



SUSTAINABILITY REPORT
TERMINAL XXXIX
2024



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WELCOME

ABOUT THE REPORT

MATERIALITY

MESSAGE FROM MANAGEMENT





Our inaugural Sustainability Report consolidates information of interest to stakeholders

ABOUT THE REPORT GRI 2-2, 2-3

With a great pleasure that Terminal XXXIX publishes its first Sustainability Report in 2025 (2024 base year), in line with its commitment to corporate governance, ethics, transparency and sustainable development. This report aims at consolidating information on the Company's economic, social and environmental performance, as well as presenting its governance structure, strategy, business model and relationship with key stakeholders.

Prepared based on the Global Reporting Initiative (GRI) standards, an international benchmark in sustainability reporting, the document presents qualitative and quantitative indicators selected according to the organization's materiality. The content was elaborated with the collaboration of the Company's various areas and underwent a rigorous review and validation process, which relied on the participation of the Compliance and Ethics Committee and the Audit Committee, and final approval by the Executive Board and the Board of Directors, ensuring the quality and transparency of the data reported. This process involves

analyzing the information, assessing the related internal controls, disclosing the results, formulating comments and providing feedback to foster ongoing improvement.

GRI 2-14

The scope of the report covers Terminal XXXIX's operations between January 1 and December 31, 2024*. The Company is a joint venture set up in equal parts by Caramuru Alimentos and Rumo Logística. There are no other entities included in the organization's financial report or sustainability report, both of which are annual and have a similar period of time.

**+ LEARN
MORE**

For information on the report or on the organization's strategy and management of sustainability and ESG aspects, please contact us via e-mail sustentabilidade@terminal39.com.br.

* Relevant facts from 2025 to the date of publication of the report have been included in the document.



MATERIALITY

GRI 2-29, 3-1, 3-2

In line with the best market practices and its partners' commitment, Rumo and Caramuru, Terminal XXXIX, for the first time conducted the process of building its materiality matrix, adopting the double materiality approach. Carried out in 2024 by external consultancy Grupo Report and approved by the Company's senior management, the elaboration involved extensive consultation with stakeholders to identify the most relevant topics for the business and society, with a focus on risks, impacts and expectations.

The process included individual interviews, online consultations, stakeholders mapping, analysis of in-house and external documents, as well as working meetings to ensure a broad and seamless vision.

The identification of impacts considered the Company's activities, as well as upstream and downstream operations, for an analysis of the entire value chain. Impacts were prioritized based on probability and severity criteria — considering intensity, extent and reversibility - as well as magnitude and relevance for stakeholders.

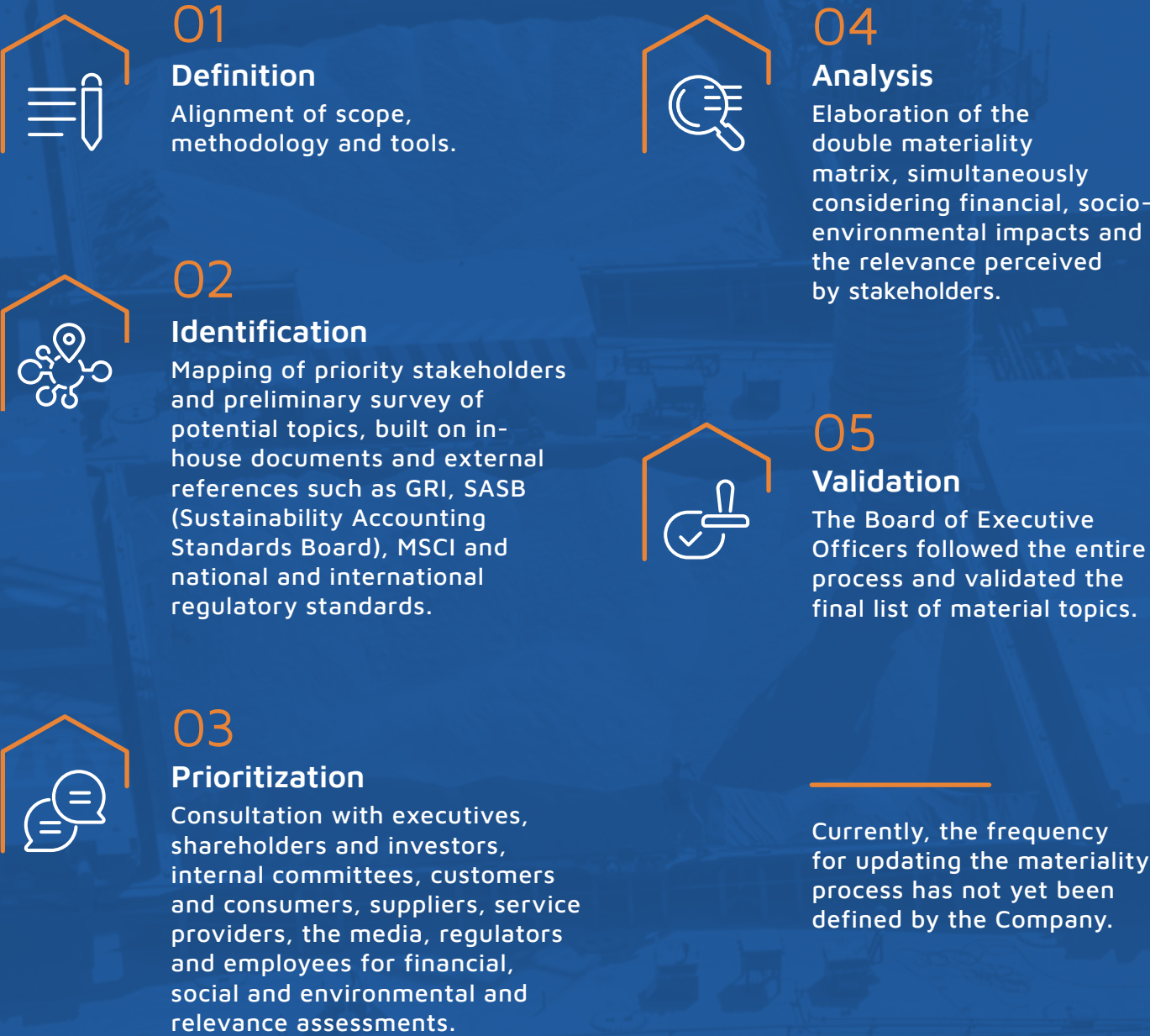
The process relied on the participation of various stakeholders, including 163 employees, 41 suppliers, 45 service providers, nine customers, 15 representatives of the Santos Port Authority and regulatory agencies.



Prioritization of impacts
considered probability, severity, magnitude and relevance criteria for stakeholders.

METHODOLOGY

The matrix elaboration observed five main stages:





MATERIAL TOPICS GRI 3-2, 3-3

Name	Description	Impacts ¹	Risks	Opportunities	SDG
Ethics, integrity and compliance	Accounting transparency, compliance with standards, laws and anti-corruption practices, promotion of the Code of Conduct, ethics in organizational processes, and action against antitrust practices and bribery, aiming at mitigating risks related to facilitating payments in ports.	Socio-environmental: bribery and corruption in the value chain; internal conflicts due to unethical conduct; increased confidence in whistleblowing channels with more seamless processes. Financial: audit costs, legal sanctions, compliance with anti-corruption laws and loss of revenue.	Association with unethical practices; corruption proceedings and sanctions; regulatory requirements, compliance costs and payments for facilitating port services.	Implement due diligence with partners, heighten integrity policies and ongoing monitoring with a focus on the value chain.	
Health, well-being and safety	Assurance of human rights, worker well-being and health by managing the organizational environment. This involves focusing on safety and reducing exposure to risk (by adapting the infrastructure and safety of the crew and port employees) while preserving the mental and physical health of employees, contractors and their families. Implementation of safety management systems to decrease accidents that affect people, property and the environment. It includes employee training and regular maintenance to prevent accidents.	Socio-environmental: prevention of accidents and ill-health; promotion of the physical and mental well-being of employees and contractors; educational campaigns and safety training. Financial indemnification costs, insurance, talent replacement and labor sanctions.	Injuries and work-related ill-health; legal proceedings and penalties; impact on reputation as an employer.	Bolster safety culture and mental health programs, enhancing engagement and productivity.	
Emissions management and climate change	Management of greenhouse gas (GHG) emissions, fossil fuel combustion to run vehicles, facilities and machinery in maritime operations. Risk management (physical and transition) and opportunities related to the climate change materialization.	Socio-environmental: GHG emissions from fossil fuels; energy consumption in operations and value chain; investment in low-carbon solutions (efficient machinery, renewable energy). Financial: environmental regulation costs, carbon pricing and sanctions.	Vulnerability to extreme weather events; higher regulatory costs; loss of competitiveness due to high emissions.	Invest in equipment electrification, energy efficiency and the adoption of renewable energies to reduce emissions.	
Privacy and data security	Safe management of collection, retention, and use of sensitive and confidential data, ensuring cybersecurity and privacy in the use of information, in compliance with the General Data Protection Law (LGPD).	Socio-environmental: personal and sensitive data exposure, affecting employees and partners. Financial: fines, litigation, reputational recovery costs and technological upgrades.	Leakage of strategic information; technological obsolescence; lawsuits due to non-compliance with the LGPD and other regulations.	Adopt robust cybersecurity technologies and processes to ensure privacy and bolster stakeholders' confidence.	

¹ The organization surveyed the actual and potential positive and negative impacts on the economy, the environment and people, including impacts on its human rights.



Name	Description	Impacts ¹	Risks	Opportunities	SDG
Innovation and technology	Investment in innovation and development of technologies enabling the capacity of adapting to new scenarios, market trends and innovations in the business model, including a process of ongoing improvement of the products/tools currently on offer and incentives for scientific research.	Socio-environmental: lower efficiency and customer satisfaction with obsolete technologies; gains from processes modernization and digitization. Financial higher operating costs and loss of competitiveness due to low innovation.	Delay in adopting new technologies; high upgrade costs; lag behind market demands.	Upgrade equipment and processes, invest in retrofit and innovation to enhance efficiency and meet market needs.	 
Supply chain management	Requirement, control and monitoring of suppliers' quality standards, including policies and procedures with socio-environmental criteria when contracting inputs and cargo transportation services. Decent working conditions and respect for human rights throughout the value chain, fostering ethical and sustainable practices.	Socio-environmental: infringement of labor rights and environmental impacts in the chain; quality of service compromised by supplier failures. Financial: regulatory compliance costs, operational disruptions and reputational recovery.	Social and environmental risks in the chain; supplier shutdowns; increased legal and regulatory requirements.	Bolster traceability of due diligence in the value chain, fomenting ethical and sustainable practices among suppliers.	  
Air quality	Management of air pollutant emissions, considering the impact of emissions from machinery and value chain operations, such as SO _x , NO _x and particulate matter (PM10).	Socio-environmental: emission of air pollutants (SO _x , NO _x and particulate matter) affecting nearby communities and employees. Financial: costs of environmental sanctions, regulatory compliance and impact remediation.	Sanctions for emissions above the authorized level; the company is associated with the degradation of air quality; growing fossil fuels costs.	Invest in technologies to mitigate pollution, upgrade equipment and solutions to lessen impacts on operations.	  
Transparency with customers	Promotion of transparency in customer relationship and communication.	Socio-environmental: loss of customer confidence and satisfaction due to lack of clear communication and improper relationship. Financial: litigation costs, regulatory compliance and loss of revenue due to reduced demand for services.	Complaints, lawsuits and impact on reputation; greater legal demand for transparency in operations and service provision.	Reinforce channels of dialogue and activity reports to enhance relationships and customer confidence.	

¹ The organization surveyed the actual and potential positive and negative impacts on the economy, the environment and people, including impacts on its human rights.



**R\$ 82.2
MILLION**

net income
for the year

10%
Ebitda growth

MESSAGE FROM MANAGEMENT

GRI 2-22

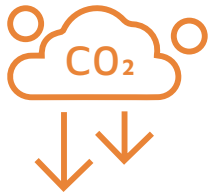
With a sense of responsibility and pride, we present Terminal XXXIX's inaugural Sustainability Report. This document reflects our ethical conduct, our commitment to integrity and our pursuit of operational excellence, guiding our actions and relations with the various stakeholders with whom we interact.

The year 2024 consolidated the Terminal as a strategic link for the domestic agricultural production distribution. We surpassed the mark of 5.97 million tonnes transported, hitting our highest volume since the operation's inception.

Financial performance recorded a 10% EBIT-DA growth, reinforcing the strength of our structure and the maturity of our management model. Net income for the year totaled R\$82.2 million, up 25.8% from 2023. We remain disciplined in the allocation of resources, with a focus on integrity and efficiency.

We have made progress in structuring our ESG strategy. In 2024, we conducted our first materiality process, listening to stakeholders and defining priorities based on actual risks and impacts. We have bolstered our management systems with a focus on security, data governance, respect for human rights, and environmental good practices.

**We surpassed the mark
of 5.97 million tonnes
transported in 2024**



10%

is the goal set
for reducing
emissions
from mobile
and stationary
combustion
by 2025

On the environmental front, we published our first greenhouse gas (GHG) emissions inventory in 2025 (2024 base year), including scopes 1, 2 and 3 in accordance with the GHG Protocol methodology. Based on this diagnosis, we have set the goal of reducing mobile and stationary combustion emissions by 10% by 2025 (2024 base year), in addition to having already ensured the use of clean energy through I-REC certification.

For the near future, we are prioritizing structural investments to expand our operational capacity, mitigating risks and ensuring the continuity of activities with safety, quality and productivity. The increased use of silos and the diversification of products that are managed by the Terminal allow it to respond flexibly to market demands.

