

CODE OF ETHICS

CHAIRMAN'S LETTER

Allog Group is a company with over 20 years of experience, which has always grown based on ethical standards of integrity and respect. The company's principles and posture are renewed every day in our actions, relationships, and the engagement of all.

In order to maintain a good relationship both in the work environment and with suppliers and customers, it is important to respect the integrity, expectations, and privacy of each one. The relationships in the work environment at Allog Group are aligned with the company's values, respect for others creates an excellent work environment, avoiding any form of embarrassment to oneself or others.

This document defines basic principles that should guide the conduct of all; administrators, employees, suppliers must be guided by the principles established in this Code.

Anderson Venancio

INTRODUCTION

The Code of Ethics is a fundamental document for Allog Group, aimed at all our employees, managers, administrators, suppliers regardless of their position, role, or their geographic location. It must be understood as a priority in all our activities, as it expresses the commitment and engagement in the adoption of conduct based on ethical standards. In this sense, Allog Group's Code of Ethics addresses the attitudes expected from all interested parties and instructs on the main situations in which there may be doubts about how to conduct our business ethically. We also emphasize that, complementing the Code of Ethics, Allog Group has its policies, rules, criteria, procedures, responsibilities, and controls that must be complied with by all.

1. OBJECTIVE

The purpose of this manual is to establish the conduct, guidelines and ethical principles that guide Allog Group's business, its employees, and other interested parties to act ethically, with integrity and in accordance with the rules and procedures of conduct applicable to our business model.

2. FIELD OF APPLICATION

This code of ethics applies to all areas and processes of the Allog Group, as well as to all related professionals who work in, directly or indirectly, related activities; including suppliers, partners, customers, and the community.

3. EMPLOYEES' RELATIONSHIP WITH THE COMMUNITY

Allog Group is committed to the social development of the communities where it has units. All employees are expected to behave respectfully, ethically and guided by our principles, in all interactions with the community. We must keep the channels of dialogue permanently open, and there cannot be any form of discrimination in these relationships.

4. EMPLOYEES' RELATIONSHIP WITH SUPPLIERS, SERVICE PROVIDERS AND OTHER PARTNERS

In order to maintain a good relationship both in the work environment and with suppliers, service providers and other partners, it is important to respect the integrity, ethics, transparency, expectations, and privacy of each one of them, complying with the legislation, the internal and external standards, and regulations. We do not tolerate unethical or illegal practices. If irregularities on our partners' part are proven, they must be reported to the manager and ethics committee to analyze the situation and, if necessary, apply penalties.

5. EMPLOYEES' RELATIONSHIP WITH CUSTOMERS

Our customers are the inspiration for us to deliver our work with quality and offer excellent services. Allog Group employees' communication with the client must be carried out in a professional manner, with cordiality, mutual respect, responsibility, confidentiality, seeking to meet ethical and moral standards.

6. EMPLOYEES' RELATIONS WITH THE PUBLIC AUTHORITIES

Allog Group does not tolerate any form of corruption, bribery or even facilitation payments, national or international, treating its relations with the public authorities with absolute care.

Allog Group and its employees are committed to complying with the legislation and not taking any action that violates the laws and regulations in force. In this way, the activity of obtaining or revalidating licenses, permits or any operating permits must always occur through official channels, without any personal involvement, promise or exchange of undue advantages between the parties.

Communication must be made by employees whose roles are directly related to the same or those designated by managers.

7. EMPLOYEES' RELATIONS WITH COMPETITORS

We are committed to free competition and must act in a loyal manner and in compliance with the legislation applicable to each location where we have business units. We do not allow any type of action or conduct that promotes and encourages the formation of a cartel, market

division between competitors, price manipulation or predatory and unfair conduct, bribery, espionage, defamation, non-compliance with intellectual property, reception of confidential information or other illegal practices.

Commercial operations with competitors, if necessary, must be limited to price and market conditions, without any sharing of information, commercial strategies, or anti-competitive practices. In situations where there is a need for contact with competitors, such as class association meetings, employers' unions, forums and technical visits or any other involving competitors, it is important to note that we should not, under any circumstances, comment or encourage discussion about prices practiced, sales conditions, commercial or business strategy with customers or suppliers. If any of these prohibited matters are noticed, we must immediately express our disagreement, end the meeting, and formalize the case to the Ethics Committee.

