Compliance Policy

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Introduction

The Code of Conduct aims to establish the ethical principles and standards of conduct that should guide the internal and external relations of the members of CLIPPER TRANSPORTES INTERNACIONAIS LTDA, and it is an integral part of the employment contract and extends to all members, hired and CLIPPER interns. The Board, HR and managers will be able to guide and resolve doubts regarding its application, as well as the Ethics Committee set up to regulate this Code.

Compliance with the Code of Conduct by CLIPPER members aims to reverse our past with fundamental principles such as work ethics, respect for others and their diversity, honesty, in all our gestures, transparency and professionalism .

The Code of Conduct requires us to always comply with its standards, being a constant reference standard, a guide to be followed that portrays CLIPPER's corporate culture.

All your decisions when relating to your customers, colleagues, suppliers must be based on the items described in this document and on concepts such as honesty, respect, diversity, prudence, kindness or wisdom.

Our reputation and credibility are the most important assets we have and the ethical principles that guide our actions contribute to maintaining CLIPPER's image as a solid and trustworthy entity in the eyes of our customers, suppliers and members in general.

The guidelines this Code of Conduct must be observed and followed by all CLIPPER members regardless of their position, duties and responsibilities.

Compliance with the Code of Conduct by each member reaffirms one of our most important objectives, which is to maintain and consolidate CLIPPER's reputation.

Code of Conduct and Responsible Practices

Preamble

Everyone who has an employment relationship, service provision contract, as well as minor apprentices and interns will be called members for all purposes.

