



# CODE OF ETHICS, CONDUCT & **COMPLIANCE**

## Summary

Objective .....	4
Mission, Vision and Purpose .....	5
Applicable to .....	5
How it applies .....	6
Relationships and behavior in the workplace .....	6
1 - Act with integrity .....	6
2 - Diversity .....	7
3 – Harassment, Prejudice and Discrimination.....	7
4 – Use of Illicit Products and Firearms .....	7
5 – Dress code .....	8
6 - Intimate Relationships and Kinship .....	8
7 - Commercial Activities .....	9
8 – Conduct on social media .....	9
9 – Contact with the Press .....	9
10 – Freedom of Association and Collective Bargaining.....	10
11 – Uses of Physical Resources .....	10
External Relationships .....	11
1 – Customer Relationship.....	11
2 - Relationship with Suppliers and Service Providers.....	11
3 – Gifts, presents, entertainment and other corporate courtesies .....	12
Non-compliant Conducts.....	12
1 - Intolerance of Corruption, Bribery or Any Undue Advantage.....	12
2 - Conflict of Interests.....	13
Confidentiality .....	14
Donations, Political Contributions and Sponsorships .....	15
1 – Donations .....	15
2 – Political Contributions.....	15
3 – Sponsorships .....	16

Human Rights and Fair Labor Practices .....	16
1 – Child, Slave or Forced Labor .....	16
2 – Health and Safety .....	16
3 – Data Protection and Disclosure of Information (LGPD) .....	17
4 – Sustainability .....	17
5 - Environment .....	17
Conformance with the Code of Ethics, Conduct and Compliance .....	17
Application of Code .....	18
Final Recommendation.....	18
Contact DUX .....	19
Term of Acknowledgment and Commitment.....	21

## OBJECTIVE

This Code of Ethics, Conduct and Compliance aims to highlight and reinforce Dux's ethical values, its organizational identity and the principles that guide the conduct of its activities, ensuring the ethical behavior of the company and its employees in all phases of the business, in accordance with the company's principles and with laws and regulations, regardless of where they work or what job or role they hold.

It aims to ensure that everyone understands that, when acting on behalf of Dux, any conduct that disrespects this Code and/or the laws in force compromises the integrity of the company.

The Code strengthens, through permanent practice of the guidelines described in this Code, the values and principles that make Dux an ethical and reliable company.

Non-compliance with the guidelines described in this Code, applicable legislation and other internal rules and regulations will be considered a serious violation, especially if it results in personal benefits or benefits to third parties to the detriment of Dux or any of its Affiliates, with the violator being subject to the application of penalties provided for by law, and may even lead to the termination of the employment contract.

## MISSION, VISION AND PURPOSE

### Mission

Promote business worldwide with intelligent logistics solutions that allow us to have flexibility and assertiveness in our decision-making. Be a global reference without losing focus on availability and quality.

### Vision

To be a global reference in logistics and cargo transportation services, by December/2030, with agility, innovation and competitiveness, offering excellence in our services and seriousness in our business and in the businesses of our clients.

### Purpose

Transforming global logistics into an excellent experience, being the trusted partner that delivers innovation, quality and integrity at every stage of the process.

## APPLICABLE TO

The Code of Ethics, Conduct and Compliance applies to DUX and its subsidiaries, in Brazil or in other countries, employees, administrators, interns, young apprentices, business partners, external providers, suppliers and anyone who provides services on behalf of DUX or of its controlled or affiliated companies. At the same time, we seek to encourage the adoption of the principles of this Code of Ethics, Conduct and Compliance in all companies in which we have a shareholding interest.

Compliance to the ethical standard is everyone's task!

## HOW IT APPLIES

Ethics is a daily practice, which requires constant exercise with every decision we make. Acting with integrity and responsibility requires discernment.

The Code of Ethics, Conduct and Compliance must be used as a mechanism to assist our employees, administrators, interns, young apprentices, business partners, external providers, suppliers, customers and anyone who provides services on behalf of DUX or its controlled companies or affiliates.

If you become aware of unethical or suspicious behavior, you should inform your superiors, the human resources area, or use the ombudsman channel (email: [ouvidoria@go-dux.com](mailto:ouvidoria@go-dux.com)).

All communication made will be treated confidentially by DUX.

## RELATIONSHIPS AND BEHAVIOR IN THE WORKPLACE

### 1 - ACT WITH INTEGRITY

- Open and transparent dialogue.

