

## HUMAN RIGHTS POLICY

### 1. INTRODUCTION

**FD Security Soluções em Segurança Ltda** reaffirms its commitment to the promotion, protection, and respect of Human Rights across all operations. Operating in a sensitive sector — executive transportation with armored vehicles — the company adopts high standards of ethics, safety, legality, and social responsibility, recognizing its role in preventing risks to clients, employees, partners, and communities. This Policy is based on Brazilian legislation and international human rights guidelines.

### 2. OBJECTIVE

To establish **FD Security's** position regarding the observance of Human Rights and International Humanitarian Law in all its activities. The Policy guides practices that ensure:

- ▶ Respect for fundamental rights.
- ▶ Minimization of risks to physical integrity and privacy.
- ▶ Safe, ethical, and fair working environments..

### 3. POLICY

**FD Security** will treat all individuals with dignity and will respect all internationally recognized human rights. All employees and representatives must fully comply with these standards.

### 4. APPLICATION

**This Policy applies to:**

- ▶ Direct employees, drivers, administrative and management teams.
- ▶ Outsourced personnel, suppliers, strategic partners and other stakeholders.

Compliance is mandatory for all.

### 5. GENERAL PRINCIPLES OF HUMAN RIGHTS

#### 5.1. DIGNITY AND RESPECT

Equal treatment, without discrimination of any kind, in accordance with the Federal Constitution.

## **5.2. SECURITY AND PHYSICAL INTEGRITY**

As a company specialized in armored executive transportation, **FD Security** adopts:

- ▶ **Continuous technical training** (defensive/evasive driving, risk analysis, conflict prevention, first aid).
- ▶ **Proportional use of force**, prohibiting any violent or risky conduct.
- ▶ **Absolute priority of life** over schedules or operational requests.
- ▶ **Responsible operation of armored vehicles**.
- ▶ **A safe work environment**, with preventive maintenance and periodic inspections.

## **6. HUMAN RIGHTS OBLIGATIONS**

### **6.1. DECENT WORK**

Commitment to lawful hiring, dignified working conditions, prohibition of child or forced labor, fair compensation, and labor rights. The company protects:

- ▶ The right to life, freedom, and personal security.
- ▶ Prohibition of torture, cruel, or inhuman treatment.
- ▶ Prohibition of sexual exploitation.
- ▶ Rights to recognition, expression, and opinion.
- ▶ Equal opportunities and non-discrimination.
- ▶ Freedom of association and prohibition of forced labor.

### **6.2. SAFE AND RESPECTFUL TREATMENT OF CUSTOMERS**

**Includes:**

- ▶ Absolute confidentiality of information.
- ▶ Professional, discreet, and non-invasive conduct.
- ▶ Balanced application of security protocols.
- ▶ Ethical behavior, with no requests for favors or advantages.
- ▶ Preservation of the client's comfort, privacy, and autonomy.

### **6.3. PROTECTION OF MINORS AND PREVENTION OF CHILD LABOR**

**FD Security** has a zero-tolerance policy towards child labor and does **not hire anyone under 18 years of age** under any circumstances. It maintains internal controls, contractual clauses for partners, continuous monitoring, and secure reporting channels.

#### **6.4. PROHIBITION OF FORCED LABOR OR LABOR ANALOGOUS TO SLAVERY**

The company fully complies with legislation and international treaties, ensuring free and voluntary hiring, internal oversight, specific clauses for suppliers, and secure reporting channels.

#### **6.5. Diversity and Inclusion**

Commitment to an inclusive, safe, and harassment-free environment, ensuring fair processes, continuous training, reporting channels, and equal opportunities.

#### **6.6. Privacy and Data Protection**

In compliance with the LGPD, the company ensures:

- ▶ Confidentiality of personal and operational data.
- ▶ Prohibition of unauthorized disclosure.
- ▶ Clients' right to access, correct, or delete data.
- ▶ Employee training on information security.

### **7. RELATIONSHIP WITH COMMUNITIES AND SOCIAL IMPACTS**

**FD Security** seeks to minimize operational impacts, respect communities, consider sociocultural contexts, maintain transparent dialogue, and ensure that security actions do not generate intimidation or inequality.

### **8. TRAINING AND CAPACITY BUILDING**

Includes continuous training in:

- ▶ Human Rights and ethics;
- ▶ Professional and humanized customer service;
- ▶ Defensive/evasive driving and risk management;
- ▶ Anti-kidnapping training;
- ▶ First Aid training;

- ▶ Information security and data protection;
- ▶ Periodic refreshers and evaluations.

## **9. MONITORING, AUDIT, AND DUE DILIGENCE**

- ▶ Continuous risk monitoring;
- ▶ Audits of critical suppliers;
- ▶ Due diligence for new partnerships;
- ▶ Rapid response to violations;
- ▶ Continuous improvement based on results.

## **10. WHISTLEBLOWING CHANNEL**

Provides a secure, confidential, and anonymous channel for reporting violations, ensuring:

- ▶ Confidentiality;
- ▶ Impartial investigation;
- ▶ Zero tolerance for retaliation;
- ▶ Feedback to the whistleblower when possible.

All reports are investigated in accordance with FD Security's Code of Conduct.

## **11. REVIEW AND UPDATE**

The Policy is reviewed annually or whenever necessary due to legal changes or emerging risks.

## **12. VIOLATIONS AND DISCIPLINARY MEASURES**

### **In case of suspected violations:**

- ▶ Fair and impartial investigation;
- ▶ Right to defense;
- ▶ Proportional measures (warning, suspension, termination).

### **Regulatory Foundations:**

- Universal Declaration of Human Rights (UN)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)

- UN Global Compact
- Fundamental ILO Conventions
- Federal Constitution of Brazil
- Civil Code and Penal Code
- Labor Legislation (CLT)
- General Data Protection Law – LGPD (Law 13.709/2018)
- Regulatory Standards (NRs) related to workplace safety
- Brazilian Internet Bill of Rights (Marco Civil da Internet)
- Applicable state/municipal laws on security and transportation

**Rio de Janeiro, June 1, 2025.**