



PRUMO
LOGÍSTICA GLOBAL

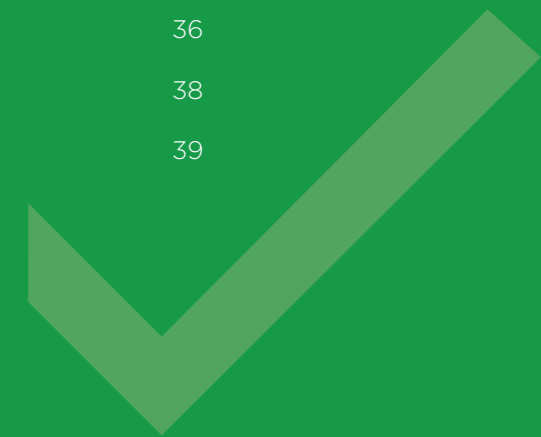
A close-up photograph of a person's hands typing on a laptop keyboard. A red smartphone is lying on the desk next to the laptop. The image is partially obscured by a large orange and green graphic on the right side.

Code of Conduct and Anti-Corruption

COMPLIANCE
EU FAÇO A COISA CERTA

Índice

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Introduction

The principles and concepts defined in our Code of Conduct and Anti-Corruption embody the commitment to the ethics and integrity assumed by Prumo Logística S.A. and by all companies and staff members of Prumo's Group. They should guide all of Prumo's relations and serve as an ethical and cultural reference in common among all Staff Members, including directors, board members, committee members, employees, interns and apprentices. And we, as Staff Members, should ensure that this Code is conveyed to every partner, customer, supplier or other third party with which Prumo does business.

All Staff Members in their daily tasks and while performing their professional activities are responsible for acting in accordance with the guidelines defined in this Code and with the Company's Values. Therefore, everybody is responsible for complying, implementing, spreading and inspecting compliance with our Code of Conduct and Anti-Corruption, and for creating a more equitable and efficient business environment in which Prumo is active.

Additionally, we shall at all times be aligned with Prumo's Values:



Ethics and Integrity



Development of people and the community



Collaboration and Authenticity



Safety and Sustainability



Entrepreneurship

When we base our daily conduct on these principles, not only do we ensure Prumo's solidly based growth, but we will also continue to take pride in working in an ethical and honest environment, free from bribery and corruption.

We believe that this is the path to ensure continuity and sustainability in our business.

Enjoy your reading!

Applying this Code

This Code of Conduct and Anti-Corruption (“Code”) should be read and complied with by all Staff Members of Prumo Logística S.A. and its subsidiaries (“Prumo” or “Company”) that adopt its Compliance Program.

In the case of companies in which Prumo does not share or own shareholding control, this Code’s contents should be made known to its business partner(s), allowing, whenever possible, the adoption of the guidelines needed by them.

In addition, our directors, board members, committee members, employees, interns and apprentices (hereinafter referred to simply as “Staff Members”) should convey the principles and standards of conduct contained herein whenever possible, in particular to

our business partners, suppliers, service providers, customers or any other persons, entities or authorities with which Prumo has relations (“Third Parties”).

For this reason, in addition to the diligences required prior to retaining Third Parties, in more detail further on, our Staff Members should make our Code known to Third Parties and require a written commitment compatible with the flawless conduct standards established in this Code. Therefore, this Code must be part of the list of attachments to all contracts entered into by the Company.

Reporting Channels

Prumo's Reporting Channel ("Reporting Channel") is a reliable communication channel that should be used to report violations of the Code, of applicable laws and regulations or the Company's internal rules and procedures, as well as aspects involving bribery, corruption and any actions harmful to the Public Administration as provided for in Law 12.846/13 (Anti-Corruption Law) and other legislation in force, in a confidential and safe manner. The Reporting Channel may be accessed by Staff Members, Third Parties and the community in general.

It is very easy to use the Reporting Channel: a person may place his/her report through the telephone that follows or through the Website:



<https://canalconfidencial.com.br/prumologistica>

Access to the Reporting Channel, either by telephone or Internet, is free of charge and is available 24 hours per day, seven (7) days per week.

