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2023

# MANAGEMENT POLICY

491 25 de Mayo Street Floor 3 | Torre 58



**Know** our clients and other stakeholders with an impact on the achievement of our goals, listen to them and **deeply understand their needs and expectations**.

**Full satisfaction of our clients**, offering and performing, in accordance with our mission, services which fulfill their demands, contemplating applicable legal and regulatory requirements, the requirements of other stakeholders and the values of our organization, seeking to **provide the best solution** tailored to our client's needs in relation to international trade.

Clients can rely on us with confidence since their international trade business will be part of our own business. This is the backbone of our **ethics** and **professionalism**.

We encourage an environment of **transparent exchange**. Thus fostering both internally and with our strategic suppliers a constant fight against **corruption, smuggling, terrorist acts money laundering** and any other type of unlawful business. For this, we develop security procedures in the relationship with our strategic customers and suppliers.

Within this framework, we have adopted a **zero tolerance policy to bribery** practices as regards members of our organization, or by members of our organization, and/or strategic suppliers in connection with other agents (acting on behalf of our company). We are committed to comply with anti-bribery laws applicable to our organization, and to create and maintain safe channels for filing complaints, while ensuring confidentiality, reception and ethical treatment to avoid retaliation by the Ethics Committee. If reasonable evidence is found, corrective and disciplinary measures shall be applied. These may include, as the case may be, disassociation from the organization and reporting to relevant bodies.



The **confidentiality** of all the information involved in our services is only limited where suspicions of potential offences (such as money laundering and customs offences) arise, in which case such information will be promptly communicated to the competent authorities, offering them all the relevant background and documents.

Demand our **strategic suppliers** and **sub-contractors** supplies and services, enabling us to ensure the **best solutions** to our clients.

Engage **suppliers in line** with our “Management Policy” and “Code of Ethics and Behavior”, interacting with them in an effective manner and in accordance with **ethical standards** in order to accomplish our **shared goals**.

Development of the **ability to detect and analyze risks and opportunities**, and **implement actions, mitigate and eliminate** said risks, whenever possible, as regards:

- Information security
- Business partners security (clients and strategic suppliers)
- Cargo security (as applicable)
- Personnel security
- Corruption
- Security of premises
- Business continuity
- Sustainability
- Management of changes generated by the comprehensive management system

Constant improvement of **our staff's competences**, providing a suitable framework for technical, professional and human development.

Promoting a **continuous improvement** of our processes, and an integrated management system.





This Policy is reviewed by the Board on a regular basis as part of the “Comprehensive Management System Check”, as well as in the case of an acquisition of or merger with any other organizations or any other changes to the business which could affect the company’s continuity.

The Board is liable for the reliability and transparency of operational information used in the decision-making process and of the information shared with stakeholders, as well as for managing the results and impact of the company’s operations.

(\*): A stakeholder is any individual or entity who may affect, be affected or appear to be affected by a company’s decision or operation, such as the company’s personnel, the National Customs Service (DNA), the National Ports Administration (ANP), the Internal Revenue Office (DGI) and joint owners.



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