



CODE OF ETHICAL CONDUCT AND PROFESSIONAL INTEGRITY



Good practice rules for corporate
governance of **COMPANHIA
DOCAS DO CEARÁ**



CDC MISSION

Promote the socio-economic development of the region of its influence, and in particular the State of Ceará, through the exercise of the port authority function and the promotion of port facilities for exports and imports besides coastal shipping of goods and tourism.



Chapter I - Preliminary Provisions



Introduction

Article 1º - Ethic is made up of demands imposed by society, by moral duties, by acts consequences and reflects responsibility towards society, the Institution and the employee itself. The CDC's Code of Ethical Conduct and Professional Integrity gathers the guidelines that must be observed in each professional action to reach a standard of conduct consistent with the precepts of moral and ethical posture.

Sole paragraph:

The essential values guiding the ethical conduct of the CDC that contributes to the improvement of the professionalism and high ethical standards of its employees are:

- I - Governance per excellence in services provision, committed with respect and valuing the human being, the commonweal and the environment;
- II - Responsible professional practice, acting by standards of character integrity, rectitude and honesty;
- III - Preservation of the integrity of its services and internal processes;
- IV - Safeguarding CDC's institutional image; and
- V - Search for guidance in decision-making in conflict of interest situations, prevention of corruption acts and fraud;

Article 2º - The commitment to this Code of Ethical Conduct and Professional Integrity, of all who work and maintain any institutional, commercial or service relationship with CDC, provide the high standard of behavior that effectively contributes to the integrity and transparency of the performed acts in the conduct of our businesses.



First Paragraph: Participants considered in this commitment are: the members of the – CDC’s Fiscal, Management and Directors Board and employees, interns, young apprentices, advisors and commissioned positions, outsourced service providers, business partners, suppliers, and everyone who, by virtue of law, contract or any other legal act, provides a permanent service, temporary or exceptional, even without financial compensation, directly or indirectly linked to CDC.

Second Paragraph: The Union representatives in the Management and Fiscal Board shall keep confidentiality of privileged information related to a CDC’s relevant act or fact, to which they have privileged access due to the position they occupy, until its effective disclosure to the market.

Third Paragraph: Privileged Information is considered to be that which relates to confidential matters or the one relevant to the decision-making process within the scope of CDC's Corporate Governance that have economic or financial repercussions and not widely known.

Fourth Paragraph: Public agents occupying the Director position shall disclose, daily, through the world wide web - internet, its agenda of public commitments.

Article 3º - The agents conduct in art. 2º, § 1º of this Code, will be guided by Decree Nº 6.029, 02/01/2007, by Resolution nº 10, of 09/29/2008, of the Public Ethics Commission (CEP), by Decree nº 1.171/94, by Law nº 12.813, 16/05/2013 (Conflict of Interest), by Resolution CGPAR. May 10th, 2016 and by the Code of Senior Management Conduct, as applicable.



Chapter II – Fundamental Principles and Values



Article 4º - The agents, subject to this code, must value ethics as a way of improving behaviors, attitudes and actions, basing their relations on constitutional principles:

Legality (respect for laws); Impersonality (public interest); Morality (respect for values and rules); Publicity (accountability) and Efficiency (quality of work), as well as the principles of Honesty, discretion, transparency, urbanity, decorum, good faith and permanent zeal for the institutional image and integrity.

Sole paragraph; The agents, subject to this code, must respect and value the diversity of any nature, giving equal treatment to all people, without prejudice of social, cultural, ethnic or gender-related origin, age, religion, philosophical or political belief, sexual orientation, marital status, physical, psychological condition, education level, repudiating any discriminatory form.

Code of Ethical Conduct and Professional Integrity of Companhia Docas do Ceará



Chapter III – Public Relations



Article 5º - The agents of Companhia Docas do Ceará will maintain the relationship with the public governed by following standards of conduct:

I - respect;

II - equity;

III - cordiality;

IV - courtesy;

V - agility;

VI - promptness;

VII - transparency;

VIII - receptivity to suggestions and criticisms;

IX - confidentiality and security of information; and

X - observance of principles and rules relevant to consumer rights.



Chapter IV - Governments, Society and Community Relations



Article 6º - The CDC's agents will guide the relationship with the Public Power through democratic discussion and the establishment of institutional partnerships, aiming the implementation of policies, projects and programs for the sustainable development of its activity area.

Article 7º - In the relationship with the communities in their activity area, as well as society in general, the CDC's agents will value and support projects that promote sustainable development and social justice, respecting cultural and historical values.

Article 8º - CDC's agents will recognize the relevance of the role of legally constituted associations and class entities, and will seek to maintain a permanent dialogue with them, as well as monitor and support initiatives and practices of these institutions that are consistent with CDC's mission.

Article 9º - CDC's agents will make express reference to this Code of Ethical Conduct and Professional Integrity in the hiring of services, calls for tenders and acquisitions in general, for prior knowledge of the suppliers and involved in these processes.



Chapter IV - Investors and Shareholders Relations



Article 10º - CDC's agents shall guide relations with tenants, investors and shareholders on universally accepted governance principles and on the assumptions of legality, impersonality, morality, publicity and efficiency, which guide public management, aiming at:

- I - transparency in market relations, through the provision of information that enables the evaluation of the Institution performance;
- II - fair treatment for shareholders;
- III - compliance with laws, rules and regulations and requirement for counterparties to comply;
- IV - fulfillment of the institutional mission; and
- V - continuity of the Company's business in long term, adding value to its services and generating positive results.

Article 11º - The corporate management strategies, objectives and goals, as well as the Port's Master/PDZ Plan and the Annual Budget Plan, are planned and evaluated by the Executive Board, observing the general business orientation defined by the Management Board in accordance with the National Secretariat of Ports' Master Plan, linked to the Transport, Ports and Civil Aviation Ministry.



Chapter V - Market and Competitors Relations



Article 12º - The Companhia Docas do Ceará's competitiveness is exercised by the pursuit of excellence in the provision of its services, in order to promote loyal and fair competition and following the applicable laws and regulations.

Article 13º - CDC's agents will respect their competitors and will be prohibited from disclosing or disseminate, by any means and under any pretext, concept, comment or news that may compromise the company's image in the market, direct competitors or not, or harm them in any way, ensuring information protection.

Article 14º - CDC's agents will be strengthened by practicing a serious and honest business relationship with competitors, seeking information in a lawful manner, using it in a reliable manner and from authorized sources.



Chapter VI – Suppliers and Other Partners Relations



Article 15º - CDC's agents shall base their relationship with suppliers and service providers on the sharing of the moral and ethical standards contained in this Code and the valorization of social and environmentally responsible initiatives.

Article 16º - The suppliers and service providers selection will be carried out impartially, transparency and preservation of the quality and economic viability of the services provided and the products provided, observing the legality, impersonality, morality, publicity principles and efficiency of administrative acts.

Article 17º - CDC's agents will require respect for ethical principles and conduct commitments defined in this code of conduct, when hiring service providers and while endure the contractual relationship.



Chapter VII – Labor Relations



Article 18º - CDC's agents will commit themselves in labor relations to:

- I - comply with the instituted human development laws, norms and policies, encouraging coexistence harmony, citizenship, team spirit, honesty and solidarity in the work environment;
- II - encourage social and environmental responsibility actions;
- III - optimize the flow of information needed for the excellence of procedures in the work environment;
- IV - repudiate, restrain and punish any procedure that may constitute harassment of any nature, whether physical, moral or psychological character;
- V - provide and democratize opportunities for professional advancement, through clear criteria of access to training, performance evaluations and supply of positions and functions, ensuring employees honesty and transparency in all processes of this nature;
- VI - offer a safe and healthy work environment, striving for employees quality of life;
- VII - make effective, safe and reliable communication channels available to all employees receive information, suggestions, consultations, criticisms and complaints;
- VIII - provide institutional guarantees regarding secrecy, the reservation of information on the processes and the identity of employees involved in complaints, aiming to preserve rights and protect the neutrality of decisions; and
- IX - ensure free union association and the right to collective negotiation, prioritizing it as a preferential way of labor conflicts resolution.



