



POLICY
ON BRIBERY AND
CORRUPTION

PURPOSE

The Code of Ethics of Horizon View and its subsidiaries addresses the responsibilities to its employees and other stakeholders. The purpose of this document is to explicitly address, in particular, the companies' commitment to providing, within the scope of the Anti-bribery and Corruption Policy, based on a set of rules, principles and values that define the conduct of all its employees and the behaviour adopted in the relationship between Horizon View and its affiliates and any other entity and / or individual that interacts with any of the companies.

The positioning and performance of Horizon View and its affiliates is fully committed to its internal rules and to transparency in accordance with its mission and values. This Anti-bribery and Corruption Policy reinforces zero tolerance for acts of misconduct, such as bribery, corruption and related offenses. This Policy embodies an essential principle of conduct: the commitment to be a responsible entity in all areas of your business and to conduct business in an honest, ethical and lawful manner.

SCOPE

This Policy aims to define the principles that must be observed and fulfilled by employees and all subjects, public or private, who have business and / or institutional relations with Horizon View and any of its affiliates. These principles are intended to ensure ethically correct practices in all areas of the business, in the defense of human and labour rights and in the defense and preservation of the environment, through compliance with established processes, policies in force and in compliance with the law.

This document applies to all employees and managers of Horizon View and its affiliates as well as to subcontracted persons.

The companies to which this policy applies are as follows:

- HORIZON VIEW – NAVEGAÇÃO E TRÂNSITOS, SA
- OREY COMÉRCIO E NAVEGAÇÃO, SA
- ATLANTIC LUSOFRETE - AFRETAMENTOS, TRANSPORTES E NAVEGAÇÃO, SA
- MENDES E FERNANDES – SERVIÇOS DE APOIO À NAVEGAÇÃO, SA
- STORKSHIP – NAVEGAÇÃO, TRÂNSITOS E LOGÍSTICA, SA
- OREY SHIPPING, SLU

GENERAL PRINCIPLES OF CONDUCT

Any practice of corruption or bribery is repudiated. The practice of such acts may have short and long term consequences, not only for Horizon View and its affiliates, but also for the individuals and / or entities involved, and may assume different levels of impact, including: civil and criminal penalties including imprisonment, loss of internal confidence, financial and / or reputational loss, and violation of fundamental human rights.

According to international studies and comparative analyzes, the areas most vulnerable to possible acts of corruption were identified:

1. gifts, offers and entertainment expenses;
2. events and sponsorships;
3. donations / offers / fees;
4. consulting, intermediation, relationships with partners and suppliers;
5. human and labor rights;
6. preservation of the environmental balance;
7. joint ventures, acquisitions and sales;
8. transactions with related parties.

GENERAL PRINCIPLES OF CONDUCT

Taking into account the scope of areas vulnerable to acts of corruption, a rigorous process of monitoring and controlling the entire value chain is implemented through this policy and its procedures are strictly observed.

In this context, employees should:

- Refrain from any involvement in practices that involve or respond to acts of corruption;
- Refrain from intentionally or negligently giving material or moral assistance to acts of corruption;
- Report any practices of corruption, known or suspected, or very serious suspicions.

Any failure to comply with the general principles set forth in this Policy may have legal and disciplinary consequences for violators, in accordance with applicable law and regulations.



EMPLOYEE RESPONSIBILITIES

This Policy applies to all employees, regardless of the company and country in which they are and operate, being extended as such to all members of governing bodies and other officers. This Policy also applies to any outside party that interacts, directly or indirectly, with any of the companies, such as suppliers, service providers or customers.

Employees who violate this company's policy regarding the rules in force under the Anti-bribery and Corruption Policy may be subject to disciplinary action in accordance with the laws and regulations of the country.

Employees must inform management or their superiors whenever there is a breach of this policy by another employee.

Employees should actively collaborate with management and their superiors to assist in the implementation of this policy.

MANAGEMENT RESPONSIBILITIES

Involve all employees in compliance with the established Anti-bribery and Corruption Policy.

Require compliance with all Anti-bribery and Corruption Policy Regulations in force in the company by its employees, and other users of its assets.

The management is responsible for implementing the Anti-bribery and Corruption Policy and for ensuring that all employees and subcontractors know and understand it.

VIOLATION OF BRIBERY AND CORRUPTION POLICY

Employees and management must always comply with this policy. Employees and managers who violate the provisions of this policy may be subject to disciplinary measures to the fullest extent permitted by the law of the country and may include, under consideration of circumstances, revocation of employment contract.

ADDITIONAL INFORMATION

If employees have doubts about this Anti-Bribery and Corruption Policy or about any aspect of their application, they should direct them to the human resources department, their hierarchical superiors or to the management.

DATE OF ENTRY INTO FORCE

This Anti-bribery and Corruption Policy is effective from February 1, 2018, replacing all previous policies.

REVIEW

This document may be revised whenever necessary or whenever legislative or regulatory changes make it necessary.

REVIEW AND APPROVAL

This Anti-bribery and Corruption Policy has been reviewed and approved by the Board of Directors.





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