



## **ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**

### **METROPOLITAN TRANSPORTS S.A.**

In compliance with Brazilian Anti-Corruption Act nr. 12.846, sanctioned by the Presidency of the Republic of Brazil on August 1, 2013 as well as FIDI ABC Charter, Metropolitan Transports S.A., located in São Paulo Brazil, is committed to Anti-Corruption and Anti-Bribery fight.

In order to achieve our goals, this policy and procedures are extended to all our employees, clients, corporate accounts, worldwide agents and third party service suppliers, who must strictly comply with them. Thus, we shall:

1. Never engage in any form of bribery, either directly or through any third party.
2. Refrain from offering or accepting bribe, kickback, bartering and/or any other kind of incentive in order to obtain or retain business.
3. Refrain from accepting gifts or anything of value from current or prospective suppliers of the company.
4. Never offer or make an improper payment, or authorize an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
5. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
6. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
7. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favor.
8. Never accept any gift from any business partner if there is any suggestion that a return favor will be expected or implied.
9. Never facilitate payments to obtain a level of service that one would not normally be entitled to.
10. Refrain from providing erroneous or insufficient information or data, as well as hide important information in order to benefit yourself or your company in any commercial business.
11. Never disregard or fail to report any indication of improper payments to the appropriate authorities.



12. Never induce or assist another individual to break any applicable law or regulation.
13. Ensure that all chain related on our service is aware and compliant with this policy and report any suspected corrupted practice
14. Seek appropriate legal advice whenever there is a conflict of any rule stated on this policy



## **ENVIRONMENTAL POLICY**

### **METROPOLITAN TRANSPORTS S.A.**

METROPOLITAN TRANSPORTS S.A. and its subsidiaries located in Brazil, company specialized in international mobility, moving and storage, presents this policy as a statement and a call to environment protection management. It is extended to all our employees, clients, corporate accounts, worldwide agents and third party service suppliers.

While conducting our activities we are committed to preserve the environment, developing actions that contribute to our ecology protection and improve better life quality to our society, in the present and future. We shall comply with current applicable local legislation.

Metropolitan has in place measures and controls for the prevention and mitigation of the environmental impacts, especially regarding the disposal of waste generated by our industry as well as general organic and solid waste. We expect same commitment from our business partners.

The improvement of procedures to reduce the consumption of natural resources, such as energy, trees and water as well as to the reduction of the generation of gas emissions is a mutual goal.

Therefore, we must include on profession development trainings themes that emphasize the importance in preserving and protecting our environment, aiming to reach an adequate level of awareness to the importance on daily activities, including work, to preserve the environment.

We also continually seek that our employees, business partners and suppliers meet our Environmental Policy, demanding appropriate material or proving services according to our policy.



## **DATA PROTECTION & PRIVACY POLICY**

### **METROPOLITAN TRANSPORTS S.A.**

METROPOLITAN TRANSPORTS S.A., and its subsidiaries located in Brazil, comply with Data Protection and Privacy from our customers, employees, corporations, worldwide agents, suppliers and authorities.

This policy communicates the measures our company has in place for the collection, retention, protection, use, disclosure and disposal of personal and company data, ensuring the security and confidentiality of information. It is extended to all our employees, clients, corporate accounts, worldwide agents and third party service suppliers, who must strictly comply with them.

#### **Personal Data**

For customs clearance it is usually necessary to acquire and present a big set of documents and information. This include client's name, documentation, occupation, address, personal and business contact information, personal possessions values and details, among others.

We will only collect, use, retain and disclose necessary personal data in accordance with applicable laws and regulations, within strictly necessity and confidentiality.

#### **Consent**

We agree to never use or disclose personal information or documentation without consent for any purpose other than for the service providing subcontracted.

#### **Storage**

Electronic Information and documentation are stored in a secure and restrict environment, without access to unauthorized personal.