Chapter VII – Labor Relations



Article 19º - The members of the boards, directors, advisors, commissioners and other employees of the Companhia Docas do Ceará will commit to:

- I - fulfill the institutional mission;
- II - observe this Code of Conduct and the internal rules related to it;
- III - maintain confidentiality on Institution matters of interest, including those related to its customers, competitors and shareholders, should not disclose them, under any pretext, unless authorized;
- IV - act in accordance with the ethical principles and values defined in this Code, always choosing, before more than one option, the best for CDC and society;
- V - previously submit to the responsible technical area a request for the elaboration of a research project and publication of authorial work in which information from the CDC is used, public or internal;
- VI - strive for economy, storage and conservation of material resources at your disposal, using them only for work of CDC's interest;
- VII - care of the assets integrity and financial resources of third parties that are in custody or are being managed by CDC;
- VIII - contribute and ensure the good image of CDC, inside and outside the work environment;
- IX - refrain in decisions involving personal interests or consanguineous family relationship or affinity, direct or collateral line to 2nd degree;



Chapter VII – Labor Relations



- X - deprive yourself from taking position, function or information advantage for your own benefit or for the benefit of third parties;
- XI - refrain from adopting procedures that may constitute harassment of any kind, whether physical, moral or psychological;
- XII - communicate to the competent areas pressure or harassment from any person whose interest conflicts with CDC's;
- XIII - contribute to maintaining a healthy work environment based on respect, solidarity, honesty, harmony, self-development, team spirit, citizenship and in the knowledge sharing for the benefit of CDC;
- XIV - exercise its activities with professionalism, contributing to the excellence of the services provided by the CDC;
- XV - consult the Ethics Committee, in case of doubt, about a situation that may violate this Code; and
- XVI - report to the Ethics Committee non-compliance within this Code.



Chapter VIII - Conduct on Receiving Gifts and Other Benefits



Article 20º - The CDC's agent may not accept, apply for or receive any type of financial assistance, gratification, prize, gift, commission, donation or advantage of any kind, for you in fulfilling mission or to influence another agent for the same purpose.

First Paragraph: In cases where the gift cannot, for any reason, be refused or returned without charge to the agent, the fact must be communicated in writing to the immediate superior and the material delivered, upon receipt, to the sector responsible for the assets and warehouse for the proper records and legal destinations.

Second Paragraph: For the purposes of this Code, the following does not characterize as gift:

- I - cash or goods prize granted to the agent by an academic, scientific or cultural entity, in recognition for their intellectual contribution;
- II - prize granted due to a public access contest for work of an academic, scientific, technological or cultural nature; and
- III - scholarship linked to the agent's professional or technical improvement, since the sponsor has no interest in a decision that may be taken by the agent, due to the position or job he holds or the function he performs.

Article 21º - In protocol cases where there is reciprocity, the agent is allowed to accept gifts from foreign authority, following the same procedure foreseen in paragraph 1º of art. 20º.



Chapter IX - Conflicts of Interest



Article 22º - Configures a conflict of interest in the exercise of a position or employment within the CDC's scope:

- I - to disclose or make use of privileged information, for personal or third party benefit, obtained due to the activities exercised;
- II - to exercise an activity that implies the provision of services or the maintenance of a business relationship with an individual or legal entity that has an interest in the decision of the CDC's employee and other board members or collegiate in which it participates;
- III - to exercise, directly or indirectly, an activity that, due to its nature, is incompatible with the attributions of the position or job, considering as such, the activity developed in related areas or matters;
- IV - to act, even if informally, as an attorney, consultant, advisor or intermediary of private interests in the bodies or entities of the direct or indirect public administration of any of the Union, the States, the Federal District and Municipalities Powers;
- V - to perform an act for the benefit of a legal entity in which the CDC's employee and other councils members participate or their spouse, partner or relatives, consanguineous or similar, in a straight or collateral line, until the third degree and that may benefit from it or influence its management acts;
- VI - to receive a gift from anyone interested in the decision of the CDC's employee and other board members or collegiate body in which it participates outside the limits and conditions established by regulation; and
- VII - to provide services, although eventual, to the company whose activity is controlled, inspected or regulated by CDC.

