



Hanseatic Global  
**Terminals**



# **CODE OF ETHICS**

It is these values that **shape the way we do business** and model the corporate identity by which we are recognized.





# Our corporate values as a starting point

## We embody our values

We believe that the company's success depends on our ability to make our corporate values and culture our own and to demonstrate them in each of our actions and in how we relate to each other, take on responsibilities and make decisions.

These values frame how we do business and shape the corporate identity for which we are known.



## 1. WE CARE

At the heart of our business is our care for people, for the environment, for generations to come. Our people – be it customers, colleagues, communities, partners or investors – they are our number one priority. For our customers, communities and partners – our people are our most important asset.

## 2. WE MOVE

By developing people, ideas, and solutions, we grow together. Continuous improvement is fundamental to our progress. We connect global trade through our terminals, ensuring cargo arrives at its destination. We are nimble in our approaches and stay ahead of our changing dynamic environment.

## 3. WE DELIVER

In a world constantly on the move, people trust us to manage their cargo safely, reliably, and responsibly. We deliver on our promises. People and customers can count on us to deliver top service quality.

# Code of Ethics

## A Commitment by All

### What is it for?

The Code of Ethics, based on the corporate values that lay the foundation for Hanseatic Global Terminals' culture and identity, establishes the company's position on certain relevant aspects of its management and serves as a guide for implementing these values on a daily basis.

This Code also inspires the standards found in corporate policies and procedures, internal regulations, manuals, management systems and other guidelines currently in force. However, it does not cover every possible situation that may arise, nor does it constitute a compendium of the laws and regulations that cover the various areas of compliance in the different territories in which the company operates.

### What is the target audience?

The principles contained in this Code apply to both domestic and foreign employees, executives and directors of Hanseatic Global Terminals and its subsidiaries, without exception. All our associates are also invited to adopt the principles and standards contained herein.

It also applies to all those who interact with the company and who form part of our immediate environment, whether through the provision or rendering of services as suppliers and contractors, or acting on behalf of and/ or under the instructions of Hanseatic Global Terminals.

### Who is responsible for compliance?

Each employee, executive and director is required to know this Code and is responsible for understanding and complying with its provisions in exercising their duties. Failure to comply with the principles defined herein may lead to internal and, in some cases, even judicial disciplinary action. Likewise, any employee, executive or director who becomes aware of a violation of this document must promptly report it through the relevant channels.

### Where can I get more information about the Code?

In this document, each corporate value is linked to a number of relevant issues, ethical principles and commitments, as a foundation for action. However, if you have any questions or concerns regarding its interpretation or application in these cases or others not addressed in this document, please turn to the following sources of information:

- Direct supervisor or area SVP
- CEO or General Manager
- Ethics Committee
- Compliance Officer



# How to put the Code of Ethics into practice in our daily lives

When faced with a potentially complex problem or decision that could impact our ethical conduct, ask yourself these questions and act accordingly:







## Our business ethics

We frame our actions based on integrity and transparency, avoiding conflicts of interest. We repudiate any act of corruption, bribery, illegal agreements between competitors or any other illicit act, and we guide our relationship with suppliers, competitors, customers, business partners and authorities in the same context.

### 1. CONFLICT OF INTEREST

- We strive for our employees, executives and directors to fulfill their duties without conflicts of interest that compromise the quality of their work or influence their ability to make decisions in Hanseatic Global Terminals' best interest. Conflicts of interest arise when the interest of a person—financial or otherwise—interferes with, affects or appears to interfere with or affect, in any way, his/her judgment, objectivity and independence in the decisions that he/she must make in the fulfillment of his/her duties.
- A current or potential conflict of interest does not necessarily constitute a breach of this Code, insofar as such a conflict is not explicitly prohibited. However, failure to report it in a timely manner is a violation.
- We must refrain from making decisions or undertaking actions in the event of a conflict of interest and we must notify direct management and other bodies established by the company for this purpose, always and without exception.
- We respect the rights of employees, executives and directors to engage in activities outside the company, as long as they do not harm, interfere or conflict with the performance of their duties.



### The following is specifically prohibited:

- Engaging in negotiations on one's own behalf or for third parties within the scope of the businesses in which we operate.
- Proposing or trying to approve businesses, policies or decisions that are not in the interest of the company, such as: i) granting commercial benefits or special deals to customers and/or suppliers with whom the employee is directly or indirectly related (through a relative or stake in a company); or ii) hiring, supervising or directly reporting to (or in the same operating area) a relative, partner or person with whom we maintain a close relationship that affects our impartiality and objectivity.
- Developing activities that compete or appear to compete with company interests (in a personal capacity, through a relative or stake in a company), or that adversely affect our work performance or interfere with our responsibilities in our area, even if these are carried out outside the company's premises and after hours.

## 2. CORRUPTION AND BRIBERY

We strive to develop our activities and achieve our business objectives by acting honestly, transparently and in good faith.

