

CODE OF CONDUCT

PROFESSIONAL ETHICS

How we act every day to protect people, data, and businesses.

ELITE SECURITY WITH BUSINESS INSIGHT

Illustrated edition • Rev. October 24, 2026 • Audience: internal and external

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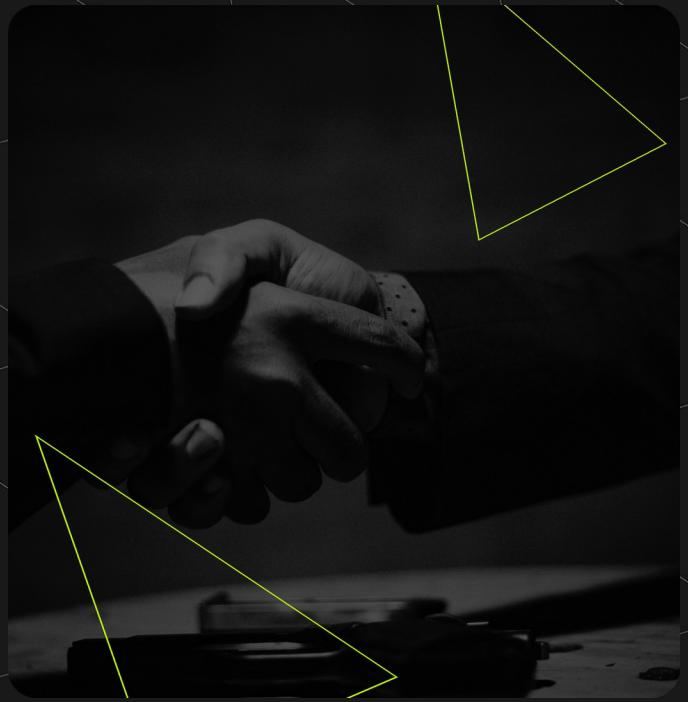
VULTUS

This code is our guide

It guides how we work with clients, vendors, colleagues, partners, investors, and public authorities.

It cannot cover every situation. When in doubt, use good judgment and ask.

"Ethics means doing the right thing in every setting. It is not temporary; it is consistent."



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For everyone who works with Vultus

Employees
Internal staff, interns, and apprentices

Clients
Those who trust us

Vendors and partners
Those who deliver alongside us

Competitors
Fair competition

Shareholders and investors
Transparency and fairness

Government and regulators
We comply with the law

The press
Authorized spokespeople only

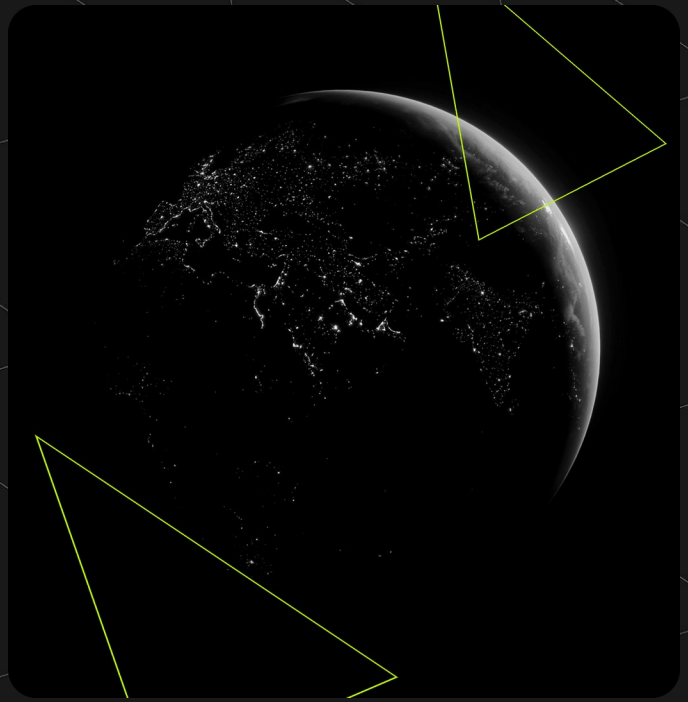
Community and society
Digital security for everyone

VULTUS

Building a safer digital world

Everyone deserves a safe online experience.

