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Internal Policies and Institutional Commitments

1. About Exportadora São Francisco

Exportadora São Francisco (ESF) has operated as a General Ship Supplier since 1990, headquartered in São Francisco do Sul, Santa Catarina, and serving the main ports of Southern and Southeastern Brazil. We supply provisions, bonded stores and technical materials to merchant vessels, offshore support vessels and other ships calling at these ports.

This document sets out ESF's internal policies and institutional commitments towards employees, clients, suppliers, authorities and the maritime community. It applies to all employees and, where relevant, to suppliers and service providers acting on ESF's behalf.

2. Food quality and safety

The supply of provisions is ESF's core activity. Food safety is part of our quality management system, structured in accordance with ISO 9001.

- **Origin:** we buy only from suppliers registered with the competent health authorities, with traceability of origin, batch and expiry date.
- **Storage and shelf life:** stock is controlled by batch and expiry date, issued on a first-in, first-out (FIFO) basis, and kept under temperature and hygiene conditions suited to each product category.
- **Cold chain:** chilled and frozen products are transported in refrigerated vehicles, keeping the correct temperature from our warehouse to delivery on board.
- **Health compliance:** we follow Brazilian health regulations for food storage and transport, including ANVISA Good Practices (RDC 216/2004) and local health authority requirements.
- **Non-conformity and recall:** products suspected of non-conformity are blocked in stock. When a batch already supplied is affected, we notify the client and the vessel, identify the deliveries involved through batch traceability and arrange replacement.

3. People, diversity and human rights

We respect fundamental human rights in all our operations, ashore and on board.

- **Equality and non-discrimination:** we do not accept discrimination based on race, colour, gender, religion, sexual orientation, age, nationality, marital status or disability, including in recruitment, pay and development opportunities.
- **Harassment prevention:** we do not tolerate moral or sexual harassment. Employees receive training on the subject, with attendance records.
- **Child and forced labour:** we do not accept child labour, forced labour, debt bondage or any form of exploitation, in our operations or in our supply chain.



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- **Freedom of association:** we respect workers' right to join trade unions, to collective bargaining and to freedom of expression.
- **Occupational health and safety:** we comply with Brazilian occupational safety regulations, provide the protective equipment required for each role and train employees for warehouse, loading and on-board delivery activities.

4. Ethics, anti-corruption and compliance

- **Code of Conduct and Employee Handbook:** the Code of Conduct sets the ethical and behavioural standards required of employees, suppliers and service providers. The Employee Handbook details internal workplace rules. Every employee receives both documents on joining, with a signed record of receipt, and is periodically briefed on the policies described here.
- **Anti-corruption:** we comply with Brazilian Law 12.846/2013 (Clean Company Act) and do not accept bribes, kickbacks or facilitation payments to public or private agents, including port authorities, crew members and client representatives.
- **Conflicts of interest:** employees must report to management any situation in which a personal interest could influence a purchasing, sales or hiring decision.
- **Gifts and hospitality:** gifts and courtesies offered or received must be of moderate value and institutional in nature, with no link to purchasing or hiring decisions or preferential treatment.
- **International sanctions:** we do not supply vessels, shipowners or companies subject to UN, US (OFAC) or European Union sanctions, and we screen against these lists whenever there is an indication of risk.
- **Payments and anti-money laundering:** we accept payments only from the parties identified in the transaction or their formally appointed representatives, through regulated financial institutions.
- **Customs compliance:** the supply of bonded stores and goods under special customs regimes follows Brazilian Federal Revenue Service (Receita Federal) regulations, with documentary control of every delivery on board.

5. Suppliers and subcontracted services

- **Supplier evaluation:** suppliers are evaluated when engaged and monitored periodically for legal and health compliance, quality and on-time delivery, and these evaluations are recorded.
- **Applicable requirements:** we expect suppliers and service providers to follow the principles in this document, in particular those on child and forced labour, anti-corruption and the environment.
- **Subcontracted services:** when hired for services it does not perform directly, ESF uses providers holding the licences and authorisations required for the activity, monitors the service and keeps supporting documentation available to the client.



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6. Privacy and data protection

- **LGPD (Brazilian General Data Protection Law, Law 13.709/2018):** we process personal data of clients, crew members, employees and suppliers only for the purposes required by our activities, in accordance with the LGPD.
 - Data controller: Exportadora São Francisco, CNPJ 81.766.198/0001-10
 - Data protection officer: Mariana Heleno, ouvidoria@exportadora-sf.com.br
- **Confidentiality:** commercial and contractual information of clients and suppliers is treated as confidential. Access to company systems is individual, password-protected and limited to what each role requires.

7. Environment

- **Own operations:** we sort and correctly dispose of waste generated at our warehouse, such as packaging, cardboard and plastics, and reduce product waste through shelf-life control.
- **Subcontracted services:** services with environmental impact contracted through ESF are performed by licensed providers, in compliance with applicable environmental legislation, and supporting documentation is passed on to the client.
- **Awareness:** we brief employees on the responsible use of resources and correct waste disposal.

8. Contact channel, review and validity

- **Whistleblowing channel:** employees, service providers, clients and suppliers may report breaches of these policies by email to ouvidoria@exportadora-sf.com.br or anonymously through the form at bit.ly/ouvidoriaesf. Reports are handled confidentially and there is no retaliation against anyone reporting in good faith.
- **Evidence:** on request, ESF provides clients and regulators with the records demonstrating compliance with these policies, such as training records, supplier evaluations and quality controls.
- **Review:** this document is reviewed annually, or earlier in the event of relevant changes in legislation, in the company's activities or in client requirements.

São Francisco do Sul, Brazil, October 2026.

The Management – Exportadora São Francisco

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