Sole paragraph: The situations that constitute a conflict of interest established in this article apply to occupants of public positions or jobs, although in possession of license or period of absence.



Chapter IX - Conflicts of Interest



Article 23º - Configures a conflict of interest after exercising a position or job within the CDC's scope:

I - in the period of 6 (six) months, counted from the date of dismissal, exoneration, resignation or retirement, except when expressly authorized, as the case may be, by the Public Ethics Committee or by the internal control of the Federal Government:

- a) to provide, directly or indirectly, any type of service to an individual or legal entity with whom it has established relevant relationship due to the exercise of the position or employment;
- b) accepting an administrator position or establishing a professional relationship with an individual or legal entity that performs an activity related to the area of competence of the position or job held;
- c) to enter into service, consultancy, advisory or similar activities contracts with agencies or entities of the Federal Executive Branch, linked, even if indirectly, to the agency or entity in which he held the position or employment; or
- d) to intervene, directly or indirectly, in favor of private interest before the body or entity in which it has occupied position or employment or with which he has established a relevant relationship due to the exercise of the position or job.

First Paragraph: Conflict of Interest consultations must be communicated in writing to the CDC's Public Ethics Commission or the Human Resources Coordination (CODREH), as the case may be, as in the case of exercise of private activity or receipt of work proposals that you want to accept, contract or business in the private sector, although not prohibited by the current rules.

Second Paragraph: Consultations with CODREH that give rise to a potential conflict of interest between the public activity and the private activity of the agent must be informed to the interested party and to the Comptroller General of the Union.

Article 24º - The agent is allowed to accept gifts.

First Paragraph: Gifts are understood as objects that:

I - have no commercial value or are distributed by an entity of any nature as a courtesy, advertising, donation, usual disclosure or on the occasion of events or commemorative dates of historical or cultural character, as long as they do not exceed the unit value of R\$ 100,00 (one hundred reais);

II - have a distribution periodicity of not less than twelve months; and

III - are of a general nature, are not intended to exclusively award a particular public agent.

Second Paragraph: The agent must not commit the use of the gift, even if received as a advertising, to the image of Companhia Docas do Ceará and its agents in the exercise of their assignments.

Third Paragraph: The participation of the public agent in social networks should not, deliberately, without prejudice of critical thinking and freedom of expression, to hold or cause exhibitions in social networks and alternative media that damage the image of Companhia Docas do Ceará and of its public agents.



Chapter X - Disciplinary Infractions



Article 25º - Are disciplinary infractions liable to sanction, in addition to others not exemplified that conflict with the principles and values foreseen in this Code and in the current legislation or that may constitute acts of corruption or fraud:

- I - to use privileged information, which is known as a result of the position or activity performed, to influence decisions that may favor self-interest or that of a third party;
- II - to use or permit the use, by third parties, of information, technologies or knowledge of CDC's domain and ownership and its relationship with its customers, without express authorization from the respective owner;
- III - to provide information or comment on internal matters that may come to anticipate CDC's decision or provide privileged situation for those who request them or refer to the interest of a third party;
- IV - to perform acts of private property management based on information of which he has privileged knowledge;
- V - to provide access to privileged information for unauthorized persons or disclose it under any pretext;
- VI - to adulterate, suppress or omit official documents, even if eventually addressed and delivered mistaken for CDC's employee and other board members;
- VII - to damage the reputation of another CDC's employee and other councils members or citizens who depend on its activity, through prejudiced judgment of any kind, false testimony, untrue or unfounded information or fallacious argument;
- VIII - to be conniving, even if out of solidarity, with an error or violation of this Code or the Conduct Code of its profession;
- IX - making inappropriate and uneconomic use of CDC's material, technical and financial resources;
- X - to prevent or hinder the investigation of irregularities committed at CDC;
- XI - to use a CDC's employee and other subordinate councils members or a contracted company by CDC, to serve private, own or third party interests;