The competition rules apply to anyone, regardless of position or role, and in any location (professional or social environments).

8. RESPECT FOR DIVERSITY

Allog Group does not accept, under any circumstances, conduct that causes embarrassment or is disrespectful, such as offensive words, intimidation, harassment and psychological or physical aggression, any and all forms of discrimination or prejudice involving age, race, color, nationality, gender, politics, religion, or physical limitations.

a. Forced and child labor

Allog Group does not use slaves (or similar) or child labor in its operations, nor does it tolerate this practice by its suppliers, service providers and other commercial partners.

b. Drug and alcohol use

Employees may not consume or be under the influence of alcoholic beverages, illicit drugs, or narcotic substances on company premises during working hours or perform external activities related to these under these conditions.

9. CONFLICT OF INTEREST

As Allog Group's employees, we must base our actions and decisions on avoiding possible conflicts of interest. These conflicts arise when personal interests interfere with organizational or collective interest. Allog Group's interests must prevail over personal interests; therefore, Allog Group does not admit that employees:

- Gaining personal advantage through their relationship with the institution or use it to gain advantage.
- Using the company's name or their position to influence or induce people to perform acts for their own benefit.
- Carrying out external activities that may interfere with their roles, performance and responsibilities within Allog Group, or conflict with the company's interests.
- Marketing internally any product or service that is not authorized by the company's HR Management.
- Acting in the hiring process with a supplier or customer in which the owner is a family member or person with a marital or emotional relationship without prior authorization from the Ethics Committee.
- Providing personal services, whether paid or not, to business partners or competitors with whom you have a direct relationship.

Any conflict of interest must be reported to the Ethics Committee, through the means informed in this code.

a. Kinship and Emotional Relationship

The hiring of a kinship degree can occur as long as the contractor does not come to work under the direct subordination of his family member. The relationship with an Allog Group's service provider or business partner of is not allowed when one has power to influence the decision to hire them. With public officials, who work in public bodies with which Allog Group maintains a business relationship, especially if said person holds a management position with decision-making or influence power in situations involving the company.

b. Gifts, presents and hospitality

This policy allows employees to offer and receive courtesies from public authorities and private individuals, provided that the offer of such items is lawful and directly related to a value of up to R\$ 500.00 ((gifts, meals, modest entertainment (collectively, "hospitality"), travel benefits or other things of value)) with a maximum frequency of twice a year.

When the gift exceeds the stipulated value, it must be analyzed and registered by the Compliance Officer and, if it is not approved, the gift may be returned. If it is not possible to return the company, it may be given internally to an employee through a lucky draw.

Promotional campaigns must have their rules established in specific contracts - Promotional Regulation applicable.

c. Donations and Sponsorship

Allog Group is committed to social responsibility and, within its guidelines, seeks to support development in the environment where it operates. In this type of relationship with the community, one must comply with the laws and not get involved in local political issues or seek any reciprocity, present or future, on the part of beneficiaries or third parties that may be served. We emphasize that Allog Group prohibits the making in its name of any donation or sponsorship to politicians, labor unions, political parties, candidates for political office or public agents. In order not to incur illegality or generate image risk, this type of relationship with the community requires additional care, such as authorizations, understanding who the beneficiaries are, transparency, evidence, contracts, and accountability.

d. Recommendations and referrals of professionals

The referring of professionals to work at Allog Group may occur without any involvement of interest, own benefit, or influence in the decisions of Allog Group's hiring policy. When referring professionals, the kinship and emotional relationship guideline must be respected.

e. External communications

Employees are prohibited from issuing any statements or comments, conferences, press releases, public forums or any other means of communication or granting interviews on their own behalf or on behalf of Allog Group. For this purpose, prior authorization from the ethics committee is required. Every employee, even when authorized to represent Allog Group publicly, must refrain from expressing an opinion on the actions of public officials, or even making comments of a political nature.

f. Political Activities

Allog Group does not support or make political contributions, it maintains an ethical and respectful conduct with political parties or political organizations. If there is any interaction, it must be formalized by email or minutes.

10. COMPANY ASSETS AND RESOURCES

The use of Allog Group's assets and resources, such as computers, cell phones, printers, cars, equipment, and software, is conditioned to the work purposes and performance of each employee's role and cannot be used for personal purposes. Allog Group's assets also include physical assets or intellectual property, exclusive use information, database, business opportunities, equipment, and facilities.