The Reporting Channel is secret and maintained by a company unrelated to Prumo, which ensures the reporting party's anonymity in case that party chooses not to identify themselves.

Prumo will not allow any type of retaliation owing to a report or lawful notice of a suspicion or concern by means of the Reporting Channel.

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Compliance with laws and Prumo's internal rules

All Staff Members should comply with the laws and regulations applicable to their activities, as well as Prumo's policies and internal procedures, and should also participate in mandatory training courses provided by the Company.

Though there may be arguments about cultural conditions or usual market practices, Staff Members are not allowed to oppose this Code's principles and concepts, existing internal rules as well as laws and regulations in force.

Should a Staff Member on occasion come across a more restrictive law than an internal rule's guidance adopted by Prumo, that Staff Member should comply with what the law requires and should inform the area responsible

for the internal rule of the need to review such document. Likewise, if Prumo's internal rules establish a more restrictive guideline, the Staff Member must respect the Company's internal rules and procedures.

Any Staff Member who is aware or suspects of non-compliance with this Code or with laws, regulations or Prumo's internal rules, is bound to report the referred occurrence to Prumo or through the Reporting Channel.

If you have any doubts regarding the lawfulness of a conduct, get in touch with the Compliance Area for due explanations.



Work Environment

Prumo will not tolerate any form of harassment, discrimination of any kind, favoring for personal reasons, physical violence, threats or any actions likely to configure violation of human rights.

We aim at a work environment free from restraints, inappropriate insinuations or discrimination of any nature, due to race, color, nationality, origin, religion, gender identity, sexual orientation, social class, marital status, age, weight, height, health condition, physical handicap or any other personal or ideological features.

All Prumo's Staff Members are responsible for following the Company's guidelines that support a safe, healthy, upright and respectful work environment, and should always act courteously and respectfully, regardless of hierarchical position, office or activity.



4.1 HEALTH, SAFETY AT WORK AND THE ENVIRONMENT

When performing their professional activities, all Staff Members and Third Parties should be aware and comply with requisites regarding environmental protection, occupational safety and their own health, and should also act responsibly, without violating laws, regulations or environmental protection, health and occupational safety standards.

Prumo ensures its Staff Members the right to refuse performance of activities or tasks, should a Staff Member find that there are no occupational safety conditions to this end.

In case of accidents or inspections, Staff Members should immediately inform the areas in charge of occupational and/or environmental safety.

4.2 4.2. SOCIAL RESPONSIBILITY

All Staff Members should comply with their social responsibility and care for Prumo's good standing, through the timely exercise of their civic duties and by performing quality and productive work. In

this regard, they should act with a view to providing good services, avoiding wastage and respecting the environment, cultural values, human rights and social organization in communities.

4.3 4.3. DIVERSITY AND INCLUSION

Prumo believes that Diversity and Inclusion is a fundamental theme and that it should guide its strategies, constituting a principle for the development of business and people. Therefore, it promotes transparency in relationships and encourages a culture of authenticity and collaboration.

We emphasize that Prumo values the respect, quality, reputation and transparency of its processes, and does not tolerate discrimination of any kind between Staff Members and Third Parties.

Prumo is committed to ensuring equal employment opportunities for all individuals. Therefore, no candidate who participates in selection processes carried out by the Company will be discriminated against or privileged due to their race, gender identity, social class, sexual orientation, religion, beliefs, disability, political views and participation in any type of association.

Prumo does not tolerate discrimination against Staff Members with regard to meritocracy actions, training and development programs, performance management and profit sharing.



4.4 PROHIBITION OF THE USE OF ALCOHOL AND DRUGS

Prumo is committed to maintaining healthy working conditions and a work environment free from the influence of alcohol, drugs or any other illegal substances that may affect Staff Members' ability to work safely and efficiently or that may put Staff Members or third parties at risk.

Prumo prohibits the consumption and possession of alcohol, drugs or substances that may be harmful to the health of Staff Members and that may endanger the safety of Staff Members and of their colleagues in the work environment.