Nobody who works at Hanseatic Global Terminals can directly or indirectly engage in behavior with third parties in order to obtain a favor or an improper benefit from them or distort or alter their regular decision-making processes.

The company rejects any form of corruption or bribery, not only because it is an illegal and unethical act, but also because it alters market conditions, affects good judgment and generates distrust and inefficiencies. Hanseatic Global Terminals rejects and prohibits its employees from offering, promising, granting or consenting to give gifts or personal, cash or in-kind benefits to counterparts, be they customers, suppliers, authorities, public officials, competitors, or others, in exchange for improper actions or omissions pertaining to their position or role, with a view to obtaining or maintaining any improper business or advantage.

## 3. RELATIONS WITH GOVERNMENT ENTITIES, PUBLIC OFFICIALS AND STATE AGENCIES.

Hanseatic Global Terminals' operations play a strategic role in the economic development of the countries where it operates, permanently interacting with government entities, public officials and state-owned enterprises or other government agencies. Hanseatic Global Terminals respects institutions and their authority, maintaining such relationships in accordance with the legal framework in force in each country and in accordance with the highest ethical standards for engaging in accordance with our principles and values.

To prevent practices constituting bribery, the company has established protocols for interacting with public officials in various day-to-day situations in our role as an important pillar of society, ranging from diplomatic or official acts to inspections and permit processing, which also includes the giving of gifts, invitations and hospitality. It also includes measures to prevent acts that may be classified as any form of corruption.

## 4. GIFTS, INVITATIONS AND HOSPITALITY

Gifts, invitations and hospitality offered and/or received may lead to misinterpretation by the recipient and/ or giver. For this reason, Hanseatic Global Terminals prohibits offering or giving third parties, as well as accepting or receiving from third parties, donations or gifts that may be construed as falling outside commonly accepted business practices or courtesy, in keeping with all local regulations and always following Hanseatic Global Terminals guidelines.

If gifts, hospitality and invitations to events or other activities of a public or protocol nature are received from government entities, public officials or state-owned enterprises, within the context of the industry in which Hanseatic Global Terminals does business, these must, without exception, comply with the considerations contained in the protocols governing interaction with public officials, which form part of our Compliance Program.

Any gift, invitation or hospitality given or received must be reported using the channels made available for that purpose in accordance with the guidelines in current Policies and Procedures. They may not be accepted if they seek to influence commercial or business decisions.

## 5. DONATIONS, SPONSORSHIPS AND POLITICAL CONTRIBUTIONS

Hanseatic Global Terminals only grants donations in cash or in kind, based on legislation in force in the territories where it operates, for educational, cultural, sports and social and social-environmental development purposes, strictly following the guidelines set forth for that purpose, without exceptions. Donations in cash or in kind to individuals, for-profit entities or organizations is prohibited, as well as any payment through private or personal accounts, on domestic or foreign soil. Likewise, no contributions are allowed to institutions whose objectives are inconsistent with our ethical principles and corporate values, or any contribution that could damage our reputation.

Hanseatic Global Terminals does not finance activities classified as political or make contributions, in cash or in kind, to parties, candidates for public office or their representatives, in any of the countries where it operates. Prohibited political activities or contributions include, but are not limited to:

- Sponsoring or hosting functions or events organized by, or associated with, any political party, politician, or candidate for public office for the explicit purpose of fundraising.
- Using company facilities or equipment free of charge or at a discount as a gift in kind to a political party.

Workers, executives and directors may personally participate in political campaigns and processes, clearly specifying that it is in a personal capacity and that they do not represent the company.





## 6. LIABILITY OF LEGAL ENTITY IN THE EVENT A CRIME IS COMMITTED

The legal entity's liability is based on failure to comply with its duties of management and supervision when one of its shareholders, directors, senior executives, representatives or other individuals performing managerial or supervisory activities, or the persons under direct management or supervision of any of them, commits one or more of the crimes indicated in that law, provided that it was committed while acting for or in the interest of the legal entity.

In Chile, Law No. 20,393 establishes the criminal liability of legal entities in the event a crime is committed. In the jurisdictions where we operate, similar laws have been passed in recent years establishing criminal liability for companies in the event of crimes related particularly to corruption in all its forms, in line with the OECD guidelines on combating bribery in international business transactions, creating systems for criminal indictment and sanctioning systems for individuals and for companies when they do not have management and control methods for preventing illicit acts. Jurisdictions without such legislation should consider the guidelines in this Code and other Hanseatic Global Terminals corporate policies. Similarly, the standard established here will be applied when the local standard is more lenient.

As a company, our main goal is to maintain business relationships based on trust, integrity and transparency with customers or suppliers involved in lawful business activities whose funds come from legitimate sources and activities; and who likewise share our values and ethical principles in the business we do together. For that reason, it is expressly prohibited to engage in any conduct that can give rise to criminal responsibility for the commission of crimes, and, therefore, generate criminal liability for the individual directly committing the illicit act as well as for the company.

