

CODE OF ETHICS

OUR WAY OF NAVIGATING



MESSAGE FROM THE PRESIDENT



More than rules, attitudes!

It is with this phrase that I begin my message, as I believe it leads us to an important reflection on the main subject of this Code: **ethics**.

More than a choice, ethics needs to be reflected in our everyday attitudes, whether when we are in a crowd or when we are alone.

We have to act correctly and encourage everyone around us to do the same to create a more fair and equal environment.

Choosing the right path isn't always easy, but I'm sure it's the only one possible for those who want to pursue their personal and professional paths calmly and with integrity.

This document aims to help apply the essential values of Hidrovias do Brasil and reinforce our Sustainable Commitment to Ethics and Transparency. It also seeks to guide employees and third parties who act on behalf of or have a relationship with Hidrovias do Brasil, regarding the conduct expected by each of them.

Therefore, I invite everyone to read this content carefully!

We can only act and engage with what we know. Therefore, knowledge of the principles and standards is the first step towards acting ethically and sustainably, both in our personal lives and in our businesses.

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ALL ABOARD!

This Code of Ethics ("**Code**") is an integral part of the Compliance Program of Hidrovias do Brasil S.A (HBSA) and all its subsidiary companies ("**Hidrovias**" or "**Company**").

It applies to members of the Board of Directors and its advisory Committees, members of the Fiscal Council, members of the Executive Board, employees, interns, apprentices, consultants, suppliers, subcontractors, representatives and any others who act on behalf of Hidrovias. Everyone should know the OUR WAY OF NAVIGATING guide so that we can navigate together and always follow the right path.

The Code will be periodically reviewed and updated under the responsibility of the Compliance area, with approval by the Board of Directors.

OUR WAY OF SAILING

ETHICS and TRANSPARENCY are part of the pillars of our Sustainable Commitment, in addition to being essential values in our activities and fundamental to our reputation and success.

This Code of Ethics establishes the expectations regarding the conduct that Hidrovias expects from EVERYONE who represents or has relationships with it.

It is everyone's duty to conduct business in a way that fully observes our values and the standards applicable to our activities, therefore, we must make sure that the members who work under our supervision or together with us also know and follow the standards contained in this Code.

In addition to being a guide to OUR WAY OF NAVIGATING, the Code is

also an excellent management tool, as it allows us to constantly reflect ethically on choices and decision-making.

Therefore, if you still have any doubts, even after knowing this Code of Ethics, about OUR WAY OF NAVIGATING, don't take any chances and look for one of these options:

- Direct manager or the manager of your contract with Hidrovias;
- Compliance Team, through the email duvidas@compliance.com.br
- Hidrovias Human Resources Team
- Compliance Multiplier
- Hidrovias Ethics Channel

OUR VISION, MISSION AND VALUES



MISSION

To provide **quality services**, using the waterway modal and always prioritizing sustainable development and ethics.



VISION

Be the **best integrated logistics operator** in South America.



VALUES

- **Honesty, integrity, and transparency;**
- **Value generation** for shareholders and customers;
- **Excellence** in operational safety;
- **Environmental** and community **responsibility;**
- **Valuing the team** and the internal environment.



HOW WE NAVIGATE

COMPLIANCE

Simply and objectively, ethics is **“doing the right thing”**.

We do not accept opportunities that violate business ethics precepts and we do not believe in shortcuts or easy paths. We prefer to renounce opportunities when we realize that they do not meet our ethical precepts, that is, that they are not in COMPLIANCE.

Controlling this compliance is what we corporately call COMPLIANCE.

Our Compliance Program is the result of the commitment with which we carry out our business, always concerned with integrity and acting strictly within the laws, formed by a set of procedures to prevent and detect misconduct.

- Always act ethically, respecting others and their differences
- Prevent any type of retaliation against anyone who communicates wrong attitudes within Hidrovias
- Do not condone non-compliant conduct, especially if this puts someone's safety at risk
- Protect your own health and physical integrity, as well as that of your coworkers
- Ensure that relationships with all partners are correct and within good competitive practices
- Discern between right and wrong, taking care of your reputation and the reputation of Hidrovias
- Ensure that your actions never cause the risk of non-compliance with legislation

HOW WE NAVIGATE

ETHICS CHANNEL

Through the ETHICS CHANNEL, the internal and external public can communicate, in a confidential and secure manner, conduct that may represent a violation of this Code of Ethics, internal policies, guidelines, procedures or relevant legislation.