General Guidelines

goal

- Facilitate knowledge and application of CLIPPER's business culture, firmly committed to complying with human and social rights and free integration within the company, of the entire collective of members, respecting their diversity.
- Establish the principle of such diligence for the prevention, detection and eradication of irregular conduct, whatever its nature, encompassing, among others, risk analysis, definition of responsibilities, training of members and, if applicable , of members directly related to the company, and the formalization of procedures, in particular, for the notification and immediate elimination of irregular conduct.
- Take into account the principle of criminal liability of legal entities, belonging to the legal system of different jurisdictions where CLIPPER carries out its activities and foresees and condemns the existence of behaviors that may determine the company's liability among its legal representatives, administrators, members or by any other person who is subject to their authority.
- **Responsibility in Conducting the Business**
- Compliance with current legislation is a necessary prerequisite of this Code. The application of the Code may in no case result in a violation of current laws.
- CLIPPER does not hire anyone under the age of 16, except minor apprentices in accordance with the Law.
- CLIPPER members have the right to join a union, have freedom of association and collective bargaining.
- Working hours and weekly overtime will not exceed the legal limit established by the country's legislation.
- The salary received by CLIPPER members is consistent with the performed work, respecting the Category's Collective Agreement.
- CLIPPER is committed to collaborating with the local, national or international communities in which it operates its business.
- CLIPPER's Corporate Social Responsibility, underlined by its social and environmental commitment in carrying out its activities and for the benefit of all its interest groups, forms an inseparable part of its business model.
- CLIPPER's social commitment is expressed in the development of sponsorship activities, cultural support and social actions, carried out by the organization or channeled through collaboration with social organizations.
- Furthermore, CLIPPER will encourage and promote the collaboration of its members with organizations of social interest wherever it operates, through corporate volunteering programs, among others.
- **Desktop**
- All CLIPPER members carry out their work in safe and healthy places.
- CLIPPER prohibits any form of physical, sexual, psychological or verbal harassment or abuse of its members, as well as any other conduct that may create an intimidating, offensive or hostile work environment.
- No member of CLIPPER will be subject to discrimination for reasons of race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or sex.
- All persons, individuals or legal entities, who directly or indirectly have any employment, economic, social and/or industrial relationship with CLIPPER will receive fair and dignified treatment.
- **Conduct of Members**
- The behavior of CLIPPER members will comply with the spirit and letter of this Code of Conduct and Responsible Practices.
- **Relationship with Members**
- CLIPPER is committed to making the necessary means available to its members to know and understand the internal and external regulations necessary to exercise their responsibilities.
- CLIPPER considers people as a key business factor, defending and promoting compliance with human and labor rights and committing to the application of regulations and good practices in terms of working conditions, health and safety at work.
- **Responsibility of Members**
- All CLIPPER members must comply with the company's standards and procedures, as well as the instructions that could be approved in its development.
- The company's team of members will collaborate in strict compliance with applicable labor standards and in the prevention, detection and eradication of irregularities in this matter.
- All members are responsible for strictly complying with health and safety standards at work and for ensuring their own safety and that of people affected by their actions.
- The consumption of substances that could affect the due fulfillment of professional obligations is prohibited.
- All members are obliged to behave, in their relations with others, using respect, dignity and prudence as criteria, taking into account the distinct cultural sensitivity of each person and not allowing any form of violence, harassment, abuse in the work or discrimination based on race, religion, age, nationality, sex or any other personal or social condition unrelated to their merit and capacity, with special consideration for the attention and labor integration of people with physical or mental disabilities.
- **Responsibility of Managers**
- Managers are responsible for:
- Offer your behavior as a model for all your subordinates and other members.
- Disclose the content of this Code to your subordinates and make them aware of its need and application, thus preventing any member from committing a violation due to lack of information.
- Identify members who have violated this Code and discuss the matter with the Ethics Council.
- Create a culture that generates compliance with this Code and encourage Members to raise doubts and concerns about its application.
- **Canonical relations**
- The company's publicity activities will be carried out in a clear manner in order to avoid false, misleading information or information that could mislead customers or members.
- CLIPPER competes in the market fairly and does not tolerate misleading, fraudulent or malicious conduct under any circumstances.
- Any search for commercial or market information by CLIPPER members will always be carried out without violating the rules that could protect it.
- **Relationship with Customers**
- CLIPPER is committed to offering all its customers a high standard of excellence and quality in its services and maintaining clear and transparent communication with them. These services will be performed ethically and responsibly.
- **Relationship with Suppliers**
- Suppliers of CLIPPER goods and services must meet the requirements of ISO 9001. Transport Suppliers must sign the Technical Quality and Safety Agreement to comply with the DAS and others will be periodically evaluated in accordance with the Supply Chain Security Assessment document. Likewise, they must allow any review to be carried out by CLIPPER authorized members or employees.
- In their relationships, CLIPPER members will, as a general rule, avoid payments in cash, as well as payments made in currencies other than those previously stipulated. All payments must always comply with the policies defined by the Financial Management Department.