Each employee is responsible for knowing and complying with the controls that the company has implemented as preventative measures, which are set forth in the respective Internal Order, Hygiene and Safety Rules, if any; in their respective employment contracts or contract appendices; in the Compliance Program and the Crime Prevention Model and its policies, procedures and complementary handbooks; in other documents and/ or communications they receive due to their position. Similarly, employees must attend training sessions to which they are invited or which they are asked to complete based on their job functions.



## 7. RELATIONS WITH COMPETITORS AND PARTICIPATION IN TRADE ASSOCIATIONS

We seek to compete openly and independently in the markets where we have a presence, inspired by loyalty and respect for customers and competitors, and we are committed to complying with the laws that govern competition and to actively promoting and protecting free competition.

In this context, we assume the following commitments:

- We do not discuss with competitors or customers any issues about prices or conditions that contravene the laws protecting free competition.
- We avoid any type of program or practice that may be considered unfair, misleading or abusive.
- We comply with the general terms and conditions of trade policies and all antitrust regulations, without exception.
- We do not enter into non-compete agreements designed to inhibit or limit competition through the formation of cartels.



We strive to compete openly  
and independently in the  
markets where we operate,  
**guided by a commitment to  
loyalty and respect for our  
customers and competitors.**

- We do not abuse a potentially dominant position through predatory pricing, imposition of agreements, sale discrimination and refusal to hire, among others.
- We do not compete unfairly or illegitimately divert our customers in order to achieve or maintain a position of market domination, using practices that tarnish the reputation of others, spreading false information or abusing the legal system.

The company recognizes the positive role it plays in trade associations, in terms of facilitating interaction and cooperation between competitors, but at the same time it recognizes that such actions may facilitate or lead to behavior that hinders free competition. Therefore, it promotes such participation under the principles of due care and diligence, where ethical action and a respect for all aspects of the principles of free competition prevail. It also adheres to the statements and good practices established in current procedures, policies and handbooks and the guidelines set forth in our Compliance Program, as well as recommendations and good practices from the Chilean National Economic Prosecutor's Office (FNE) and antitrust agencies in other jurisdictions where we operate.



We foster a mutually beneficial business relationship, **based on integrity and respect**, through a sustainable relationship with high standards of quality and compliance.





## 8. RELATIONS WITH OUR SUPPLIERS AND CONTRACTORS, FAIR TRADE AND OBJECTIVE SELECTION CRITERIA

We are aware that positive relations with our suppliers and contractors can contribute significantly to our success. Therefore, we foster a mutually beneficial business relationship, based on integrity and respect, through a sustainable relationship with high standards of quality and compliance.

The selection and retention of suppliers and contractors, as well as all purchasing decisions, should always be based on objective, professional, ethical and operational criteria based on the company's needs, such as competitive pricing, quality of the goods or services, performance, suitability and compliance with current legislation applicable to its operations.

We expect our suppliers and contractors to share our values and principles, and share our commitment to:

- Respect the human and labor rights of workers, especially those related to integrity, occupational health and safety.
- Develop activities in keeping with applicable environmental protection laws.

- Not commit crimes within the context of their activities, especially corruption or bribery, money laundering, terrorism financing and handling stolen property.
- Comply with applicable internal procedures and controls.

To implement these commitments we have a Supplier Policy and a Contractor Policy, in addition to a set of procedures and protocols that provide guidelines for the integration and ongoing assessment of suppliers as well as internal standards on conflict of interest and care in the areas of engagement and negotiation.



# Our people and the environment in which we operate

Each person's actions must always be based on mutual respect. We can only achieve our goals if we treat each other with respect, value diversity and inclusion, and separate ourselves from abusive behaviors and discrimination. We also respect the setting in which we develop our activities, the communities and the environment.

## 1. RESPECT FOR PEOPLE AND ANTI-DISCRIMINATION

We value the ideological and cultural diversity of our human team, which enriches perspectives for analysis and problem solving within Hanseatic Global Terminals. To this end, we have defined policies and procedures to prevent discrimination in all its forms.

We promote treatment based on respect, dignity and trust. We condemn any discrimination in the workplace on the basis of race, gender, age, marital status, political opinion, sexual orientation, religion, disability, nationality or any other condition that fails to recognize the dignity and diversity of people.

## 2. HUMAN RIGHTS

We adhere to the Universal Declaration of Human Rights of the United Nations General Assembly. In compliance with this, we are committed to fostering non-discrimination, prohibition of forced labor, prohibition of all types of harassment and degrading treatment, to promoting diversity based on personal merit and talent, and to employing internal compensation practices with objective criteria for fair pay.

Likewise, we adhere to and respect the 10 Global Compact Principles, which are grouped into the areas of Human Rights, Labor Relations, Environment and Anti-corruption.

