Code of Conduct for

SUPPLIERS AND SERVICE PROVIDERS

SANTOS BRASIL

1. INTRODUCTION

Santos Brasil is committed to conducting its business ethically, with integrity, and in compliance with all applicable laws, regulations and rules.

The Company expects its suppliers/service providers to demonstrate the same commitment, following the highest standards of business conduct. Uncontrolled copy.

2. COMMITMENT

This Code of Conduct establishes the values and behaviors expected of each supplier/service provider of Santos Brasil.

All suppliers/service providers must follow the guidelines established in this Code and take actions to ensure these are equally observed across their own supply chains.

In contracts with Santos Brasil, sustainability, corporate integrity, human rights and environmental aspects will be observed, in accordance with the guidelines established by the Company.

Therefore, suppliers/service providers must be aware of and observe, as applicable, the Company's policies on these subjects:

- Human Rights Policy;
- Sustainability Policy;
- Compliance Program.

3. GUIDELINES

3.1 COMPLIANCE WITH APPLICABLE LAWS

Suppliers and service providers must fulfill the obligations set forth in the contracts entered into with Santos Brasil and to adhere to this Code for the entire duration of the contractual relationship.

Suppliers/service providers must comply with all laws, especially labor, social security, tax, regulatory and environmental obligations, among others, as well as applicable regulations and rules.

Compliance by the suppliers and service providers of Santos Brasil with the laws and regulations applicable to their operations is essential for the continuity of their business relations with the Company.

In case of any conflict between the guidelines in this Code of Conduct and the agreement signed with the supplier / service provider, the guidelines established in this Code will prevail.

3.2 INTEGRITY IN BUSINESS

3.2.1 General compliance guidelines

In exercising their activities, the suppliers/service providers must adopt dignified and honest conduct, in accordance with ethical principles and values, comply with all applicable laws and respect the environment and human rights.

The suppliers/service providers will be responsible for selecting their employees and business partners, who must follow the guidelines contained in this Code, the rules applicable to their operations and the regulations of Santos Brasil, as well as the Anticorruption Law (Federal Law 12,846/2013).

Before entering into any business relationship, the suppliers/service providers must check the practices of their business partners for any deviations of conduct established in the drivers in this Code. They will also be held responsible for any infraction committed by their employees or representatives to the detriment of Santos Brasil.

3.2.2 Prohibition of acts of corruption

Santos Brasil has zero tolerance for situations of corruption or bribery. All suppliers / service providers must comply with all applicable laws on the prevention of bribery and corruption.

All suppliers/service providers, including their employees or representatives, should under no circumstances promise, offer, make, authorize, induce and/or grant a bribe, an undue advantage, gifts, entertainment or items of value for public officials, clients, third parties or others with the objective of influencing decisions or aiming at any form of gaining personal advantage, equity or off-balance sheet, directly or indirectly.

Similarly, no supplier/service provider and its employees or representatives must accept any kind of benefit or advantage that could corrupt or influence their business decisions.

Suppliers and service providers must allow prior checks (due diligence) and measures aimed at supervising those contracted by Santos Brasil, also committing to update the information provided at the time of contracting if there is any relevant change in their integrity status.

3.2.3 Offering gifts, presents, entertainment and hospitality

Offering gifts, presents, entertainment and hospitality may be a practice of kindness and cordiality accepted within a business relationship, but it requires certain precautions.

Receiving and offering these items to Public Officials, especially when they are intended as consideration for granting any advantages, is prohibited.

The accumulated value of all gifts, presents and entertainment offered by a supplier/service provider to an employee, director or third party serving Santos Brasil cannot exceed US$100 during a year.

Hospitality invitations can be offered when these meet the legitimate business objectives of the Company, when there exists a real opportunity for commercial contact, and when these are also offered to professionals from other companies, after going through the formal authorization and analysis process established in the Policy on Gifts, Presents, Entertainment and Hospitality of Santos Brasil and provided these expenses are in line with the expectations for commitments of this nature.

Gifts, presents, entertainment and hospitality may be offered to employees, directors and third parties serving Santos Brasil subject to the following guidelines:

- These are not offered as bribes, rewards or commission to obtain personal advantage or to third parties.
- These do not influence the employee's judgment on the business relationship, including the need for penalty or termination of contract for non-compliance or provision of substandard service by the supplier/service provider.
- These are not offered with promises of temporary or permanent job offers and resolution of problems of any kind.
- These are not frequent.
- These are not prohibited by any law.
- These do not create the impression or appearance or an implicit obligation that the supplier/service provider is entitled to any kind of preferential treatment, such as receiving insider information or obtaining differential treatment in the execution of the agreement.
- These do not cause embarrassment if they become public.
- These are not prohibited under the guidelines and rules of the supplier/service provider.
- These are not in cash or equivalents (gift certificates) or as financial compensation (discounts) in personal and similar transactions.