- Unplanned payments made to members or by members when performing contracts will be subject to special control and supervision; payments made to accounts other than those usual in relations with a specific organization or person; payments made to people or by people, companies, or organizations operating in tax havens or payments made to tax havens. Additional data made to organizations whose partner, owner or beneficiary cannot be identified.
- Members will demand compliance with regulations for processes or product origin declarations, supervising compliance with standards and processes established by the company in this area.
- CLIPPER members will verify the suppliers of goods and services in a lawful, ethical and respectful manner.
- The choice of suppliers will be governed by criteria of objectivity and transparency, reconciling the company's interest in obtaining the best conditions with the convenience of maintaining stable relationships with qualified and responsible suppliers.
- All suppliers who work with CLIPPER must commit to respecting the human and labor rights of all contracted members, as well as transmitting and involving their business partners with these principles. CLIPPER will not accept the violation of any of these principles under any circumstances.
- Activities relating to purchases and supplies will be carried out in strict compliance with the rules and procedures in force at the company. All decisions taken in this context must be certified, which means that they must be justifiable, verifiable and verifiable in the event of review by CLIPPER members or supervisory bodies themselves. CLIPPER members have the obligation to protect commercially sensitive information relating to the conditions established by the company with regard to its supply chain.
- CLIPPER members will not request or accept information from competitors regarding the conditions established with other companies that compete with CLIPPER.
- No member of CLIPPER may offer, grant, request or accept, directly or indirectly, gifts or donations, favors or compensation, in money or in articles, of any nature, which could influence the decision-making process related to the performance of functions derived from their
- Office. Any gift or donation received contrary to this Code must be immediately returned and this circumstance communicated to the Ethics Committee. If the possible return of the gift or donation is not feasible, it will be donated or used to the HR department, which, after issuing the corresponding receipt, will allocate it for social purposes.
- In particular, no member of CLIPPER may offer, grant, request or accept gifts or donations from or to an individual or legal entity with which CLIPPER maintains relationships of any type.
- **Relationship with Competitors**
- Members will refuse to receive information about competition obtained improperly or in violation of the confidentiality under which its legitimate owners maintain it. In particular, we will take special care not to violate company secrets in cases of incorporation into CLIPPER of professionals from other companies in the sector.
- Company members will also avoid spreading malicious or false information about the company's competition.
- **Relationship with Family**
- Family members are understood to be the spouse, parents, siblings, children, uncles-in-law, nephews, cousins up to 2nd degree, including the spouse.
- Only with written permission from their manager and the Ethics Council can family members work in any out business with family members or with companies where family members are partners, have a relevant stake in the company or even receive advantages from the business.
- **Relationship with Public Power**
- CLIPPER members will interact with authorities and public institutions, in those countries where it carries out its activities, in a lawful, ethical, respectful manner and in accordance with international principles for the protection of human rights. All members who have a relationship with representatives of public authorities must be specifically authorized by the company.
- Members who have relations with public authorities must document decisions and demonstrate compliance with applicable internal and external standards, with the aim of making it easier for members and the company's supervisory bodies to verify regulatory compliance in this area.
- As a general rule, no member of CLIPPER may offer, grant, request or accept, directly or indirectly, gifts or donations, favors or compensation, whatever their nature, to or from any authority or member.
- The only exception to the previous rule will be for gifts or details of little value that are proportionate and reasonable according to local practice, transparent, delivered for reasons of legitimate interest, always acceptable and appropriate, to avoid that their receipt or requesting could lead to doubt the good faith of the member or the company. Cash donations are expressly prohibited.
- It is the responsibility of each member to know and comply with local practices, taking into account the company's interests and good reputation. In case of doubt, the Ethics Committee should be consulted.
- In any case, the usual practices regarding donations and gifts must be monitored, evaluated and recorded appropriately by the company.
- CLIPPER members must refrain from making payments to facilitate or speed up procedures, which consist of the delivery of money or other things of value, of any amount, in order to guarantee or accelerate the performance of the procedure or action, of any nature, in the face of of any judicial, governmental or official body.
- Members must avoid obtaining undue advantages in terms of taxation for CLIPPER and will ensure that the information declared in this regard to the authorities is true and consistent with the company's reality. Members will also ensure that the information they will ensure that the accounting records of public administrations are properly used and that their request is transparent, avoiding falsifying the conditions for obtaining them or giving a different use to what they were granted.
- In countries where there are requirements and restrictions relating to international trade, CLIPPER members will scrupulously comply with current regulations and will present the necessary information about the activities to the authorities that request it.
- **Accounting Records**
- All operations of economic importance carried out by the company will appear clearly and accurately in the appropriate accounting records that represent the true image of the transactions carried out and will be available for internal and external audits.
