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# 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 (national and international), 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 is part of our own business. This is the backbone of our **ethics** and **professionalism.**



We encourage a climate of **transparent exchange.** In this sense, to the extent of our abilities, we foster, internally and with our clients and strategic suppliers, the prevention of **corruption, smuggling, trafficking of counterfeit goods, arms trafficking, terrorist-financing, money laundering, drug trafficking** as well as any other type of unlawful business. In furtherance of the above, we develop security procedures applicable to our transactions and to the relationship with our business partners: clients 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, due reception and ethical treatment to avoid retaliation by the Ethics Committee. If reasonable evidence is found, corrective and disciplinary measures are applied. These may include, as the case may be, disassociation from the organization and reporting to relevant agencies. The Ethics Committee has an ample jurisdiction and independence, ensuring a reliable treatment and due process of law, as regards any doubt, suspicion or complaint received.



The **confidentiality** of all the information involved in our services is only limited where grounded suspicions of potential offences (such as money laundering, corruption and customs offences) arise, in which case such information shall be promptly communicated to the corresponding authorities, together with all 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 aligned** 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**.

Develop at all levels the **ability for recognition and assessment of risks and opportunities**, and **implement actions** to address them, whenever possible, regarding:

- Information security
- Business partners security (clients and strategic suppliers)
- Cargo security (as applicable)
- Employees' 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.

Promote a culture of **Safety and Sustainability** in our organization and supply chain, a **continuous improvement** of our processes and comprehensive management system, as well as compliance with the comprehensive management system requirements.



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 and its comprehensive management system.

(\*): A stakeholder is any individual or entity who may affect, be affected or appear to be affected by a company’s decision or business, such as members of the organization, government agencies, and joint owners.



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