We are confident that our role extends beyond port operations, and that our achievements are the result of an innovative, diverse, and engaged team within our organizational culture: 328 employees committed to the highest standards of conduct and performance. Our actions are guided by principles of responsibility, fostering relations grounded on ethics, respect, and transparency, while creating value for all stakeholders.

Our principles remain unwavering. We are driven to do the right thing, the right way.

Good reading!

Cristiano Faria
Managing Officer

Altamir Perottoni*
Chief Operations Officer

* In 2025, Altamir Perottoni steps down and João Marcelo Alves da Silva takes over the Company's co-leadership as managing officer.



Cristiano Faria
Managing Officer



Altamir Perottoni
Chief Operations Officer

THE TERMINAL XXXIX

WHO WE ARE
TIMELINE
OUR OPERATIONS





WHO WE ARE

GRI 2-1, 2-6



6 MILLION

tonnes of solid bulk
are transported by the
Company annually,
generating approximately

**R\$ 300
MILLION**
net revenue

Terminal XXXIX de Santos S.A., known as Terminal XXXIX, is a closed, for-profit corporation that operates exclusively in Brazil. It is a joint venture between Caramuru Alimentos S.A. and Rumo S.A., two of Brazil's leading agribusiness and logistics infrastructure companies. Located on the right bank of the Port of Santos (SP), the largest in Latin America, it provides services for receiving, storing and exporting solid bulk (soybean meal, soybean and corn). Since its inception, the Company has been fulfilling a role as a liaison between Brazilian agribusiness and global trade.

The organization's value chain encompasses inbound and outbound logistics, services, and its own operations. The Company transports an annual volume of 6 million tonnes of solid bulk materials and generates net revenues of approximately R\$300 million. Most of the cargo originates in the states of Mato Grosso, Mato Grosso do Sul, Goiás and São Paulo. The primary business partners involved in operations are suppliers, customers, service providers, and government agencies at the municipal, state, and federal levels.

OUR PARTNERS

Caramuru Alimentos S.A.

Caramuru is one of Brazil's leading soy, corn, sunflower and canola processing groups, with units in Goiás, Paraná, Mato Grosso, São Paulo, Pará and Amapá. It operates in the industrialization of grains, production of biodiesel, soybean ethanol and various inputs, as well as the export of bran, oil, lecithin, glycerin and SPC. It invests heavily in logistics, with operations in the ports of Santos and Santana and on the Tietê-Paraná and Tapajós-Amazonas waterways. In the domestic market, Caramuru is present under the Sinhá brand, offering soy and corn-based foods and supplying raw materials to different industries.

Rumo S.A.

Rumo, the Latin American's leading railway operator, provides integrated logistics solutions, connecting Brazil's agricultural hinterland with ports. Rumo's involvement as a partner in Terminal XXXIX ensures seamless synergy with the rail network, delivers agility and scale in operations, optimizing the domestic production shipment to international markets.





MISSION, VISION AND VALUES



Mission

To provide exceptional services to Brazilian agribusiness, creating value for customers, partners, employees and the community, with social and environmental responsibility.



Values

Our values include commitment, honesty, humbleness, innovation, respect, safety and unity.



Vision (2024 – 2030)

Act as an agent of change with a focus on economic, social and environmental sustainability.

Provide a safe and challenging environment that values and develops employees.

To be recognized as the best export terminal for agricultural products.



ESG PILLARS

ESG (Environmental, Social and Governance) is an integral part of our organizational culture, with strategic, environmental, social and governance actions outlining our commitment to climate change, the community and integrity in business relationships.



ENVIRONMENTAL PILLAR



- Biodiversity and ecosystem
- Energy efficiency
- Emissions management and climate change
- Air quality
- Water and effluents management
- Waste and residues management



SOCIAL PILLAR



- Employee attraction, development and retention
- Diversity, inclusion and equity
- Health, well-being and safety
- Transparency and customer relationship
- Community relations and local development



GOVERNANCE PILLAR



- Ethics, integrity and compliance
- Supply chain management
- Privacy and data security
- Innovation and technology
- Service quality and safety
- Government relations and regulatory agencies



OUR FIGURES



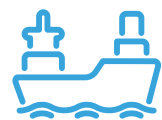
328
employees



42,281
road freight
loading/unloading



6,102,983
tonnes received



96
vessels serviced



54,701
railcars received



5,973,937
tonnes shipped





TIMELINE



Tonnes of static capacity

135,000

196,000

Terminal XXXIX is inaugurated, a partnership between Caramuru Alimentos and Ferronorte do Brasil. Static capacity of 135,000 tonnes.

Corporate change with the acquisition of Ferronorte Brasil by América Latina Logística (ALL).

The first bran pool is created in the Port of Santos, bolstering the cooperative export model.

Renewal of the lease agreement is anticipated with the port administration, ensuring operation until 2050.

The Board of Directors, the Ethics Channel and the Code of Conduct and Ethics are created. Own shiploader is inaugurated at berth 37.

Increase in reception capacity from 1,250 tonnes/hour to 2,500 tonnes/hour.

2002

2006

2016

2018

2021

2023

2003

2015

2017

2020

2022

2024

First company in the Port of Santos to receive five simultaneous certifications: ISO 9001, ISO 14001, OHSAS 18001, HACCP and GMP+FSA.

Merger between ALL Logística and Rumo Logística. Rumo becomes a partner in the operation.

The Company starts operating as a Port Operator, fully undertaking the execution of services.

Works began on expanding storage from 135,000 to 196,000 tonnes, with two new vertical silos.

The Internal Audit, Compliance, Risks and Internal Controls areas and corporate policies are put in place. ANTAQ approves berth 37's back area densification. The Company hits 5 million tonnes shipped.

The materiality matrix is elaborated with a double materiality approach.



OUR OPERATIONS GRI 2-6

Located on the right bank of the Latin America's largest port, the Port of Santos, Terminal XXXIX was strategically set up to transport grains originating in the Brazilian Midwest region. Operating under the white-label model, which offers equal conditions for all customers exporting their products, it accounts for 70% of the port's soybean meal exports and holds 25% of the national share in this market. This model reinforces its role as a liaison between Brazilian agribusiness and the global market.

Its static capacity of 196,000 tonnes, distributed between a horizontal warehouse with 135,000 tonnes capacity and two vertical silos storing 61,000 tonnes includes in its logistics infrastructure, a branch railroad and its own locomotive, as well as two independent receiving lines, which allow for the efficient separation of stored products.

Berth 37, the designated area for shipping operations, boasts sufficient depth to accommodate vessels with a draft of up to 14.20 meters, offering enhanced flexibility

for export operations. The Terminal is capable of shipping up to 3,000 tonnes per hour.

A notable strength of this operation is the innovative use of remote-commanded excavators, which ensure employee safety and enhance loading efficiency. The reception system is equipped with a railway hopper that facilitates the simultaneous unloading of three railcars. It is also fitted with integrated scales for precise weighing, along with two road platforms designed to accommodate bulk trucks, interlink semi-trailers, road vehicle trains, among others.

In addition to the physical structure, the Company invests in quality and safety. Since 2003, the Terminal has stood out in the field of quality and sustainability, becoming the first port terminal in the country to simultaneously receive five certifications: ISO 9001, ISO 14001, OHSAS 18001, HACCP and GMP+FSA.



196,000
tonnes of static capacity

70%
of soybean meal
exports from the
Port of Santos

**Our berth is deep enough to
accommodate vessels with a
draft of 14.2 m**





Commitment to sustainability and social responsibility composes the Company’s essence, which adopts practices in line with national and international ESG and compliance guidelines. In recent years, the Company has undergone restructuring based on a survey carried out by a risk management consultancy. The survey identified strategic points for consolidating business growth. The work yielded the division of areas, the establishment of structured policies and procedures, and the enhancement of governance. Consequently, shareholders experienced increased security. ([read more in Corporate Governance](#)).

EXPANSION PROJECT

Terminal XXXIX is undergoing a strategic transformation with its ongoing expansion project, which aims at doubling capacity over the next five years, reaching a total of 366,000 tonnes by 2030. The proposal outlines investments in engineering and technology studies, with a focus on enhancing logistics efficiency and ensuring compliance with government commitments, particularly within the context of the densification contract. It is at the licensing stage, with the executive project completed and ready for execution. The initiative includes the adoption of cleaner technologies, greater automation and structural advancements that reinforce Terminal XXXIX's position as a benchmark in the port sector.



Learn more about our operations on the institutional video [available on YouTube](#).



THE PORT OF SANTOS

Located on the coast of the state of São Paulo, it is the Latin America’s largest and most important port. The port is recognized as one of Brazil's main logistics hubs. It plays a strategic role in foreign trade, accounting for roughly 28% of Brazil's trade balance.

The Port of Santos relies on a modern infrastructure and continuously invests in expansion, technology, safety, and sustainability. It handles a wide range of cargo, including grains, containers, vehicles, fuel, and chemicals. It stands out especially as the largest export corridor for agricultural commodities, such as soybean meal, soybeans and corn, pulp and sugar.



INNOVATION AND TECHNOLOGY

GRI 3-3: INNOVATION & TECHNOLOGY

Terminal XXXIX continuously invests in technology and in implementing initiatives aimed at innovation and operational efficiency. Current actions focus on standardizing and digitizing logistics processes, optimizing the use of resources and reinforcing engagement with strategic partners. While there are still no formalized policies on this topic, the Company has outlined measures to prevent and mitigate negative impacts, besides a validation approach in controlled environments. New equipment and improvements are tested on a reduced scale to identify faults or errors without affecting operations.

Other measures, such as the standardization and digitization of operational processes, have bolstered traceability and the control of indicators in real time, enabling data-based decision support.

The effectiveness of these actions is continuously monitored through managerial reports, periodic analysis of indicators and alignment meetings between the logistics, operations and IT areas. The process enables to identify deviations and make adjustments, in a cycle of ongoing improvement.

The objectives and targets established are focused on optimizing permanence of trucks at the Terminal, reducing idleness at berths, enhancing accuracy and logistics flow predictability, also fostering comprehensive process integration and standardization. The indicators that are monitored include the average dwell time per vehicle, the average operating time per vessel, the percentage of trucks with scheduled entry, and the percentage of logistics processes with systemic integration completed.

The standardization and digitization of operational processes have enhanced traceability and the control of indicators in real time

CORPORATE GOVERNANCE

ORGANIZATIONAL STRUCTURE

ETHICS, INTEGRITY AND COMPLIANCE

RISK MANAGEMENT AND INTERNAL CONTROLS

TRANSPARENCY, PRIVACY AND DATA SECURITY





ORGANIZATIONAL STRUCTURE

GRI 2-9, 2-10, 2-12

Terminal XXXIX's corporate governance ensures that strategic, operational and ethical decisions are aligned with the principles of sustainability, responsibility and stakeholders' value creation. The year 2024 was marked by actions focused on Compliance, Risk Management and Internal Controls, and Internal Audit areas.

The structure is composed of the Board of Directors, the Audit Committee, Compliance and Ethics Committee and Board of Executive Officers, as well as an Internal Audit area, linked to the Board of Directors. Both the Board of Directors and the Board of Executive Officers play a central role in overseeing and making decisions about the

organization's impacts on the economy, the environment and people, comprising environmental, social and economic topics.

BOARD OF DIRECTORS

The Board of Directors is the highest governance body, acts as a deliberative joint committee and plays a strategic role. The Board conducts business with a long-term vision, making decisions that ensure sustainable growth, balancing the interests of the partners and preserving institutional integrity. The Board is liable for proposing, guiding, and approving the guidelines related to the business, including risks, hiring

and dismissing external auditors, dividends, financial statements, and the strategic vision for the business's sustainability.

Its duties comprise defining actions and goals aimed at achieving ESG objectives, as well as for developing policies and overseeing the processes of identifying and managing impacts on the economy, the environment, and people. The organization relies on advisory groups of partners to follow up and report on actions, as well as to monitor the execution of activities, communicating material facts to stakeholders when necessary.

Information on impact management is reported to the Board from different fronts, including advisory committees and the Board of Executive Officers. Reporting is conducted on a monthly basis or as needed. This process involves meetings and improvement reports, using presentations to ensure effective follow-up, monitoring, and



In 2024, the Company focused on compliance, risk management, and internal control initiatives

the visualization of agenda items. The minutes of these meetings serve as formal and transparent records of decisions taken, issues discussed and other relevant information. [GRI 2-13](#)



In 2024, the Board requested the elaboration of a double materiality matrix with meetings and definitions coordinated by in-house groups and partners’ representatives. As this is the inaugural year of implementing the matrix and consolidating the indicators, the long-term targets will be monitored as of 2025, and the effectiveness analysis will be carried out in 2026.

The Board¹ members provide the necessary support for the activities of the Compliance, Audit and Risks and Internal Controls areas to be properly conducted, so that to mitigate risks and guide decision-making process. The chairman of the Board of Directors does not hold executive position in the organization. [GRI 2-11](#)

Terminal XXXIX sets out a formal nomination and selection process for the members of the highest governance body and its committees. This process takes into account skill profiles and the adoption of transparency principles. Members are appointed based on the level of trust established. Among the criteria assessed in the nomination and selection process are the involvement of stakeholders, the candidates’ skills and experience, and the participation of senior management. [GRI 2-10](#)

Members of the Board of Directors of Terminal XXXIX on 12/31/2024:

Marcus
Erich Thieme



Mr. Thieme took over as Chairman of the Board of Directors at the end of 2024. He is the chief executive officer of Caramuru Alimentos S.A., a company he has worked for since 2021, initially as Investor Relations statutory officer. An economist from Mackenzie University, he has a specialization from the Institute of Economic Research Foundation (FIPE) and an MBA from Saint Mary's University (abd; all but dissertation) (Canada). He has over 30 years' experience in capital markets, having worked for Banco Pactual, RBC Capital Markets (Canada), Vale S.A., Tenda, Citibank, Tereos International (as officer and member of the Board of Directors of Guarani), Bunge and ONE. He is certified as a Fiscal Council member by the Brazilian Institute of Corporate Governance (IBGC).