We are a company with active listening, which values the expression of opinions and the diversity of points of view.

We act with maturity and respect in the face of contradictions, in constantly learning.

Under no circumstances we retaliate against manifestations of divergences.

We know how to deal with our mistakes and, therefore, we reject any omission of problems.

Everyone is expected to always practice an open and transparent dialogue.

- Respect

We respect and value each other, for individual and corporate development.

Employees, customers, partners, service providers, suppliers and everyone who has a relationship with Dux must be treated with respect and honesty.

Employees must be recognized as unique and have their subjectivity preserved.  
Always respect the difference of opinion and diversity among colleagues.

## 2 - DIVERSITY

We respect diversity, courtesy, impartiality, and cordiality to people, being contrary to any discriminatory act, harassment and retaliation.

## 3 - HARASSMENT, PREJUDICE AND DISCRIMINATION

DUX does not allow or tolerate any type of harassment discrimination, prejudice or harassing treatment between employees, customers, partners, service providers or suppliers.

Examples of situations that cannot happen:

- Any abusive conduct that hurts a person's dignity or physical or mental integrity, threatening their job or degrading the working environment.
- Preferences or favors arising from personal affinity, social position, hierarchical or working time.
- Attitudes or words that may be characterized as harassment, including making embarrassing proposals in the workplace.
- Intimidation, humiliation, threats or abusive attitudes, whether through gestures, words or behavior against the moral and physical integrity of any person.

## 4 - USE OF ILLICIT PRODUCTS AND FIREARMS

Fica proibida nas dependências da empresa:

- Consumir bebidas alcoólicas e drogas durante o horário de trabalho;
- Fumar dentro de ambientes fechados da empresa;
- Acessar as dependências da empresa sob o efeito de substâncias entorpecentes, lícitas ou ilícitas;

- Portar armas, exceto colaboradores ou prestadores autorizados a realizar o serviço de segurança e vigilância patrimonial.

#### 5 - DRESS CODE

The company's dress code is available on the Intranet.

#### 6 - INTIMATE RELATIONS AND KINSHIP

Intimate, loving and sexual relationships are not permitted, as well as family relationships (parents, spouses, children, siblings, grandchildren, grandparents, in-laws, cousins, etc.) between employees who work in the same sector, who have a direct or indirect relationship of subordination, between peers or between employees when one of them performs a function that weakens Dux's internal controls.

Employees must inform their immediate superior and the Human Resources area if they know that a relative or person with whom they have intimate relationships is participating in a selection process at the company or if they have this type of relationship with someone who works in any company of the group.

For employees who work in the same sector and do not have a direct or indirect relationship of subordination, whenever there is a relationship of an intimate nature, the situation must be informed to the immediate superior and the Human Resources area, to assess whether there is a risk of exposure of the company image, as well as disrupting the performance of the functions of the employees involved in the work environment.

Demonstrations of affection that go beyond the reasonableness of a friendly coexistence between employees, such as more intense hugs, inappropriate kisses, etc., are prohibited.



## 7 - COMMERCIAL ACTIVITIES

DUX does not allow the sale of any products or services on its premises, such as the sale of cosmetics, food, catalogues, clothing, financial consultancy, income tax, among others, nor that such activities are carried out with the use of company resources. Both by employees, as well as suppliers, partners, customers and service providers.

## 8 – CONDUCT ON SOCIAL MEDIA

We are committed to protecting Dux's image and reputation, as well as that of our employees.

We respect freedom of speech and expression, the free Internet and the power of social media, but we understand that there are risks and basic principles of social behavior online.

Avoid opinions or posts that are aggressive, hostile, discriminatory or incompatible with your status as a Dux employee and your position.

Make your posts consciously and responsibly, with good faith and respect.

Always communicate to the Talk to DUX channel (*Fale com a DUX*) if you identify any post by another employee of the company that violates Dux's Code of Ethics, Conduct and Compliance.

## 9 - CONTACT WITH THE PRESS

It is imperative that any contact with the media, press or market as a whole, such as requests for opinions, statements, interviews, reports, publications, lectures, conferences, presentations, comments or any other form of communication with the external public, which exposes the activities, strategic or business plans, results, concept, name or image of Dux companies is submitted for approval by the Board of Directors.

When any employee participates, as a representative of Dux, in a media activity, spontaneously and unplanned, he must notify the Board immediately after the occurrence.