With technology, intelligence, and specialist expertise, we stay one step ahead of attacks and help people and businesses protect themselves.



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Five values guide every decision

Collaboration
Everyone has a voice. We learn together.

Ethics and integrity
Do the right thing, always.

Respect
Value every person's dignity.

Trust
Clarity and honesty with sensitive information.

Customer focus
We put ourselves in the shoes of those we protect.

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Everyone here is treated with respect

Diversity
No discrimination based on gender, origin, religion, color, age, disability, or orientation.

No harassment
We do not tolerate workplace or sexual harassment, aggression, or intimidation.

Equal opportunities
Objective, merit-based hiring and promotion.

Alcohol and drugs: no use at work. Alcohol only in moderation at events.



Personal interests must not come first

Outside activities
Outside work hours, without harming Vultus.

Businesses with colleagues
Started a business? Disclose it formally.

Inside information
Never use it to gain an advantage.



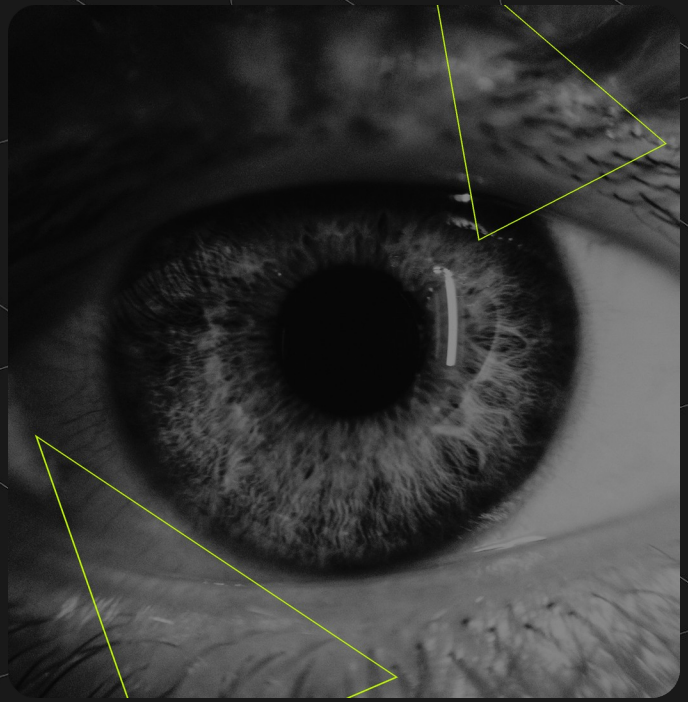
When in doubt, speak with your manager and report it through the Ethical Conduct Channel.

We do not pay, accept, or conceal

Bribery: never
No improper advantage, even if it means losing business.

Fraud: zero tolerance
We investigate and pursue civil and criminal accountability.

Suspicious funds
Unclear source? Notify Compliance immediately.



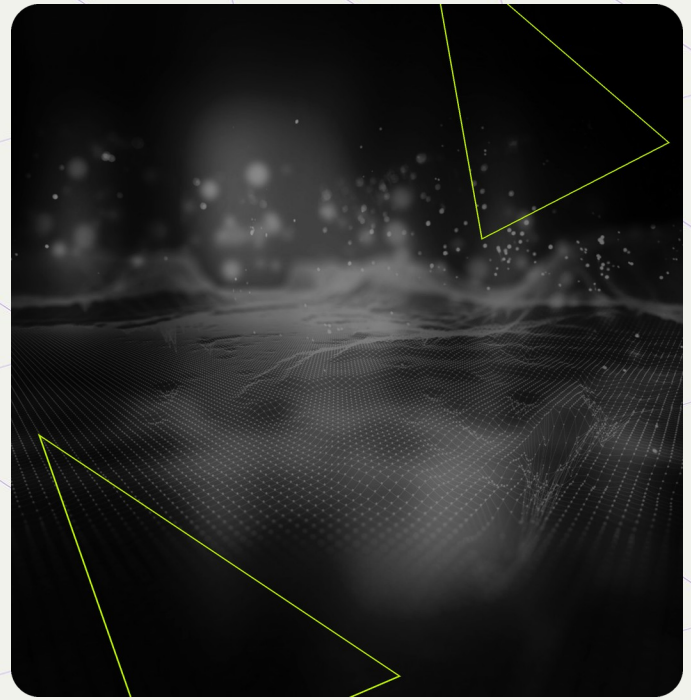
A gift can become a problem

Up to US$100
Customary promotional items and gifts (e.g., Christmas) may be accepted.