Altamir
Perottoni Junior



In 2024, he served as Terminal XXXIX’s chief operations officer, besides holding the position of Rumo’s commercial officer. With solid experience in B2B companies, he has worked for over 17 years in sales and marketing, strategic planning and business development areas. A results-oriented manager, he has the skills to engage and influence different groups, in addition to financial skills to develop business plans, valuations, scenarios and simulations. His expertise includes business development, team leadership, strategy and liable for P&L. In earlier 2025, he became Rumo's chief commercial officer and a Board member, transferring his position as Terminal XXXIX’s officer to Mr. João Marcelo Alves da Silva.

Wesley
Sousa Rezende



Mr. Rezende is Caramuru's International Commodities officer, liable for the export of products such as soybeans, corn and their byproducts. He leads the operations of the Sorriso (MT) unit for the trading of soy protein concentrate (SPC), biodiesel and lecithin, as well as coordinates the Non Gmo Hard IP Program, which ensures the traceability and preserved identity of products free from GMO contamination.



Learn more about the Board of Directors and the competencies of its members at [the website](#).

¹ Current members of the Board (2025) are Marcus Erich Thieme (chairman) and João Marcelo Alves da Silva (Rumo's Ports Officer, who took the office of Board member and managing officer of Terminal XXXIX in 2025).



AUDIT COMMITTEE

With members appointed by the shareholders, it reports to the Board of Directors, acting as an oversight body for Risk Management and Internal Controls, Compliance and Internal Audit activities. It aims at providing technical guidance to these areas, ensuring that critical processes are conducted reliably, complying with standards and mitigating relevant risks.

COMPLIANCE AND ETHICS COMMITTEE

It reports to the Audit Committee, and is liable for setting out the criteria for good ethical and integrity practices. It guides advisory, investigative and disciplinary instructions necessary for the effectiveness and operation of the Compliance Program. Their work contributes directly to the preservation of reputation and the prevention of misconduct in all the Company's relationships.

 **LEARN
MORE**

Learn more about the committees and the competencies of their members at [the website](#).

BOARD OF EXECUTIVE OFFICERS

The Board of Executive Officers plays an instrumental role in the Company's daily operations and is liable for implementing the strategic plan outlined by the Board of Directors. With a technical and operational role, it ensures the execution of corporate guidelines and the fulfillment of business objectives.

Within the scope of operational and financial processes, the Board of Executive Officers is liable for compliance with internal rules, laws and regulatory provisions, besides the application of disciplinary measures in cases of infringement of the integrity standards defined by the Board of Directors and the Audit Committee.

The Board delegates responsibility for managing the organization's impacts to the officers. The executives' duties include developing and implementing sustainability strategies, complying with applicable regulations and standards, promoting innovation and research, publishing sustainability reports, and assessing risks and opportunities related to the organization's impacts.

 **LEARN
MORE**

Learn more about the Board of Executive Officers and the competencies of its members at [the website](#).

INTERNAL AUDIT

The area is liable for conducting, planning, executing and assessing internal audit activities and advising the Board, Audit Committee and Executive Board on the control of Terminal XXXIX's main operations, as well as meeting in-house demands and those of external control bodies, aiming at adding value to the business and providing systematic and objective advice to the Company's other areas.

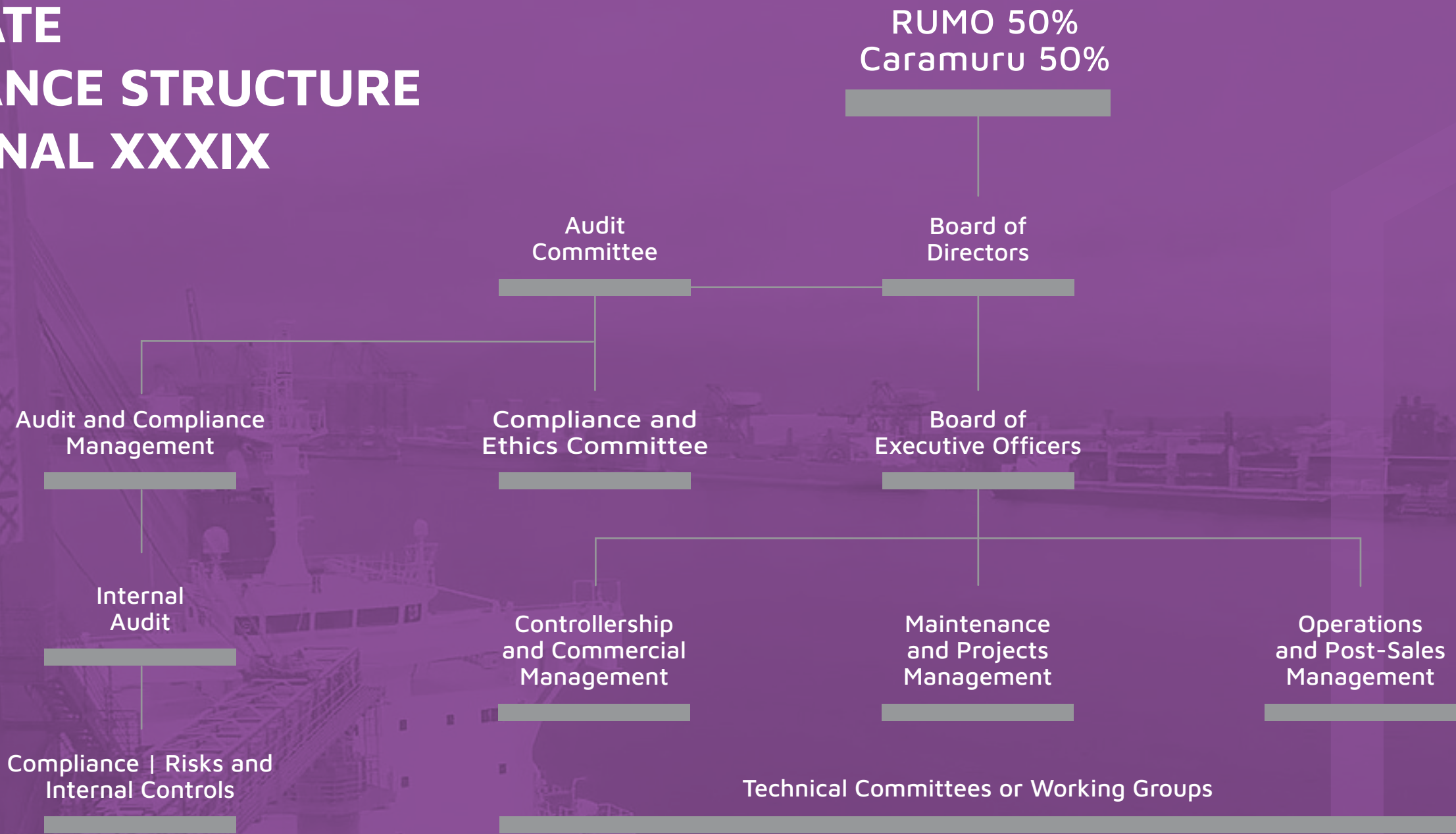
 **LEARN
MORE**

Learn more about the Internal Audit at [the website](#).





CORPORATE GOVERNANCE STRUCTURE OF TERMINAL XXXIX





Our Code of Conduct and Ethics* sets out guidelines for employees, customers, partners and suppliers

ETHICS, INTEGRITY AND COMPLIANCE

GRI 3-3: ETHICS, INTEGRITY AND COMPLIANCE, 2-23, 205-1, 205-2

Committed to responsible business practices, Terminal XXXIX consolidated the areas of Compliance, Risk Management and Internal Controls, and Internal Audit in 2024, in line with the best corporate governance practices. This strategic decision is intended to align local practices with the requirements of international customers and partners.

Governance indicators based on the guidelines of the Brazilian Institute of Corporate Governance (IBGC) were implemented, and a risk matrix was approved by the Board, in line with a corporate risk prevention and response approach. ([read more in Risk management and internal controls](#)).

An essential document for Company management, the [Code of Conduct and Ethics* sets out](#) conduct guidelines for Terminal XXXIX's employees, customers, partners and suppliers. These commitments are based on recognized intergovernmental instruments,

such as national and international anti-corruption legislation, anti-money laundering laws, the Coso ERM internal controls methodology (Committee of Sponsoring Organizations of the Treadway Commission – Enterprise Risk Management) and Cobit (Control Objectives for Information and Related Technology), framework of IT governance and management. It also provides guidelines for conducting due diligence, implementing the precautionary principle, and adhering to internationally recognized human rights, which encompass compliance with current legislation, ensuring adequate working conditions, facilitating free political and trade union association, and prohibiting forced and child labor. These commitments apply to employees and partners.

*Our Code of Conduct is only available in portuguese



The Code of Conduct and Ethics details the ESG Pillars as an integral part of the organizational culture, underscoring employee safety and the Company's social and environmental responsibility ([read more in ESG](#)

[Pillars](#)), besides mentioning the ISPS Code (International Ship and Port Facility Security Code) as a set of maritime security actions to combat terrorism, highlighting the responsibility of the Asset Security area for compliance.

The Company does not tolerate corruption, money laundering or bribery. These issues are dealt with in accordance with the Anti-Corruption, Money Laundering, Antitrust and Bribery Policy, under the Board of Directors' oversight. No lawsuits pending or dismissed relating to unfair competition or monopoly were recorded in 2024. In addition, during this period, there were no confirmed cases of corruption involving the Company or its employees. [GRI 205-3, 206-1](#)

During the year, the Terminal assessed 100% of the 142 controls mapped to mitigate risks, adopting a structured and multifaceted approach to prevention and control. This process is conducted by the Internal Audit, Risks and Internal Controls, Compliance and Asset Security areas. Monitoring is ensured by instruments such as: an Ethics Channel, an ombudsman's office, the in-house Feedz platform, as well as specific policies and procedures.

Terminal XXXIX adopts processes to prevent and mitigate conflicts of interest, including the role of the Compliance and Ethics Committee in the application of policies, procedures, education and training programs, transparency in the recording of relevant decisions and compliance mechanisms. To foster transparency, eventual conflicts of interests in its business relationships are communicated to stakeholders. [GRI 2-15](#)

The Board of Directors is the highest level liable for approving and overseeing the incorporation of commitments and policies, applied to all the Company's activities and its business relationships. These commitments are communicated to employees, business partners and other relevant parties through mandatory training courses held on an annual basis and when new employees are hired, as well as through in-house communications. This ensures that the ethical culture is disseminated at all levels.

These commitments are implemented at various organizational levels through the following processes: delegation, assignment of responsibilities, follow-up accountability, and regular evaluations. Integration into organizational strategies, policies and



100%
of the 142
controls mapped
to mitigate risks
were assessed



operations is carried out through the development of operational procedures, training, impact assessment, ongoing monitoring and review, due diligence procedures, in-house communication, besides fomenting feedback and employee engagement. The organization promotes transparent reporting on the progress of these actions. [GRI 2-24](#)

There are several mechanisms for communicating crucial concerns to the Board of Directors. The main mechanisms include regular reports and presentations, meetings with the Executive Board and advisory committees, internal and external audit reports, risk reports, financial performance presentations, strategic analyses and business plans, reviews of legal and regulatory issues, as well as specific communications in the event of crises and emergencies. Currently, the Company does not keep track of the number of concerns reported to the Board. [GRI 2-16](#)

The Company offers a variety of resources for individuals to access information regarding the organization's responsible policies and practices, which include manuals and supporting documentation, mentoring programs, external consultancy, participation in forums, in addition to sharing best practices to guide employees and partners. [GRI 2-26](#)

Communication and training about anti-corruption policies and procedures¹ [GRI 205-2](#)

Governance members	Informed	Trained
Total headcount	9	9
Total headcount informed/trained	3	3
Percentage of employees informed/trained	33.33%	33.33%
Employee by employee category	Informed	Trained
Management		
Total headcount	3	3
Total headcount informed/trained	3	3
Percentage of employees informed/trained	100%	100%
Supervision/coordination		
Total headcount	10	10
Total headcount informed/trained	10	10
Percentage of employees informed/trained	100%	100%
Engineering		
Total headcount	1	1
Total headcount informed/trained	1	1
Percentage of employees informed/trained	100%	100%
Leadership		
Total headcount	8	8
Total headcount informed/trained	8	8
Percentage of employees informed/trained	100%	100%

Employees by employee category	Informed	Trained
Administrative		
Total headcount	49	49
Total headcount informed/trained	49	49
Percentage of employees informed/trained	100%	100%
Operational		
Total headcount	246	246
Total headcount informed/trained	240	240
Percentage of employees informed/trained	97.56%	97.56%
Young apprentice		
Total headcount	11	11
Total headcount informed/trained	11	11
Percentage of employees informed/trained	100%	100%
Total		
Total headcount	328	328
Total headcount informed/trained	322	322
Percentage of employees informed/trained	98.17%	98.17%

¹ All employees are located in the Southeast Region, in Santos-SP.