Dux employees must protect confidential and privileged information, as well as the name and image of companies, committing themselves to:

- Care for the company's image;
- Follow the rules applicable to communications with the market and the press;
- Forward to the Board of Directors, any request from any press vehicle or social media;
- Do not disclose, by any form or means, Dux's confidential or privileged information.

#### 10 - FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Employees must be free to join or refuse to join a trade union/workers' association of their choice, free from threats or intimidation.

Employees recognize and respect the right to collective bargaining in accordance with applicable legislation.

#### 11 - USES OF PHYSICAL RESOURCES

It is the responsibility of each employee to use the company's resources carefully and conscientiously, without personal ends, within the current legislation and without any intention of damaging them.

The use of IT resources must strictly follow the guidelines of the Information Security policy. Illegal copies of software, use of pirated products and access to sites unrelated to work activities are not permitted.

All messages distributed through the electronic mail system are the property of the company, therefore, if the company deems it necessary, the emails may be monitored without prior notice.

Internet access is not allowed for matters not related to work, as well as to illegal or unethical websites. Consulting the bank's website, checking test results, or other specific matters, such as looking for a phone number or address, are allowed as long as it is occasional.

Telephone use should be considered and restricted to work matters. This feature can be used for non-work related matters quickly and occasionally.

## **EXTERNAL RELATIONSHIPS**

### 1 – CUSTOMER RELATIONSHIP

The company's employees must conduct all negotiations with customers in an ethical and efficient, cordial and respectful manner, seeking to effectively understand customer needs, developing solutions that create value for both and reinforce long-term relationships.

Preferential treatment should be avoided for any customers for personal reasons that are at odds with DUX's service standards.

Any attitudes or actions that may impact the guarantee of customer satisfaction must be communicated to the manager, the board and the reporting channel.

### 2 – RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

We maintain a relationship with our suppliers and service providers based on professionalism and mutual respect.

We work with transparent selection criteria and demand compliance with all legal requirements, which take into account the competence, technical qualification, meeting deadlines, quality, price and financial health of the companies.

Doing business with suppliers or service providers with a questionable reputation or who do not comply with the rules and requirements contained in this Code, or with labor, environmental and tax laws, is prohibited.

If any employee wishes to hire, on behalf of Dux, suppliers or service providers with whom they have a close personal relationship or in which they have a relevant corporate interest, they must report the matter to their immediate superior and to the Board of Directors, for evaluation and authorization or not of the business.

It is strictly prohibited to hire any supplier or service provider upon receipt of personal favors, gifts, financial compensation, payment of commissions or any other amounts outside the normal course of business in question.

We do not tolerate any act of corruption or fraud and, therefore, our suppliers and service providers cannot be linked or involved in any illegal activities.

### 3 – GIFTS, PRESENTS, ENTERTAINMENT AND OTHER CORPORATE COURTESIES

We are committed to promoting fair and transparent business decisions and protecting Dux's reputation.

Therefore, gifts, presents, entertainment and other corporate courtesies must be appropriate and reasonable, with the aim of promoting good relations with customers, partners, service providers and suppliers.

Gifts, presents, entertainment and other courtesies are practices of kindness and cordiality accepted in a commercial relationship, which do not characterize the obtaining of benefits or advantages, direct or indirect, in any negotiations, and may, therefore, be accepted by Dux Group employees, in accordance with the Company's Gifts, Presents, Entertainment and Other Corporate Courtesies Policy.

## **NON-COMPLIANT CONDUCTS**

### 1 - INTOLERANCE OF CORRUPTION, BRIBERY OR ANY UNDUE ADVANTAGE (ANTI-CORRUPTION/ANTI-BRIBERY POLICY)

Dux is committed to the laws to prevent and fight against corruption and money laundering, in particular the Brazilian Anti-Corruption Law (no. 12,846/13) and Law

No. 9,613/98, as well as the North American Foreign Corrupt Practices Act (FCPA) and the United Kingdom Anti-Bribery Act (UK Bribery Act), which provides for the crimes of laundering or hiding assets, rights and values, corruption, bribery, among others. The company does not tolerate unethical conduct, especially when it involves acts of corruption, bribery or any other acts that may harm Public Administration, national or foreign.

Corruption is an unacceptable practice in the company, whether on the part of our employees, such as suppliers, partners, representatives and service providers.

Any form of bribery or the practice of any act of corruption with the aim of exerting influence over any public official or public entities in order to obtain or maintain business for DUX, for itself or for third parties, is prohibited, in accordance with national laws and /or international anti-bribery or anti-corruption.