- Available 24 hours a day, 7 days a week
- 3 languages (Portuguese, Spanish and English)
- Reports are received by a third-party, independent and specialized company, with no type of tracking and ensuring confidentiality
- Manifestation can be carried out anonymously
- Tracking your report using a unique protocol number.


The information provided to the ETHICS CHANNEL is strictly confidential, except in situations in which Hidrovias has a legal obligation to inform government bodies and authorities. Furthermore, cases involving illicit conduct may be referred to the competent authorities, making those responsible subject to administrative, civil or criminal proceedings.


WE DO NOT TOLERATE RETALIATION. Hidrovias is firmly committed to ensuring that, when speaking out through the ETHICS CHANNEL, people do not suffer any type of retaliation, intimidation or harassment. We warn that disciplinary measures are planned to combat this type of situation.

Do not condone conduct that is not in accordance with OUR WAY OF NAVIGATION! Cooperate in our investigations, use one of our channels and REPORT!

 Online Form: <https://canaldeetica.com.br/hbsa>

 Email: etica@hbsa.com.br

 Free call
 Argentina 0800-666-0653
 Brazil 0800-377-8047
 Paraguay 009-800-542-016 (landline call)
 Uruguay 000-401-91168

 WhatsApp: +55 11 99490-0091

ETHICS COMMITTEE

The Ethics Committee ("**Commission**") is the body responsible for monitoring and evaluating the Compliance Program, including ensuring the application of the guidelines in this Code.

As guardians of our compliance, all manifestations received by our ETHICS CHANNEL will be forwarded to this Committee.

The members of the Commission have the duty to keep the information received confidential and all reports, without exception, grant the complainant anonymity.

In addition to the statements received through the Ethics Channel, the Ethics Committee will monitor training on this Code and other procedures linked to the Compliance Program.

The Committee is independent and its members, in addition to the Compliance Officer, are the President and directors of the Legal and Human Resources areas. You can even count on invited members from the most diverse areas to help with the evaluation and monitoring of specific topics.

The results of the Ethics Committee's work are regularly presented to the non-statutory Audit Committee and the Hidrovias Board of Directors.

WORK ENVIRONMENT



We believe that all professionals should be treated with dignity and respect.

A healthy and stimulating work environment is the difference that will attract and retain the talents necessary to achieve our mission, generating an atmosphere of healthy competitiveness among market competitors and resulting in mutual respect and improvement of logistics services.

HEALTH AND SAFETY

At Hidrovias, ensuring the Health and Safety of our employees and partners is a **RULE**. When carrying out our activities, the protection and appreciation of life come first.

- Ensure that Hidrovias takes all necessary measures for you to carry out your activity safely
- Know and strictly comply with internal occupational health and safety standards
- Correctly use Personal Protective Equipment (PPE)
- Always be proactive, preventing accidents and reporting any imminent risk situation
- In case you feel exposed to risk of any nature, do not proceed with the task and immediately inform leadership
- Seek quality of life through healthy practices and, above all, balance between personal and professional life
- Know that all actions aimed at property security must be within the law and, under no circumstances, can they invade your privacy or embarrass you

PREJUDICE, HARASSMENT and DISCRIMINATION

We respect all individuals and do not tolerate any discrimination of a political-ideological, ethnic-racial, social, economic, cultural, regional, religious, gender, sexual orientation, age or any other nature. We also do not tolerate situations that constitute disrespect, intimidation or threats in relationships between professionals, regardless of their position in the Company. We value differences and consider them an essential part of human diversity.

We believe that people should be treated with dignity and respect and, therefore, we do not tolerate any type of discrimination or harassment.

What is harassment?

"Harassment" is the use of a privileged position by a professional to humiliate, disrespect or embarrass another professional, repetitively and for a long time, during the workday or in the performance of their duties.

There will be moral harassment when there are constant vexatious, embarrassing and humiliating situations during the performance of your role. And there will be sexual harassment when a professional advantage is offered or a disadvantage is threatened on the same terms to obtain a sexual favor.