## 3. DIVERSITY, INCLUSIVENESS AND EQUAL OPPORTUNITIES

We facilitate diversity in the workplace, encouraging a commitment to inclusiveness in the workplace, with an underlying respect and value for individual differences in order to leverage the talent and strengths of each employee.

It is the responsibility and obligation of the company and all people working at Hanseatic Global Terminals to help foster an inclusive environment and diversity on their teams, in compliance with the Inclusiveness and Diversity Policy.

## 4. OCCUPATIONAL HEALTH AND SAFETY

Any activity developed by the company must provide and promote safety as an essential value, observing the following principles:

- We recognize the respect for life and the protection of the people who make up Hanseatic Global Terminals as the basis of our culture of safety.
- We prevent workplace injuries and illnesses by implementing adequate risk control measures in all our operations, by identifying and evaluating hazards and establishing, implementing and maintaining measures specifically aimed at preventing serious and fatal incidents.



- We comply with the legal requirements and other standards that the company subscribes to on its own and with its customers, guaranteeing their strict application by our workers, suppliers and contractors.
- We encourage self-care and mutual care.
- We promote leadership as a driver of our culture of safety.
- We persevere in efforts to continually improve the performance of our Occupational Health and Safety Management System, encouraging learning opportunities, constructive criticism and the implementation of improvements.

## 5. DRUG AND ALCOHOL USE

We aim to promote human development and commitment to others, promoting in our workers a healthy, responsible lifestyle, free from drug and alcohol abuse.

In line with this commitment, we must perform our duties without being under the effects of illegal or legal drugs, including alcohol, with the understanding that this compromises our priority commitment to health and safety.

## 6. WORK-LIFE BALANCE

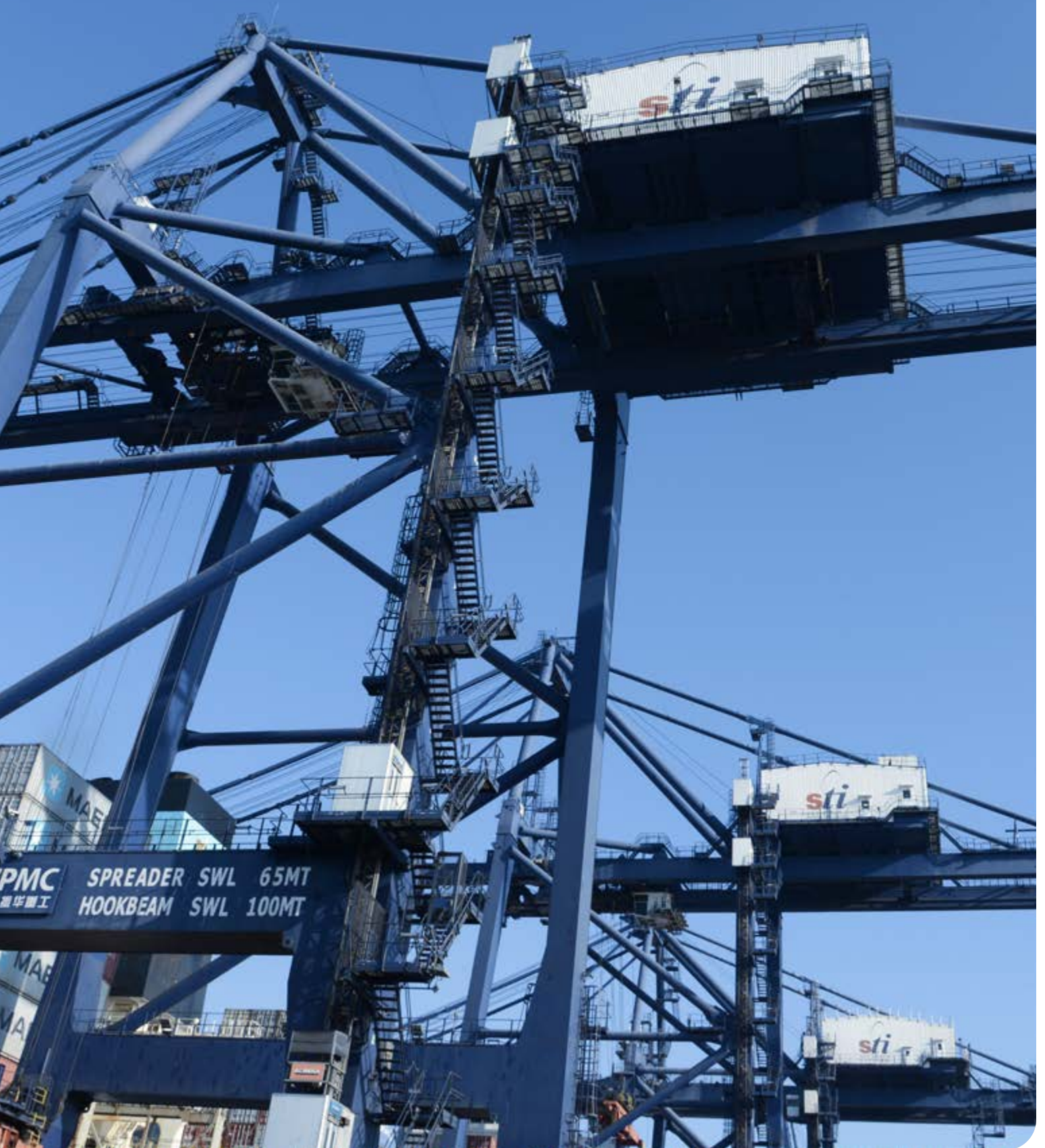
We promote the comprehensive wellbeing and satisfaction of our workers, seeking a high commitment to work and productivity, based on an adequate work-life balance. We demand respect for the maximum daily working hours and we manage a set of benefits focused on the health, education, recreation and healthy life of our workers and their families.