- CLIPPER members must enter financial information into the company's systems in a complete, clear and precise manner, to portray, on the corresponding date, their rights and obligations in accordance with the applicable accounting, financial, tax and other regulations.
- financial information that, according to current regulations, must be communicated to the market. CLIPPER is committed to implementing and maintaining an adequate system of internal control over the preparation of financial information, ensuring regular supervision of its effectiveness. Accounting records will be available to internal and external auditors at all times. To this end, CLIPPER is committed to providing its members with the necessary training so that they know and understand
- and comply with the commitments established by the company regarding internal control of financial information.
- **Interest conflicts**
- CLIPPER members must avoid situations that could lead to a conflict between their personal interests and those of the company. Furthermore, they must refrain from representing the company and from intervening or influencing decisions in which, directly or indirectly, they themselves or a third party linked to them have a personal interest. They may not use their position or influence, directly or indirectly, to obtain financial or personal benefit or business opportunities.
- No member of CLIPPER may provide services as a consultant, advisor, director, member or advisor to another competitive company, except for services that may be provided at the request of CLIPPER or with the authorization of the Ethics Committee.
- CLIPPER respects the private lives of its members and, consequently, the private scope of their decisions. Within this policy of respect we encourage members, in the event of personal conflicts of interest or those of their family environment, to commit to the necessary objectivity or professionalism of their role at CLIPPER, consulting the Ethics Committee, so that with respect to confidentiality and privacy of people, proceed to take appropriate measures, both for the benefit of society and the people involved.
- Specifically, the following cases are situations of potential conflict and must be reported to the Ethics Committee:
- The performance by the member or by people linked to the member, of any activity, by himself or through some company or institution, activities that generate the same type of activity, analogous or complementary to the type of activity carried out by CLIPPER.
- The performance by the member or by people linked to him, directly or indirectly, by himself or through some company or institution, of activities that generate the exchange of goods and/or services with CLIPPER, whatever the agreed remuneration system.
- CLIPPER members will be liable to carry out work and professional duties other than those carried out at CLIPPER, when these do not result in a reduction in the expected effectiveness in carrying out their functions. Any work or professional activity, of others that may influence the company's working hours must be previously authorized by the Ethics Committee.
- **Confidential and Privileged Information**
- Members must know that the documents and data contained in CLIPPER's information technology systems and equipment may be subject to review by the company's competent units, or by members designated by it, when considered appropriate and permitted by law.
- CLIPPER members have the obligation to protect the information and knowledge generated within the organization, their property or custody.
- Members must refrain from using any data, information or knowledge of which they are aware of their professional activity for their own benefit. Furthermore, they must refrain from communicating information to Members, unless they are following applicable regulations, company rules or when they are expressly authorized to do so. Likewise, they must not use privileged data, information or knowledge obtained from a third party without receiving written authorization.
- CLIPPER members undertake to maintain confidentiality and to use any data, information or document obtained during the exercise of their responsibilities in the company in accordance with the corresponding internal regulations. In general, and unless otherwise ordered, the information to which they have access must be considered confidential and must be used exclusively for the purpose for which it was obtained.
- Furthermore, they must not make copies, reproduce or make other use of the information beyond what is necessary to carry out their tasks, nor can they store it in information systems that are not owned by CLIPPER, except in cases and for purposes expressly authorized.
- The confidentiality obligation will remain after the activity at CLIPPER has been completed and includes the obligation to return all materials associated with the company that are in the member's possession at the time of termination of their relationship with the company.
- CLIPPER members must respect the personal and family privacy of all people, whether members or not, to whose data they have access. Authorizations for the use of data must correspond to concrete and justified requests. CLIPPER members must strictly comply with the internal and external standards established to guarantee the appropriate treatment of information and data provided to the company by members.
- When collecting personal data from customers, members, contractors or any person or entity with which they have a contractual relationship or of any nature, CLIPPER must provide sufficient consent, where as mentioned, and undertake to use the data for the purpose and intended by the grantor of such consent. Furthermore, CLIPPER members must be aware of and respect all internal procedures implemented in relation to storage, custody and access to data, which are designed to guarantee the different levels of security required depending on their nature.
- Members will communicate to the corresponding department or the Ethics Committee any incident detected related to the confidentiality of information or the protection of personal data.
- CLIPPER is committed to respecting its own and its members' intellectual and industrial property. This includes, among others, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights and rights to specialized technical knowledge.
- CLIPPER is responsible for the originality of its own models and will ensure that its supplies are responsible for the originality of the models they make available to the company.
- CLIPPER members are expressly prohibited from using the intellectual or industrial property works, creations or logos of members without the knowledge that the company has the corresponding rights and/or licenses.