We do not tolerate harassment, regardless of the hierarchical level of the harasser.

- Repudiate any type of harassment, prejudice, retaliation or discrimination
- Ensure that relationships between Hidrovias' employees, at all hierarchical levels, are based on respect, commitment, loyalty and team spirit
- Report any act of discrimination, harassment or retaliation to Hidrovias' direct manager, the Compliance area or through the ETHICS CHANNEL.

DRUGS, ALCOHOL AND WEAPONS

We believe that the consumption of drugs, alcoholic beverages and tobacco, as well as the carrying of weapons, chemical devices or explosives, threaten the health and safety of our people. They compromise performance and expose our safety, in addition to damaging the work environment and affecting our image.

The following are strictly PROHIBITED while commuting to the workplace, or in any situation in which you are carrying out your duties:

- The possession, distribution, sale, manufacture, consumption or use

of alcohol, drugs or any other illicit substance

- Smoking inside any Hidrovias facilities, except in places specifically designated for this purpose
- The carrying of weapons by unauthorized persons on Hidrovias premises, or in the means of transport provided by it

Make sure that professionals who, due to their role, are carrying weapons or explosive devices are qualified, trained and duly authorized by Hidrovias.

Instruct everyone with whom you interact (employees or third parties, partner companies and their respective employees) that, when acting on our behalf or in our favor, they must follow the same restrictions on the use of drugs, alcohol and carrying weapons.

FUNDS PRESERVATION

We consider corporate responsibility and sustainability in business management, in relations with all stakeholders and in decision making to be fundamental to the success of Hidrovias and, therefore, we must minimize the negative impacts of our actions, seeking balance in economic results, social and environmental.

It is your duty to protect Hidrovias' assets and the assets of third parties under your management. Our assets include not only financial and physical assets, but also clients relationships and intellectual property, such as information about products, services, systems and people.

Furthermore, the materials, instruments and tools that are offered to you to carry out your activities are also part of our assets and we count on you to avoid waste and use the funds that are made available to you exclusively for professional activities.

Remember that the use of **e-mail, notebook and corporate telephone** must also be appropriate and respectful. We do not allow the transmission of or access to content that is inappropriate or prohibited by law, such as games, pornography, discrimination, terrorism, party

WORK ENVIRONMENT

political propaganda or the sale of products unrelated to our business.

The information and messages that are exchanged through e-mail, corporate telephone and other official internal tools are the property of Hidrovias. These messages are monitored and therefore you should have no expectation of privacy regarding matters exchanged using these tools.

In addition to material and financial assets, our reputation is also one of our main assets. We are recognized for undertaking business ethically, for having the trust of our clients, partners and competitors and for always acting with integrity and respect. All people who act on behalf of Hidrovias must avoid any attitude that could compromise our reputation.

- Take care of Hidrovias' assets, as well as the assets of third parties that are under your management, avoiding losses, waste or damage.
- Comply with established policies regarding the use of assets and maintain confidentiality regarding information that directly impacts the Company's value.
- Use all communication systems (telephone, cell phone, e-mail, websites, internal communication networks, among others) consciously, aiming to meet the Company's interests.
- Please be aware that any information written or stored in communication systems is the property of Hidrovias and may be accessed for evaluation. Even if a personal password has been provided, the corporate e-mail and telephone number are for strictly professional purposes.
- Request formal authorization from your manager to install any programs not included in the material provided by the Business Technology area and only install programs that have valid licenses.
- Protect Hidrovias resources against misuse, theft, damage, loss or destruction.

CONFLICT OF INTERESTS



CONFLICT OF INTERESTS

We consider that the personal interests of our people must always be in accordance with those of Hidrovias, thus avoiding any situation in which the professional uses his position, Company facilities or information to which he had access, due to the exercise of his activities, to favor oneself or others.

Employees must not, under any circumstances, allow their personal interests to conflict, or appear to conflict, with the Company's interests.