## 7. LABOR RIGHTS

We promote trust-based relationships with our workers to mutually create value. We foster constructive dialog for sharing and channeling concerns, providing timely responses and proactively resolving discrepancies in a context of mutual respect. Compliance with the International Security Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, laws in force, and individual and collective bargaining agreements are a basic imperative for our management.

## 8. HARASSMENT

We strictly comply with current labor legislation to ensure treatment that protects the dignity of workers. Sexual and workplace harassment and workplace violence are not tolerated by the company. Hanseatic Global Terminals has implemented reporting channels and formal procedures to prevent, investigate and penalize such conducts and thereby protect our workers.





## 9. ENVIRONMENT

The organization's commitment to the environment lies not only in regulatory compliance and meeting standards committed to with our stakeholders, but also in respecting communities and our surroundings. This commitment is reflected in how we do business, always favoring efforts to care for the environmental as we develop our activities.

Our business doings are based on protecting the environment while aiming to efficiently use water and energy resources, establishing work plans to minimize the generation of waste and implement new strategies that make our performance cleaner and more efficient. To accomplish this, we involve our employees and the community in order to cultivate an environmental culture within the organization and our surroundings, and we constantly look for ways to improve and innovate that contribute to this goal.

## 10. COMMUNITIES AND THE ECOSYSTEM

We are committed to managing the impacts of our operations and projects in the economic, environmental and social spheres, so as to maximize the benefits and minimize the damages of any alteration on our workers, neighbors, ecosystems and the environment as a whole.

We seek to contribute to increased prosperity and the identity of the towns and communities that take us in, contributing to their economic and social development, with respect for their cultural and material heritage, through stable, long-term relationships. At our largest operations, we maintain ongoing communication with neighboring communities and are committed to keeping them informed of our management efforts. We promote community engagement based on dialogue, involvement and mutual respect, with the goal of contributing to the comprehensive development of these communities.

# Our company and assets

We focus our actions with the responsibility and transparency that drives us to protect and preserve our company's value. We are responsible for the use of our physical and digital assets and for maintaining an efficient control and management system for our processes.

## 1. ADEQUATE USE OF RESOURCES

We are responsible for the efficient use and care of company resources and assets. We must all efficiently and responsibly protect and use the assets that are under our control, whether these are facilities, machinery, vehicles, cash resources or securities, computer and communication equipment, computer hardware and software and all data stored in information systems, and we must take appropriate precautions to prevent the theft, sale, loan, donation, misuse or damage of such assets.

If we become aware that the company's resources are being misused, we must notify and report this through the appropriate communication channels, through our direct or area supervisors, or through the use of the Whistleblower and Reporting Systems that the company has in place.

## 2. CONTRACTS AND AGREEMENTS

We will fully comply with our commitments and agreements with customers, suppliers, contractors and business partners.

We are responsible for making contractual commitments, and all contracts and agreements we sign will be implemented in good faith.

All contracts and agreements must be approved by our legal team, and can only be signed by our representatives with sufficient powers to do so.

## 3. ACCURACY AND VERACITY OF REPORTING AND INFORMATION SYSTEMS

We are fully aware of the importance of information, and we commit ourselves to the truthfulness and accuracy of the information we generate and make available to our stakeholders.

Business records, including financial statements, as well as transaction information, should always reflect all elements of financial transactions and economic events. In particular, the company's accounting policies and practices will be based on the legal and regulatory standards in force for such purposes, applicable in the territories where we operate, and on reporting and disclosure standards under the principles and criteria of International Accounting Standards.

Likewise, all transactions, regardless of their amount, must be duly authorized, executed, registered and supported by pertinent documentation. All of us who are responsible for the information generated must have the corresponding authorizations before carrying out an operation or transaction, and must keep accurate and reliable records of all operations performed.





#### 4. INTERNAL CONTROL, DUE DILIGENCE AND SUPERVISORY DUTY

We are committed to acting with due diligence, transparency, and due exercise of our duties of management and supervision at different organizational levels. This commitment is paramount when we are leaders of businesses, areas, management areas, divisions, units, subsidiaries or affiliates that are under the direction and supervision of Hanseatic Global Terminals, or when we manage and are responsible for the work of others. This implies, among other things, that each worker should stress the importance of work done well, ethical culture, compliance and due diligence, integrate them into daily activities and promote them through personal leadership, setting clear, ambitious and realistic objectives, and lead by example.