COMPLIANCE PROGRAM

One of the year’s highlights was the launch of the [Compliance Policy](#) inspired by Decree No. 11.129/2022 (new regulation of the Anti-Corruption Law). The document sets out guidelines to ensure ethical and legal compliance in operations, fostering a culture

of integrity and transparency. It also provides the structure of the Terminal XXXIX’s Compliance Program. The program includes mechanisms for monitoring in-house policies and procedures, internal and external audit, as well as identifying deviations and implementing corrective actions that are documented and presented to the Board of Executive Officers.

The program’s pillars include:



Senior management support is crucial for ethical culture



Risk management involves identifying and documenting threats



Codes and manuals formalize corporate positioning



Communication and training ensure transparency and awareness



Internal controls promote integrity and compliance



Ethics channel enables secure reporting of irregularities



In-house investigation ensures compliance analysis



Audit and monitoring ensure the program's effectiveness



Due Diligence assesses integrity risks in relationships



Inclusion and diversity are valued at the workplace

ETHICS CHANNEL

GRI 2-25, 2-26

In 2024, the Terminal migrated its Ethics Channel to the Resguarda platform, which is ISO/IEC 27001 certified in information security. The channel is a secure and confidential instrument for reporting any infringements. It facilitates the submission of reports, suggestions, and recommendations, whether anonymously or with attribution, to ensure integrity and respect. The channel is available 24 hours a day, seven days a week. Reporting any situation that indicates an infringement or appearance of a violation of ethical principles, policies, rules, laws and regulations, or any other improper and/or illegal conduct is possible, as well as recording negative impacts caused directly or indirectly by the Company.

The information received is reported monthly to the Board of Executive Officers, the Compliance and Ethics Committee and the Audit Committee and quarterly to the Board of Directors, with reports on the investigation and progress of the complaints received.

In 2024, the Ethics Channel was monitored to identify patterns and guide ongoing improvements in policies. This process included enhanced training and an institutional lecture (Elo Porto), aimed at widely publicizing the channel and presenting the results to employees. The initiatives have increased confidence in the channel, bolstering integrity and transparency in the corporate environment. During the period, no complaints or cases requiring remedy for stakeholders were recorded.



www.resguarda.com/terminalxxxix.canaldedenuncia



0800 591 2234 / 0800 891 4636



terminalxxxix@resguarda.com



+55 11 47806110



RISK MANAGEMENT AND INTERNAL CONTROLS

The objective of risk management is to enhance the clarity and security of processes, facilitate decision-making, safeguard the Company's reputation, and elevate the institutional maturity of Terminal XXXIX, besides optimizing alignment with the expectations of partners and stakeholders. Conducted in a collaborative manner, with each area acting as responsible for its own risks, it is guided by the Risk Management Policy, which brings together principles, guidelines and responsibilities for integrating risk management and internal controls into the corporate strategy.

Our risk management processes are composed of methodologies based on the Coso ERM, ISO 37001 and Cobit frameworks

The policy, which defines strict criteria for test sampling and underscores an ongoing improvement, employs a systematic approach to risk identification, analysis, assessment, treatment, and monitoring. It applies a risk matrix based on a combination of impact and probability, besides adopting concepts of inherent and residual risk. The assessment of controls considers the confidence level (CL) and enables to measure the control risk. Treatment can involve actions such as avoiding, reducing, accepting and sharing risks.

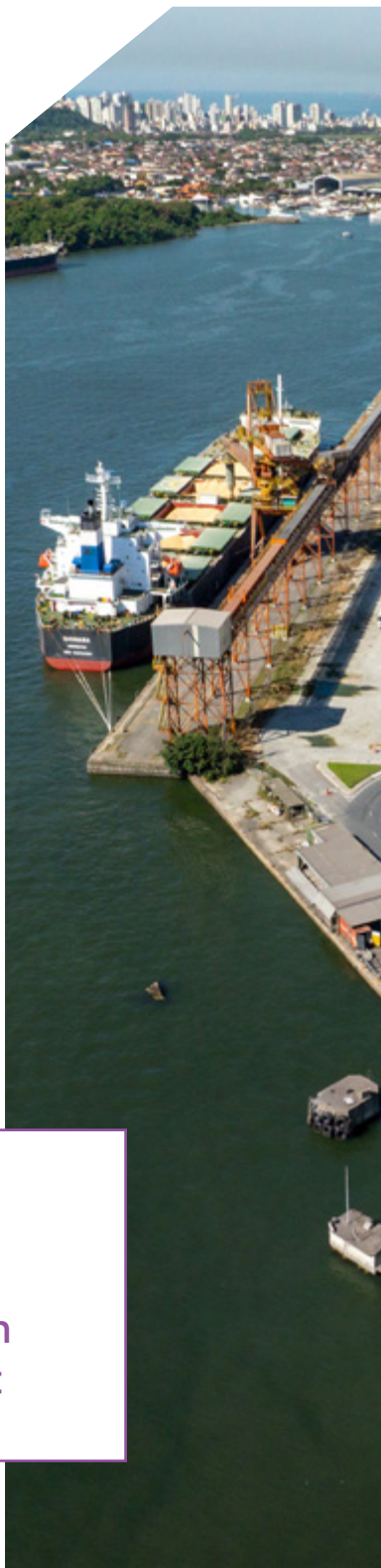
Management is applied to projects, processes, products and services, and is guided by structured methodologies built on the Coso ERM and ISO 37001 frameworks (which set out requirements and guidelines for the implementation of an anti-bribery management system), and Cobit (Control Objectives for Information and Related Technology), which aims at enhancing the governance, management and audit of

information systems, helping to mitigate the related risks. Responsibility for implementation is shared between the Audit Committee, Board of Executive Officers, Risk Management area and risk managers, with a focus on ensuring informed decisions, ethical culture and transparency.

Terminal XXXIX elaborated a risk matrix in accordance with international guidelines, such as Coso ERM 2017 and Cobit, and the provisions of the Sarbanes-Oxley Act (SOx, enacted in the United States to safeguard investors and the general public against frauds and accounting irregularities perpetrated by publicly-held corporations), and guidelines set forth by the Brazilian Securities and Exchange Commission (CVM). This choice ensured a common and standardized language with stakeholders and anticipated regulatory or contractual requirements.



The Terminal's risk matrix follows national and international guidelines such as Coso ERM 2017 and Cobit





Validated by the Audit Committee and approved by the Board of Directors, the matrix has 142 mapped risks that directly impact the Company's financial statements and a contingency plan for the fronts addressed. The assessment includes the International Ship and Port Facility Security Code (ISPS Code) and is linked to sustainability and governance indicators (ESG). The Company intends to incorporate the ESG materiality matrix into the risk matrix by 2026, including climate and environmental aspects in the control model.

Risks are monitored and updated supported by the business areas, helping to maintain and ensure that eventual risk scenarios are foreseen, tested and evidenced in the business continuity plan (BCP). Risk analysis involves two elements: impact and probability. The combination of these factors defines the level of risk, guiding mitigation and control initiatives.

LEARN
MORE

Learn more about internal controls and risk management in our [Financial Statements](#) and at [the website](#).

CLIMATE RISK MAPPING GRI 201-2

The Terminal's climate risk study conducted in 2024 base year identified the main events that could impact its operations and proposed adaptation measures. The most significant phenomena include storms, high winds, waves and rising sea levels, which can cause operational disruptions and damage to port infrastructure.

The analysis adopted a methodology based on the Intergovernmental Panel on Climate Change (IPCC), considering threats, exposure and vulnerability, and applied data from the Santos Port Authority and the Brazilian National Waterway Transportation Agency (Antaq). The primary risk identified for the Terminal pertains to rainfall, which has the potential to impede the shipping of solid bulk, such as soybean meal, soybeans, and corn, even at low intensity. Over the past five years, the average annual number of days of downtime due to this factor has been 52.

Other weather events, such as extreme winds and fog, have an indirect impact on the Terminal's shipping operations. Receiving operations by truck and train continue as normal during these periods.

The organization is committed to monitoring the evolution of climate impacts and assessing improvements in control systems and financial metrics, aiming at more accurately foreseeing costs and benefits related to adaptation and mitigation opportunities.

LEARN
MORE

Learn more about climate change in [Environmental management](#).

CRISIS MANAGEMENT

Terminal XXXIX's Business Continuity Management Policy sets out guidelines, roles, and responsibilities to ensure that, in the event of a disruptive situation, a predetermined acceptable level of service is delivered, and that measures are taken to ensure the sustainability of the Company's activities. The guidelines are designed to mitigate risks due to internal failure and external factors, significant operational downtime, reputational damage, incident response and disaster recovery.

A set of strategic plans ensures continuity of operations. These plans are designed to protect the integrity of activities, respond quickly to emergencies, and minimize impacts in the event of disruptive events.





Different stakeholders are engaged in data security policies and processes

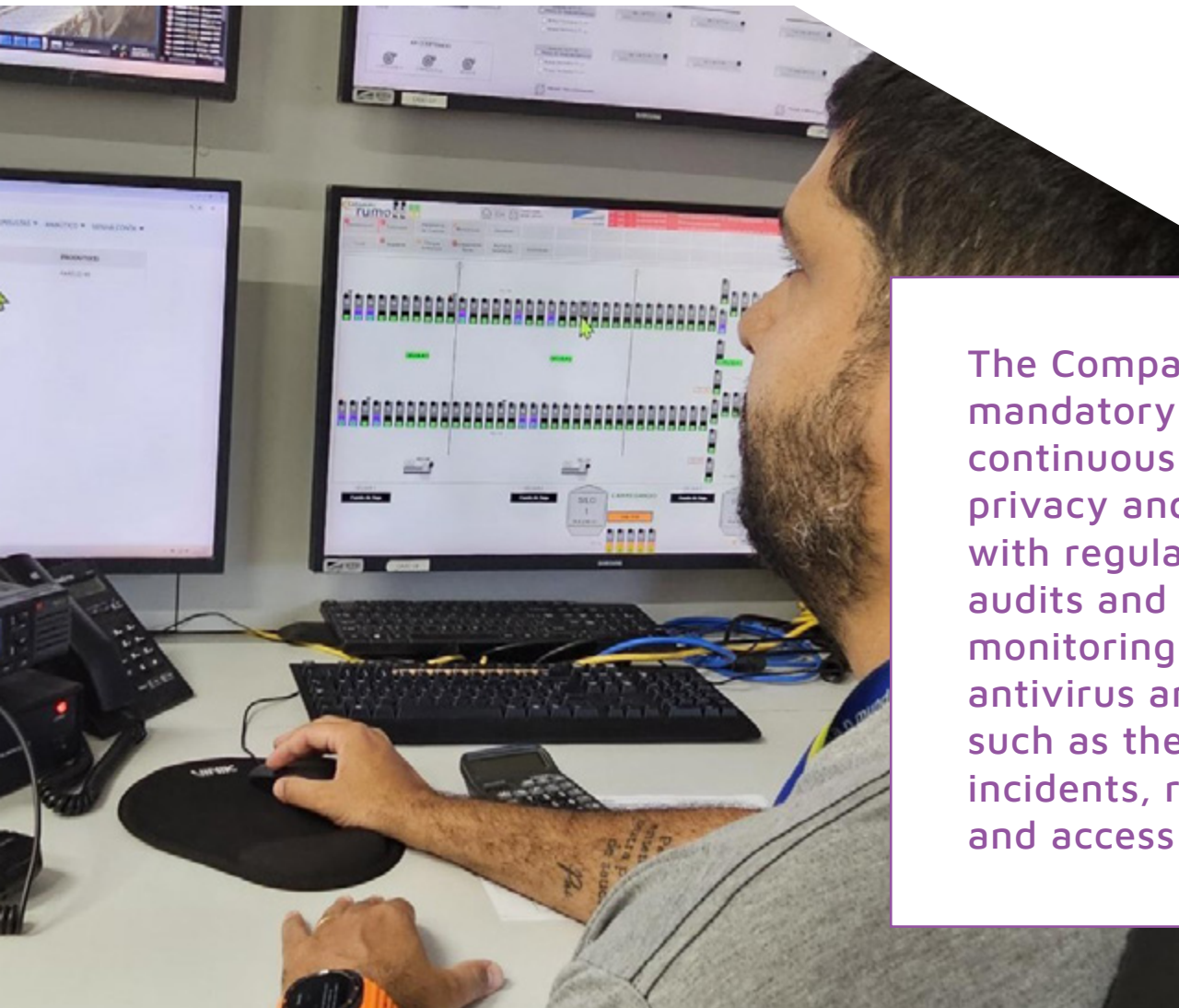
TRANSPARENCY, PRIVACY AND DATA SECURITY

GRI 3-3: PRIVACY AND DATA SECURITY, 2-29

At Terminal XXXIX, information security is treated as a shared responsibility by all employees and partners. This includes a commitment to stakeholder data, protection against leaks and maintaining confidentiality under all circumstances. In-house policies comprise from information security to the protection, retention and disposal of personal data, with a focus on confidentiality, integrity, availability, transparency and minimization.

The Company engages with various groups of stakeholders, including business partners, civil society organizations, customers, employees and other workers, governments, local communities, shareholders, suppliers and trade unions. However, all data, records and information generated or stored in its systems are the Company’s exclusive property.

This engagement aims at identifying actual and potential impacts, managing risks and opportunities, fostering innovation, complying with regulatory requirements, fostering sustainability, meeting investor demands and building lasting relationships. It is promoted through seamless communication, commitment to decision-making, corporate social responsibility and continuous evaluation of interactions.



The Company promotes mandatory and continuous training in privacy and security, with regular internal audits and technical monitoring through logs, antivirus and indicators such as the number of incidents, response times and access compliance.