It is up to each Hidrovias professional to monitor the occurrence of situations that may be characterized as causing, or potentially causing, a conflict of interest. Therefore, we expect our professionals to identify and report any noted risks or concerns regarding certain business practices conducted by anyone working on behalf of Hidrovias, regardless of job position or hierarchical level. The information must be brought **to the attention of the direct manager, the Compliance area (through our Conflict of Interest Form) and/or the ETHICS CHANNEL.**

Report about:

- activities outside the work environment and that may be in conflict with their activities at Hidrovias
- financial interests that may present potential conflicts with Hidrovias
- personal or professional relationships with customers, suppliers, competitors or other employees of the Company

Please be aware that affective relationships are not permitted between Hidrovias' employees who have a degree of direct or indirect subordination, or who may influence the partnership's activities. In case this situation arises, the relationship must be communicated by completing the Conflict of Interest Form and to the local Human Resources manager. In case a conflict is detected, administrative measures must be adopted to mitigate the risks of conflict.

If there is no subordination or influence in activities, people must maintain, within Hidrovias' facilities, an impartial relationship, without personal relationships of any nature affecting their professional posture.

If you have any questions about whether you have a conflict of interest, take it for evaluation by filling out the Conflict of Interest Form. Reject and report any action in which you perceive favoritism or conflict of interest to your manager, Human Resources or directly to the ETHICS CHANNEL.





GIVE-AWAYS, GIFTS AND HOSPITALITIES

Acts of offering, delivering, promising or receiving give-aways, gifts or hospitalities must not occur habitually for the same person (employee or third party) and, under no circumstances, must they compromise, nor give the impression of compromising, the integrity or Hidrovias' reputation.

Any Gift, Hospitality or other benefit may not exceed the value of USD 50.00 per person (or its equivalent in local currency) in a single act. The offer and receipt of Gifts, Hospitalities or other benefits surpassing the said amount are prohibited under any circumstances.

Even Give-aways, which do not have market value, such as advertising materials and those with a logo, if distributed or received in excess

may constitute favoritism and must also be reported and treated with due attention.

Hidrovias employees must immediately report to the Compliance area the receipt or offer of a Gift, Hospitality or other benefit with a value exceeding USD 50.00.

In the Hidrovias Anti-Corruption Policy it is possible to access further details of permissions and restrictions regarding give-aways, gifts and hospitalities. Do not forget to check it out!

DONATIONS AND SPONSORSHIP

Donations made by Hidrovias must be aligned with Hidrovias' Social Investment pillars and its Stakeholder Engagement and Relationship Plan.

Sponsorships are a communication tool used to contribute to the construction of corporate image and must be aligned with the guidelines set out by the Communication and Institutional Relations areas of Hidrovias.

Contributions for the purpose of obtaining undue advantage or as facilitation payments are not permitted.

Whenever they are targeted to public entities or officials, Donations and Sponsorships must additionally respect the limits and guidelines provided at specific laws and those domestic or foreign laws addressing anti-corruption practices.

Both donations and sponsorships must be duly approved by the Ethics Committee and registered for audit purposes, including formal documentation validated by the Legal Department.

In the Hidrovias Anti-Corruption Policy it is possible to access further details of the permissions and processes for making donations and sponsorships. Do not forget to check it out!



PREVENTION OF FRAUD, CORRUPTION AND MONEY LAUNDERING

We believe in conducting our business ethically and responsibly and are committed to promoting integrity in the public or private business environment, acting in complete compliance with legislation.

In addition to generating immeasurable losses for society, corruption deconstructs the basic pillars of companies' operations in a free market, compromising the criteria for choosing better price, quality and service needs.

Hidrovias does not admit any practice of fraud, corrupt or money laundering practices by its domestic or foreign employees, suppliers or clients. We adopt a "zero-tolerance" policy before any action or omission that may reverberate in any breach to the provisions of the Brazilian Clean Company Act, known as the Anti-Corruption Law (Law

PREVENTION OF FRAUD, CORRUPTION AND MONEY LAUNDERING

No. 12.846/13), regulated by Decree No. 11.129/2022 or the rules provided for in foreign laws such as the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA).

What is bribery or corruption?

"Bribery or corruption" is the act of offering, promising, giving or receiving, either directly or indirectly, "something" with the aim of influencing decision-making or obtaining some undue advantage, either commercial, contractual, regulatory or personal which would otherwise not be obtained. The simple promise without the effective delivery of "anything" is also considered as a corruption act.