Likewise, it is our responsibility to maintain an effective internal control system, take responsibility for our processes and manage the risks derived from our operations and activities, and ensure that these are controlled in keeping with the standards required for detecting and preventing any failure or breach in our processes, which may endanger the company's operational continuity, its ability to generate revenue or fulfill its commitments or obligations, or affect its reputation. We also have the obligation to report any situation of fraud or weakness, relevant or not, of which we become aware in the exercise of our duties.

#### 5. INDEPENDENT AUDIT PROCESSES

As a company, it is our responsibility to preserve at all times and in all circumstances the independence of judgment and objectivity of the auditing processes carried out by the company's external and internal auditors, preventing any improper influence on the audits they carry out, in any area of management, and facilitate the provision of information and the examination of books, records, documents, information systems and background that are requested in the exercise of their duties.



## 6. CONFIDENTIAL INFORMATION

We are committed to protecting confidential information at Hanseatic Global Terminals. Confidential information is all information related to the company, its customers, suppliers, business partners or third parties, to which each of us has access through our position or through the service we provide to the company, which has not been published or made available to the public.

We are obligated to maintain absolute confidentiality with respect to such information and we must always take the reasonable and necessary precautions to prevent disclosure, either for personal benefit or for purposes outside the company, even after our contract has terminated.

It is important to always consider any Hanseatic Global Terminals information that we have access to as confidential. This information can only be disclosed to the market and the general public through the channels formally established by the company.

In addition, disclosure of this information could constitute or facilitate the commission of an anticompetitive offense.

## 7. EXTERNAL COMMUNICATIONS AND MEDIA RELATIONS

All communication and information provided by the company and its executives must be truthful, sufficient and timely, in response to the expectations and needs of its stakeholders. These should be reviewed and approved by the responsible area, and communicated through authorized communication channels or spokespeople, through appropriate and formal means.

Hanseatic Global Terminals maintains a proactive relationship with the media, in order to portray an adequate understanding of the nature and scope of the company's activities, to ensure that the information communicated by the media is truthful and useful to the interests and needs of our stakeholders.





## 8. PROTECTION AND PRIVACY OF PERSONAL DATA

We are responsible for the legal protection and safeguarding of the personal information we collect and maintain from our employees, executives, directors, shareholders, business partners, customers, suppliers, contractors and any other person who interacts with us.

Company records include electronic data, information or communications created, transmitted or stored on devices, computer equipment, servers or other company materials, including personal information.

The exchange of information along different channels is fundamental for the efficiency and effectiveness of our work and the achievement of our objectives. However, given the advantages of this open communication, risks must be foreseen and measures taken to protect the privacy and security of data from unauthorized access and exposure to vulnerabilities. It is the duty of everyone, on all levels, to respect and comply with the law and current policies and procedures for addressing this responsibility.

## 9. INTELLECTUAL PROPERTY

We respect intellectual property, trademarks and patents, copyrights, software property rights and licenses. We are responsible for their use, under the conditions of the owner or the licensing conditions.



## Our interaction with partners and stakeholders

Our customers are the backbone of our activity. Therefore, we strive to provide timely, efficient and friendly service. We are committed to ongoing improvements in our processes to create value for our customers.

### 1. CUSTOMER RELATIONS

The company's commitment to customer satisfaction is reflected in the respect for their rights and the constant search for solutions that serve their interests, always in line with the company's development and profitability objectives.

We are committed to building correct, ethical and honest business relationships, in accordance with good business practices and our principles and values to generate trust-based relationships that add value to customer operations.



## 2. QUALITY OF SERVICE AND SATISFACTION

We are committed to the ongoing improvement of the quality of our services, and to ensure this, we assess customer satisfaction and strive towards improved and more efficient processes.

We seek to fulfill our legal and contractual responsibilities with our customers, committing ourselves to:

- Give all customers equitable, fair and non-discriminatory treatment.
- Provide our services in competitive conditions in terms of price, rates, quality, quantity, terms and profitability.
- Comply with confidentiality obligations imposed by law and applicable ethical principles, protecting confidential and private information to which we have access.
- Establish monitoring and satisfaction indicators, accompanied by a management system.



# Ethics management

We have an ethics management and compliance system, consisting of a set of tools that together embody Hanseatic Global Terminals' commitment to conducting business in a responsible manner, based on its ethical principles and corporate values. This integrated management model includes our Code of Ethics, Whistleblower System, Ethics Committee, Communication and Training Program and Compliance Program, which includes the prevention measures that the company has implemented for antitrust, anti-corruption and corporate criminal responsibility issues.



