ANTI-CORRUPTION POLICY

1. OBJECTIVE

FD Security Soluções em Segurança Ltda.'s Anti-Corruption Policy aims to prevent, detect, and combat any form of bribery, corruption, fraud, facilitation payments, money laundering, and any conduct that violates ethics and Brazilian legislation, including Law No. 12,846/2013 (the Anti-Corruption Law).

This policy applies to all employees, drivers, affiliates, service providers, partners, and suppliers, regardless of the contractual relationship..

2. GENERAL PRINCIPLES

Everyone must act with:

► Integrity

► Transparency

► Honesty

► Compliance with laws and regulations

► Respect for internal rules

► Care for the company's assets and reputation

The company adopts zero tolerance for any act of corruption.

In addition, decisions must Always be made based on technical criteria, without favoritism, privileges or discrimination.

3. PROHIBITION OF BRIBERY AND UNDUE ADVANTAGES

It is strictly prohibited to:

► Offer, promise, give, request, or receive any amount, gift, bribe, "kickback," or undue advantage;

► Pay to expedite processes, avoid fines, facilitate inspections, or obtain illegal benefits;

► Make payments to inspectors, police officers, public or private agents to influence decisions;

► Use intermediaries to carry out illicit acts;

► Offer commissions or percentages not contractually agreed upon.

This includes money, gifts, favors, deposits, transfers, presents, commercial advantages, or any other benefit.

3. **FACILITATION PAYMENTS**

The company strictly prohibits any facilitation payments, such as:

► Giving money to speed up passage through inspection checkpoints;

► Paying to avoid fines or citations;

► Offering “favors” on highways or at inspection posts.

Drivers and employees must immediately report any attempt to solicit a bribe.

5. **RELATIONSHIP WITH PUBLIC OFFICIALS**

Interactions with public officials must be:

► Professional;
► Transparent;
► Documented;
► Without any offer of advantage.

It is prohibited to:

► Offer gifts or favors;
► Make unrecorded payments;
► Act through third parties to obtain illegal benefits.

6. **GIFTS, HOSPITALITY AND GIVEAWAYS**

Allowed only when:

► Of low value;
► Of an institutional nature;
► Offered transparently;
► With no intention of influencing decisions;
► Previously authorized by the compliance officer.

It is prohibited to accept or offer:

► Money;
► Trips;
► High-value gifts;
► Sponsorships or donations that may create conflicts;
► Lodging;
► Invitations to leisure events.

7. HIRING AND MANAGING THIRD PARTIES

Due to the high use of third parties in the operation, the company adopts specific controls:

► All third parties must undergo registration and minimum verification (documents, background checks, references, and tax and labor compliance);

► Contracts must contain an anti-corruption clause and allow for immediate termination in case of violation;

► Payments must be made only to accounts in the contractor's name;

► Subcontracting is prohibited without formal authorization;

► Third parties caught engaging in illegal acts will be immediately dismissed.

8. PAYMENTS AND FINANCIAL CONTROLS

To prevent fraud and corruption:

► No payment will be made without an invoice or valid proof;
► Expenses must be recorded and approved before payment;
► Maintaining parallel cash funds, off-the-books payments, or payments without receipts is prohibited;
► Any suspicious payment must be reported;
► Accounting entries must reflect real transactions;
► Transactions with shell companies or companies without a known physical address will not be allowed.

9. PREVENTION OF MONEY LAUNDERING

The company prohibits:

► Receiving cash amounts beyond reasonable limits;
► Transactions without a clear origin;
► Operations conducted outside formal channels;
► Use of third-party bank accounts;
► Hiring services without clarity on purpose or delivery capacity.

Any suspicious situation must be reported immediately.

10. CONFLICTS OF INTEREST

Everyone must report situations in which personal interests may affect professional decisions, such as:

► Hiring relatives;
► Using personal vehicles without authorization;
► Receiving commissions from third parties;
► Personal relationships with suppliers, inspectors, or business partners;
► Shareholding participation in companies that conduct business with **FD Security.**

11. WHISTLEBLOWING CHANNEL

The company maintains a channel for reporting irregularities:

Site: fdsecurity.com.br

E-mail: compliance@fdsecurity.com.br

The company guarantees:

► Confidentiality;
► Anonymity (if desired);
► No retaliation against whistleblowers;
► Ethical and impartial handling of information.

The company encourages responsible reporting and cooperation with investigations.

12. INTERNAL INVESTIGATIONS

Every report will be:

► Impartially analyzed;
► Recorded;
► Investigated with confidentiality;
► Conducted by unbiased personnel or an independent consultancy, when necessary.

13. TRAININGS

The company will conduct periodic training for:

► Employees;
► Company drivers and third-party drivers;
► Critical suppliers.

Training content includes:

► How to act during inspections;
► Refusal of bribes;
► Mandatory documents;
► Money laundering prevention;
► Integrity in operations;
► Internal and safety procedures.

14. CONSEQUENCES OF NON-COMPLIANCE

Violation of this policy may result in:

► Warning;
► Suspension;
► Termination of employment;
► Contract termination;
► Notification to authorities, when applicable;
► Civil and criminal liability.

15. EFFECTIVE DATE

This policy becomes effective on the date of its approval and should be reviewed annually or whenever there are relevant legal or operational changes.

Rio de Janeiro, July 5, 2025.