Safety and Responsible Driving

Safe driving is a non-negotiable obligation. Drivers and other professionals involved in operations must practice defensive driving, comply with speed limits, traffic signs, and traffic laws, and perform all required vehicle inspections and procedures.

- Driving under the influence of alcohol, drugs, or any substance that impairs driving ability is strictly prohibited.
- Mobile phone use while driving must fully comply with applicable laws.
- All occupants must wear seat belts.
- Mechanical failures, tire problems, brake defects, lighting issues, or any other unsafe condition must be reported immediately.
- No scheduling target or deadline justifies reckless driving or exposing people to risk.

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9. Customer and Passenger Service

- Welcome passengers courteously, respectfully, and discreetly.
- Confirm necessary operational information without disclosing unnecessary personal data.
- Keep vehicles clean, organized, sanitized, and suitable for the agreed service standard.
- Avoid conversations, questions, or personal comments that could make passengers uncomfortable.
- Respect reasonable customer preferences regarding silence, temperature, and comfort.
- Never argue with, confront, or raise one's voice at passengers or business partners.
- In the event of a complaint, listen carefully, document the matter, and refer it to the responsible person.

10. Privacy, Confidentiality, and Data Protection

Information concerning passengers, clients, routes, schedules, contracts, operations, prices, and other data obtained through work is confidential and must be handled in accordance with applicable legislation, including personal data protection requirements.

- Do not disclose passenger itineraries, destinations, or personal information without authorization or a legitimate operational need.
- Do not photograph or film passengers, facilities, or operations without authorization.
- Do not publish information on social media that could identify clients, routes, contracts, or confidential operations.
- Use information solely for authorized professional purposes.

I 1. Conduct at Ports, Airports, Terminals, Vessels, and Offshore Environment

Operations conducted in controlled environments require discipline and strict compliance with the safety and access procedures established by each client, terminal, port, airport, vessel, or facility.

- Comply with accreditation, access, identification, and security procedures.
- Respect restricted areas and never enter unauthorized locations.
- Use personal protective equipment (PPE) and comply with other safety requirements whenever required.
- Follow instructions issued by the site's security and emergency response teams.
- Do not transport materials, people, or cargo in violation of the rules established by the contracting party or facility.
- Immediately report any hazardous situation, incident, or emergency.

I 2. Integrity, Anti-Corruption, and Conflicts of Interest

GGR does not tolerate corruption, fraud, bribery, improper favoritism, or any practice intended to obtain an unlawful advantage. Everyone must act transparently and comply with applicable laws.

- Do not offer, promise, authorize, request, or accept improper advantages.
- Do not make payments or offer favors intended to improperly influence decisions.
- Avoid situations in which personal interests may interfere with professional decisions.
- Report potential conflicts of interest to management.
- Maintain truthful and appropriate business records and information.

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I 3. Gifts, Presents, and Hospitality

Gifts and hospitality are acceptable only when legitimate, reasonable, transparent, consistent with the professional relationship, and not intended to influence a commercial or operational decision.

Whenever in doubt, the professional must consult management before offering or accepting any benefit.

I 4. Respect, Diversity, and Prevention of Harassment

GGR does not tolerate workplace harassment, sexual harassment, intimidation, humiliation, threats, or any form of abusive treatment in the professional environment. Respeitar diferenças individuais e profissionais.

- Respect individual and professional differences.
- Do not use offensive, discriminatory, or humiliating language.
- Do not engage in or encourage behavior that creates a hostile environment.
- Report serious or recurring situations through the company's available reporting channels.

I 5. Alcohol, Drugs, and Fitness for Work

Operational safety depends on the full physical and mental fitness of professionals. Working under the influence of alcohol, illegal drugs, or any substance that compromises driving ability, judgment, or the performance of duties is incompatible with operational activities.

16. Vehicles, Equipment, and Company Assets

- Use vehicles and equipment exclusively for authorized purposes.
- Protect and maintain company assets, ensuring their proper condition, cleanliness, and safety.
- Record and report damage, accidents, losses, or irregularities.
- Do not allow unauthorized third parties to use company vehicles.
- Avoid waste and use resources responsibly.

17. Social Media and Use of the Company's Image

Personal participation on social media must respect client privacy and protect GGR's reputation.

Internal information, passenger images, documents, contracts, restricted facilities, or operational situations must not be disclosed without authorization.

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18. Environment and Social Responsibility

- Seek to reduce waste and minimize the environmental impacts associated with our operations.
- Ensure the proper disposal of waste.
- Avoid practices that may cause environmental harm.
- Support responsible relationships with communities, clients, and partners.
- Promote the conscious use of fuel, water, energy, and materials.
- Our fleet is progressively transitioning from internal combustion engine vehicles to hybrid and electric vehicles, aiming to reduce environmental harm and promote the use of sustainable energy sources.

19. Incidents, Accidents, and Emergencies

In any incident, the priority is to preserve lives and control risks. Professionals must follow the applicable emergency procedures, contact the appropriate response resources, and immediately notify management.

1. Protect your own safety and the safety of others whenever possible.
2. Contact emergency services, authorities, or operational support as appropriate to the situation.
3. Provide assistance within the limits of your abilities and training, without taking unnecessary risks.
4. Notify the company of the incident as soon as possible.
5. Preserve information and evidence required for investigation.

20. Reporting and Communication of Irregularities

Anyone who identifies potentially illegal, unethical, or unsafe conduct must report the matter to management or through a channel that may be officially made available by the company.

Reports must be handled seriously, confidentially, and respectfully.

GGR must not tolerate retaliation against anyone who, in good faith, reports a concern or irregularity.

21. Responsibility for Compliance

Compliance with this Code is everyone's responsibility.

Ignorance of a rule does not justify conduct that places people, clients, property, or the company's reputation at risk.

This Code must serve as a reference for everyday decisions. When a situation is not expressly addressed, common sense, safety, ethics, applicable laws, and guidance from management must prevail.

22. Acknowledgment and Commitment Statement

I hereby declare that I have received, read, and understood the Code of Ethics and Conduct of GGR Andrade Logística e Transportes Ltda.

I undertake to comply with its principles, values, and guidelines, as well as to report situations that may represent a risk, irregularity, conflict of interest, or violation of its principles.

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Full Name: _____

Position / Job Title: _____

Signature: _____

Date: ____ / ____ / ____

23. Institutional Information

Legal Name	GGR Andrade Logística e Transportes Ltda
CNPJ (Brazilian Corporate Taxpayer ID)	68.912.841/0001-09
State Registration	16.653.79-9
Municipal Registration	68912841000109
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Telephone	+55 22 99857-3070
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