



**NAVSUPPLY**

SHIP CHANDLER 4 ALL NEEDS

# Anti-Corruption Policy

# Summary

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## OBJECTIVE

To present a reference document of the company's commitment to business ethics and integrity that will also serve as a guide for employees and third parties when they have questions about conduct and transactions in the company's day-to-day activities. In this document, the company will not only demonstrate its commitment to ethics and integrity to its employees and third parties, who should follow it, but also to clients, partners, suppliers, and society as a whole.

## CONCEPTS

### a) Public Agents:

Anyone who acts either by temporary elective mandate, commissioned or concurred position as an employee, representative, trainee, manager, head of some organ, office or company of the public administration or concessionary company of the public administration, such as: police officers, port, customs, federal revenue; state and municipal treasury, ANVISA inspection and sanitary surveillance secretariat.

### b) Members:

NAVSUPPLY employees or outsourced service providers.

### c) Ethics and Integrity Committee:

The Committee has the task of establishing the minimum criteria of good practices regarding the matter to be followed by employees, business and commercial partners – customers, suppliers – and other related parties, in order to ensure compliance with the guidelines established in the NAVSUPPLY Code of Ethics and Conduct and its complementary policies, ensuring a business environment of integrity and the preservation of the Company's reputational assets.

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### **d) Compliance:**

A term that comes from the English, "to comply with", its literal translation means "compliance" and applied in the context of the compliance program means compliance with laws, ethical standards, code of ethical conduct and company regulations and market best practices.

### **e) Corruption:**

By the criminal code, the crime of corruption is defined by: **"requesting or receiving, for oneself or for others, directly or indirectly, even if outside the function or before assuming it, but because of it, an undue advantage, or accepting the promise of such advantage" in its active form and "offering or promising an undue advantage to a public official, to determine him to practice, omit or delay an official act"** in its passive form.

These concepts were taken from the criminal code, and active corruption is that practiced by public agents, such as civil servants, government employees, or politicians. Passive corruption is the name of the crime committed by citizens who are not in public office, i.e. ACTIVE CORRUPTION is the crime of those who receive and PASSIVE CORRUPTION is the crime of those who pay.

It is important to state that these actions that this policy aims to avoid and fight within NAVSUPPLY are those of PASSIVE CORRUPTION, because the risk of corruption of public agents by employees or third parties is a risk of the company's activity.

### **f) Fraud:**

The act of fraud is an act of bad faith that has **the purpose of deceiving someone, inducing or keeping in error; a false perception of reality, altering the truth or the nature of facts, documents or operations.**

**g) Third Parties:**

Suppliers, partners, customers, and service providers who are present in the company's daily life, such as dispatchers and representatives.

**3. REFERENCES:**

- Law No. 12,846/2013 - Also known as the anti-corruption or clean company law.
- Decree No. 8,420/2015 - Regulates law 12,846/2013 and provides the procedure for administrative accountability for acts against the public administration.
- Guide for the implementation of integrity programs in private companies- CGU - Controladoria geral da União.
- FCPA - "Foreign Corrupt Practices Sct" - American law that punishes acts of transnational corruption
- UKBA - "United Kingdom Bribery Sct" - United Kingdom law that fights transnational corruption.

**4. PRINCIPLES:**

- ZERO TOLERANCE FOR ACTS OF FRAUD OR CORRUPTION:
- Acts of corruption or fraud WILL NOT BE TOLERATED under any circumstances and will be punished.
- ACT WITH TRANSPARENCY
- The reports of contacts with public agents must be made in the most transparent way possible.
- ENCOURAGING COMMUNICATION TO THE INTEGRITY CHANNEL
- The integrity channel is the means through which we receive reports of irregularities and employees, collaborators and third parties must make them without fear of reprisal.

## **5. GUIDELINES:**

### **5.1. Periodic Risk Analysis:**

The analysis of business risks should be performed according to the probability and impact of possible risk events and should be reviewed according to market changes, changes in interaction with public authorities or if 36 months have passed since the last analysis

### **5.2 Communication and Training:**

Periodic integrity training should be conducted to all employees, collaborators and company representatives, valid for 12 to 18 months, in addition to in between the face-to-face trainings, virtual trainings, dynamics and informatives to raise awareness of the need to respect a clean business environment, so that the program is widely disseminated and thus can be effective.

### **5.3 Monitoring of the Compliance Program:**

Establish procedures for observing the instruments of the program and their application, how their adherence is being among employees, collaborators and third parties, evaluate how the response to these instruments is, what is the frequency of communications to the integrity channel, for knowledge and improvement of the program.

### **5.4 Structuring and Implementation of Procedures:**

Discuss and talk with employees and service providers what is the best way to provide transparency when dealing with any public agent and from there develop procedures to be followed in the dealings, according to the needs of each person and sector.

# GENERAL REGULATIONS

The contents of this policy shall be known, observed and applied by all members of the Board of Directors, Executive Officers, employees, customers, suppliers, representatives and third parties that have a relationship with NAVSUPPLY, with no exceptions. Anyone who understands that any act of corruption has occurred must report it to the integrity channel (whistleblowing).