Over US$100
Decline. If that is not possible, give it to Compliance.

Brand events
Request approval by email beforehand and notify Compliance.

Public officials: never
No gifts or courtesies to public officials.



Protecting information is everyone's job

Passwords are personal
Do not share them, even with colleagues.

Official information only
Discuss only information published by Vultus.

Approved tools
Keep data only in approved environments and software.

No personal storage
Do not send data to personal email, USB drives, or cloud storage.

Monitored use
Company systems may be monitored.



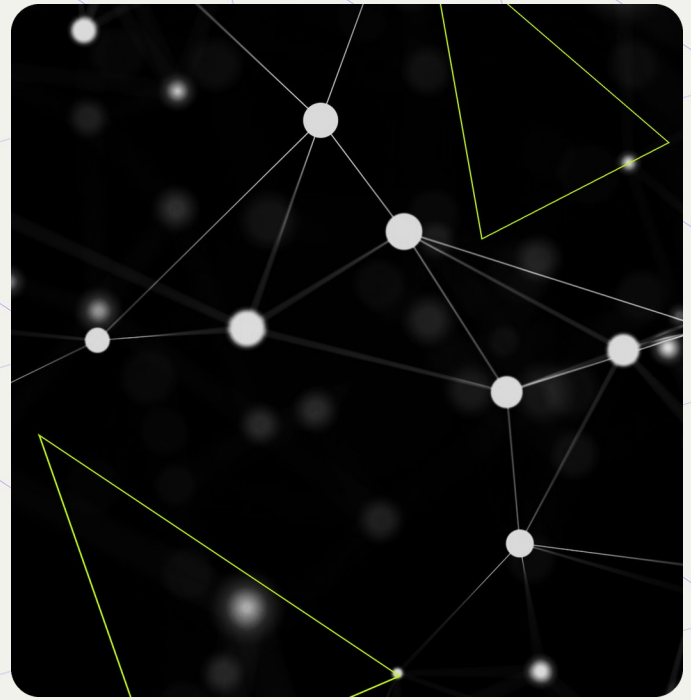
Personal data belongs to a person. Handle it with care.

Privacy from the start
Consider it when creating any product or service.

Prevention comes first
Act before a problem, not afterward.

Need-to-know access only
Partners and vendors follow the same rules.

Question or incident? dpo@vultuscyber.com.br



Official channels speak for Vultus

Personal profiles are personal
Express your own opinions, in your own name, without linking them to the brand.

No confidential data on social media
No client, project, or internal information.

Press statements require approval
Only designated spokespeople may comment.



Responsibility beyond business

We also support public policies for digital security and free competition.

Children and teenagers

Against exploitation and child labor.

Decent work

Against forced labor in our team and supply chain.

Health and safety

A safe environment and well-being for all.

The environment

Responsible resource use, recycling, and disposal.



Care for shared resources and those who trust us

Company resources

Use equipment and systems only for work, without personal gain.

Clients

Clear, truthful information. Complete confidentiality.

Vendors

Impartial selection and honored contracts.

Competitors

Respect. No price fixing or disparagement.

Government

Provide information in writing, with guidance from Legal or Compliance.

Shareholders

Transparency and fairness.