In this way, no employee, such as supplier, partner, representative and service provider, acting on behalf of Dux, may, whether directly or indirectly, accept, offer, promise, grant, authorize the offering of bribes, kickbacks, unlawful commissions , payments or any other means that could be perceived as such, to a third party for the purpose of influencing or giving the appearance of influencing their actions, their inaction or decision, to take undue advantage to the company or themselves.

An illegal or undue payment or offer, under the terms described above, can destroy the company's image, in addition to generating civil and even criminal liability for Dux and the employee involved.

## 2 - CONFLICT OF INTEREST

Conflict of interests occurs in situations where the personal interests of employees, administrators, interns, young apprentices, business partners, external providers, suppliers and anyone who provides services on behalf of DUX or its controlled or affiliated companies are opposed to the interests of Dux or may cause damage or losses to the Company.

Examples of situations that cannot happen:

- Any type of favor, material or financial advantages that an employee receives from one of our suppliers, partners or service providers.
- Carrying out, by the employee, of other professional activities that may interfere with DUX's business, even if carried out outside working hours.
- Misuse of privileged information obtained within DUX.
- Kinship or affective relationship between employees or between employee and supplier, partner or service provider that compromises impartiality in business.
- Any unjustifiable favoritism, directed by the employee towards a specific client, to the detriment of other clients or the interests of DUX itself, especially when that professional maintains any social or affective relationship with the favored person.
- Parallel activities carried out by the employee during working hours or using DUX resources.

## CONFIDENTIALITY

Confidential information that the employees have access to as a result of their work at Dux and that has not yet been publicly disclosed by the company ("Confidential Information"), must be kept in absolute secrecy so as not to harm the company's business, especially publishing it or disclose it to any of our competitors.

Examples of this Confidential Information are: Dux's strategies, methods, budget, business plan, results, presentations (printed or electronic), manuals, books, handouts, records, electronic files, emails and other documents, as well as technical information relating to the services. Protection against unauthorized disclosure and use of such Confidential Information is extremely important for maintaining Dux's competitive position and reputation.

Confidential information must not be subject to misuse or disclosure during or after the end of the employment contract or contract for the provision of services to Dux. Employees should exercise caution when discussing confidential information in public spaces where others can overhear the conversation, as well as avoiding reading documents with confidential information in public spaces and not disposing of them in places where others can retrieve them.

## **DONATIONS, POLITICAL CONTRIBUTIONS AND SPONSORSHIPS**

It is possible for DUX to make or receive donations or collaborate with sponsorships. None of these activities is illegal or violates any of the rules contained in this Code, but, in each case, it is necessary to obtain express authorization from senior management.

### 1 – DONATIONS

In order not to incur illegality or generate image risk, the donation requires additional care, such as authorizations, understanding who the beneficiaries will be, transparency, evidence, contracts and accountability.

DUX prohibits any Donations to obtain or retain any improper advantage for the company or employees.

Donations must be previously analyzed and approved by the responsible Departments and senior management and will not be granted exclusively to individuals.

### 2 - POLITICAL CONTRIBUTIONS

Political Contributions include, but are not limited to, financial contributions, or provisions of goods or services, to political parties, candidates or their staff.

Dux must not make Political Contributions even if permitted by local legislation, employees are prohibited from promising, offering, authorizing or giving, directly or indirectly, Political Contributions to political parties or candidates for public office with the resources or on behalf of Dux, except in situations previously approved by senior management.

### 3 - SPONSORSHIPS

DUX carries out Sponsorships – the transfer of financial resources to for-profit or non-profit entities to carry out projects or events for commercial, technical and/or promotional purposes.

Sponsorships provide the company with clear and specific benefits, such as publicity, participation in events, visual identification or brand exposure.

DUX prohibits any Sponsorship made with the purpose of obtaining or retaining any improper advantage for the company, directly or indirectly to any collaborator or Third Party.

Sponsorships must be previously analyzed and approved by the responsible Departments and senior management and will not be granted exclusively to individuals.

## **HUMAN RIGHTS AND FAIR LABOR PRACTICES**

### 1 - CHILD, SLAVE OR FORCED LABOR

DUX does not tolerate the use of child labor, slave labor or forced labor throughout the business chain and conducts its activities with respect for human rights and dignity. In addition, it seeks, in its relationships, companies that share this value.