XII - to request, suggest, imply, broker, offer or accept, directly or indirectly, any type of financial assistance, gratification, prize, commission, donation or personal advantage, of any kind, for yourself or for third parties, as well as proposing or obtaining an exchange of favors that may give rise to a commitment that may influence CDC's decisions;

XIII - to provide services of any kind to contracted companies, suppliers, service providers or those that are interested in the outcome of the bidding process;

XIV - to defend, favor or preserve the interests of people, customers, financial institutions, suppliers, entities or other companies to the detriment of CDC's interests;

XV - to remain in the exercise of a trust or a rewarded function when there is dissonance or conflict with CDC's strategic guidance and guidelines;

XVI - to condition the hiring of a company, the provision of services or the acquisition of material or product, to admission of any professional appointed by himself or another CDC's employee and other councils members;

XVII - to promote, suggest or induce the hiring of spouse, partner or relatives, consanguineous or similar, in straight or collateral line, up to the third degree, by yourself or through another CDC's employee and other councils members;

XVIII - to keep under his immediate leadership, in function of trust or gratification, spouse, partner or relatives, consanguineous or similar, straight or collateral line, up to the third degree;

XIX - to maintain private commercial relations with suppliers or with companies that, by themselves or by others, have direct or indirect interest or participation in CDC's business or activities, except in the strict quality of consumer of the product or service;

XX - to engage, directly or indirectly, in suspicious, doubtful or that violate the values ethical activities and that, in any way, may damage the CDC's public image;

XXI - to invoke political party support or political or union organization, in the performance of their professional functions, with the objective of influencing or trying to influence, contrary to the public interest, CDC's decisions;

XXII - to disclose documents of a confidential nature or to manifest themselves through the media, on behalf of CDC, without authorization;

XXIII - to denigrate the honor or the functional performance of another employee or CDC's employee and other councils members or publicly express an opinion on the merits of the matter submitted to decision, whether individually or in a collegiate body, except in cases provided in specific rules;

XXIV - to use the position, function, friendship or influence to obtain benefits or different treatment, to yourself or others, in your relationship with a client, public agency or private entity; and

XXV - to practice discrimination based on ethnicity, nationality, gender, religious belief, political conviction, origin, social class, age or physical ability.

Sole Paragraph: The agent who performs the acts provided for in arts. 22^o and 23^o of this Code will incur Administrative Improbity, pursuant to art. 11^o of Law N^o 8.429/1992, when the conducts described in arts. 9^o and 10^o of Law N^o 12.813/2013 are not characterized.



Chapter X - Disciplinary Infractions



Article 26º - Disciplinary infractions that are liable to sanction are also non-observances of the guidelines provided for in this article about participation in events and activities funded by third parties:

§1º. Expenses related to the participation of an employee or any commissioner, and other council members or public agent at events that correlate with the duties of their position, job or function, promoted by a private institution, such as seminars, congresses, visits and technical meetings, in Brazil or abroad, they should be paid, preferably, by CDC.

§2º. Exceptionally, in view of the public interest, the event promoting institution may pay, in all or in part, expenses related to transportation, food, lodging and registration of the CDC's employee and other board members, the receipt of remuneration is prohibited.

§3º. When the matter to be addressed is related to their institutional functions, the CDC's employee and other board members may accept invitations to dinners, lunches, breakfasts and similar nature activities, funded by third parties, provided that the activities do not involve items considered to be luxury, such as excessively expensive drinks and food, and to inform your superior, directly or through appropriate channels under the CDC.