- CLIPPER members will take the necessary measures to protect intellectual and industrial property, seeking to ensure the tracking of processes and decisions in this area, in order to document, be able to justify, and prove, in particular through the titles of the works themselves, creations or logos and the application of contractual clauses that guarantee the originality and non-conflictive use of members.
- The intellectual and industrial property resulting from the work of members during the company, and which are related to CLIPPER's present and future business, will be the property of the company.
- Only brands, images and texts duly authorized by the Board will be used in marketing and advertising
- **Political Activities**
- CLIPPER develops its business model without politically interfering in the communities where it carries out its service provision activities.
- Any CLIPPER relationship with governments, authorities, institutions and political parties will be based on principles of legality and neutrality.
- In the case of contributions made by the company, in cash and/or in articles, to political parties, institutions and public authorities, they will always be made in accordance with current legislation and guaranteeing their transparency, the purpose of which will be proceeded by a report from the Legal Department that demonstrates its full legality.
- The right of members to participate in legally recognized political activities is recognized, as long as these do not interfere with the adequate performance of their activity in the company and are carried out outside working hours and in any CLIPPER premises so that they cannot be attributed to the company.
- **Use and Preservation of Assets and Heritage**
- CLIPPER members must efficiently use the company's goods and services and never for their own benefit
- In this regard, CLIPPER members should under no circumstances use the equipment that CLIPPER makes available to them to install or download programs, applications or content whose use is illegal, which violates the company's rules or which may harm its reputation . They should also not use company capital or cards to cover activities that are not typical of their professional activity.
- **Environment**
- All CLIPPER activities will be carried out respecting the environment, favoring the conservation of biodiversity and the sustainable management of natural resources.
- CLIPPER is committed to minimizing the impact on the environment throughout the life cycle of its fixed assets or material for use and consumption until their final disposal, storing them in an appropriate location.
- CLIPPER members carry out their activities promoting the company's social and environmental sustainability, as a means of responsibly creating values for all its interest groups.
- **Violations**
- In the event of a violation of the Code, the company has a consultation and notification procedure, which allows anyone related to CLIPPER to report, confidentially, any irregularity that, in their opinion, involves a violation of the Code.
- Ethics Committee
- In order to ensure compliance with this Code, there is an Ethics Committee which includes:
- Executive Board
- Commercial Directorate
  - Representative of members
  - Human Resources
- The Ethics Committee may act on its own initiative or at the request of any member of CLIPPER, manufacturer, supplier or members with a direct relationship and legitimate commercial or professional interest, through a report made in good faith.
- For this purpose, communications made under the terms of this Code, and containing allegations of violation or queries regarding its interpretation or application, may be sent to the company through any of the following means:
  - Ordinary mail to the address: Rua Rui Barbosa, 281 Bela Vista- São Paulo, SP, CEP:01325-010.
  - Email to the address: marketing@clipperweb.com.br
- The Ethics Committee has the following basic functions:
  - Supervise compliance and internal dissemination of the Code among all CLIPPER members.
  - Receive all types of documents related to the application of the Code and forward, if applicable, to the company or department of the company that corresponds to its procedure and resolution.
  - Control and supervise the processing of files and their resolution.
  - Interpret issues arising from the application of the Code and its development regulations that require the application of the Code and, at least, an annual report that analyzes its application.
  - Supervise the Reporting Channel and compliance with its procedures.
- In carrying out its functions, the Ethics Committee will ensure that:
  - The confidentiality of all data and records processed and the actions carried out, unless by law or judicial measure the information is sent.
  - The complete analysis of all data, information or documents based on which your action will be carried out will be carried out.
  - The instruction of a procedure appropriate to the circumstances of the case, which will always be carried out independently and with full respect for the right to hearing and the presumption of innocence of the persons involved.
  - The guarantee of anonymity for any whistleblower as a result of presenting instances or complaints in good faith to the Committee.
  - The Ethics Committee has the necessary means to guarantee the application of this Code.
- The decisions of the Ethics Committee will be binding on CLIPPER and the member.
- The Code will be sent in each member's own language, will remain available on CLIPPER's extranet and will be the subject of appropriate communication, training and awareness actions for its timely understanding and practice throughout the organization.
- **General Provisions**
- This Code of Conduct comes into force on February 18, 2015 and will be made known to all members electronically, granting automatic acceptance, and it will not be possible to claim ignorance of the guidelines under any circumstances or under any circumstances. New members will receive information that the Code is published on the Company's website and extranet upon joining CLIPPER.

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(11) 3281-6900

comercial@clipperweb.com.br

Rua Rui Barbosa, 281 01325-010 - Bela Vista, São Paulo - Brasil

Commercial Policies and Conditions

Compliance Policy

Quality policy

Commercial Conditions

DAS Declaration

Declaration of Responsibility in Security and Compliance

code of Conduct

Receive valuable tips and information foroptimizeyour logistics chain.

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SIGN UP

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