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## CODE OF ETHICS

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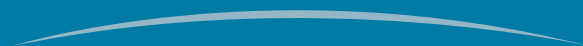
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# CODE OF ETHICS

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### MESSAGE FROM THE CHIEF EXECUTIVE OFFICER - CEO

Horizon View, established in 2009, holds a set of transport and shipping companies, activities in which we are present since 1886 and where we benefit from a reputation recognized by customers and business partners.

We act in our own name, and through the companies Orey Shipping, Atlantic-Lusofrete, StorkShip, Mendes & Fernandes and Correa Shipping in five business areas: port agency, liner agency, sea and air forwarding, logistics and customs clearance.

We have offices in Algeciras, Aveiro, Bilbao, Figueira da Foz, Leixoes, Lisbon, Sao Paulo, Setubal, Sines and Valencia. Today we are, therefore, a multinational with strong Iberian presence, with presence in Brazil, and the rest of the world at your fingertips through a set of agents, correspondents and partners that allow us to offer a full service, which is to be competitive built to customer needs, always under our control.

We aspire to a modern technology in an increasingly digital world without losing what makes us different. Our long history, dating back more than 130 years, was built on a foundation of values such as credibility, integrity, rigour, solidity, ethics and quality. We want to continue to project these values in a future that we also want to be long and successful.

We stand for a socially responsible behaviour towards our employees, customers and the community. We want all who work with us to identify with our strategy, our values and be proud to be part of this project and this team.

Rui de Albuquerque d'Orey.

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## CODE OF ETHICS

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### 1 . SCOPE

This Code of Ethics is applied to Horizon View group employees, both permanent and eventual, as well as to the statutory bodies.

The Code of Ethics is available for consultation by all employees and all Stakeholders of the group.

Stakeholders include, besides the employees, suppliers, service providers and clients, whether individuals or corporate bodies.

This Code of Ethics does not overrule any applicable legal provisions.

### 2 . VISION, MISSION, VALUES AND POSITIONING

#### VISION

To occupy an outstanding position in the Iberian shipping agency market, in the provision of forwarding services and in continuous-flow product logistics, recognized by our customers, correspondents and principals as their preferred and long-term partner.

#### MISSION

True to human values, to establish new relations and to cement centuries-old ones in the competitive provision of transport services by sea and by air, as well as to act as husbandry and regular-line shipping agents, providing returns for equity holders and a climate of professional and personal development for our employees.



## CODE OF ETHICS

### 2 . VISION, MISSION, VALUES AND POSITIONING (Cont.)

#### VALUES AND POSITIONING

**Credibility, Integrity and Rigor:** We assume our commitments, seeking to act ethically with our customers and other business partners.

**Customer Orientation:** We provide solutions designed for each customer taking into account their needs and expectations, while seeking to ensure their satisfaction and loyalty.

**Organization, Quality and Innovation:** We foster an environment of ongoing training and development, implementing quality rules governing our activities and actively searching for solutions and alternatives to serve our customers ever more efficiently.

**Competitiveness:** In a highly competitive environment we contribute through our solutions to increasing our customer's competitiveness.

**Social Responsibility:** We assume a commitment to socially responsible conduct towards our employees, our customers and the community.



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## **CODE OF ETHICS**

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## CODE OF ETHICS

### 3 . INTERVENTION

The Horizon View group and its employees should base their commercial and personal conduct on the principles of Truth, Integrity, Legality, Social and Business Responsibility, Transparency, Efficiency and Equality.

#### **HORIZON VIEW GROUP**

The companies of the Horizon View group are committed to ensuring the moral and physical integrity of their employees and to promoting work conditions that respect their personal dignity.

The Horizon View group is committed to fostering an environment of personal and professional development for its employees, equal opportunities and non-discrimination relative to race, religion, age, sexual orientation, disability, political affiliation, marital status or union membership.

The Horizon View group is committed to providing for its employees in matters regarding safety and health in the workplace.

The group is committed to respecting the Universal Declaration of Human Rights and the labor conventions applicable to the group's activities. The group is committed to never employ child labor and to never side with organizations, companies or individuals who do not respect the same ethical principles and interventions as those stated within this Code of Ethics.

The Horizon View group aims to employ the best practices in the protection of data belonging to its employees, clients, suppliers and other stakeholders that the group does business with.



## CODE OF ETHICS

### 3 . INTERVENTION (Cont.)

#### EMPLOYEES

The employees should fulfill their obligations with a sense of responsibility and correctness, and always carry out their professional duties with pride and devotion, in the interest of the clients and of the Horizon View group's good image.

They should not perform any professional activity parallel whose interests may conflict with those of the Horizon View group, they should remain independent and impartial in their decisions and should never intervene in decision-making processes which may directly or indirectly place them in situations related to organizations which they may have belonged to, or to people they may be connected to by way of friendship or kinship.

The employees are committed to and determined to guarantee they carry out their functions in strict conformity with the national and international legislation of the countries in which they operate.

The employees commit to use the assets of the Horizon View group which are entrusted to them, both tangible as well as intangible, for the sole purpose of the exercise of their duties.

The employees commit to maintain confidentiality regarding all of the information acquired during the course of their functions, and to never use such information improperly even after eventual termination of their affiliation with the company.



## CODE OF ETHICS

### 3 . INTERVENTION (Cont.)

#### CLIENTS

The Horizon View group and its employees should respect the rights of their clients as well as all commitments assumed with them. They should always propose and render their services in a reputable manner.

Horizon View seeks to continuously improve its performance and the quality of the services provided to clients.

#### SUPPLIERS

The Horizon View group and its employees should choose their suppliers carefully and with full transparency based on ethical, technical and economical principles.

#### COMPETITION

Horizon View and its employees base their performance on respect towards free trade and non-involvement in illicit practices such as price fixing or any other activity not in accordance with the competition laws of the country in which they operate.



## CODE OF ETHICS

### 4 . CORRUPT PRACTICES

Any corrupt practice performed either actively or passively, or otherwise by means of acts or omissions, is strictly prohibited.

Any form of bribery by means of favors or monetary contribution to organizations, companies or individuals in the sense of creating situations of preferential treatment in favor of the Horizon View group, is strictly prohibited.

The employees should not accept any offer, gratification or favor which may influence their behavior or be understood as such.

For situations in which the employees are in doubt regarding less correct practices, they should immediately report to their superior.

### 5 . SOCIAL RESPONSIBILITY

The Horizon View group and its employees are committed to act within the interests of the communities into which they are inserted, both socially as well as environmentally.

### 6 . LEGALITY

The Horizon View group and its employees are committed to acting in accordance with the current legislation and regulations in force.

Employees must never, under any circumstances, act on behalf of the Horizon View group in any way that may violate the current legislation and regulations in force.



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## CODE OF ETHICS

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### 7 . NON-COMPLIANCE

#### CLIENTS

Employees who do not comply with the provisions of this Code of Ethics are subject to disciplinary action under the law.

### 8 . DISCLOSURE

The present Code of Ethics is published at [www.horizon-view.pt](http://www.horizon-view.pt).

### 9 . APPROVAL AND REVISION

The present Code of Ethics was approved by the Board of Directors on September 21, 2016 and shall be reviewed whenever deemed necessary upon deliberation by the Board of Directors.



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