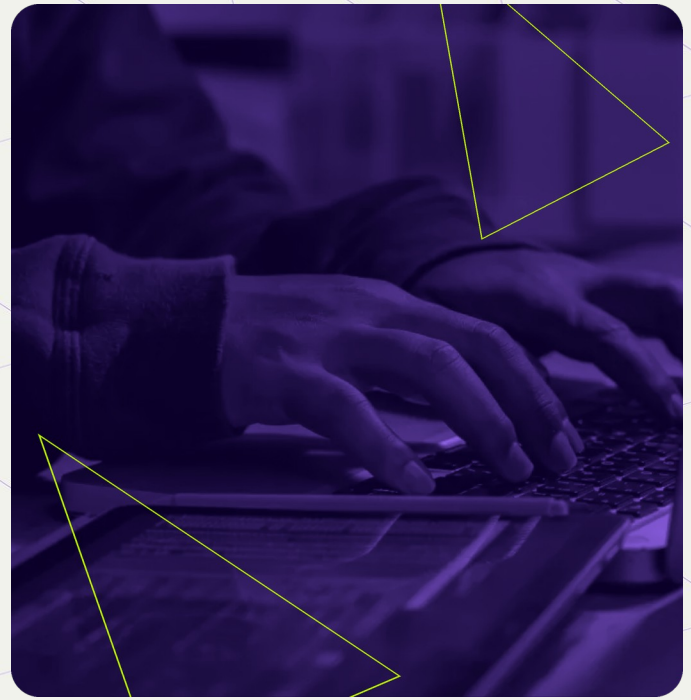
Stop. Think. Ask.

Is it legal and ethical?
Does it comply with the law and this code?

Would I accept seeing it made public?
If not, that is a warning sign.

Speak with your manager
Or with HR, Legal, or Compliance.

Use the reporting channel
If the issue persists or you feel uncomfortable.



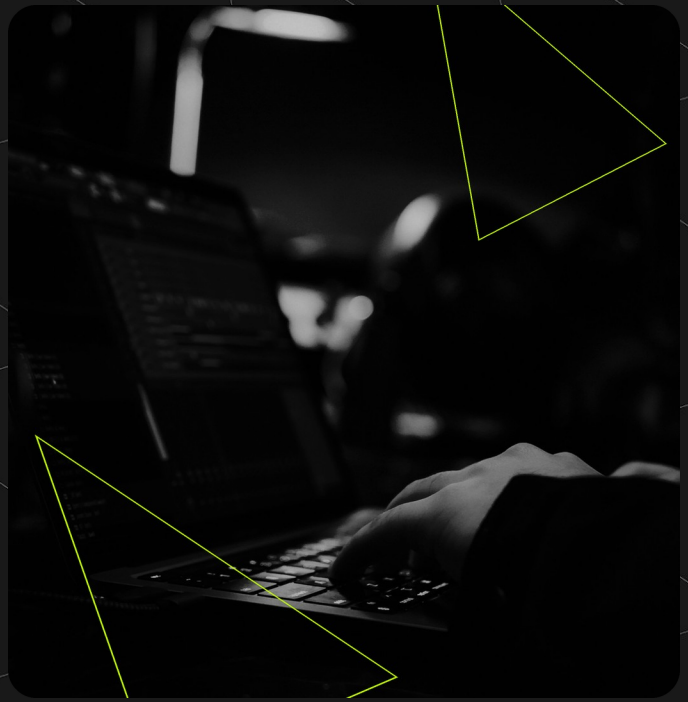
See something wrong? Tell us

denuncias@vultuscyber.com.br

Confidentiality and anonymity
Your identity will be protected if you wish.

No retaliation
Anyone who retaliates against a reporter will face penalties.

Good faith
Bad-faith allegations may lead to sanctions.



Who decides when misconduct occurs

Who participates
Executive leadership, supported by Compliance, with HR as secretariat.

What it does
Keeps the code current and active.

Final authority
Decides on violations and disciplinary sanctions.

Impartial, independent, and confidential investigation.



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Put your judgment to the test

A client gave me a US$40 gift for the holidays.

Yes. It is a customary gift within the limit.

A vendor invited me to an expensive dinner.

Not without prior approval and notifying Compliance.

I want to post a photo of a client's project.

No. Client information is confidential.

May I lend my password to a colleague?

No. Passwords are personal and nontransferable.

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Read, understand, and commit

I have read and understood
I know the rules of this code.

I will put it into practice
I apply it every day with every audience.

I will report
I report misconduct I witness.

The formal statement is included in the full Code.



VULTUS

CYBERSECURITY SINCE 2008

More than 60 specialists in security, risk management, compliance, and ethical hacking.

Information Security and Privacy Management System (SGSPI)
Continuously reviewed against the principles of ISO 27001 and ISO 27701 and industry references such as NIST, among other frameworks.

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