## Compliance Program

The Compliance Program is based on the pillars of prevention and detection, response and monitoring activities, which together establish the company's commitment to implementing control measures, policies, procedures and best practices to identify, manage and reduce risks of compliance with external standards and laws or internal rules, remedy any violations and breaches and consequently generate a culture of compliance within the company.

The Hanseatic Global Terminals Compliance Program establishes specific guidelines for preventing irregular conduct that could be associated with corporate criminal liability and antitrust violations in the activities and territories where it operates, in addition to preventing the company's organizational structure from being used to commit any such crimes.

Likewise, it is designed to fulfill the duties of management and supervision and strengthen and consolidate our culture of compliance and corporate integrity through concrete actions embedded in business processes.

## Communication and Training Programs

The main objective of the Compliance Communication and Training Program is to establish a compliance culture within the company.

Specifically, it refers to activities to communicate our corporate values, ethical commitments and various compliance issues, which includes communicating the Program's content, any updates, its pillars and principles, guidelines, policies and procedures, including awareness campaigns and specific topics, accompanied by training sessions in the form of lectures, capsules, focus groups, e-learning or in-person activities and orientation courses.



## Whistleblower System

To facilitate our commitment to report events, conducts or circumstances that may, in the whistleblower's opinion, constitute an infringement, breach or violation of the principles of this Code, the Compliance Program and general policies and procedures, we have implemented an anonymous, confidential Whistleblower System. This tool is a key component of any Compliance Program.

It is available on our corporate website and on each business unit's website.

### Our system offers three reporting channels:

- Web platform: accessible anywhere with Internet connection. The whistleblower can access an online, confidential, independently managed platform and choose whether they want their report to be anonymous.
- Available here: <https://hgt.integrityline.app/>

The whistleblower platform guarantees secure, independent, efficient and prompt communication between the platform and the whistleblower, safeguarding confidentiality and anonymity, in accordance with international standards.

In addition, two other possible channels are available for filing reports or complaints of irregularities. They are governed by the same principles of confidentiality and anonymity and the same management procedure.

- Email: Alternatively, reports may be filed by emailing: [compliance.latam@hgt.com](mailto:compliance.latam@hgt.com)
- In person: You can also file a report through your direct supervisor, your department manager, the Ethics Committee, the Human Resources department or the Compliance Department. These individuals/ departments all have the obligation to promptly deal with this report through the channels available for centralized management.

Our whistleblower system is available to all parties covered by the scope of this Code of Ethics.



## Complaint Management Procedure

All complaints received are centralized by the Compliance Officer for a preliminary analysis and assessment of admissibility, and are then referred as defined in the Complaint Referral Matrix based on the company/incident involved in the complaint, if necessary.

Each complaint is managed under the protocols established in the Complaint Management Procedure, which defines how each case should be managed, from reception to investigation and scaling up, where it is passed on to the Ethics Committee and evaluated for eventual penalties, closure of each event and finally reporting to oversight authorities, where relevant.

Our complaint management procedure also includes following up on reports and complaints that were derived to subsidiaries and associates that operate under the centralized whistleblower system, to ensure that each complaint follows the proper investigation and resolution process and complies with the procedure in place, that corrective or improvement measures are taken, that anti-retaliation measures are adhered to and that guarantees of confidentiality are respected for both the whistleblower and the accused.

## Anti-Retaliation Measures

The company is against any act of retaliation of any kind taken directly or indirectly in response to complaints made in good faith, in conformity with our ethical principles and the respective procedures in force.

Retaliation is defined as dismissal, separation from duties or work without due cause, transfer from position, public degradation or attack, exclusion from professional or social activities, exacerbated efforts to identify the informant or to personify anonymous complaints, among other attitudes and actions aimed at intimidating the informant or violating the anonymity and confidentiality of the complaint.



## Ethics and Compliance Committee

The Ethics and Compliance Committee is the corporate body responsible for ensuring the Code of Ethics is applied correctly and the Ethics and Compliance System is running properly.