Employees must ensure that Allog Group's assets and resources are in good conditions of use, not wasting or misusing them. All abuse or misappropriation, whether by employees or third parties, must be reported. Additionally, avoid situations that facilitate thefts or robberies.

a. Information security

Information regarding Allog Group's business, whether related to the company, employees, customers, suppliers, service providers or other business partners and which are not public knowledge, must be treated confidentially.

Confidential information must not be disclosed to the outside public, except when the nature of the business so requires. Nor should they be shared with other employees who do not have knowledge and are not taking part or supporting a certain project and need them.

Employees may not use confidential information for personal gain.

The credentials of each employee, whether badges, logins, and passwords, are individual and personal and cannot be shared with third parties under any circumstances, including other company's employees, as expressed in the Information Security Policy and Data Privacy Policy.

11. PUBLIC RELATIONS

In order to avoid inaccurate information that could affect Allog Group's business, as well as its employees and business partners, the group's relationship with the press must be carried out solely through people highlighted by the Executive Board.

12. ACCOUNTING RECORDS

Allog Group values the transfer with members of the company's Executive Board. Our internal records reflect the detail of the financial transactions carried out and ensure compliance with accounting legislation. Allog Group has internal financial and accounting rules and procedures that are subject to periodic audits to guarantee the legality of the process.

The practice of money and property laundering is not tolerated by the company, as well as other financial and accounting offenses that may harm public administration.

13. SECURITY, HEALTH, AND ENVIRONMENT

The safety and health of employees is a priority for Allog Group, we focus on maintaining well-being and harmony among people, we provide the best ergonomic resources and equipment, as well as a work environment that adds good experiences during the employee's workday.

Allog Group's purpose is to preserve the environment and ensure the sustainable development of the planet, and these commitments take place through awareness among our employees.

14. EMS SCOPE

The scope of Allog Group's Management System is defined as "Commercialization of Freight Forwarding and Logistics for Import and Export, Customs Clearance".

15. CORRUPTION PREVENTION

Allog Group does not tolerate and prohibits its employees or third parties from acting in its interest or benefit to practice any act of corruption or bribery with public agents or business partners.

They are forbidden and must be immediately communicated to the ethics committee if the following situations occur, or on mere suspicion:

- Omit, allow, induce, or facilitate any form of corruption or bribery, directly or indirectly, through another employee or representative of Allog.
- Failure to report any payment suspected of being overdue.
- Manipulate accounting in order to omit records and transactions carried out.

16. RESPONSIBILITIES AND VIOLATIONS OF THE CODE OF ETHICS AND CONDUCT

Allog Group does not tolerate any practice of retaliation against any employee who reports in good faith.

It is expected that all Allog Group employees and administrators ensure compliance with the provisions of this code of ethics and communicate inappropriate conduct through the intranet page at the ombudsman link, a communication channel with all employees that ensures the interested party absolute confidentiality.

Violations of this code of ethics will subject their perpetrators to disciplinary measures and penalties in accordance with current legislation (verbal and written warnings will be applied by managers of each department).

This document ensures that the employee is aware of all legal sanctions that may arise, as well as grounds for serious misconduct, suspension, or dismissal for just cause.

17. ETHICS COMMITTEE

Allog Group's ethics committee, together with other areas related to Allog, is responsible for operating and disseminating the company's culture and conduct. The members of this committee are expected to have the following responsibilities:

- Monitor and discuss the policies and measures adopted by compliance to disseminate the culture of compliance and internal controls.
- Make sure all employees are aware of this code of ethics.
- Analyze potential conflicts of interest, as well as possible failures in internal controls.
- Discuss exposure to regulatory and image risks related to new products, operations, and customers.
- Decide on the application of sanctions for violations of the code of ethics and compliance policy.
- Follow up on compliance with the compliance program.

This committee will meet at least every six months for evaluation and must report any violations of applicable laws to the advisory board, as well as suggest corrective actions when necessary.

In case of violation of this code of ethics, the case must be taken to Allog Group's Ethics Committee, where it is responsible for evaluating the appropriate disciplinary measures, which may even lead to the termination of the employment contract or service provision contract with third parties.