



ANTI-CORRUPTION POLICY

Astromarítima Navegação S.A., in this act, represented by its Board of Directors President, elaborated this policy aiming to consolidate the company's commitment against corruption practices and unethical behaviour acts in all spheres of the organization. Below, we relate the main points that drive this policy.

Objective

The Anti-corruption Policy prohibits specifically that board of directors members, directors, managers, employees and suppliers get involved in any activity considered corrupted and, directly or indirectly, offer, commit or authorize any person to provide money or anything of value to public authorities, private individuals or legal entities, with the purpose to obtain or accumulate any advantage or facilitation.

Principles and Values

The commitment with the satisfaction of our clients and the excellence of our activities are fundamental aspects to sustain the principles and values of Astromarítima.

We make business and work oriented by a deep ethical sense that gets reflected in the moral conduct of our actions with a posture of a citizen company, conciliating the interests of all stakeholders – society, clients, suppliers, shareholders and employees -, valuing the human being in all relationships.

Relationship with Suppliers and Other Service Providers

All employees must safeguard the secrecy of information settled between Astromarítima and its suppliers, as the suppliers also oblige themselves to watch out for the conditions of mutual trust related to the contractual secrecy and warranties, under penalty of rupture of the commercial relationships.

Astromarítima does not allow that, in dealing with suppliers, any employee or service provider obtains personal advantage through influence due to his or her position in the company. In the case that an employee becomes aware of practices ethically questionable performed by a supplier, he or she must immediately communicate it to his or her immediate superior.

Penalties

If an employee, including members of the Top Management, is blamed for violations to this anti-corruption policy and other programs that aim conduct, ethics and integrity, Astromarítima will apply the existing penalties of the legal/contractual system in place, that can include even his or her dismissal from the company.

Responsibilities

It is expected that everybody internalize this Anti-corruption Policy, observe and recognize it, reporting any questions and doubts related to possible noncompliance through the e-mail ouvidoria@astromaritima.com.br .

Rio de Janeiro, february, 16th, 2017

Rev.1.

Board of Directors President