

CODE OF ETHICS

Every Ecuador Security officer shall always:

:

- I. Respond to the professional requirements of your employer**
- II. Demonstrate exemplary behavior**
- III. Protect confidential information**
- IV. Maintain a safe and secure workplace**
- V. Your image should show professionalism**
- VI. SAW. Comply and enforce all laws and regulations**
- VII. Encourage good relations with the police**
- VIII. Develop good understanding with other professionals**
- IX. Strive for professional competence**
- X. Encourage high standards of ethics to colleagues, superiors and subordinates**

INTEGRATED MANAGEMENT SYSTEM POLICY

“Creating a Safety and Security Culture”

ECUADOR SECURITY – Administración, Rentabilidad, Entorno y Seguridad Cia. Ltda. provides services, transportation, investigation, training and certification activities aimed at creating a safety and security culture. To this end, it commits to the following:

- To implement an Integrated Management System, which is based on the continuous improvement of our operations and work conditions, so that the integrity of our operations, our clients and all those who work here can be guaranteed.
- To comply with all applicable Environmental, Health, Safety, Security and Quality legislation and technical standards; as well as our client’s internal regulations. This in addition to our commitment to provide a safe and secure environment to every employee and contractor.
- To comply with our code of ethics, operate in a manner that recognizes and supports the rule of law; respects human rights, and protects the interests of our clients. Establishing and maintaining an effective internal governance framework in order to deter, monitor, report, and effectively address adverse impacts on human rights
- To cooperate in good faith with national and international authorities exercising proper jurisdiction, in particular with regard to national and international investigations of violations of national and international criminal law, of violations of international humanitarian law, or of human rights abuses
- To comply with anti-corruption and anti-boycott legislation and standards applicable in all countries where we have influence; as well as relevant business conduct standards. This includes the U.S. Foreign Corrupt Practices Act (FCPA), the Bribery Act of the United Kingdom (U.K. Bribery Act).
- To respect signed agreements with clients, especially with regard to Confidentiality and Non Disclosure.
- To routinely evaluate civil and criminal records of our employees, contractors and business partners, checking on public lists such as the OFAC SDN.
- To maintain a drugs and alcohol free work environment.
- To commit the technical, human and financial resources needed to correct and adequately implement our integrated management system; this includes initial and ongoing training to all management levels, permanent compliance evaluation, preventative treatment of nonconformities, and to provide means for responding to and resolving allegations of activity that violates any applicable national or international law.
- To minimize negative environmental impacts generated by our activities; reduce the consumption of natural resources and reuse all applicable materials before final disposal.
- To publish this policy in relevant places, make it available to all interested parties; to document, implement, and periodically update it based on our commitment to continuous improvement

Our commitment to prevention and continuous improvement, and the responsibilities derived from it must be fulfilled by all ECUADOR SECURITY employees and contractors. Being the responsibility of the leaders to lead it, and of all employees and other interested parties to know it and contribute to the achievement of this policy

The phrase summarizing our integrated management system policy "**Creating a Safety and Security Culture**" will be included in all official documents of our organization, the complete policy will be included in any applicable documents for the knowledge of all interested parties.

Sincerely,



Kevin E. Palacios Andrade
General Manager