

OPGCR S&L

ETHICS AND CONDUCT MANUAL



OPERAÇÕES GCR-PRESTAÇÃO DE SERVIÇOS E LOGÍSTICA

WWW.OPERACOES-GCR.COM

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PRESENTATION

OPERAÇÕES-GCR is a diversified Angolan company providing services: specialized in Supply of Material and Equipment (sourcing & procurement), Logistics, Labor, Engineering services, support to the exploration and production of Oil, gas and mines, Construction, Chemicals and all the Industry.

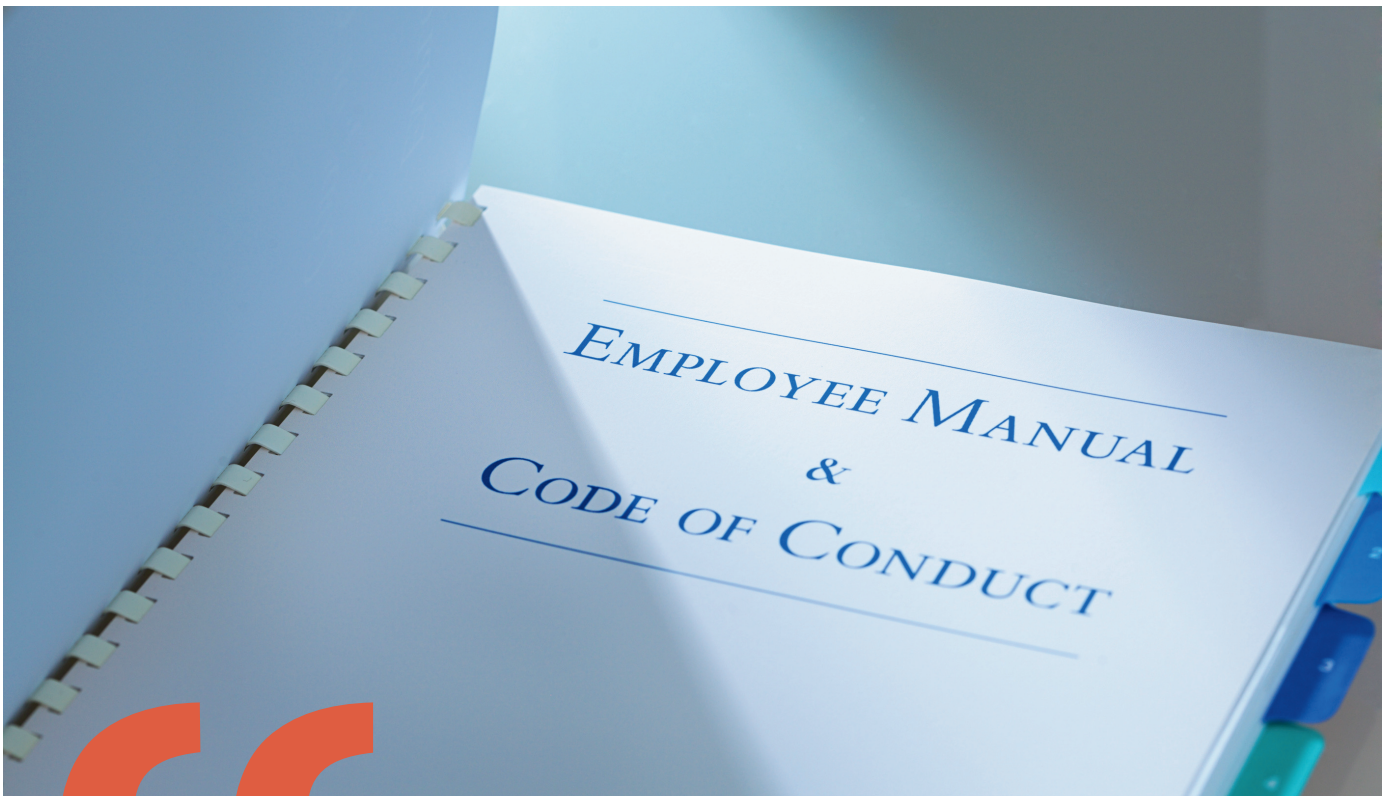
Founded in 2020, our office is located: Avenida Hoji ya Henda, Cidadela frente ás Torres, junto ao Banco BFA-1 º Andar, Marçal, Luanda-Angola.

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INTRODUCTION

All processes and transactions carried out by **OPERAÇÕES-GCR** take place in accordance with the ethical standards and principles established in this instrument, which are fundamentally supported by the precepts established by Organs regulatory bodies.

