

1. Introduction

This Compliance Policy establishes the principles and guidelines that govern **SEATRADE – Agência Marítima de Angola, Limitada** actions, ensuring compliance with applicable laws, regulations, and internal standards, as well as promoting a culture of integrity, ethics, and responsibility.

2. Objectives

- To ensure compliance with applicable national and international legislation, including safety, environmental, and labor standards.
- To prevent legal, financial, and reputational risks.
- To promote ethical and transparent practices in all of the organization's activities.
- Ensure alignment with international benchmark standards, including compliance with sanctions programs (e.g., OFAC, UK, EU).

3. Scope

This policy applies to all **SEATRADE** employees, managers, suppliers, service providers, and business partners.

4. Fundamental Principles

- **Legality:** strict compliance with national laws and regulations, including Angolan legislation on public probity and labor standards.
- **Integrity:** ethical, honest, and transparent conduct.
- **Responsibility:** commitment to sustainability, safety and respect for human rights.
- **Impartiality:** prohibition of discrimination, harassment, or unfair favoritism.

5. Rules of Conduct

- Prohibition of corruption, bribery and fraud.
- Proper use of organizational resources.
- Respect for health, safety, and environmental regulations.
- Confidentiality and protection of personal and corporate data.

6. Risk Management and Internal Controls

- Implementation of monitoring and auditing mechanisms.
- Periodic assessment of compliance risks.
- Adoption of corrective and preventive measures.

7. Whistleblowing Channel

SEATRADE provides a secure and confidential channel for reporting violations of this policy, guaranteeing protection against retaliation.

8. Training and Communication

All employees must participate in ongoing training programs in compliance, ethics, and integrity.

9. Sanctions and Disciplinary Measures

Failure to comply with this policy may result in disciplinary action, including warnings, suspensions or termination of contract, without prejudice to applicable civil and criminal liabilities.

10. Review and Update

This policy will be reviewed periodically to ensure its alignment with the organization's legal, regulatory, and strategic changes.

The Management:

