



# **CODE OF ETHICS**

## **VMI SECURITY**

**VMI SISTEMAS DE SEGURANÇA LTDA**

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# A MESSAGE FROM THE PRESIDENT



The responsibility towards the community that makes up the company is increasingly growing and the world is demanding more than work: individual, moral, and ethical commitments are fundamental.

And, facing such reality, the guidelines of this Code of Ethics and Conduct have been created to guide and strengthen the actions of those that need them, so that the correct decisions are made, both by the individual and organization.

This brings the need to define the principles that must guide the actions and commitments of professional behavior at the working environment, searching for coherence between speech and practice with concrete actions in the context of professional routine.

And the convergence of all these factors will contribute with the formation of professional who are prepared and qualified to transform the corporate liability into the main competitive advantage of VMI.

This Code applies without distinction to all collaborators, which shall mean employees, members, service providers, commercial representatives, suppliers, and business partners. Therefore, it is fundamental that the totality of the professionals related to VMI read it, assimilate it, and assume the unequivocal commitment towards its compliance. The guidelines contained in this document will provide a road map for the actions to be taken and decisions to be made by each collaborator, including business, relationship, products, services, and operations of VMI.

The Code will also support VMI in the protection of its most valuable assets: reputation and integrity.

With the participation and collaboration of all, the leading position achieved by VMI in the market will certainly be maintained, being the best method to build the true example that must be followed.



**OTÁVIO  
MORAES**

**CEO  
VMI SECURITY**

- 1. Introduction**
- 2. Our Mission and Values**
- 3. Objectives and Application of the Code of Ethics and Conduct**
- 4. Decision-making**
- 5. Compliance Hotline**
- 6. Expected Behaviors**
- 7. Intolerable Behaviors, subject to disciplinary measures**
- 8. Equal Opportunities**
- 9. Gifts**
- 10. Using the Internet and corporate e-mail**
- 11. Confidential Information**
- 12. Personal Data Protection**
- 13. Forced and Child Labor**
- 14. Environment**
- 15. Conclusion**

## 1. INTRODUCTION

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The Code of Ethics and Conduct of VMI Sistemas de Segurança gathers the main guidelines applicable to the conduction of the business of the company and also covers the manner how all collaborators must relate internally, with customers, suppliers, governmental agencies, competitors, community, and the environment.

The Code has been elaborated from the VMI's MISSION and VALUES, outlining the expected conducts so that collaborators of the company act in compliance with the objectives and culture of VMI.

Everyone, without distinction, is responsible for the maintenance of the good reputation of VMI at the several levels of relationship.

An inappropriate behavior, or infringing the principles of the Code of Ethics and Conduct, may compromise the good image and internal environment of VMI, also affecting all other collaborators and members.

Collaborators are expected to act in accordance with the recommendations and principles of this Code.

## 2. OUR MISSION AND VALUES

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VMI contributes to a safer and efficient society through technological and innovative solutions.

For that VMI has as pillars the following values:

- **Ethics (act with respect towards the others);**
- **Professional and personal development of the team;**
- **Innovative way of working to be outstanding in the market;**
- **Responsibility for the company results (act like the owner).**

### 3. OBJECTIVE AND APPLICATION OF THE CODE OF ETHICS AND CONDUCT

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This Code of Ethics and Conduct contains the general guidelines of the company and recommendations for the conduct of its business in compliance with the highest standards of ethics and good practices.

One of our main virtues, as a company and individually, is integrity. This is the reason why this Code was developed, having as its base both ethical and righteous principles.

VMI expects the same behavior from its collaborators, in the exercise of their tasks, as well as ethical and proportional measures, which shall represent and reflect the conduct of business by the company.

Although not intended to cover every situation of the daily routine involving ethical issues or duties to be performed, the Code specifies the main principles that must guide the daily decision-making processes.

### 4. DECISION-MAKING

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The abidance of the laws governing our ethical standards.

VMI and its collaborators are compelled to comply with all local, regional, or national laws and regulations applicable to its business.

The violation of laws may be extremely harmful to the company, subjecting VMI (and also, in various cases, its collaborators) to both civil and criminal penalties.

An inappropriate action may cause disastrous results. Therefore, before acting, make sure that the conduct is appropriate:

1. Verify if the conduct is in accordance with the legislation in force;
2. Verify if the conduct is coherent with this Code and with VMI's Policies and Practices;
3. Verify if the conduct is coherent with the values of the Company;

The action or behavior of a collaborator will be deemed inappropriate if you get a negative answer to any of the questions above.

A personal evaluation is also suggested. In case the doubt persists, please get in touch with your Regional Manager or the contact identified in this document.

**Whenever in doubt, ask!**

## 5. COMPLIANCE HOTLINE

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We are committed to acting in accordance with the highest ethical standards and in strict compliance with the laws and regulations in force.

Therefore, **we expect collaborators to report any type of suspicious conduct or effective disrespect to the principles of this Code of Ethics.**

We take seriously our responsibility to create a comfortable environment, open to complaints related to any actions or omissions that generate disturbances or threats to the health of VMI's working environment.

Thus, whenever problems are identified, please get in touch using the following communication channels:

- **website: [www.wecomply.com.br/eticavmis](http://www.wecomply.com.br/eticavmis)**
- **Email: [eticavmis@wecomply.com.br](mailto:eticavmis@wecomply.com.br)**

The policy of this company prohibits any type of retaliation to anyone who, in good faith, has reported any suspicious conduct or effective infringement.

## 6. EXPECTED BEHAVIORS

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The commitment towards ethics and conduct standards is a collective effort, with clear guidelines to all collaborators.

But our obligations go beyond the mere knowledge of the content of this Code of Ethics and Conduct. We must all:

- Observe the provisions of this Code, the policies, and other regulations of the company;
- Maintain a positive, straightforward, loyal, and honest professional attitude, of mutual respect, confidence, and collaboration with colleagues and also within the company
- Request an explanation from the contact identified regarding any uncertainty in the application of the standards set forth herein, whether related to a specific situations or to the working environment as a whole;

- Preserve the property of VMI, including its image and reputation, facilities, information, equipment and materials, using them only for their intended purposes and in the strict exercise of the respective attributions;
- Act with impartiality, objectivity, honesty, respect, transparency, loyalty, and courtesy in the relationship with administrators, employees, suppliers, business partners, and customers;
- Be diligent, righteous, and responsible in the relationship with customers, authorities, suppliers, and all other individuals, companies, and organization with which VMI relates in the exercise of its ordinary activities, always searching for preserving the good reputation, image, and relationship of the company;
- Avoid situations that may lead to conflicts between individual interests and the interests of VMI and, when this is not possible, refrain from representing VMI in the subject matter, communicating the fact to the Regional Manager or the contact identified in this document;
- Commit to the sustainable development of the regions in which VMI operates and respect the environmental legislation;
- Act with social responsibility and respecting human dignity;
- Perform the daily activities, respecting the aspects of safety and health defined by the company;
- Act with honesty and transparency, as fundamental principles in the treatment of customers;
- Present possible and true offers, supported by proposals or ads of products and/or services that will be certainly honored;
- Respect VMI's values in the social networking (Facebook, Twitter, WhatsApp, Instagram, among others), in accordance with the recommendations contained in this Code;
- Participate in training to stimulate the understanding of the ethical requirements described in this Code;
- **Report to the company, using the channels indicated in this Code, any situations or suspicion of violation of the laws and regulations in force, internal policies, or provisions of the Code.**

## 7. INTOLERABLE BEHAVIORS, SUBJECT TO DISCIPLINARY MEASURES

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- Use the job title aiming at obtaining personal advantages, facilities, or any other form of illegal personal benefit or favor, even if to third parties;
- Discriminate against any person due to ethnicity, origin, gender, sexual orientation, religious belief, union affiliation, political or ideological conviction, social class, disability, marriage status, age, in strict compliance with VMI's ethical principles and the legislation in force. The work performed at VMI embraces different individuals, profiles, and personalities and therefore the mutual respect, honesty, integrity, dignity, and individual rights will always be respected.
- **Engage in harassment of any nature, including moral or sexual, causing embarrassment to others;**
- Give preferred or privileged treatment to any customer or supplier not in compliance with the policies and standards of VMI;
- Offer or receive gifts in violation of VMI's policies and standards and as a mean of exercising undue influence, or for gain or benefit to self or others, with the commercial decisions being based on behalf of VMI and not on behalf of personal benefits, whether in the past or future (read more on this specific topic in item "9");
- Offer, promise, or authorize the concession of any type of personal benefit (whether by means of payment or any other type of personal benefit), whether directly or indirectly, to any company or government officer;
- Active or passive corruption is strictly prohibited, as well as extortion, bribery, and money laundering, including any other similar illegal acts.
- Contact any VMI competitor in violation of the applicable antitrust legislation;
- Distort the numbers or accounting records of items that may reflect to the managerial reports or financial statements of VMI;
- Use or appropriate of resources or objects of the company for personal benefit.

## 8. EQUAL OPPORTUNITIES

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VMI is committed to providing a working environment with equal working opportunities to all.

This company will make its decisions based on the qualifications and merit of work of its collaborators, without distinction of race, color, gender, sexual orientation, religion, origin, age, marriage status, senility, physical or mental disability.



## 9. GIFTS

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Accepting gifts, awards, or any other type of gratification may cause conflict of interest, even if only apparently.

Therefore, VMI's policy consists of the full observance of such practices, with its collaborators being strictly prohibited to accept any type of gratification by suppliers, customers, government officers, or any other person that, due to any reason, is seeking to influence business or transactional decisions with VMI.

Occasionally there may be circumstances in which the denial of a gift may be impractical or rude. In such rare occasions, the collaborator may accept the gift on behalf of VMI, immediately reporting to his/her superior. The failure to observe this instruction may result in disciplinary action.

Gifts to third parties (including invitations to events) may only be offered as a commercial courtesy, provided that such practice is accepted locally and, in the industry, as a token of appreciation, and in compliance with the legislation in force. Gifts shall not be offered in cash. In addition, the gift shall not have a value that may influence a commercial decision and/or lead to a relationship of dependence or also carry the impression of impropriety.

## 10. USING THE INTERNET AND CORPORATE E-MAIL

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VMI's e-mail and Internet must be used exclusively for professional purposes, being permitted minimum personal usage in cases of emergency.

No collaborator shall use the email or Internet illegally or in a manner that may harm the reputation of VMI or bring any type of legal penalty to the company.

VMI reserves the right to access, at any time, data and voice or image transmissions occurred with the use of the IT sources of the company.

## 11. CONFIDENTIAL INFORMATION

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Strict confidentiality must be kept in relation to any secret, commercial, industrial, or strategic information of VMI, which shall not be disclosed to third parties, except when for the strict business interest of VMI or in compliance with the legal standards. In case of any disclosure, it shall only occur from the individuals previously authorized by the Company.

Confidential information shall mean all the technical and commercial data related to the products and services, short and long-term planning, containing the tactics and strategies of business and customers, findings of technological research, development of design and product, statistical data, financial and accounting data, labor and production information, as well as any other information or data related to the corporate interest of VMI.

VMI collaborators must act with the due precaution so that confidential or restricted information are kept safe, attracting to themselves ethical and legal responsibility regarding the protection of the knowledge transmitted, even after an eventual withdrawal from the Company.

## 12. PERSONAL DATA PROTECTION

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VMI is committed to protecting the privacy of users of our products and services. We respect and value the trust placed in our company when providing personal information.