3.3 INTEGRITY IN POSSIBLE CONFLICT OF INTEREST SITUATIONS

Business relations must be entered into and maintained without the interference of any conflict of interest and in accordance with the principles of free competition.

Suppliers/service providers must be selected according to objective criteria and based on their reliability, price, quality and performance of the product or service.

The supplier/service provider must inform the Compliance Department of Santos Brasil of the possibility or existence of conflict or irregularity regarding the principles of free competition, so that the necessary measures can be taken.

3.4 INTEGRITY IN INTERNAL WORK RELATIONS

Santos Brasil requires its suppliers/service providers to execute the services in line with the guidelines of ethics, honesty, cordiality, respect and dignity among their employees, directors and third parties, regardless of their position, function or hierarchical position.

3.4.1 Harassment

No employee or representative of the supplier/service provider and no employee of Santos Brasil will be subjected to any situation of harassment or abuse.

Harassment can take many forms, all of which are unacceptable to Santos Brasil, as shown in the following examples:

- Jokes, insults, threats and other undesirable behavior referring to race, color, sex, age, religion, nationality, descent, citizenship, disability, social or economic status and education.

- Behaviors or insinuations of a sexual nature, such as requests for favors, verbal, written or physical insinuations, and exhibition of inappropriate objects or images.
- Verbal or physical conduct that disturbs the performance of another employee or which creates fear or hostility in the workplace.

3.4.2 Discrimination

Suppliers/service providers will provide a workplace free of discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, genetic information, religion and political affiliation, among other characteristics, since this practice is not tolerated.

3.4.3 Diversity

Suppliers/service providers must respect and value diversity by ensuring fair and equal treatment, and by rejecting any form of prejudice or discrimination based on gender, sexual orientation, ethnicity, race, creed or any other characteristic.

3.4.4 Human Rights

Santos Brasil strives for the execution of its operations and work relationships based on Human Rights principles.

The Company requires partnerships entered into with suppliers/service providers to perform their activities are also guided by compliance with Human Rights guidelines, as well as labor and social security laws, among others.

The following are considered essential guidelines by Santos Brasil:

3.4.4.1
Eradication of slave labor

Santos Brasil does not tolerate or permit forced labor or labor in degrading conditions or analogous to slavery and does not enter into or maintain commercial relations with suppliers/service providers that adopt or may adopt such practices.

3.4.4.2
Eradication of child labor

Suppliers/service providers must not employ child labor in their production chain, except as apprentices aged 14 years and above. Suppliers/service providers must not allow sexual exploitation of children and adolescents in their processes and/or production chain.

3.4.4.3
Adequate working conditions

Santos Brasil is committed to compliance with Human Rights principles in the execution of its activities and hence strives to hire and work with suppliers/service providers whose operations are guided by the following guidelines:

- Respect for freedom of expression and association of employees.
- Remunerate their employees in a dignified and fair manner, based on objective criteria and provide all the benefits and rights established in applicable laws.
- Equal opportunities for employees at all levels, regardless of gender, race, color, nationality, religion, ethnicity or any other characteristic or differentiating factor.
- Adequate working hours that comply with applicable laws.

3.4.4.4
Right to freedom of association and exercise of political activity

Santos Brasil respects its employees' right to freely exercise political activity and join trade associations and/or unions. As such, the Company also supports its suppliers/service providers in taking a similar approach towards their employees and representatives.

3.5 INTEGRITY IN RELATIONS WITH THE ENVIRONMENT, HEALTH AND SAFETY

Santos Brasil is committed to protecting the environment and expects its suppliers/service providers to share this same commitment. Our suppliers/service providers are required to comply with all legal requirements applicable to the fulfillment of this obligation.

We encourage our suppliers/service providers to reduce the consumption of resources, including raw materials, energy and water, in all aspects during the life of their product or service. When entering into contracts, suppliers/service providers must take into account environmental, social and economic factors, and implement measures that support the achievement of the United Nations 2030 Agenda's Sustainable Development Goals (SDGs). Whenever possible, they should set environmental guidelines for their suppliers/service providers, taking into account environmental considerations throughout the value chain and in their partnerships.

The health, safety and well-being of employees are very important for Santos Brasil. Their suppliers/service providers must provide and maintain a safe and healthy workplace that fully complies with all applicable health and safety laws, regulations, and practices, as well as with the rules of Santos Brasil.

3.6 FINANCIAL INTEGRITY

3.6.1 Protection of assets

Suppliers/service providers must protect the assets of Santos Brasil from theft, loss, cyberattacks or other threats of loss. The Company's assets can be used only for business with Santos Brasil.

To the extent that a supplier/service provider has access to a Santos Brasil email system, another form of electronic communication or any other system, any information generated, received or stored in these systems is considered the property of Santos Brasil and the supplier/service provider should not expect privacy.