Attending work under (or appearing to be under) the influence of alcohol, drugs or substances that may be harmful to the health of the Staff Member, or being in possession such substances during work may be considered a serious disciplinary offense.

If Prumo suspects that there has been a violation of the provisions of this policy or that the Staff Member's performance and conduct have been harmed by the consumption of alcohol, drugs or other substance at the workplace or before

the start of working hours, Prumo may investigate the occurrence and apply appropriate disciplinary measures, within the limits of the law.

If a Staff Member has a problem with alcohol, drugs or other illegal substances, or even legal substances that are nonetheless harmful to their health and safety and that of their colleagues or third parties, Prumo encourages such Staff Member to seek help.

4.5 PROHIBITION OF THE USE OF WEAPONS

It is not allowed, under any pretext or justification, to carry, use or keep a weapon of any kind on Prumo's premises. For the purposes of this policy, weapons are understood to be (i) firearms, whether or not accompanied by their accessories and/or ammunition; and (ii) bladed weapons, such as daggers, razors, kitchen knives, sickles, pocket knives, stilettos, or any inappropriate sharp or piercing instrument that is incompatible with the Staff Member's activities.

Only Staff Members expressly and previously authorized by Prumo and legally qualified may carry a weapon on the Company's premises and provided that they are doing so in order to carry out their activities.

4.6 PROHIBITION OF PHYSICAL AND VERBAL AGGRESSIONS

Prumo does not accept any type of aggression, whether physical or verbal, between Staff Members or between Staff Members and third parties. It is the duty of Staff Members to maintain respectful relationships, cordiality and ethical standards of conduct consistent with the work environment.

4.7 PERSONAL AND INTIMATE RELATIONSHIPS ON THE COMPANY'S PREMISES

Personal relationships of a romantic or family nature, regardless of the degree of kinship, between Staff Members of the same management team are prohibited, due to potential conflicts of interest. Additionally, for other cases in which there is a romantic or family relationship between Staff Members, the HR and Compliance Areas must be informed so that measures that prevent personal influence in professional activities, respecting the intimacy of the Staff Members, may be applied.

It is forbidden to grant any preferential treatment,

to anyone, for personal interest or due to a personal relationship.

Prumo also requires that Staff Members maintain strictly professional relationships typical of co-workers within the company's premises, and the occurrence of intimate and sexual contact is prohibited and may constitute a serious disciplinary offense.

4.8 PROHIBITION OF WORK UNDER CONDITIONS SIMILAR TO SLAVE AND CHILD LABOR

Prumo prohibits any form of work under conditions similar to slave work, which is an illegal practice under the terms of the Federal Constitution and current legislation. For the purposes of this Code, work in conditions analogous to slave labor is defined as work that subjects the worker to the following situations, either jointly or separately: (i) submission of the worker to forced labor or exhausting working hours; (ii) submission to degrading working conditions, with restriction of the worker's mobility, either due to a debt incurred, or by restricting the use of any means of transport by the worker, or by any other means for the purpose of retaining the worker at the workplace

through the use of overt surveillance by the employer or the employer's agent.

Prumo also prohibits the use of child labor and labor by minors up to 18 (eighteen) years of age, either directly or indirectly, through direct employment or through its suppliers and service providers, except under the conditions permitted by Brazilian law. It is prohibited for minors aged under 18 (eighteen) to work, including as minor apprentices, in places that are harmful to their formation, physical, psychological, moral and social development, as well as in dangerous or unhealthy places and conditions, in shifts that do not allow school attendance, and night shifts.

The conduction of business, selection and hiring of Third Parties, as well as the selection of entities for donations and sponsorship contracts, must observe the prohibition of work practices analogous to slave work and the use of child labor.



5

Confidentially and privileged information



All Staff Members are bound to keep secrecy and confidentiality on all of Prumo's affairs to which they may have access and that were not produced for public disclosure. **Use of credentials (ID, passwords and name tags) is individual and non-transferable, and they must not be shared at any level.**

All and any information deemed to be confidential and privileged should be employed in strict compliance with professional activities and cannot be used for personal advantages or that of third parties.

Prumo's confidential or privileged information cannot be exposed at work stations, printers and meeting rooms, and should not be discussed in public places such as elevators, taxis, trade union meetings, associations and others.

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Protection of personal data

Prumo is concerned with the protection and security of personal data processed within the scope of its activities and is guided by the principles established in the applicable legislation on data protection, in particular Law No. 13.709/2018 (General Law for the Protection of Personal Data - LGPD), namely: purpose, adequacy, necessity, free access, quality, transparency, security, non-discrimination, responsibility and prevention.

To ensure compliance with these principles, Prumo makes every effort so that the processing of data is:

- Compatible with the purpose for which the data was collected;

- Limited to the minimum necessary to achieve the purpose;
- Transparent, with clear and accessible information about the treatment of data;
- Non-discriminatory, illegal or abusive in relation to its purposes; and
- Safe, through the adoption of technical and administrative measures to prevent and protect data against unauthorized access, accidental or illegal events of destruction, loss, alteration, communication, disclosure or any other damage.

During the performance of their activities, Staff Members may process personal data belonging to third parties, of which Prumo is the controller or operator. Whenever carrying out any processing of personal data, the Staff Member undertakes to process such data in accordance with the principles listed above, as well as to follow the guidelines and implement security measures contained in the Company's internal rules.

The Staff Member shall immediately notify Prumo in the event of any failure, or suspected failure, in the security or integrity of the data, including cases of accidental destruction or loss, alteration, disclosure or unauthorized access to personal data, and the Staff Member shall assist the Company in identifying and resolving the issue as necessary.



Before sharing any personal data with third parties, the Staff Member shall assess the need for such action, verifying whether the recipient of the personal data has the necessary approval and authority to receive such data, and whether it really needs to be aware of the identified data to perform its activities and contractual obligations.

In addition, the sharing of data must be done in a way that contemplates all applicable security measures, including contractual clauses for data protection, obtaining guarantees that the third party is able to handle the data and information in a secure manner and in accordance with the applicable legislation.

Prumo has specialized areas for getting in touch with media vehicles and its shareholders.

Any eventual need for contact with media vehicles should be taken to the immediate attention of the Media Relations Area.

Staff Members are not authorized to grant interviews or to convey information about the Company and its activities, directly or indirectly, to any communications media, save when duly approved by the Media Relations Area. Similarly, attendance by Staff Members at external events representing Prumo, should be previously made known to the Media Relations Area.

Staff Members are not authorized to speak with potential investors or market analysts, and it is not permitted to provide information on the Company's business.

In social networks, Staff Members should make sure that all the contents posted are solely of a personal nature. Staff Members are only authorized to share posts published by the Company's official social media pages.

Unless previously approved by the Media Relations Area, it is not permitted to disclose photos or information on operations carried out by the Company.



8

Use of assets and resources

Assets and resources provided by Prumo to its Staff Members should be used in a responsible manner and only for professional purposes.

Staff Members **should not expect privacy with regard to devices and systems provided by Prumo to carry out their professional activities**, such as Internet, telephones, emails, software, hardware and any others. Prumo may monitor such devices and systems whenever required, as permitted by law.

Under no circumstances shall assets and resources provided by Prumo be diverted for personal use or unlawful ends.

9

Internal ledgers and records

Prumo and its Staff Members should keep ledgers and accounting and financial books rigorously updated, precise and complete, in compliance with legislation and applicable accounting standards. It is the duty of all Staff Members to ensure accuracy of information recorded, so that Prumo's shareholders may monitor the Company's performance transparently.

Every information and internal record produced, circulated or kept in the systems or in Prumo's equipment are the latter's sole property and should not be used for personal purposes and for any other purposes that are not strictly professional and are not related to the Company's activities.

Any relevant information created by Staff Members during their work at Prumo should be stored pursuant to legal deadlines and in accordance with internal procedures. Staff Members are restricted from deleting, destroying or taking any information or documents on termination of their labor bond with Prumo.

Anti-corruption and Anti-bribery



Prumo does not tolerate acts of corruption or bribery in any of its forms, as well as any acts harmful to the Public Administration, assuming the commitment to act in accordance with the Anti-Corruption Law and other legislation in force.

Staff Members should know that for the purpose of this Code the term “Public Agent” means anybody that in Brazil or overseas holds an office, employment or public function in bodies, state entities or diplomatic representations, in legal entities directly or indirectly controlled by the public authorities (i.e., autarchies, public companies, mixed capital companies and public foundations), in international public organizations, in political parties, although temporarily or with no compensation, or those persons who are candidates for elective offices.

The same treatment applied to public agents should be received by (i) family members of public agents: spouses, partners, grandparents, parents, siblings, children, nieces, nephews, aunts, uncles and first cousins; (ii) spouses of any persons mentioned above; and (iii) any other persons that share the same home.

Staff Members are strictly forbidden to offer, promise, give or receive, directly or indirectly through third parties, any undue advantages to Public Agents, third parties related to Public Agents or private agents (whether in cash, assets, services or any other means) with the purpose of influencing decisions likely to affect Prumo’s business or to involve any personal benefits or benefits to related third parties.

An example of undue advantages is a “facilitating” payment: small sums in cash or promises of advantages to a Public Agent or private agent with the purpose of

speeding up an action, such as, for example, the issuing of an official document.

If a Staff Member is the target of an undue payment request made by a Public Agent or a Third Party, the Staff Member shall refuse it and immediately report the incident to Prumo or through the Reporting Channel.

If an undue payment request is accompanied by a threat of violence or any serious threat, the Staff Member should always prioritize his safety. Subsequently, the Staff Member should report the event to Prumo, directly or through the Reporting Channel as soon as possible, so that the Company is able to take the appropriate legal steps.

10.1. RELATIONS WITH PUBLIC ADMINISTRATION

Prumo requires that its Staff Members' interaction with Public Agents take place ethically and strictly in compliance with the legislation in force.

When these contacts are intermediated by professional service providers such as attorneys, consultants or expeditors, Staff Members should formalize this action by means of an appropriate instrument and include compliance clauses compatible with the activity's nature.

Staff Members should act correctly in all of their contacts with Public Agents, such as when obtaining or renewing licenses and permits, taking part in public bids or public contracts, monitoring inspections and court or administrative proceedings, among others.

Besides being forbidden to directly or indirectly offer or give undue advantages to Public Agents or to related third parties, Staff Members are strictly forbidden, whether directly or indirectly, from practicing any type of action against domestic or overseas Public Administration, including without limitation:

- Funding or incurring expenses with unlawful actions, and concealing or dissimulating interests or the beneficiary of unlawful actions;
- Tampering with or defrauding public bids or administrative contracts; or
- Hindering investigation activities or inspections by bodies, entities or public agents, or interfering in their activities.

Prumo's representation before Public Agents in hearings and meetings should include at least two (2) Staff Members. Additionally, the meeting should have a defined agenda and the Staff Members should comply with any other provisions pertaining to the Company's internal rules.

Furthermore, Staff Members cannot make any donations to political parties or candidates to public office, on behalf of or using the Company's funds. Moreover, Prumo will not permit political and/or party activities during business hours or inside its facilities, and will require Staff Members to inform the Compliance Area should they wish to become a candidate for elective office.

Provided that it is not prohibited by specific legislation or regulation, Prumo may hire Staff Members or services from Third Parties who are also Public Agents (for example, teachers and doctors), as well as allow Staff Members to take over such positions, jobs or public functions as long as there is no conflict with the Company's interests and the hours are compatible with Staff Members' working hours at Prumo. All such cases shall be preceded by a specific analysis by the Compliance Area, which will verify potential conflicts of interest, risks to the Company's corporate integrity and any mitigating measures.

The hiring of former Public Agents, in the cases provided for in Law No. 12,813/13, which provides for conflict of interest in the exercise of office or employment in the federal Executive Branch and subsequent impediments, shall only be allowed with proper authorization or after the course of the term provided for in the aforementioned legal disposition, and shall comply with any other rules and guidelines provided for in the Company's internal rules.



