

## **Supplier Code of Conduct**

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### **1. Objective**

This Code of Conduct establishes the minimum principles and standards required by van Herp & Frumento (P&I Services) Ltda. for its suppliers, with a focus on legal compliance, combating corruption, commitment to ethics, socio-environmental responsibility, and respect for human rights.

We expect our suppliers to practice, share, and demand, throughout their entire business chain, the standards of ethics and responsibilities presented in this Code.

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### **2. Definitions and Scope**

**2.1.** A supplier is defined as an individual or legal entity that provides goods or services to van Herp & Frumento (P&I Services) Ltda., including sub-suppliers and contracted third parties.

**2.2.** This code applies to all operations, both nationally and internationally, for the duration of the commercial relationship.

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### **3. Compliance with Laws, Norms, and Regulations**

Suppliers must comply with all applicable laws, regulations, and norms in force, including, but not limited to, the Brazilian Federal Constitution, the Brazilian Consolidation of Labor Laws (CLT), the Brazilian General Personal Data Protection Law (Law No. 13.709/2018), the Brazilian Anti-Corruption Law (Law No. 12.846/2013), the Brazilian Forest Code, the Brazilian Penal Code, and the determinations of the International Labour Organization, the International Maritime Organization, and the Brazilian Navy, as well as the respective Acts/Laws in force at the Countries of the P&I Associations to which van Herp & Frumento (P&I Services) are correspondents to.

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#### 4. Business Ethics

Suppliers must act with integrity, committing to adhere to the highest standards of transparency, ethics, and legal compliance, avoiding situations of conflict of interest and practicing:

**4.1. Combating corruption:** any form of bribery, kickbacks, facilitation payments, or undue advantage to public or private agents is prohibited, and the supplier must adopt internal controls to prevent such practices.

**4.2. Fair competition:** respect for the rules of free competition, in compliance with applicable laws.

**4.3. Conflict of interest:** suppliers must declare any situation of conflict of interest.

**4.4. Information protection:** suppliers must protect confidential information and personal data in accordance with the General Personal Data Protection Law.

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#### 5. Labor and Human Rights

Suppliers must ensure dignified working conditions, not use child labor or slave-like labor, combat discrimination and harassment, and comply with remuneration and working hours in accordance with the CLT and applicable legislation.

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#### 6. Sustainability

The supplier must prevent their activities from causing negative environmental impacts. They must preserve and protect natural resources, such as energy sources, water, forests, soil, and raw materials. Contamination of the soil, air, and water must also be avoided, as well as noise and light pollution.

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#### 7. Violations and Consequences

Violations of this Code of Conduct may be characterized as improper behavior, and the supplier may be subject to the termination of the business relationship, in addition to administrative, civil, or criminal liability, where applicable.

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## 8. Communication

Upon receipt of this Code, the supplier is duly informed and aware of its content.

For questions or to send evidence of compliance: [pandi-png@pandi-png.com.br](mailto:pandi-png@pandi-png.com.br)