3.6.2 Accuracy of business records

The suppliers/service providers of Santos Brasil must comply with accounting and tax procedures based on applicable laws. As such, they must keep clear and correct accounting records to avoid the commission of any inappropriate act and uphold their reliability in the market.

All entries in books and records must adequately reflect the nature of the respective transactions in accordance with applicable standards. False or incorrect entries will not be accepted. Moreover, no information that should appear in the reports or books can be omitted.

3.7 INTEGRITY REGARDING CONFIDENTIALITY OF INFORMATION

Intellectual property, confidential information, patented technology, documentation or other materials of Santos Brasil cannot be used without the written permission or beyond the scope of work performed for Santos Brasil.

During the term of the agreement for the supply of goods and/or provision of services for or to Santos Brasil, these third parties cannot use the exclusive information, patented technology, documentation or other materials without authorization.

Confidential information must be protected and cannot be transferred, published, used or disclosed, beyond what is necessary, in the ordinary course of business or service signed with Santos Brasil.

Applicable data privacy standards must be observed for materials containing confidential information or which are protected by privacy standards. These materials must be stored securely and shared only internally with competent employees based on specific needs.

3.7.1 Non-use of insider information in selling goods and services to other customers or for other purposes

Suppliers/service providers who have access to confidential or insider information of Santos Brasil by virtue of the services they provide to it are not authorized to use or share this information in selling other services and goods to other customers or for other purposes.

3.7.2 Data protection

Accessing and using data are only permitted to suppliers/service providers for the purposes previously defined in the agreement or regulations.

Suppliers/service providers must securely maintain the data that they have access to and are responsible for providing the means necessary to store, handle and transmit data. This obligation remains valid even if the agreement or regulations signed between the parties is no longer in force. The supplier/service provider must pass on this obligation to their employees, representatives, partners and others who have access to this data.

3.8 INTEGRITY IN INTERNAL COMMUNICATION

The suppliers/service providers are responsible for disseminating the guidelines established in this Code and the values of Santos Brasil to all their employees, representatives, partners, and others who, at any moment, will provide services to Santos Brasil on their behalf. And thus ensure that the guidelines in this document are effectively followed by all suppliers/service providers.

3.9 MANAGEMENT OF SUPPLIERS AND SERVICE PROVIDERS BY SANTOS BRASIL

Suppliers/service providers must allow Santos Brasil to carry out due diligence and other measures to manage risks and monitor the sustainability and corporate integrity aspects as per a specific process widely disseminated to its suppliers/service providers.

Santos Brasil carries out due diligence prior to signing contracts and takes measures to supervise contractors, especially for profiles with high integrity risk.

Such due diligence and measures include, but are not limited to:

- certification that there are no impediments to the contract;
- verification of information about partners, managers and administrators of bidding companies;
- compliance with the General Contracting Conditions of Santos Brasil, which require: (I) commitment to integrity in public-private relations and compliance with guidelines and policies of Santos Brasil, including the implementation of its Compliance Program, especially with regard to the prohibition of fraud and corruption practices; (II) termination of contract if contractor practices acts harmful to public administration in Brazil and abroad; and (III) indemnities in cases of contractual breach;
- provision to determine the degree of risk of the agreement to ensure adequate supervision;
- periodic verification of the contractor to check compliance with contractual provisions, ensure its conduct is consistent with the Company's values and does not carry out any illegal acts that may result in the Company being held liable.

3.10 VIOLATIONS SET FORTH IN THIS CODE

Santos Brasil reserves the right to apply the measures it considers appropriate for non-compliance with the guidelines established in this Code. Compliance with the guidelines in this document is mandatory.

Any suspicion of an irregular situation and knowledge of violation of any aspects of this Code or other regulations of Santos Brasil by the supplier/service provider, through their employee, representative or others, must be reported through the **Confidential Portal** provided by the Company.

The **Confidential Portal** is a channel available not only for reporting violations but also for registering complaints and suggestions.

Santos Brasil values an environment open to suggestions, opportunities for improvement and correction of problems. We reject all forms of retaliation or intimidation of suppliers/service providers or third parties who communicate doubts, complaints, suggestions or complaints in good faith regarding any situation of non-compliance with the Code of Conduct and other regulations and guidelines established by Santos Brasil.

The **Confidential Portal** is an independent tool by which we guarantee the anonymity of whistleblowers to protect their image, as well as our suppliers/service providers and the Company.

4. CONTACT

Reports, complaints, suggestions and questions can be sent through the following channels:

Website: www.contatoseguro.com.br/santosbrasil
Telephone: 0800 800 0818.

All reports, complaints, suggestions and questions will be received by a third party and addressed independently and confidentially.

5. QUESTIONS

In case of questions about the guidelines in this **Code of Conduct** and other issues that may arise during the provision of services by our suppliers/service providers to the Company, the **Compliance Department** can be contacted at **compliance@santosbrasil.com.br**