Activities that require special care

11.1. RETAINING SUPPLIERS AND BUSINESS PARTNERS, DONATIONS AND SPONSORSHIPS

Some activities have greater legal and integrity risks for Prumo and for Staff Members, and require special care:

- **Suppliers and service providers:** Selecting, retaining and paying suppliers of goods and services should be based on a genuine need and on technical, professional, ethical and sustainable criteria, assuring the best cost-benefit to Prumo, free from interference by any Staff Members' personal interests, always by means of duly formalized contracts.
- **Joint Ventures:** As such companies are organized under one sole purpose, Prumo may be held responsible for inappropriate activities carried out by the joint venture (companies which Prumo owns an equity interest jointly with another company). Out of

respect for its values and principles, Prumo encourages its business partners to commit to conducting their activities ethically and with integrity.

- **Donations to non-profit entities:** Donations to non-profit, philanthropic or charitable entities should be made with a genuine purpose, to entities defined institutionally by Prumo, based on technical criteria and formalized by the appropriate documents.
- **Sponsorships:** Sponsorships are permitted, provided that performed in compliance with Prumo's internal rules, with a genuine purpose and at a fair market price, in order to provide publicity or to disclose Prumo's brand, by retaining a lawful and adequate institutional counterparty selected based on technical criteria and by means of written agreement.

In the cases stated above as well as others provided

for in Prumo's internal rules, the Staff Members in charge should obtain the required information for a due diligence (background check process), should send the applicable forms duly completed and previously obtain a retaining recommendation by the Compliance Area, always in compliance with Prumo's internal rules.

The background check process has the purpose of assessing eventual risks that a connection with the referred Third Party may bring to the Company.

11.2. OFFERING AND RECEIVING COMMERCIAL FAVORS

Provided that there is no impediment for the offering or receiving of commercial favors, and provided that they are not motivated by a corrupt intention, that they are not excessive or inappropriate, that they respect the limits established by this Code and that they do not characterize a habit, Prumo's Staff Members may individually receive and offer, promise or give the following kinds of commercial favors from/to Third Parties or Public Agents:

- Institutional hand-outs with Prumo's or third parties' name or logo such as pens, notebooks, planners, calendars, caps, bottles, among other promotional items;
- Meals with a clear commercial purpose or when a Staff Member is representing Prumo officially;
- Invitations to lectures, congresses and other corporate and academic events; and
- Cultural or sporting entertainment with a clear commercial purpose or related to Prumo's institutional representation.

Prumo establishes as a limit a sum equivalent to R\$ 350.00 (three hundred and fifty Brazilian reais) per person.

The receipt or offer of commercial favors listed above, as well as other expenses with accommodation, meals, travel and commuting, involving Third Parties or Public Agents that exceed the sum allowed by this Code should be pre-approved in writing by Prumo's Compliance Area. In order to obtain previous authorization, Staff Members should complete a specific form and observe any other guidelines established in the Company's internal rules.

Without prejudice to the above, any expenses involving Public Agents must always be reported to the Compliance Area, regardless of the amount involved.

A number of overall guidelines related to the offering of commercial favors should be complied with:

- Payment should be made directly to the service provider when applicable (e.g., hotel, airline, etc.).

- Should there be a contractual provision for payment of daily expenses, these should be made by checks or bank transfers to a bank branch or other company, but never directly to a person, and will be documented by means of an appropriate receipt. Cash payments are prohibited under all circumstances;

- Expenses with accommodation, meals and travel will be restricted to Public Agents or Third Parties, and cannot include expenses in connection with family members or their guests;

- The invitation to travel should be addressed to the body in which the Public Agent works or to the company where the Third Party works. Official means (such as institutional email) should be adopted for contact.

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Respect for competition rules

Prumo believes in respect for free competition. For this reason, it prohibits any conduct aimed at harming or which may produce effects that harm free competition, in accordance with the legislation in force.

In particular, Prumo prohibits its Staff Members from entering into agreements with its competitors, in any way, to fix prices or commercial conditions, divide customers, markets, territories or products or terms related to the participation in public or private bidding processes.