### 2 - HEALTH AND SAFETY

We expect our customers, partners, service providers and suppliers to commit to implementing the highest standards of health and safety at work, providing a safe and adequate work environment, in order to preserve the health of employees, protect third parties and prevent accidents and occupational diseases.



### 3 - DATA PROTECTION AND DISCLOSURE OF INFORMATION (LGPD)

We are committed to protecting the security and privacy of personal data provided to DUX by employees, customers, third parties and others, always respecting the General Data Protection Law, and current and applicable international laws.

### 4 – SUSTAINABILITY

DUX understands that only an attitude that relates economic efficiency and social responsibility can guarantee corporate sustainability, aiming at building a better society.

In this way, it seeks a balance between economically viable businesses that generate profits within good corporate governance practices, adopting the commitment to seek business growth in an ethical, responsible manner and with respect for the environment, the people with whom it relates and to the community in which it operates.

### 5- ENVIRONMENT

Employees, customers, partners, service providers and suppliers must comply with all environmental laws, regulations and standards, as well as ensure an effective system to identify and adjust potential dangers to the environment.

## **CONFORMANCE WITH THE CODE OF ETHICS, CONDUCT AND COMPLIANCE**

Dux reserves the right to verify compliance with the requirements of this Code of Ethics, Conduct and Compliance whenever it deems necessary, upon prior notice. Any failure to comply with the obligations stipulated in this Code of Ethics, Conduct and Compliance is considered a serious violation.

Employees, customers, partners, service providers and suppliers recognize and accept compliance with all elements of this Dux Code.

## **APPLICATION OF THE CODE**

Dux is committed to preventing and detecting behaviors that constitute a violation of this Code and any violations of the Code that are detected will be evaluated, including if necessary, disciplinary action may be applied to the employees involved, which may even result in the termination of their employment contract, in accordance with the company's policies and procedures, in addition to adopting the appropriate legal measures.

Responsible departments and senior management are responsible for ensuring compliance with the Code and all policies, and must immediately report any violation of the Code or any other violation to the respective human resources or legal departments and must take steps to remedy violations or deficiencies in terms of compliance, including through the application of appropriate disciplinary actions.

Officers who fail to exercise proper supervision will be subject to disciplinary action up to and including termination of employment.

In the case of non-compliance with the Code of Ethics, Conduct and Compliance by suppliers, partners, service providers, this may result in contractual termination and, consequently, the elimination of the company's registration in the DUX database.

## **FINAL RECOMMENDATION**

The Dux Code of Ethics, Conduct and Compliance describes our commitment to ethics and integrity and serves as a guide for all employees.

Our goal is to provide everyone with the information and tools necessary to perform their duties and maintain the trust of customers, partners, service providers and suppliers in which we are present.

In case of doubt or if you find yourself in a situation where you don't know what to do, contact your manager or the company's human resources or legal department, or directly via email: [ouvidoria@go-dux.com](mailto:ouvidoria@go-dux.com).

Any employee who violates the principles of this Code and other policies will be subject to the disciplinary measures described in our sanctions policy.

Acting in a respectful and ethical manner to the principles of the DUX Code helps to ensure the company's continued success.

### CONTACT DUX:

- **SITE:** [www.go-dux.com](http://www.go-dux.com)
- **EXTERNAL CONTACTS** (CUSTOMERS, PARTNERS, SERVICE PROVIDERS and SUPPLIERS)

Use the ombudsman channel: e-mail: [ouvidoria@go-dux.com](mailto:ouvidoria@go-dux.com)

- **INTERNAL CONTACTS** (EMPLOYEES)

Through the intranet via internal channel

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# TERM OF KNOWLEDGE & COMMITMENT

## TERM OF ACKNOWLEDGMENT AND COMMITMENT

I hereby state that I have received, read and am aware of and in accordance with the provisions of the DUX CODE OF ETHICS, CONDUCT AND COMPLIANCE.

I assume the obligation to fully comply with it in my activities related to DUX, including the non-disclosure of information, whether during or after the term of my employment or service contract.

Likewise, I agree to follow the guidelines and regulations adopted by Dux, comply with current legislation and maintain the good faith of my acts before public and/or private bodies and agents.

NAME OF THE INDIVIDUAL: \_\_\_\_\_

CPF (NATIONAL REGISTER OF INDIVIDUAL TAXPAYERS): \_\_\_\_\_

COMPANY NAME: \_\_\_\_\_

CNPJ (NATIONAL REGISTER OF CORPORATE TAXPAYERS): \_\_\_\_\_

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