§4º. CDC's employees and other board members are prohibited from accepting invitations or tickets to entertainment activities, such as concerts, presentations and sports activities, with the exception of:

I - the cases in which the CDC's employee and other board members are in the exercise of institutional representation, cases in which the transfer of invitations or tickets to third parties outside the institution is prohibited;

II - invitations or tickets originating from promotions or sweepstakes of public access, or private consumer relationship, without being bound, in any case, with the condition of CDC's employee and other board members of the acceptor;

III - invitations or tickets offered due to family ties or friendship, without being linked to the condition of CDC's employee and other board members, and provided that its cost is borne by the offering individual itself;

IV - invitations or tickets distributed by a public body or entity of any sphere of power, provided that observing the value limit set by the Public Ethics Committee.

§5. The invitation to participate in events funded by private institution should be sent to the CDC's President, or the other body or authority designated by him, who will indicate, in case of acceptance, the appropriate representative, in view of the nature and subjects to be treated at the event.

§6. Questions about the acceptance of gifts, proposals and offers may be submitted, through consultation with the CDC's Ethics Committee for analysis and guidance.



Chapter XI – Sanctions Disciplinary



Article 27º - The disciplinary sanctions provided for in this code are those indicated in the Ethics Code of High Public Administration (warning and ethical censorship) in what fits each agent, which can be complemented with sanctions, based on the **disciplinary infraction found**.

First Paragraph: Disciplinary sanctions consist of:

- I - Dismissal for Just Cause or exoneration;
- II - Administrative suspension;
- III - Professional and Personal Conduct Agreement - ACCP;
- IV - Ethical censorship.

Second Paragraph: The procedures for applying the penalties provided for in items I and II of previous paragraph are governed by the provisions of the CDC's Staff Internal Rules.

Third Paragraph: The application of any sanction will be preceded by an administrative process.

Article 28º - Dismissal for Just Cause is applicable in cases of:

- I - Application, for three times of suspension, and recurrence of any infraction;
- II - Commitment of a serious infraction that violates the CDC's values and the laws provided for in Article 3º of this code;

Article 29º - Administrative suspension is applicable in the case of:

- I - committing any infraction defined in articles 25º and 26º, caput, paragraphs and other items;

Article 30º - The Ethical Censorship will be applied in an educational way to the employee who is submitted to the conducts provided for in articles 20º, 22º and 23º.



Chapter X - Management of Ethic



Article 31º - The Professional and Personal Conduct Agreement - ACCP will be applied to everyone who, after undergoing a preliminary investigation to determine deviation from ethical conduct and professional integrity, that before the opening of verification process, sign the ACCP, thus being committed to compliance with the agreement, and if not satisfied, the CE will initiate disciplinary proceedings.

Single Paragraph: The ACCP cannot be signed in case of recurrence.

Article 32º - The CDC's Ethics Committee is responsible for permanently evaluating the timeliness and relevance of this code, as well as promoting necessary actions for its dissemination in order to disseminate the highest standards of ethical conduct within the company.

Article 33º - The functioning of the Ethics Committee is established in Internal Regulations approved by the Commission.

Article 34º - The Ethics Committee is responsible for analyzing the occurrences of non-compliance with this Code of Conduct and to decide whether to open an ethical investigation process or forward it to the competent internal areas.

Article 35º - The Ethics Committee is obliged to preserve the confidentiality of any information to which it has access.

First Paragraph: as protection mechanisms to preserve the integrity of the people who do complaints through CE access channels, will not disclose the name of any person, until the conclusion of the investigation, thus avoiding any kind of retaliation against the person who used the reporting channel. Anyone will be able to access and obtain copies of documents contained in the ethics verification procedure, as long as the investigation and deliberation of the ethics committee are concluded.

Second Paragraph: Any interested party may submit a request for information access to the CE, by any legitimate means, the request must contain the applicant's identification and the specification of the required information.



Chapter X - Management of ethic



Article 36º - The reporting channel that makes it possible to receive internal and external complaints regarding the non-compliance with the Conduct and Integrity Code and with other internal ethical and mandatory rules will be directly through the CDC's CE, or by accessing the CE email, and by the OMBUDSMAN, available on the CDC's website.