The Staff Members shall, in addition, take additional precautions and always consult the Legal Area before undertaking, on behalf of Prumo, any commercial operation that may constitute: (i) mergers or acquisitions of companies; (ii) formation of consortiums; (iii) formation of joint ventures; or (iv) any kind of associative contract between companies.

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Prevention of money laundering

Prumo repudiates any act involving money laundering, terrorist financing, and any criminal activities involving the simulation or concealment of financial resources. Therefore, if circumstances indicate evidence of Third-Party involvement in acts related to money laundering and/or terrorist financing, Prumo shall adopt measures of a restrictive nature regarding the conduction of business and the maintenance of the relationship.

Circumstances that, depending on the case, may indicate involvement in activities of this type, include:

- Concealment of the companies' final beneficiaries, when not permitted by the legislation of the company's country of origin;
- Use of cash; and
- Request for payment issued by a company other than the company providing the service.

It is worth noting that the above situations may occur legitimately. Therefore, in case of doubt, the Staff Member must contact the Compliance Area.

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Prevention of conflicts of interest

Prumo does not admit Staff Members obtaining personal advantages or subject to influence in their professional duties due to conflicts of interest.

Prumo should be informed forthwith when personal interests by Staff Members are in conflict with Prumo's interests, whether due to facts that have occurred or due to circumstances not yet materialized.

Staff Member transparency with the Compliance Area is extremely important in order to resolve apparent conflicts of interest situations. For example, when a Staff Member's spouse works at a company that provides services to Prumo, it is important that this fact is reported to the Company, for the adoption of steps intended to protect the Staff Member from being involved in a likely conflict of interest.

Acting in conflicts of interests may be unlawful and lead to serious consequences for Staff Members and for Prumo. Several examples of serious and restricted conflicting interests include, but are not limited to the following:



- Using or sharing confidential or privileged information in order to create personal or family gains, for example, profiting from purchasing and selling shares of Company's clients;

- Retaining a friendly or family supplier under less favorable conditions to the Company, as compared to those practiced in the market by third parties with equal abilities; and

- Acceptance of external responsibility of a personal nature likely to affect performance in the Company or assist Prumo's competitors; or

- Taking advantage of Company resources or business opportunity that a Staff Member has become aware of as a result of his or her activities, harming the Company's interests or generating personal benefit.

All Staff Members must inform the Compliance Area, annually or when their situation changes, about the existence or absence of a personal relationship with Public Agents, clients or suppliers/service providers, in accordance with the provisions established in the Company's internal rules.

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Disciplinary measures

Staff Members who disregard this Code or laws and regulations applicable to their activities, as well as Prumo's internal regulations, or when omitting certain activities, allowing Staff Members to do this, will be subject to disciplinary measures compatible with the conduct practiced, including oral or written warning, suspension or termination of labor agreement with just cause.

Depending on the violation's nature, Prumo reserves itself the right of reporting such violation to the competent authorities, which may result in imposing lawful sanctions.

Any attempts to prevent, obstruct or convince Staff Members not to report what they believe to be, in good faith, a violation of this Code, that of an applicable legislation as well as any other of Prumo's internal rules, is not allowed.

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Final provisions

All Staff Members should declare that they received, read and agreed with this Code's provisions.

The Code is not intended to cover every possible situation involving ethical and flawless conduct. Hence, Prumo requires that all Staff Members know and comply with all the other internal rules of the Company, which contain detailed guidelines about their related processes, and exercise careful vigilance and judgment at every moment in the course of their professional activities.

Any exception to the rules set forth in this Code shall be registered and formally approved by the Compliance Area.

Staff Members who wish to receive additional guidance or make suggestions to the Code should contact the Compliance Area by means of the email compliance@prumologistica.com.br.

CODE OF CONDUCT AND ANTI-CORRUPTION RECEIPT INSTRUMENT

I confirm that I:

(1) received, read and understood the Code of Conduct and Anti-Corruption by Prumo Logistica S.A.;

(2) I agree fully with its contents; and

(3) I am bound to comply fully with its provisions, reporting any actions or likely actions of violations of which I may become aware.

Employee Third Party

Taxpayers' Enrollment No. (CPF): _____

Company: _____

Legible name: _____

Signature: _____

Date:



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