Thus, this manual is a program that aims to prevent and/or identify conduct that is not in compliance with legal rules, identifying risks and/or causes and acting preventively and/or correctively, enabling the exercise of a culture focused on ethics and compliance with



"Empowering Integrity: Upholding Ethical Standards and Regulatory Compliance"

PRUPOSE

The purpose of this Ethics and Compliance Manual is to establish principles, standards and values that guide the ethical conduct of all those who relate, directly or indirectly, with OPERAÇÕES-GCR for Money Laundering Prevention and Illegal financing, in accordance with Laws nº.05/2020 of January 27th and the resulting regulations.

Our Ethics and Compliance Manual reflects the culture of transparency and commitment of OPERAÇÕES-GCR with their customers and employees, they reject any prejudiced manifestation that may exist.

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TARGET AUDIENCE-GUIDELINES

TARGET AUDIENCE

All employees and directors of **OPERAÇÕES-GCR**, customers, service providers and the external public in general.

GUIDELINES

- Disseminate the principles, guidelines and conduct established in the OPERAÇÕES-GCR Code of Ethics and current legislation, as well as disseminate standards of integrity and ethical values, through the dissemination of a culture that addresses this importance.
- Implement a Compliance Structure whose function will be to oversee and manage the **OPERAÇÕES-GCR** Compliance Program.
- Assist and guide, in the analysis of the risks of using **OPERAÇÕES-GCR** for Money Laundering and Illegal Financing, respecting the legal norms and resolutions of the Board of Directors.
- Maintain the Monitoring of People and Operations, in a prior, structured and periodic way
- Ensure ethics and provide guidance on good governance practice



BEHAVIOR AND RELATIONS

Relationship with Service Providers and Suppliers.

The hiring of these professionals and companies must take place based on the needs of OPERAÇÕES-GCR, respecting technical and impartial criteria. Any hiring, where any employee who has an interest or participation, will be submitted for approval by the company's Board of Directors

Relationship with Public or Private Companies.

Each and every relationship must take place under the scrutiny of ethics and morality, as well as all requests will be met with punctuality and veracity.

Relationship between Employees.

OPERAÇÕES-GCR does not admit or tolerate bullying, sexual harassment, disrespectful behavior, as well as prejudiced or intolerance behavior among its Employees.

Involvement with Social Media and Media. Any press statement, disclosure of OPERAÇÕES-GCR or use of the Brand and Logo will require prior approval from the company's Board of Directors.

Likewise, it will not be allowed to make references to OPERAÇÕES-GCR or its Clients on social networks, in a discrediting and dishonorable manner.

Relationship with Customers.

The relationship with customers must be respectful and fully commercial, with no personal interest being allowed.

Gifts and Presents Private Agents.

It will not be allowed, except as an exception and with justifications (eg Events, Sponsorships, Gifts, etc.). However, prior, and express approval from the Board will be required.

Gifts and Presents Public Agents

It will not be allowed to give gifts or pay for travel by any Public Agent.



RESPONSABILITIES

COMPLIANCE BOARD

- It is responsible for the crime prevention practices of Money Laundering and Combating the Financing of the Terrorism, carrying out the necessary investigations and response to the complaints received
- Implement and monitor compliance with this Policy and the current legislation.
- Through your team, formalize the necessary information to Organs competent bodies and other members of the Board, reporting suspicious transactions and transactions.
- Establish the Compliance Committee, submitting cases

OTHERS BOARDS

Enforce the provisions of this manual with its employees.

Participate in any Compliance Committees, when requested by the Compliance Officer.

EMPLOYEES IN GENERAL AND BACKOFFICE

Responsibly comply with the premises of this Manual and ensure the Ethical posture expected by OPERAÇÕES GCR.

- Inform the Compliance Board of any conflicts found, as well as any illegal fact, involving problems with image, ethics, as well as Money Laundering and Illegal Financing
Register customers, keeping the necessary data to ratify them in the general customer framework, as well as ensuring good and efficient management, practice and operation

HR DEPARTMENT

- With Compliance's consent, disclose the existence of the manual to all employees, which is available on the OPERAÇÕES GCR's 'intranet and conduct periodic training, together with training on administration procedures
- Board of Directors

Present this manual and other company policies at the integration meeting for its new employees.

Report any suspicious facts to the Compliance area, involving problems with image, ethics, as well as Money Laundering and Illegal Financing
- Guide and direct employees to use the whistleblower channel, when necessary.

COMMUNICATION AND COMPLAINTS CHANNEL

COMPLAINT

MES RÉALISATIONS

OPERAÇÕES GCR has a Communication and Complaints Channel, which can be accessed by all employees, customers, suppliers, and partners: compliance@operacoes-gcr.com

All complaints will be evaluated confidentially, preserving the complainant.

The involvement of everyone in the continuous application of this manual is necessary.

Thus, we will achieve the ethical and moral conduct expected by **OPERAÇÕES GCR** and its employees

Godzua Cornélio Rodrigues
Godzua Cornélio Rodrigues

Founder / CEO



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