We recognize the importance of the General Data Protection Law (LGPD) to ensure the privacy and security of personal data, and we strive to comply with the requirements and obligations imposed by this legislation. All information collected will be treated in accordance with applicable data protection laws and regulations.

We treat people's privacy with ethics and integrity, so we act responsibly in the treatment of the personal data of our partners, employees, customers, consumers, sales representatives, partners, suppliers, competitors and other related.

Thus, any and all individuals or legal entities that are bound to VMI must adopt the best practices regarding the protection and processing of personal data, respecting the principles of good faith, purpose, transparency, adequacy, security, necessity (minimization), prevention, free access, non-discrimination, quality, responsibility and accountability.

The processing of personal data in an improper, irregular or illegal manner, whether directly, indirectly, actively or passively, is prohibited.

All VMI employees are advised to respect the privacy and confidentiality of personal data, being aware of their individual and collective responsibilities to ensure that data protection practices are followed in all activities related to the processing of personal data.

Sales representatives, business partners and other third parties who may act on behalf of VMI must treat personal data responsibly and in accordance with the principles of the LGPD, this Code of Ethics and other policies, also observing the following guidelines:

- Collect and use personal data only for legitimate and authorized purposes.
- Ensure the security of personal data during processing, storage and transmission.
- Guarantee data subjects the exercise of their rights at any time.
- Respect the privacy preferences of individuals.
- Process data that have legal bases and obtain adequate consent, when necessary, for the processing of personal data.

VMI considers compliance with the LGPD and other data protection legislation a priority. We commit to conduct periodic reviews of this code of conduct and to adapt our practices and other ancillary policies as necessary to ensure continued compliance. All employees, suppliers, sales representatives and business partners are responsible for contributing to the fulfillment of these obligations and must report any violations or concerns related to privacy and data protection.

In case of questions, clarifications and/or suggestions, suspected violation of this Code or other concerns, report the fact through the channels below:

- **Website:** [www.wecomply.com.br/eticavmis](http://www.wecomply.com.br/eticavmis)
- **Email:** [eticavmis@wecomply.com.br](mailto:eticavmis@wecomply.com.br) or [lgpd@vmis.com.br](mailto:lgpd@vmis.com.br)

Your contribution is fundamental to maintaining an effective data protection culture and to fulfilling our legal and ethical commitments.

## 13. FORCED AND CHILD LABOR

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### FORCED WORK

In any case VMI will not make use of forced or slave work, such as the work performed by individual's allocation in an institution, or compulsory work, including work as a mean of coercion or political education - in the manufacture or assembly VMI products.

### CHILD LABOR

VMI does not hire children, as per Conventions 138 and 182 of the World Labor Organization.

## 14. ENVIRONMENT

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The promotion and maintenance of a sustainable environment are a priority. VMI respects the environment during the performance of its activities, manufacture of its products and provision of its services, adopting practices and measures assuring a harmonic coexistence, reducing to the highest degree possible any negative environmental impacts, by means of:

- Observance of the environmental legislation and standards in force;
- Research, development, and implementation of technologies that do not only contribute with VMI's development, but that also respect the environment;
- Promotion of recycling and reuse, whenever possible, of the waste generated in the performance of its activities;
- Stimulation and awareness of collaborators in the search for sustainable corporate practices.

## 15. CONCLUSION

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The Code of Ethics is the tool that allows the company to indicate and explain its own ethical, social, and environmental responsibility, observing the legislation in force.

The purpose of the Code is to demonstrate a type of CONTRACT, responsible for connecting the company to the various groups and individuals interacting directly or indirectly in its business routine.

Therefore, this Code of Ethics is the instrument that allows the public to become acquainted with VMI, its forms of engagement, and its rules of behavior, both for itself (company) and all its collaborators.

This is where the importance of reading its content resides, for this is only way in which collaborators will effective exercise their commitment.



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