In addition, corruption is also understood as the acts of fraud, extortion, money laundering, participation in cartel, embezzlement and embezzlement by public agents.

The good offered, received or promised is not limited to cash values. It may also be any benefit or favor, including payment of expenses, offering of gifts, trips, hospitality, entertainment, among other conducts.

These are prone to corruption or bribery: (i) officials or Public Servants; and (ii) entities or employees of private companies.

Hidrovias expressly prohibits the public or private corrupt practice, or any harmful act to the Public Administration Institutions¹. None of the actions described herein may be carried out by any employee or anyone acting on behalf of or at service of Hidrovias, in relation to any Public Official², whether Brazilian or foreign, or even their family members.

¹"Public Administration Institution" is any body or entity that carries out management activities and/or execution of public services, at the federal, state or municipal levels. It is comprised of autonomous agencies or public foundations, Government-controlled companies and further entities directly or indirectly controlled by the Federal, State, Federal District or City Government.

²"Official or Public Servant" is anyone who carries out an activity, whether permanent or not, paid or not, by election, appointment, designation, hiring or any other activity in a Public Administration entity

The following practices are prohibited by the Brazilian Clean Company Law:

- Frustrate or fraud, upon adjustment, combination or any other way, the competitive nature of a public bidding process
- Impede, disturb or fraud the performance of any act in the public bidding process
- Remove or seek to remove a bidder fraudulently or by offering an undue advantage
- Fraud a bid, public contract or any related act
- Obtain any undue advantage or benefit, in a fraudulent manner, for modifications or extensions of agreements entered into with the Public Administration Institutions, without any legal authorization, in the invitation to bid or respective agreements; or
- Manipulate or fraud the economic-financial balance of the agreements executed with the Public Administration Institutions
- Difficult the investigation or inspection activity of bodies, entities or Public Servants

The law provides for a custodial sentence for the crime of bribery, which is punishable by the person involved. The company may be required to pay significant fines and be prevented from selling to Government bodies and entities or lose tax benefits.

Furthermore, Hidrovias may have its reputation and brand seriously damaged due to its involvement in cases of fraud, corruption and money laundering. Therefore, any identification of situations that are contrary to the precepts of this Code will be immediately reported to the competent authorities for investigation, with the Company committed in good faith to assisting with all necessary information.

EXTERNAL RELATIONSHIPS



RELATIONSHIP WITH CLIENTS AND SUPPLIERS

We believe that good, consistent and lasting partnerships are built based on collaboration, honesty, respect and balance in meeting the interests of the parties, including society and, therefore, in our relationships with clients and suppliers we are committed to complying with laws, excellence in service, professionalism, quality of services and sustainability.

- Be committed to fighting corruption, money laundering and terrorist financing and, therefore, only do business with reputable customers and suppliers, involved in legitimate business practices and with honestly sourced funds.

We make decisions about choosing partners, purchasing products and services and serving clients based on objective criteria from a technical, commercial and strategic point of view, complying with all the Company's rules.

You are not permitted to act on behalf of Hidrovias in any operation involving people or organizations with which you (or your family) have any significant connection or financial interest. You may not enter into any negotiations because of your position at Hidrovias or accept or request from a supplier any personal benefit that is not generally available to others, or that is available to you only because of your position at the Company.

- Be strict and do not, under any circumstances, participate in technical or commercial negotiations with suppliers of products or services in which you, your relatives or people with whom you have a close personal relationship have any financial or personal interest. Remember the Conflict of Interest!

PUBLIC REPRESENTATIONS AND INTERACTIONS WITH GOVERNMENT AGENCIES

All of our business and relationships are based on honesty, integrity, impartiality and transparency, as we believe that these are essential values for building a solid and lasting Company. We always seek to establish constructive and sustainable relationships with

EXTERNAL RELATIONSHIPS

governments, at all levels, in accordance with the local laws of the different countries where we operate.

Extortion or facilitation payment

It may happen that a public official abuses his authority to obtain undue advantages. An example is the request for a payment or "favor" to speed up the granting of a license or "prevent" the issuing of an infraction notice. This type of attitude is defined as extortion and no Hidrovias employee should give in to it.

Payments to public authorities are only permitted when expressly provided for by law, and any payment must be previously authorized and preceded by sufficient information about its nature, need, purpose and destination.