First Paragraph: The CDC will adopt protection and/or anonymity mechanisms that prevent any kind of retaliation against the person using the reporting channel.

Second Paragraph: Protection against retaliation does not exclude any liability, such as labor, ethics, civil or criminal, of the person who illegally uses the reporting channel.

Article 37º - The Ethics Committee will consider any and all suggestions for improving this Code.

Article 38º - The Ethics Committee is responsible for:

- I - resolve any doubts related to the application of this Code, including omitted cases; and
- II - propose changes to the CDC's Board that it deems necessary.



Chapter XII – Final Provisions



Article 39º - The CDC's Ethics Committee is composed of 3 (three) regular members, with respective alternates, all chosen among employees of permanent staff and working at CDC.

§1º. The effective and alternate members are appointed by the CDC's President;

§2º. It is incumbent upon the CDC's President to appoint, among the components, the President of the Commission;

§3º. The mandate of the Commission members is 3 (three) years, not coincident, allowed only one reappointment;

§4º. The Ethics Committee has an Executive Secretariat with the purpose of contributing to the preparation and execution of the ethics management work plan and provide technical and material support for the fulfillment of the Commission duties;

§5º. The assignment of executive secretary is entrusted to an employee of the permanent staff and working at CDC, indicated by Ethics Committee members and designated by the CDC's President;

§6º. The executive secretary is prohibited from being a Ethics Committee member;

§7º. The Ethics Committee members are not remunerated for the exercise of their activities in the Committee and the works developed by them are considered priority, relevant and recorded in functional registration;

§8º. Functional record consignment may also occur for the executive secretary of the Ethics Commission and for those people who, in the opinion of its members, have rendered the relevant service to the Commission;



Chapter XII – Final Provisions



Article 40º - This Ethical Conduct and Professional Integrity Code takes effect on the date of its approval.

Sole paragraph: This Ethical Conduct and Professional Integrity Code is valid for an indefinite period, and will be revised whenever necessary.

Article 41º - This Ethical Conduct and Professional Integrity Code will be published on the CDC's website, and will be the subject of periodic training among all, at least annually, involving the Ethical Conduct and Professional Integrity Code and on the risk management policy for administrators.

Article 42º - The Public Agent when assuming the position, job or function rewarded at Companhia Docas do Ceará must sign the Adhesion Term of the CDC's Ethical Conduct and Professional Integrity Code according to the model in appendix 1 of this code.

- ❖ The Ethics Committee will always be open to suggestions that may contribute to the improvement of existing ethical standards.
- ❖ Questions, suggestions and/or criticisms should be sent to the address: etica@docasdoceara.com.br

Appendix 1



TERM OF ADHERENCE TO THE CODE OF ETHICAL CONDUCT AND PROFESSIONAL INTEGRITY CDC OBSERVANCE COMMITMENT

Employer's name:

Position / Function:

Registration:

Capacity:

I declare that I have read and am aware of and in accordance with the rules, policies and practices established in the CDC's Code of Ethics Conduct and Professional Integrity and I commit myself to respect and fully comply with them. I understand that this Ethical Conduct Code reflects the commitment to dignity, decorum, zeal, effectiveness and awareness of the moral principles that should guide the public agent, whether in the exercise of the position, function or job, or out of it. And yet, that my acts, behaviors and attitudes must be directed towards the preservation of honor and tradition of services provided at the CDC. I also assume the responsibility of report to the CDC's Ethics Committee, or Ombudsman, any behavior or situation that is in disagreement with the rules, policies and practices established in the CDC's Code of Ethical Conduct and Professional Integrity.

The signing of the Adhesion Term and Compliance of Commitment with the CDC's Code of Ethical Conduct and Professional Integrity is an expression of free consent and agreement to comply with the rules, policies and established practices.

Fortaleza, / /20_____.

Employee Name / Signature