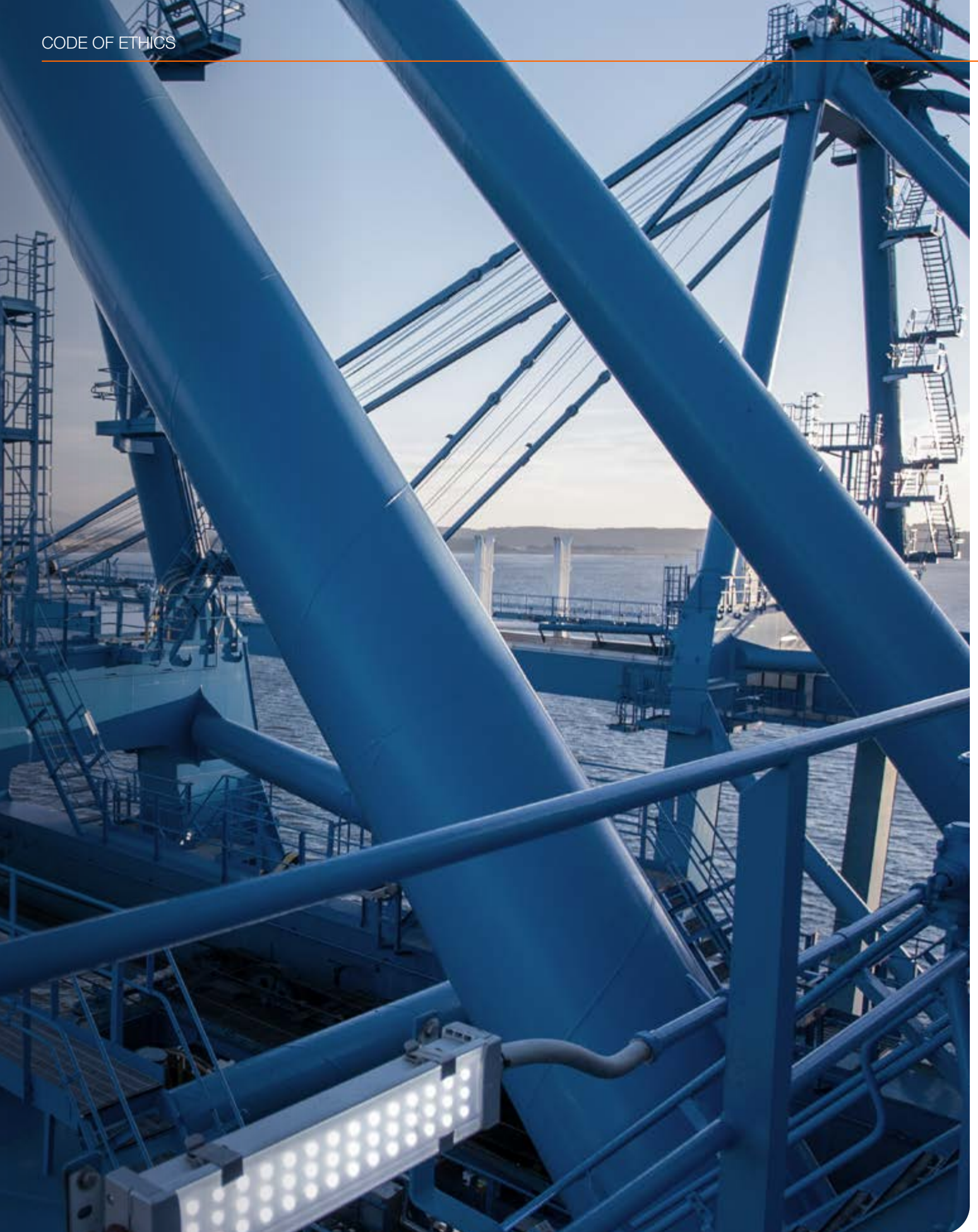
### Its main duties include:

- Fostering an ethical culture within the organization, promoting the company's values and ethical principles.
- Ensuring that all reports, offenses or violations of current rules and regulations received through the channels provided are received and attended to.
- Updating the Code of Ethics based on suggestions and situations observed or reported, new applicable standards and/or legislation.
- Making improvements to the Ethics and Compliance Management System, its management tools and related policies.

- Evaluating disputes, conflicts, and/or omissions related to the Code of Ethics and their potential penalties.
- Acting as a body for consultation and resolution for more complex topics.

The committee is chaired by the Chief Executive Officer and made up of members of senior management, including the SVP HR, VP Legal, Compliance Officer and VP Internal Audit. They meet regularly to discuss a preset work agenda.









# Code of Ethics

## Letter of Adhesion and Commitment

**This copy of the HANSEATIC GLOBAL TERMINALS Code of Ethics  
has been given to:**

<b>Name:</b>	<b>ID Number:</b>
<b>Company:</b>	<b>Country:</b>
<b>Area / Unit / Section:</b>	<b>Position:</b>
<b>Employment Start Date:</b>	<b>Direct Supervisor:</b>

**Who hereby declares the following:**

I hereby declare that I have received a free copy of the Code of Ethics, which I undertake to read and study in detail, keeping it in my possession for consultation as needed. I further declare that I understand the importance and context of the principles contained herein.

I understand that compliance with this Code is mandatory in all areas of the activities that I undertake, and I hereby pledge to respect these.

I undertake to consult the corresponding parties if I have doubts regarding its interpretation and application, and I will participate in outreach and training activities that are relevant for my position.

I declare that I comply with the standards of conduct established herein and I am obliged to report any conflict of interest, which may be real or potential or may appear to be real or potential, and I will address it through the proper channels available. Likewise, I am obliged to report to the parties described herein any event in violation of the principles of this Code that I am party to or take notice of.

Place: \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

I sign this document by means of an electronic signature platform, through which I can access a PDF copy once signed.



Hanseatic Global  
**Terminals**