Hidrovias **prohibits any payment for extortion or facilitation.**

You must be aware of the limits of your competence in acting on behalf of Hidrovias and not adopt any action that exceeds these limits. Your competence to act on behalf of Hidrovias is limited by laws, regulations, powers of attorney, constitutional documents and statutes.

Remember that you may not sign any document, represent or exercise authority on behalf of Hidrovias, unless you are specifically requested or authorized to do so.

- Act cordially, respectfully, honestly and with integrity when representing Hidrovias, inside or outside its facilities, and must always comply with and act in accordance with the rules established in this Code and the Anti-Corruption Policy
- Remember that only those formally authorized represent Hidrovias in its relationship with the government and in interaction with public bodies or inspection agents
- Always be guided by Hidrovias' ethical principles when

participating in discussions of public policies related to your activities at Hidrovias

- Repudiate any promise, offer, payment or donation of values (money, goods or services) to public agents, politicians or representatives of government departments, national or foreign, except in cases provided for by law
- Monitor, evaluate, guide and monitor the activities of people who represent Hidrovias - consultants, dispatchers, suppliers and partners - with government bodies and ensure that such activities are in accordance with the provisions of this Code of Ethics, policies, guidelines or procedures Hidrovias' employees.

SHAREHOLDERS AND MARKET

Our principle is to offer innovative, quality and highly competitive services and products, with the commitment of being the best investment option for our shareholders and remunerating their capital appropriately, in the short, medium and long term, always balancing their interests and those related to the company.

We guide employees to record information, accounting or otherwise, accurately, unambiguously and in accordance with applicable legislation. Records must be accurate and at the correct time, that is, when they actually occur.

Data related to safety, quality, financial records and other information on the Company's activities are extremely important in decision-making by management and shareholders.

Our Company's books and records will always be maintained in accordance with current accounting principles and guidelines established by shareholders. The retention and proper disposal of records will be carried out in accordance with our financial policies and always in compliance with applicable legislation.

- Always provide all necessary and correct information for records and reports that Hidrovias maintains in accordance with accounting rules and national and international laws.

EXTERNAL RELATIONSHIPS

- Cooperate so that all books, accounts and financial statements have all the details that reflect the financial transactions carried out by the Company, meeting its internal control standards.

COMPETITION

We respect existing competition and antitrust³ laws. At Hidrovias, all actions that may be interpreted as contrary to correct, fair and loyal practices are expressly prohibited.

- Reject any and all actions that may be interpreted as non-competitive, monopolistic, cartelization or contrary to local, national or international laws that regulate competitive market practices
- Openly express Hidrovias' commitment to complying with the laws if a competitor proposes price fixing, market division, boycott of a supplier or client or other actions that undermine competitiveness

POLITICAL PARTIES AND CLASS ENTITIES

We are committed to the development of citizenship, the maintenance of democracy and freedom of expression and we maintain an impartial position in relations with candidates and political parties.

We do not make any type of donations or benefits of any kind for political-electoral purposes

- Remember that you, as a citizen, can have political party participation, but you must express it outside the environment and working hours and exclusively in a personal capacity. Any type of coercion between co-workers is prohibited, whether to encourage or discourage their participation or contribution of any kind, as well as the use of Hidrovias funds and assets for such purpose.
- Please, be aware that you need authorization to act on behalf of Hidrovias in relation to any external official (public entity, media, professional associations, clients, suppliers and communities)

³ Action intended to prevent anti-competitive practices that use market power to restrict production and increase prices, so as not to attract new competitors, or eliminate competition.

- Always keep in mind that no funds, capital or other assets of Hidrovias, even if permitted by law, may be used or donated to political parties, electoral committees, candidates or holders of elected positions.

COMMUNITY

We are committed to maintaining a transparent, open, constant and proactive dialogue with the communities surrounding our operations, in order to effectively contribute to their social, economic and environmental development.

- Always repudiate activities that devalue human beings, such as prostitution and sexual exploitation, whether adult or child.

ENVIRONMENT

We have the responsibility and obligation to comply with environmental standards and legislation in the countries where we operate and to evaluate and control the socio-environmental impacts of our activities, to minimize negative consequences and enhance positive ones, following the guidelines of our Sustainable Commitment.

