CODE OF CONDUCT AND ETHICS

FD Security Soluções em Segurança Ltda reaffirms its commitment to ethics, compliance, and corporate responsibility in all relationships with employees, clients, partners, consultants, suppliers, and any third parties acting on its behalf. The Code of Conduct and Ethics defines the principles, standards, and expected behaviors, reinforcing the importance of integrity, transparency, and compliance with laws and regulations.

All individuals representing **FD Security** must be familiar with, understand, and follow the Code, keeping it accessible for reference. The company values responsible reporting and ensures protection against retaliation for good-faith reports of ethical or legal violations.

1. CULTURE OF INTEGRITY

FD Security conducts its business ethically, honestly, and in accordance with all applicable laws. Employees and third parties must adhere to internal policies, the Code, and integrity practices.

Mission → Deliver services with quality, agility, and efficiency at competitive costs, maintaining collective focus and a forward-looking vision.
Vision → Be a reference in consulting, management, and the provision of specialized services.
Values → Seriousness, ethics, responsibility, and confidentiality.
Guiding principles → Integrity, dignity, innovation, excellence, governance, and teamwork.
Ethical decision-making → When facing doubts or ethical dilemmas, employees must assess risks, consider impacts, verify compliance with policies, and seek guidance from supervisors or the legal department.
Duty to report → Any suspicion or violation involving unethical or illegal conduct, fraud, risks, accounting irregularities, or unsafe practices must be reported to management, HR, or Legal.
Non-retaliation → FD Security prohibits any form of retaliation against those who report suspicions or violations in good faith.

2. SAFE WORKPLACE

FD Security promotes a safe, respectful environment free from discrimination, harassment, violence, intimidation, abuse, or any form of inappropriate treatment.

Respect and Anti-discrimination → Everyone must be treated with dignity, regardless of race, gender, age, religion, disability, origin, or any other protected characteristic.
Anti-harassment → Harassment of any kind—verbal, physical, visual, or virtual—is strictly prohibited.
Workplace violence → Threats or acts of violence within or outside the corporate environment related to work are grounds for sanctions.
Safety, alcohol, and drugs → Everyone must comply with health and safety standards. Working under the influence of alcohol, illegal drugs, or medications that impair safety is prohibited.
Environment → The company follows environmental laws, seeks to reduce impacts, and promotes sustainable practices.

3. WORKPLACE INTEGRITY

FD Security prohibits:

► Political involvement that interferes with professional responsibilities.

► Misappropriation, diversion, or misuse of assets.

► Unprofessional behavior that harms the company or its reputation.

4. INTEGRITY IN THE USE OF RESOURCES AND DATA

Use of assets and systems → Corporate resources must be used only for authorized professional purposes.
Records and information → It is forbidden to falsify, omit, destroy documents, or provide inaccurate information.
Books and reports → Must accurately reflect financial and operational reality, in accordance with accounting standards and legal requirements.
Data and information protection → Personal, confidential, strategic, and proprietary information must be protected, used only for authorized purposes, and never disclosed without permission.
External communications → No employee may speak on behalf of the company without express authorization; media requests must be forwarded to authorized personnel.

5. ETHICAL BUSINESS PRACTICES

Quality → **FD Security** maintains a commitment to safe, reliable, and high-standard services.
Fair competition → The company competes ethically, ensuring transparency in bidding, negotiation, and contract execution.
Conflicts of interest → Any situation compromising impartiality must be avoided and reported.
Suppliers and consultants → Must comply with ethical standards equivalent to those of **FD Security**. The company does not tolerate illegal practices, bribery, espionage, or undue favoritism.
Marketing materials → Must be truthful, accurate, and used only with authorization when involving data, trademarks, or clients.

6. ANTI-CORRUPTION POLICY

FD Security adopts zero tolerance for corruption, bribery, kickbacks, illicit payments, or undue advantages.

Gifts and hospitality → Must be modest, occasional, and never linked to obtaining advantages. Improper acceptance or offering must be reported.

Bribes and kickbacks → It is prohibited to offer, request, or accept anything of value that influences business decisions.

Antitrust and competition → Practices such as price fixing, bid rigging, illegal boycotts, and agreements with competitors are prohibited.

Money laundering → Suspicious transactions must be reported immediately.

Insider information → Employees and third parties may not trade securities based on non-public information.

7. CONTRACTS

Contract execution must strictly follow:

► Contractual terms

► Technical specifications

► Deadlines

► Audit procedures

► Accurate and legitimate billing rules

Documents must be maintained in accordance with regulatory and contractual requirements.

8. SOCIAL RESPONSIBILITIES

FD Security complies with national and international laws, especially human rights standards, including:

► Hague Conventions

► Universal Declaration of Human Rights

► Geneva Conventions

► UN Global Compact

► International codes of conduct for security companies

The company does not tolerate any practice that violates human dignity.

9. WORKING CONDITIONS

Hiring → Due to the nature of its activities, **FD Security** does not hire individuals under 18 years old.

Forced labor → Compulsory, slave, or degrading labor is prohibited.

Retention of documents → Retaining employees' personal documents or funds is prohibited.

Freedom of association → Employees may join or not join unions without fear of retaliation.

10. HUMAN RIGHTS

FD Security respects all fundamental rights, ensuring:

► Life, liberty, and security

► Prohibition of torture or cruel treatment

► Prohibition of sexual exploitation

► Freedom of expression and opinion

► Equal opportunities

► Freedom of engagement and association

Suspicions of violations must be reported and will be investigated.

11. DISCLOSURE, REVIEW, AND COMPLIANCE

The Code is distributed to all employees and third parties, and compliance is mandatory. The company may revise it whenever necessary.

Each person must:

► Read and understand the Code

► Clarify doubts with their managers

► Sign a compliance statement

► Comply with future updates

Exceptions to the Code may only be approved by the CEO and the technical committee.

Rio de Janeiro, October 1, 2025.