In 2022, 2023 and 2024, the Company reinforced the access controls and information protection, in compliance with information security standards and in dialogue with the requirements of the General Data Protection Law (LGPD) and ISPS Code. The [Data Privacy and Protection Governance Policy](#)

sets out the guidelines for the processing of personal data by the Company and third parties. In addition to this policy, the [Privacy Policy](#) was drawn up aiming at describing the protection measures and procedures for processing personal data, which applies to online and physical activities carried out

by Terminal XXXIX. Other policies set out guidelines for protecting information assets, set deadlines and criteria for storing and disposing of data, and define technical and organizational barriers to prevent leaks or improper access.

The year's highlights in the area include projects such as the advanced validation of road schedules, which helps to reduce the collection and storage of physical personal data, besides expediting the process of trucks entering the Terminal. On another front, processes have been established to bolster the Company's cyber protection, with ongoing monitoring and proactive identification of threats, including in environments such as the dark web.

In 2024, the Terminal did not record any formal complaints relating to breaches of privacy of customers, employees, third parties or suppliers. In addition, no incidents of leakage, theft or loss of personal data under the organization's responsibility were identified. It should be noted that all of Terminal's customers are legal entities, which reduces exposure to risks involving personal data. [GRI 418-1](#)



In **2024**, the Terminal has not received any records relating to breaches of privacy of customers, employees, third parties or suppliers.



TRANSPARENCY WITH CUSTOMERS

GRI 3-3: TRANSPARENCY WITH CUSTOMERS

The Company's Integrated Management System guides its efforts to deliver services that meet its customers' needs, underpinned by a dedication to quality, productivity, innovation, and social, community, and environmental responsibility.

The Commercial Policy sets out guidelines to lead agreements with customers, ensuring fairness, clarity and soundness in negotiations and contracts, and the Code of Conduct and Ethics outlines the attitude expected of employees. To mitigate potential risks such as miscommunication, conflicts over the scope of services, or perceptions of unequal treatment, the organization employs standardized contractual clauses and provides for mutual penalties to safeguard stakeholders. Quarterly alignment meetings are held with the main customers, as well as biannual satisfaction surveys and an exclusive channel for contractual clarifications. In the event of irregularities in shipped cargo, the Terminal brings together managers from the operational and quality areas to elaborate on corrective action plans.



SATISFACTION SURVEY

The results of the satisfaction surveys are monitored on a six-month basis. These surveys assess criteria such as the clarity of contractual information, the speed of service, and transparency in communications. The results, consolidated by the Commercial area, are discussed with the operational areas for adjustments whenever the expected minimum score of 8.0 is not achieved. Historically, the Terminal has maintained satisfaction rates above 93% in the overall assessment, with percentages below this level triggering improvement processes and action plans.

The organization now adopts clauses with simplified language and offers contractual onboarding meetings to facilitate understanding of the logistics contract, which raised the satisfaction rate for the item "clarity of information" from 89% to 96% in the survey. In addition, the protocol for responding to



We maintain satisfaction
rates above

93%

in the overall assessment

complaints has been improved, reducing the average return time from five to three working days.

According to the most recent survey, published in February 2025, 100% satisfaction was achieved in categories such as Professionalism, Efficiency and Courtesy.

Institutional transparency has been improved at the website www.terminal39.com.br, which now clearly presents the governance structure, committee members and public regulatory documents.

ENVIRONMENTAL MANAGEMENT

EMISSIONS AND CLIMATE CHANGE

AIR QUALITY AND WASTE MANAGEMENT

BIODIVERSITY AND WATER





EMISSIONS AND CLIMATE CHANGE

GRI 3-3: EMISSIONS MANAGEMENT AND CLIMATE CHANGE

The Terminal adopts sustainability strategies and practices in the environmental area focused on reducing waste of resources and bolstering the efficiency of operations. In this regard, the Company's environmental management is based on ISO 14001 certification, which sets out the requirements for an Environmental Management System (SGA) and guides the creation of controls to manage environmental impacts, such as resource consumption and waste generation.

In 2025, the Company conducted its first greenhouse gas (GHG) emissions inventory, audited for 2024 emissions and entered into the Getúlio Vargas Foundation (FGV) Public Emissions Registry (RPE) platform. Elaborated by the Company's Environment department, the inventory observed the methodology of the GHG Protocol Corporate Accounting and Reporting Standard and complied with the guidelines of the ISO 14064 standard. The inventory considers

scopes 1 (direct emissions), 2 (electricity consumption) and 3 (other indirect emissions resulting from the Company's activities, with categories 5 - Waste generated in operations; 6 - Business travel; 7 - Home-work emissions; and biogenic emissions and removals).

An analysis of the greenhouse gas (GHG) inventory indicated that the primary sources of emissions were concentrated in machinery and equipment. As a result, the Company replaced old units with more energy-efficient ones, such as old wheel loaders and excavators. In addition, the equipment is kept off during periods of low demand, both in receiving and shipping, which contributes to reducing fuel consumption and related emissions.



**In 2025 we conducted
our first GHG
emissions inventory,
referring to emissions
in 2024**



10%

was the reduction target for mobile and stationary combustion emissions by 2025 (2024 base year).



In 2024,
we saw a
24%
reduction
in scope 1
emissions
compared
to base year
of 2023

The goal has been set to lower greenhouse gas emissions from light and heavy vehicle fleets (mobile combustion) and fossil fuel consumption in stationary combustion by 10% until December 2025, based on 2024 figures. In this regard, fuel consumption and the intensity of emissions per tonne transported are monitored on a monthly basis, in addition to the analysis of waste generated, such as used oil and unusable bran. These indicators are monitored through dashboards embedded into the SGI and reviewed at regular meetings with the leadership.

The effectiveness of climate actions is checked annually based on the analysis of indicators such as direct emissions (Scope 1) and energy consumption. This data is compiled by the Environment area and discussed in meetings with the Operation, Maintenance and Controllershship departments and the Integrated Management System (SGI). The monitoring cycle is supported by methodologies such as PDCA, with results reported to senior management and the Compliance area, allowing for adjustments and the development of corrective action plans whenever necessary.

In 2024, a 24.52% reduction was recorded in scope 1 emissions compared to the base year of 2023 (both reports can be found on the FGV platform), as a result of initiatives such as replacing old transformers with dry models, which offer less environmental risk and more energy efficiency. In scope 3, the

62.36% reduction in indirect emissions from the value chain was mainly due to the decline in business trips, with the adoption of online meetings, and the mobility diagnosis conducted with employees, aiming at identifying opportunities to lower emissions from commuting.

Scopes 1, 2 and 3 direct greenhouse gas emissions¹ [GRI 305-1, 305-2, 305-3](#)

Categories	2023		2024	
	Total emissions (tCO ₂ e)	Biogenic emissions (tCO ₂ e)	Total emissions (tCO ₂ e)	Biogenic emissions (tCO ₂ e)
Scope 1 emissions	809.83	96.84	611.23	87.11
Stationary combustion	2.92	0.34	5.45	0.77
Mobile combustion	806.65	96.50	586.32	86.34
Fugitive emissions	19.63	0	19.46	0
Scope 2 emissions	316.787	-	570.49	-
Scope 3 emissions	204.37	16.81	76.98	0.41
Waste generated in operations	86.29	-	73.81	0
Business travels	3.63	0.01	0.79	0.07
Employee transportation	114.45	16.81	2.38	0.34
Total GHG emissions	1,330.99	113.66	1,258.70	87.52

¹ The Terminal monitors its emissions based on the GHG Protocol methodology, applying site-specific data to ensure the accuracy of the results. The estimate was made in accordance with international guidelines, which envisage the recommended emission factors and global warming potentials (GWP).

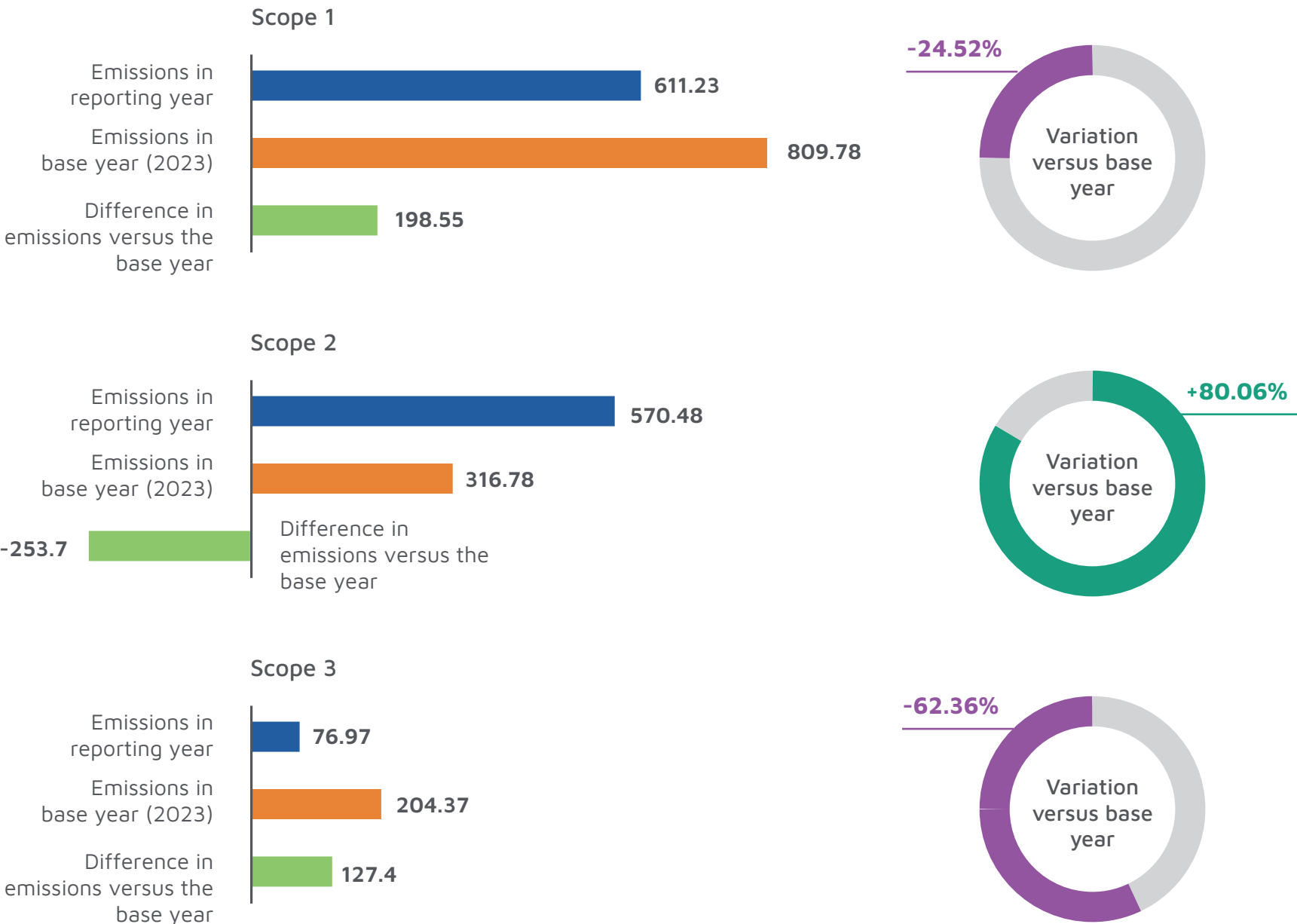


Intensity of greenhouse gas (GHG) emissions¹ [GRI 305-4](#)

Total GHG emissions (Scopes 1 and 2) (tCO ₂ e)	1,181.71
Emissions per total quantity of product shipped	6,183,822.11
Energy intensity rate	0.0002

¹The emissions intensity calculation only considered CO₂ emissions.

Greenhouse gas emissions reduction (tCO₂e)¹ [GRI 305-5](#)



¹Emissions were calculated based on the GHG Protocol methodology, considering the gases carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O).



ENERGY [GRI 302-4, 302-5](#)

The energy consumed in Terminal XXXIX's activities is purchased from the local energy distribution company, CPFL Energia, which is connected to the National Interconnected System (SIN). The Company has been expanding since the end of 2019, which has resulted in higher receiving and export capacity. Accordingly, we saw a proportional increase in energy consumption, preventing us from reporting reductions in energy requirements related to the products and services provided.

The Company signed a contract with CPFL Soluções, which represents it at the Electricity Trading Chamber (CCEE). Currently, 50% of the energy consumed at the Terminal derives from renewable sources,

certified with the I-REC seal (International Renewable Energy Certificate). The renewable energy certificate ensures the traceability of the renewable origin according to international standards. In addition, the organization strictly controls the supply of machinery and equipment, with field checks and monthly monitoring.

The year 2021 was adopted as the base year for energy measurements. The energy performance analyses and calculations follow the methodology of the Brazilian GHG Protocol Program (PBGHG).

In 2024, the Terminal implemented initiatives such as replacing 95% of conventional light bulbs with LED models and optimizing road-rail unloading equipment, aiming for greater efficiency in operations and lower energy demand. The actions led to an estimated reduction of 3.72 GJ in total electricity consumption. The calculation was made using monthly internal spreadsheets, reducing by 10% the energy consumption per tonne transported.

50%

of the energy consumed at the Terminal derives from renewable sources, certified with the I-REC seal

Total energy consumed within the organization (GJ)^{1, 2} [GRI 302-1](#)

Type of energy	Quantity calculated
Non-renewable fuels consumed	8,244.33
Diesel (liters)	8,179.83
Gasoline (liters)	64.50
Renewable fuels consumed	1,008.76
Biodiesel (in diesel)	992.25
Ethanol (in gasoline)	16.51
Electricity ^{3,4}	37.22
Total	8,281.55

¹ The methodology for converting liquid fuels into gigajoules (GJ) observed the ANP and IPCC conversion factors, adopting the criteria set out in the GHG Protocol guidelines.

² The Company does not trade surplus electricity, heating, cooling or self-generated steam.

³ The Terminal is represented by CPFL Soluções at the Electricity Trading Chamber (CCEE). Electricity consumption, recorded in kWh, is segmented into Peak and Off-Peak modes, with 50% of the energy consumed coming from renewable sources and 50% from non-renewable sources.

⁴ No energy consumption due to heating, cooling, steam.

Energy intensity^{1, 2} [GRI 302-3](#)

Total energy consumed within the organization (GJ)	8,281.55
Energy used in product shipping operations (GJ)	6,428.38
Energy intensity rate (GJ per unit of product shipped)	1.29

¹ From the total energy consumed, the amount used in product shipping operations is calculated - from arrival by truck or railcar to loading on the vessel. This figure represents the amount of energy directly linked to the Terminal's logistics operation.

² The energy intensity rate was calculated based on the ratio between the energy consumed in logistics operations and the total transported.



AIR QUALITY AND WASTE MANAGEMENT

GRI 3-3: AIR QUALITY, 305-6, 305-7

With a focus on resource efficiency and waste control, the Company adopts automated systems and real-time monitoring to ensure environmental compliance and prevent risks. Air pollution is addressed through actions to control the emission of particulates and direct and indirect gases. [GRI 2-25](#)

Standard Operating Procedure POP. SSMA.023 - Control of Air Emissions establishes the system for monitoring and controlling gas emissions from diesel engines. This procedure reflects the organization's commitment to mitigating environmental impacts related to air quality, especially in the context of its port and logistics operations.

Additionally, all machines operated by outsourced companies are required to pass the black smoke test. This ensures that only equipment meeting the established colorimetric standard is allowed to operate on the

Terminal's premises. If any equipment is not compliant, corrective maintenance must be carried out before it can be released.

Information on air emissions is consolidated on a monthly basis and analyzed by the team in charge. This process enables the Company to identify the root causes of deviations and implement effective corrective actions, when required, even in the absence of formalized indicators to assess the effectiveness of these measures. The Company does not emit ozone-depleting substances (ODS) and, in 2024, no significant emissions of SO_x, volatile organic compounds,

particulate matter were recorded nor other substances listed in environmental regulations. During the period, 13 tonnes of nitrogen oxides (NO_x) were emitted, the only substance with a quantified value in the period. Emissions result mainly from burning fossil fuels, moving solid waste (scope 3), commuting and corporate travel.

**Consolidated on a monthly basis,
information on air emissions is analyzed
and, where necessary, corrected**



WASTE GRI 2-25, 306-4

In 2024, significant progress was made in the Terminal's waste management, prioritizing sustainable practices with a low environmental impact. All the waste generated was directed for treatment or final disposal outside the Company's boundaries, exclusively by duly licensed outsourced companies.

The Terminal already operates a zero land-fill policy. Therefore, the waste generated in operations is directed for recovery and re-use processes, without being sent to land-fills. In addition, the unusable bran generated in the process is composted, closing the cycle of reusing organic waste.

In 2024, 1,082.16 tonnes of waste were treated, of which 14.91 tonnes were classified as hazardous and 1,067.25 tonnes as non-hazardous. All hazardous waste was directed for recycling. As for non-hazardous waste, the disposal was: composting, energy recovery, recycling or reuse. The oil used in engines underwent re-refining, textile waste and uncontaminated PPE have been converted into blankets.

Waste generated (tonnes)¹ GRI 306-3

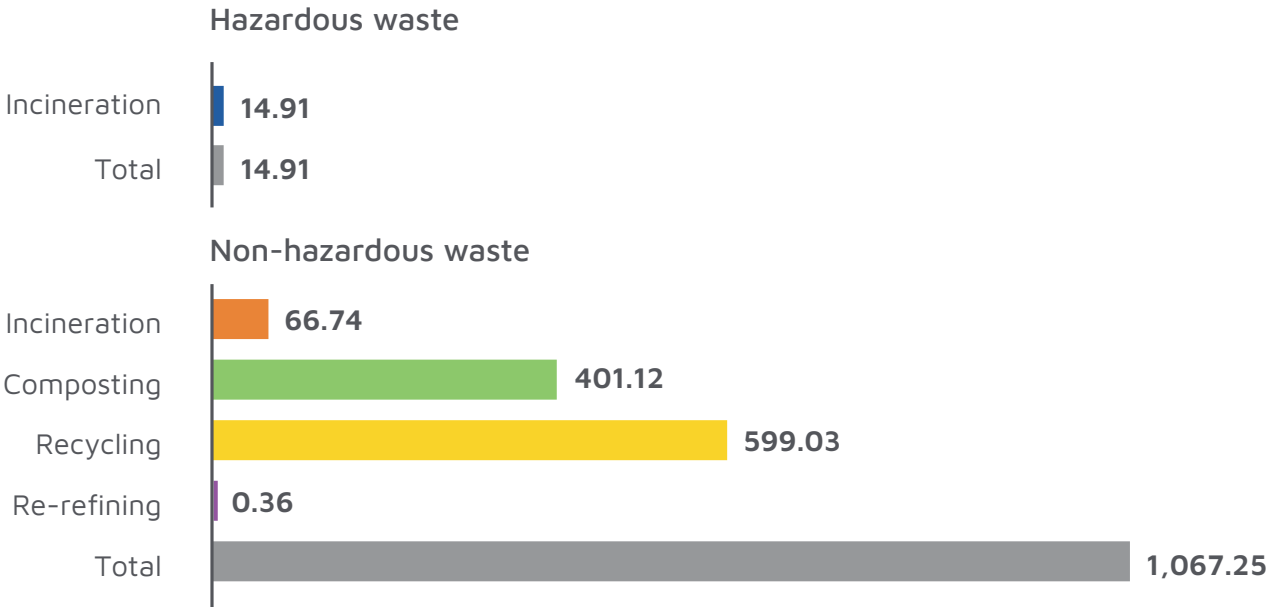
Hazardous waste	Quantity
PPE, plastic and/or metal packaging, paper and cardboard, hoses and fittings, air filters, engine filters, absorbent blankets, sawdust, sand, peat, paint material, ink cartridges and printer toner, oily sludge, organic sweepings, contaminated with oils and greases.	14.91
Total	14.91
Non-hazardous waste	Quantity
Unusable bran	401.12
Commercial waste	42.65
PPE - recycling	0.19
Electronic waste	0.82
Timber	23.85
Rubble	402.39
Paper and plastic	104.93
Engine, transmission and lubrication oil	0.36
Uncontaminated PPE	0.24
Metal scrap	90.7
Total	1,067.25

¹ Before being transported, all the waste is weighed and the Waste Transportation Manifest (MTR) is issued through Sigor/Cetesb.



In 2024,
1,082.16
tonnes of waste were treated,
of which 1,067.25 tonnes were
of non-hazardous waste and
14.91 tonnes of waste were
classified as hazardous

Final waste disposal, by disposal operation (tonnes) GRI 306-5





BIODIVERSITY AND WATER

GRI 2-25, 303-3, 303-4, 303-5, 304-2

The Company recognizes the relevance of biodiversity conservation as an integral part of its environmental responsibility. The Terminal's operations are concentrated in the urban and industrial areas of the Port of Santos and its activities do not have a significant impact on biodiversity. Despite this, the Company adopts a preventive stance in light of eventual impacts on local ecosystems. Among the reported impacts are water contamination, mitigated through river

control, the installation of containment barriers and the hiring of specialists to trace the contaminated product; and eventual accidental hydrocarbon spills, which can affect marine and coastal fauna, especially birds, mammals and reptiles.

The Company also relies on an Emergency Response Plan (PAE), a Fauna Protection Plan (PPAF) and contracts with specialized companies: one dedicated to emergency response in the marine environment and the other to rescuing fauna in critical situations.

Additionally, in 2024, a technical report was drawn up to assess sound pressure in populated areas, in accordance with Conama Resolution 01/90 and NBR 10151/2019. The results evidenced that noise levels are below or close to the established limits, indicating no significant impact on the biodiversity of the surrounding communities.

We rely on an Emergency Response Plan (PAE) and a Fauna Protection Plan (PPAF) to mitigate the risks of environmental impacts





POCKET FOREST

In 2024, the Company took an important step by creating a pocket forest within its area. This tree-planting initiative contributes directly to CO₂ sequestration, besides promoting environmental benefits such as preserving biodiversity, protecting water resources and enhancing air quality.

Water management involves adopting a set of practices, policies and actions aiming the sustainable, efficient and responsible use of water. The year’s highlights include the planning of a rainwater reuse project, by implementing a Rainwater Treatment Plant (Etap). This system aims at reducing drinking water consumption by using the reused water to wash the structures, equipment and streets of the Terminal. The treatment system selected will be physical-chemical, which encompasses the stages of decantation, filtration, and disinfection. The project could generate savings of more than R\$28,000/year, accounting for 97.4% of total water and sewage consumption (which costs R\$20.33/m³). The installation of the new system should be completed by the end of 2025.

All the water used by the Terminal is supplied by Sabesp, under a concession for port supply. In 2024, 7.22 megaliters were withdrawn - the same volume disposed of via the Santos Port Authority (APS) network.

The effluents are entirely directed to the APS collection network, in compliance with legal and environmental standards. Samples are collected at strategic points in the administrative and operational areas, including

water and oil separator outlets. The analyses observe the parameters of State Decree No. 8.468/76 and standard NAP.SUMAS. GCO.001.2023. No substances with the potential to cause irreversible damage to the environment were detected, nor were there any records of non-compliance with disposal limits.

The Terminal is not located in water-stressed areas. Information on consumption and disposal is obtained via monthly invoices from the utility company and controlled in-house.



The new Rainwater Treatment Plant could generate savings of more than

R\$ 28,000
per year, accounting for 97.4% of total water and sewage consumption

OUR PEOPLE

HEALTH, WELL-BEING AND SAFETY

DEVELOPMENT AND CORPORATE CULTURE

SUPPLY CHAIN





HEALTH, WELL-BEING AND SAFETY

GRI 3-3: HEALTH, WELL-BEING AND SAFETY,
403-1, 403-2, 403-3, 403-4, 403-5, 403-7, 403-8, 403-9, 403-10, 416-1



Terminal XXXIX adopts a strategic and humanized approach to ensure safe, healthy and productive workplaces. The Occupational Health and Safety Management System (SGSST) covers all the Company's activities and sites, with ongoing updating based on the risk matrix, Occupational Risk Management (GRO), Risk Management Program (PGR) and legal requirements.

Operational changes with a significant impact are communicated immediately to employees and stakeholders through channels such as e-mail, Daily Safety Dialogues (DDS) and virtual meetings, prioritizing transparency and alignment. Workers actively participate in the SGSST through the Internal Accident and Harassment Prevention Committee (Cipa), in-house committees, participatory inspections, training and structured channels.

The Health, Safety and Environment Policy guides risk prevention practices and the promotion of well-being, based on:





The SGI.SSMA.004 methodology guides the identification of hazards and the application of the hierarchy of controls. The approach is embedded into the Preliminary Risk Analysis (APR), Work Permits (PTs), incident investigations and reviews of the GRO and PGR. The surveys are carried out by technicians and validated by safety engineers.

All employees and contractors undergo mandatory SST training, including risk perception, use of PPE, regulatory standards, ergonomics and emergency response. Management is conducted by the People and Management area, with attendance control. Before starting activities, they must submit APRs and operating procedures for approval. Measures such as PTs for critical activities, inspections, audits and alignment meetings are adopted. Freelance (OGMO) and seasonal workers take part in training and DDS, although they are not formally integrated into the SGSST. The confidentiality of health information is ensured in accordance with the LGPD, with access restricted to health staff, protected systems and access tracking.

Health and safety impact assessments cover all areas of the Company, based on inspections, audits, performance indicators and near misses.

The main risks identified include:



Psychosocial:
occupational stress and its impact on mental health



Mechanical:
entrapment, crushing, falling objects and accidents with heavy vehicles



Ergonomic:
inappropriate postures, repetitive movements, cargo lifting and intense rhythms



Accidents:
falls from a height, slips, internal collision, fires and cave-ins



Physical:
exposure to noise, vibration, extreme temperatures and inadequate lighting



Chemical:
inhalation of plant dust, contact with grease, oil and maintenance products

The Company ensures workers the right to interrupt activities that pose risks to their integrity, without retaliation. Real cases evidence the effectiveness of this guideline.

Accidents are investigated using tools such as Ishikawa and the "5 Whys", with structural, administrative and behavioral corrective actions. In 2024, we recorded an accident involving a service provider. No cases of work-related ill-health were recorded.





ATTENTION AND WELL-BEING

Health promotion includes campaigns such as Pink October, Blue November, Yellow September and White January, as well as vaccinations, preventive examinations, lectures, psychological support and prevention programs. In 2025, permanent care was provided by a contracted psychologist, in line with the new NR1 guidelines. Actions are communicated via Feedz, WhatsApp, in-house TVs and bulletin boards.



The occupational health clinic is open from 7 a.m. to 5 p.m. with an occupational physician, a nursing technician and an administrative assistant. It offers occupational examinations, first aid and guidance. Appointments can be scheduled or made directly. Out of business hours, emergencies are answered by a contracted company.





We foment professional growth based on performance, results and length of service



328

own employees:
84.1% men and
15.9% women

DEVELOPMENT AND CORPORATE CULTURE

Terminal XXXIX's culture is marked by ongoing evolution and a clear purpose: to build a safe, ethical and inclusive environment in which human development is at the core of strategic decisions. In 2024, significant strides were made, including the setup and consolidation of the Human and Organizational Development (DHO) area. This initiative enabled a more strategic approach to leadership training and the promotion of an inclusive, welcoming, and sustainable environment.

Leadership engagement in safety, diversity, climate and well-being issues evidences a more sensitive, inclusive and responsible management culture. The Company has implemented initiatives to promote women's hiring, including the review of architectural projects (such as the inclusion of women's locker rooms in new construction works). These efforts evidence a commitment to active listening and female empowerment in management roles. The Company

ended 2024 with 328 of its own employees - 84.1% men and 15.9% women - and 100% of the workforce was covered by collective bargaining agreements, ensuring representation in labor claims through formal collective bargaining instruments.

[GRI 2-7, 2-30](#)

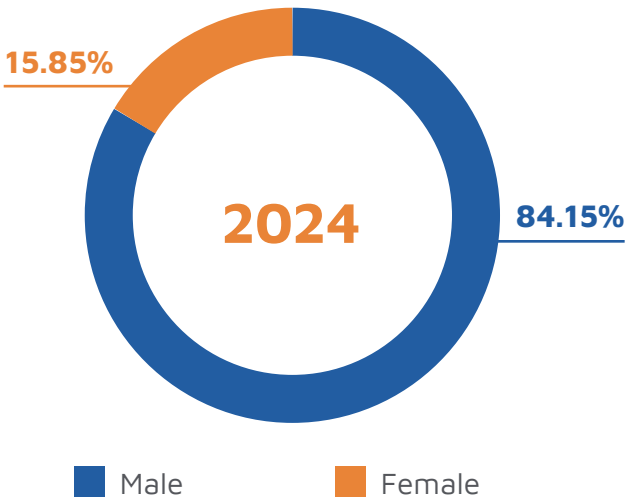
The Terminal, through a collective agreement with the union, ensures that no employee is paid below the category's wage floor, which is always equal to or higher than the legal minimum wage. The Company fosters professional growth based on performance, results and length of service. In 2024, the salary for men and women was fair, in line with the floor of the collective agreement, maintaining a ratio of one to the local minimum wage. With regard to contracted companies' employees, remuneration follows the local minimum wage, in accordance with the contract and legal requirements.

[GRI 202-1](#)



The Company does not have a consolidated control system for the number of services providers. These professionals, hired by outsourced companies, work in various support activities, including mechanical, electrical and civil maintenance services, transportation, equipment operation and product quality analysis in specific port activities, on contractual demand. In 2024, we saw a significant temporary increase in the number of workers due to the project to expand Terminal XXXIX’s facilities. This project required the hiring of mainly outsourced workers for civil engineering, electrical, and industrial assembly activities. [GRI 2-8](#)

Total employees by gender [GRI 2-7](#)



Employees, by employee category and gender ^{1, 2, 3} [GRI 2-7](#)

Management	Male	Female	Total
No.	2	1	3
Percentage	66.67%	33.33%	100%
Supervision/coordination	Male	Female	Total
No.	9	1	10
Percentage	90.00%	10.00%	100%
Engineering	Male	Female	Total
No.	1	0	1
Percentage	100%	0%	100%
Leadership	Male	Female	Total
No.	7	1	8
Percentage	87.50%	12.50%	100%
Management	Male	Female	Total
No.	27	22	49
Percentage	55.10%	44.90%	100%
Operational	Male	Female	Total
No.	224	22	246
Percentage	91.06%	8.94%	100%
Young apprentice	Male	Female	Total
No.	6	5	11
Percentage	54.55%	45.45%	100%
Total	Male	Female	Total
No.	276	52	328
Percentage	84.15%	15.85%	100%



¹ The employees data was extracted from the TOTVS Datasul system, using the FP4061 program, from which an Excel report was generated with the consolidated information. The methodology adopted to count the total number of employees was a direct count, considering all registered full and part-time employees, based on the data at the end of the reporting period.

² All employees are located in the Southeast region.

³ There are no employees without guaranteed workload.



Employees, by type of contract and gender ^{1, 2, 3} [GRI 2-7](#)

	Male	Female	Total
Indeterminate duration (full-time)	270	47	317
Determined duration (part-time)	6	5	11
Total employees	276	52	328

¹ The employees data was extracted from the TOTVS Datasul system, using the FP4061 program, from which an Excel report was generated with the consolidated information. The methodology adopted to count the total number of employees was a direct count, considering all registered full and part-time employees, based on the data at the end of the reporting period.

² All employees are located in the Southeast region.

³ There are no employees without guaranteed workload.

Percentage of total annual remuneration¹ [GRI 2-21](#)

Ratio between the organization’s highest paid individual total annual remuneration and total annual median remuneration of all employees (excluding the highest paid individual)	8.81
Percentage increase in the total annual remuneration of the highest paid individual	1.77%
Median percentage increase in the total annual remuneration of all employees except the highest paid individual	16.66%
Ratio of the percentage increase in the total annual remuneration of the organization’s highest paid individual to the median percentage increase in the total annual remuneration of all employees (excluding the highest paid individual)	0.11

¹ The composition of the remuneration considered for calculation included: base salary, overtime, night work pay, additional hazard pay, health hazard bonus, childcare allowance, bonus, vacation, 1/3 allowance, family allowance, Christmas bonus salary.

CORPORATE
EDUCATION



In-house training and learning path: development programs for leaders.



“Elas T39” program: a groundbreaking initiative to train women to work in operational areas.



Engagement and belonging projects: initiatives such as the distribution of the welcome kit and the parenting kit reinforced the sense of belonging.



Young apprentice with a focus on real training: young people are trained focused on career development, preparing participants for internal and external opportunities.



Culture of integrity: Eloporto events expanded the scope of the former Internal Work Accident Prevention Week (Sipat). The meeting combined activities on topics such as occupational safety, health, ESG, combating harassment, anti-corruption, social responsibility and ethics.





DIVERSITY & INCLUSION

Terminal XXXIX promotes a culture of diversity, the parameters of which are detailed in its Compliance Program ([read more on page 27](#)), ensuring an inclusive and respectful workplace. Diversity is seen as a fundamental pillar for innovation and a healthy organizational climate.



Among the relevant aspects on this front, it is worth highlighting:



Valuing diversity in all relationships.



Equal opportunities for all employees, regardless of their personal characteristics.



Prohibition of discrimination and inappropriate behavior.



Incentive for respect and appreciation of differences.



SUPPLY CHAIN

GRI 2-6, GRI 2-24, 3-3: SUPPLY CHAIN MANAGEMENT, 308-1, 414-1

Terminal XXXIX's supply chain management system is structured based on the Procurement and Contracting Management Policy and the External Provider Approval System. These instruments set out strict criteria for qualifying and assessing suppliers, comprising technical, legal, financial, environmental, social, labor and compliance aspects. The approval requires up-to-date documentation, certifications and signing the [Suppliers Code of Conduct](#), under the coordination of the Procurement area, with support from the technical and operational areas.

Code of Conduct for Suppliers and ISO 14001 certification set out criteria for approving suppliers

As part of the process, suppliers with significant potential for environmental and/or social impact - and who are not ISO certified - complete a self-assessment questionnaire based on ISO 14001 and other applicable standards. This selective approach aims at ensuring that critical suppliers are aligned with the organization's standards and values. The current system, however, neither automatically consolidates the total number of suppliers assessed nor the percentage of new suppliers approved based on these criteria.

The supply chain relies on nearly 600 suppliers who provide various services and materials. In 2024, the payments amounted to approximately R\$40 million. These partners, of different sizes, are mostly national and maintain direct and indirect relationships with the organization.



Roughly

600

suppliers of materials and services are part of our supply chain





Chain management includes regular performance assessments, action plans and active communication with suppliers. Contractual clauses reinforce compliance with legal requirements and alignment with the Code of Conduct and Ethics. The effectiveness of these measures is reinforced by audits, mandatory training and professional courses for business partners.

The organization seeks to build positive impacts by prioritizing regional suppliers, fomenting ISO certification, developing new partners and promoting ongoing improvements in its processes. Monitoring takes place through the Administrative Information System, which issues alerts about pending documents and notifies managers about performance assessments.

The targets include: approving 100% of critical suppliers according to document F. SUPRIM.003, keeping 96% of suppliers with up-to-date documentation and carrying out all assessments according to the Integrated Management System (SGI) schedule.



The goals include:
to approve

100%
of critical
suppliers and keep
96% of suppliers
with up-to-date
documentation



DUE DILIGENCE AND THIRD PARTY RISKS

One of the advances made in 2024 was the consolidation of the due diligence process for contractors, focusing on reputation, legal, social security and financial compliance of suppliers, who undergo ongoing monitoring throughout the contractual relationship, ensuring that they comply with the applicable legal and regulatory principles. The process now considers image risk as a selection criterion, excluding partners who do not adhere to ethical and legal standards. Suppliers involved in practices such as child labor, corruption, money laundering or environmental damage are automatically disqualified. Businesses with a negative track record in aspects such as social security evasion, FGTS (Workers' Severance Indemnity Fund) or legal non-compliance were excluded from the partner base.

**+ LEARN
MORE**

Learn more about the Suppliers
Code of Conduct at the [website](#).

2024 PERFORMANCE

OPERATIONAL HIGHLIGHTS

FINANCIAL RESULTS

AWARDS AND CERTIFICATIONS





The Terminal
hit a new annual
record with

+5
MILLION
tonnes exported

OPERATIONAL HIGHLIGHTS

The year 2024 was marked by the consolidation of Terminal XXXIX as a key player in the export of solid bulk plant-based products. Even amid adversities in the global market, the Company has demonstrated resilience, innovation and excellence in logistics performance.

Despite not reaching the target of 6 million tonnes shipped, the Terminal hit a new annual record with 5,976,000 tonnes exported. The year's operational milestones included the all-time volume of 5,655 railcars unloaded in October. The performance was partially driven by the start of use of the new silos, which raised the static storage capacity by 61,000 tonnes to a total of 196,000 tonnes.

The Terminal has reached unprecedented levels of efficiency by loading vessels in less time, consolidating its capacity to operate with large volumes in reduced berthing windows. We also saw a significant advance in

railway reception, as a result of investments in infrastructure and automation.

The modernization of the conveyor belts allowed to uplift the receiving capacity from 1,500 to 2,500 tonnes/hour, directly leading to an increased productivity. The introduction of pneumatic vibrators for unloading railcars has improved ergonomic conditions and safety for employees.

For logistics management, the road scheduling system has been enhanced, integrating regulating yards and real-time tracking. Railway is managed in partnership with Fips (Ferrovia Interna do Porto de Santos), an integrated concessionaire of the railways operating in the port, liable for coordinating the arrival and unloading of trains.



Investments in fixed assets totaled R\$9.9 million in 2024, with a focus on renovating the infrastructure and continuing the expansion project, in accordance with the contractual commitments with the Santos Port Authority.



Investments in fixed
assets totaled

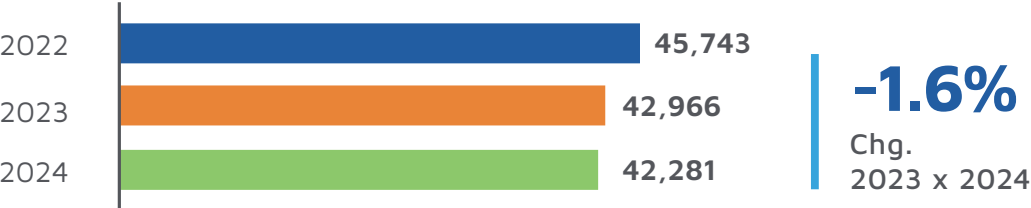
R\$ 9.9
MILLION

INTEGRATED MANAGEMENT POLICY

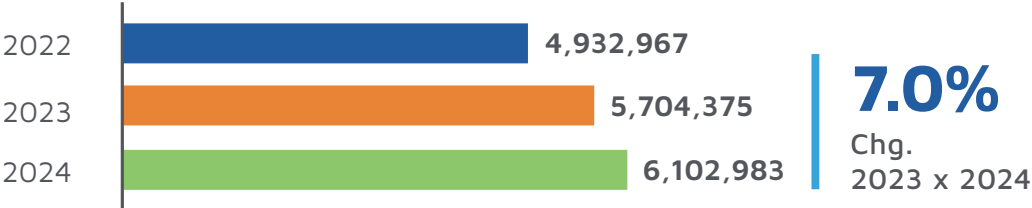
Since May 2022, Terminal XXXIX has adopted an Integrated Management Policy concerned with the ongoing improvement of its port services. The policy is designed to ensure compliance with legal requirements, standards such as GMP+FSA, and customer expectations. It fosters a culture of health and safety at work through employee engagement, ensures responsible environmental practices, invests in the professional development of team members, and pursues a balance between operational performance and profitability.

Our operation’s figures

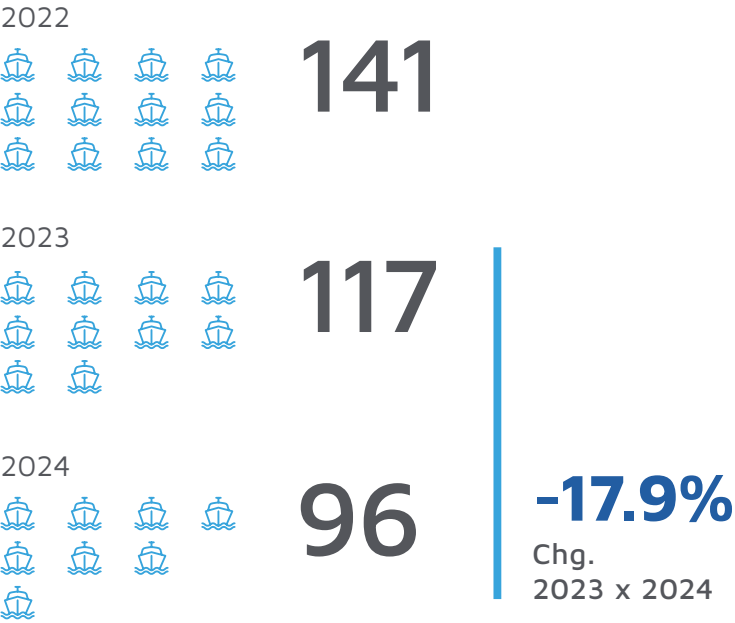
Number of trucks received



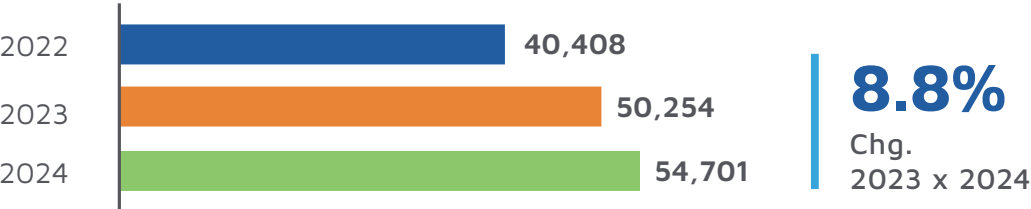
Tonnes received



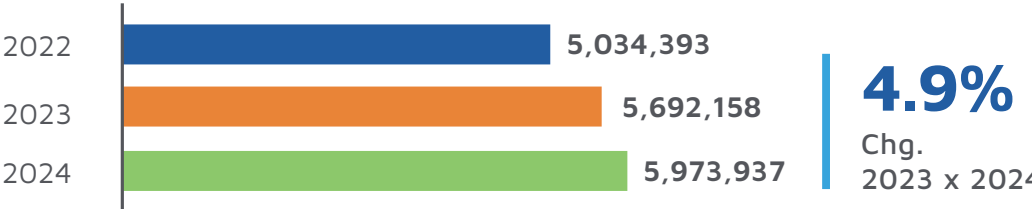
Vessels at berth



Number of railcars received



Tonnes shipped





FINANCIAL RESULTS



Growth of

25.8%
in net income
versus 2023

Despite the challenges posed by the downturn in the corn market and strategic changes by major customers, Terminal XXXIX ended 2024 with a solid financial performance. Net operating revenue reached R\$289.1 million, 10.4% higher than in the previous year. This performance was mainly driven by higher volume of services provided and operational efficiency in a challenging scenario for the port sector.

Net income for the year totaled R\$82.2 million, up 25.8% from 2023. This result reflects the rigorous management of costs and expenses, the expansion of operations and the optimization of the Terminal's assets.

Ebitda was favored by an efficient operating structure and strict financial control, which resulted in a year-on-year reduction of R\$6.3 million in net financial expenses.

The Company's capital structure was reinforced with the payment of capital in the amount of R\$28 million, increasing the share capital to R\$100 million. The dividend distribution policy remained in line with the Bylaws, with 50% of adjusted profit allocated to shareholders.

The Company remains compliant with its financial and operational commitments, including the contractual covenants associated with the working capital financing of R\$190 million. The financial ratios remain within the thresholds set forth by the contracts.

The 2024 performance evidences Terminal XXXIX's ability to respond efficiently to the sector's challenges, while maintaining profitability and operational consistency. The financial strength achieved reinforces the business sustainability and the confidence of partners and customers in the management model adopted.



**The Company's capital
structure was bolstered and
the share capital reached
R\$ 100 million**



AWARDS AND CERTIFICATIONS

OUR RECOGNITION



ESG Excellence Award – Port of Santos 2024

Participation in the award granted by the Santos Port Authority (APS).



Port 2024 Best Companies- GMB (Grupo Multimodal Brasil) & FIPS (Internal Railway of the Port of Santos)

Second place in the Productivity Increase, Operational Regularity and Operational Stability categories.



Feedback Gupy Seal

Recognition of the Gupy Human Resources platform. The seal is awarded to companies that achieve a candidate return rate of at least 90% in their recruitment processes.



Tribute from the Association of Friends of the Military Police - Atlantic Command (AAPOM)

In recognition of the support given to the event commemorating the 193rd anniversary of the Military Police of the State of São Paulo (PMESP).



Tribute III Integration Forum of Port Security Supervisors

Recognition for the contribution to bolstering safety practices in the port environment.

CERTIFICATIONS

Pioneer in the Port of Santos, the Company has held certifications since 2003 for the provision of port operation services: reception, storage and shipping of bulk plant-based products.

Certifications are periodically audited by accredited bodies and allow us to serve markets with strict requirements, such as the European Union and Asia, ensuring the integrity, traceability and safety of the exported product. This standard of excellence is also a priority for the business of partner Caramuru, which relies on the Terminal to ship internationally certified products.



ISO 9001: 2015:
Quality Management System



ISO 14001:2015
Environmental Management System



ISO 45001:2018
Occupational Health and Safety Management System



HACCP (Hazard Analysis and Critical Control Points)
Preventive food and feed safety management system.



GMP+ FSA (Good Manufacturing Practices + Feed Safety Assurance)
Quality seal ensuring that port activities for the storage and transshipment of feed raw materials are carried out pursuant to international food safety standards.



Zero Landfill Certification
Recognition from the Multilixo Group that reinforces its responsibility towards the environment, human health and future generations. The Terminal has implemented a program that ensures waste disposal, prioritizing reuse and recycling, without sending it to landfills.



I-REC
The Terminal ensured the redemption of 10,875 MWh in I-REC renewable energy certificates for the period from January to December 2024. The certification attests offset with generation from low-impact hydroelectric sources, assuring emissions neutrality.

GRI CONTENT INDEX





Use statement	Terminal XXXIX reported the information mentioned in this GRI content index for the period from January 1, 2024 to December 31, 2024 based on GRI Standards
GRI 1 adopted	GRI 1: General Disclosures 2021

GRI Standards	Content Index	Location
GRI 2: General disclosures 2021	General disclosures	
	2-1 Organizational details	11
	2-2 Entities included in the organization’s sustainability reporting	4
	2-3 Reporting period, frequency and contact point	4
	2-4 Restatements of information	As this is our first report, there is no restatements of information.
	2-5 External assurance	This report will not be subject to external assurance.
	2-6 Activities, value chain and other business relations	11, 16, 17, 50
	2-7 Employees	46, 47, 48
	2-8 Workers who are not employees	47
	2-9 Governance structure and composition	20
	2-10 Nomination and selection for the highest governance body	20, 21
	2-11 Chair of the highest governance body	21
	2-12 Role of the highest governance body in overseeing the management of impacts	20
	2-13 Delegation of responsibility for managing impacts	20, 22
	2-14 Role of the highest governance body in sustainability reporting	4
	2-15 Conflicts of interests	25
	2-16 Communication of critical concerns	26



GRI Standards	Content Index	Location
General disclosures		
	2-19 Remuneration policies	The Company does not have a formal remuneration policy, but currently adopts a salary scale according to job functions.
	2-21 Annual total compensation ratio	48
	2-22 Statement of sustainable development strategy	8, 9
	2-23 Policy commitments	24
	2-24 Embedding policy commitments	26, 50
	2-25 Processes to remediate negative impacts	27, 38, 39, 40
	2-26 Mechanisms for advice and presentation of concerns	26, 27
GRI 2: General disclosures 2021	2-27 Compliance with laws and regulations	Five fines were imposed in 2024 for significant cases, totaling R\$180,275.90: Notice of Infringement ME No. 22.184.986-6, related to the failure to implement protection devices in electrical installations; Notice of Infringement ME No. 22.184.985-8, due to deficiencies in dry bulk operations; Notice of Infringement ME No. 22.184.979-3, related to deficiencies in the annual report required by NR 7; Fine by means of MPT Notice No. 22252365-4; and fine for non-compliance with TAC (Conduct Adjustment Agreement).
	2-28 Membership associations	Member of the Brazilian Association of Port Terminals (ABTP).
	2-29 Approach to stakeholder engagement	5, 30
	2-30 Collective bargaining agreements	46



GRI Standards	Content Index	Location
Material topics		
GRI 3: Material topics 2021	3-1 Process to determine material topics	5
	3-2 List of topic materials	5, 6, 7
Ethics, integrity and compliance		
GRI 3: Material topics 2021	3-3 Management of material topics	6, 24, 25, 26, 27
GRI 202: Market presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	46
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	24
	205-2 Communication and training about anti-corruption policies and procedures	24, 26
	205-3 Confirmed incidents of corruption and actions taken	25
GRI 206: Anti-competitive behavior 2016	206-1 Legal actions for anti-competitive behavior, trust and monopoly practices	25
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	None.
GRI 410: Security practices	410-1 Security personnel trained in human rights policies or procedures	None.
Health, well-being and safety		
GRI 3: Material topics 2021	3-3 Management of material topics	6, 43, 44, 45, 46
GRI 402: Labor relations	402-1 Minimum deadline for notice on operational changes.	Terminal XXXIX does not have an established minimum deadline for notifying on significant operational changes.
	403-1 Occupational health and safety management system	43
GRI 403: Occupational health and safety 2018	403-2 Hazard identification, risk assessment and incident investigation	44
	403-3 Occupational health services	45
	403-4 Worker participation, consultation, and communication on occupational health and safety	43, 44
	403-5 Worker training on occupational health and safety	44
	403-6 Promotion of worker health	45
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	43, 44



GRI Standards	Content Index	Location
Material topics		
Health, well-being and safety		
GRI 403: Occupational health and safety 2018	403-8 Workers covered by an occupational health and safety management system	43
	403-9 Work-related injuries	44
	403-10 Work-related ill health	44
Emissions management and climate change		
GRI 3: Material topics 2021	3-3 Management of material topics	6, 34, 35, 36
GRI 201: Economic performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	29
GRI 308: Energy 2016	302-1 Energy consumption within the organization	37
	302-3 Energy intensity	37
	302-4 Reduction of energy consumption	37
	305-1 Direct (Scope 1) GHG emissions	35
GRI 305: Emissions 2016	305-2 Indirect (Scope 2) GHG emissions deriving from energy acquisition	35
	305-3 Other indirect (Scope 3) GHG emissions	35
	305-4 Greenhouse gas (GHG) emissions intensity	36
	305-5 Reduction of GHG emissions	36
Privacy and data security		
GRI 3: Material topics 2021	3-3 Management of material topics	6, 30, 31
GRI 3: Customer privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	31
Innovation and technology		
GRI 3: Material topics 2021	3-3 Management of material topics	7, 18
GRI 302: Energy 2016	302-5 Reductions in energy requirements of products and services	37



GRI Standards	Content Index	Location
Material topics		
Supply chain management		
GRI 3: Material topics 2021	3-3 Management of material topics	7, 50, 51
GRI 204: Procurement practices 2016	204-1 Proportion of spending on local suppliers	The Company's procurement system does not consolidate the percentage of spending with local suppliers. Improvements are being evaluated to enable this control.
GRI 308: Suppliers environmental assessment 2016	308-1 New suppliers that were screened using environmental criteria	50
GRI 408: Child labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	None.
GRI 409: Forced or compulsory labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	None.
GRI 414: Supplier social assessment 2016	414-1 New suppliers that were screened using social criteria	50
Air quality		
GRI 3: Material topics 2021	3-3 Management of material topics	7, 38
GRI 305: Emissions 2016	305-6 Emissions of ozone-depleting substances (ODS)	38
	305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	38
Transparency with customers		
GRI 3: Material topics 2021	3-3 Management of material topics	7, 32
GRI 201: Economic performance 2016	201-4 Financial support received from the government	The total amount received in 2024 was R\$770,669.51, through tax benefits related to the Workers' Food Program (PAT).



GRI Standards	Content Index	Location
Material topics		
Transparency with customers		
GRI 416: Consumer health and safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	43, 44
	416-2 Incidents of non-compliance concerning the health and safety impacts of product and service categories	Two cases were registered, identified during external audits. These refer to the GMP+ scope and the scope of the Integrated Management System based on ISO 45001.

Additional disclosures: non-material indicators relevant to the organization		
GRI	Content Index	Location
GRI 303: Water and effluents 2018	303-3 Water withdrawal	40, 41
	303-4 Water discharge	40, 41
	303-5 Water consumption	40, 41
GRI 304: Biodiversity 2016	304-2: Significant impacts of activities, products and services on biodiversity	40
GRI 306: Waste 2020	306-3 Waste generated	39
	306-4 Waste diverted from disposal	39
	306-5 Waste directed to disposal	39



CORPORATE INFORMATION



Terminal XXXIX

Av. Gov. Mário Covas Júnior, s/n
Estuário, Santos (SP) - CEP 11020-300
terminal39.com.br

Audit, Compliance and ESG Management

Juliete Cruz Barros
Isabella Agostinho Fernandes Lapa

Materiality, consultancy,
project management, content
and design

Grupo Report

www.gruporeport.com.br

Indicators Collection

Grupo Report (Central ESG)

Report team

Ana Paula Cardoso, Ana Souza, Cristiana Sampaio,
Fenanda Assis, Giuliana Bellegarde, Isabela Ribeiro,
Larissa Miragaia, Larissa Pedroso, Marília Campos,
Priscila Garrido, Rejane Lima, Ulisses Romano,
Victor Netto

Photos/images

Terminal XXXIX Archives

Translation

Célia Yamashita