- Contribute to the preservation and recovery of biodiversity, by managing the potential negative impacts of your activities, minimizing or eliminating them, whenever possible
- Identify, evaluate and manage environmental liabilities acting preventively and correctively

USE OF INFORMATION



INTELLECTUAL PROPERTY

We understand that all knowledge generated in the activities of Hidrovias' employees is the Company's intellectual property.

- Identify and protect registrations, patents, trademarks, copyrights and other proprietary information and those of organizations with which you relate
- Respect the intellectual property of third parties and copyright law, remembering that the use of any piracy (software, music, books, etc.) is strictly prohibited.
- Always keep all security tools implemented by the Business Technology team enabled

SOCIAL MEDIA

We are committed to open dialogue, truth and transparency and, therefore, we provide truthful, clear and objective information of public interest or relevant to the Company's relations which is not considered confidential.

The use of social media on behalf of and for Hidrovias matters is restricted to the area of Institutional Communication. No other professional, whether employed by Hidrovias or not, is authorized to record personal opinions or respond to comments posted on social media on behalf of or in relation to the Company.

The use of social media to express opinions and opinions, even for personal purposes, may negatively impact Hidrovias' reputation, as you may mistakenly imply that your opinion represents the Company's opinion. For this reason, it is important that you use social media respectfully and appropriately, observing the ethical principles covered in this Code of Ethics.

In case you are aware of situations involving the name of Hidrovias on social media, do not interact or respond. Report this fact immediately to your direct manager or the Institutional Communication area. You may also consult the Hidrovias Social Networks Manual for more information on this matter.

PRESS

- Remember that only properly trained and authorized people may speak on behalf of Hidrovias
- Forward requests from media companies (radio, television, newspaper, internet, etc.) to the immediate manager or the Institutional Communication area
- In case the person contacts you directly, inform them that you are not a spokesperson for the Company and that they must communicate directly with the Hidrovias Institutional Communication area.

CONFIDENTIALITY

We are a publicly traded company and as such, we must follow specific rules for the equal disclosure of information among all shareholders. If in doubt about the type of information to be shared, always consult the Institutional Communication and Investor Relations areas.

Confidential information must be treated as such and, for this reason, we must maintain absolute confidentiality regarding any type of fact or knowledge considered strategic, such as accounting and commercial reports, names of clients or partners (potential or existing), proposals, business plans, projects, financial and market projections, technical and operational definitions, etc.

- Remember that the use of confidential information for private purposes or contrary to the interests of Hidrovias, as well as its transfer to any other person, is illegal.
- Keep in mind that all information relating to the Company, which is not public, may not be used for personal gain or that of third parties.
- Please be aware that Hidrovias' entire communication system is subject to periodic evaluation and monitoring in accordance with the law.

DISCIPLINARY MEASURES



Violation of any of the provisions of this Code of Ethics, internal policies, guidelines, procedures or current legislation, as well as non-cooperation with an internal investigation, may have consequences for those involved, for Hidrovias and for society itself. When the deviation is proven, disciplinary

measures compatible with the seriousness of the facts will be applied, which may range from a warning to dismissal with or without just cause, termination of the service provision contract, commercial partnership agreements, among others.

The application of any of the disciplinary measures described above will be defined by the Ethics Committee according to the seriousness of the infraction.

The application of a sanction does not depend on another, and it is possible, for example, to be dismissed for just cause without the need for a prior warning, in accordance with applicable legislation.

Finally, the use of the internal disciplinary sphere will not limit the implementation of applicable legal measures to repair any damage caused to Hidrovias or its clients, who may take the appropriate measures for eventual compensation, including monetary compensation, if applicable.



TERM OF ENGAGEMENT

I confirm receipt of the Code of Ethics, in addition to having participated in specific training on its content and how to use it.

I am aware that the principles and conduct described in this document must be followed by all employees and business partners.

I am responsible for fully complying with the rules, and in case of doubt, contact the Compliance area, or report any misconduct in NOSSO JEITO DE NAVEGAR [OUR WAY OF NAVIGATING] through the available channels (Ethics Channel).

Remember: Our code of ethics is an integral part of your employment contract!

Name (printed name):

Position:

Area:

Signature:

Date:
