



# CODE OF ETHICS AND CONDUCT

Approved by GPS Participações e Empreendimentos S/A Board of Directors, in deliberation of August 10th 2022, filed in the Company's headquarters.

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José Caetano Paula de Lacerda  
Chairman of the Board of Directors

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Cláudio Petruz  
Secretary

## **GRUPO GPS CODE OF ETHICS AND CONDUCT**

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## 1. Message from the Executive Management

We, from the management of Grupo GPS, integrated by GPS Participações e Empreendimentos S.A. and its controlled companies, value excellence, and quality in all our activities. We believe that, by acting within the strictest integrity and ethics standards, we are contributing not only to a safe and honest work environment but also to a fairer society.

Our Code of Ethics and Conduct establishes the ethical principles and rules of conduct that must guide internal and external relationships of our employees with each other, with our Customers, shareholders, suppliers, competitors, government bodies, and the community.

All our employees and third parties who have a relationship with us must have complete knowledge and understanding of its terms. Its observance is mandatory, and the allegation of lack of knowledge will not be accepted under any circumstances or any argument.

Our Ethics Committee is responsible for implementing this Code of Ethics and Conduct, assessing its mandatory disclosure, awareness, and compliance, and for its update when necessary.

We are all responsible for disseminating the values, principles, and guidelines presented herein.

Luis Carlos Martinez Romero  
CEO

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## 2. Mission, Vision and Values:

This Code of Ethics and Conduct establishes the ethical principles and standards of conduct that must drive our internal and external relationships, based on our Mission, Vision and Values:

**Mission:** everybody serving with pride and dedication, making us essential to our Customers.

**Vision:** to be the reference in the indoor services market in Brazil, respected for offering innovative solutions, for the quality of its delivery and for the ability to offer the best cost-benefit relation to its Customers.

**Values:** a) spirit to serve; b) teamwork; c) discipline; d) self-development; e) commitment; and f) entrepreneurship.

## 3. Scope:

The application of this Code of Ethics and Conduct does not distinguish area, hierarchical level or type of relationship with Grupo GPS and aims to drive our actions in the relationship with our Customers, shareholders, employees, suppliers and service providers (third parties), competitors, government bodies and the community.

## 4. General Guidelines:

### 4.1 Registration and disclosure:

This Code of Ethics and Conduct must be available on our website, <https://www.gpssa.com.br/canal-de-etica/>, and on the Company's Investor Relations site, [ri.gpssa.com.br](https://ri.gpssa.com.br).

### 4.2 Communication about violations – Ethics Channel

The practice of illegal acts, which violate or may violate the enforcing Law and regulations, as well as any violations or suspected violations of Grupo GPS policies and procedures, must be promptly reported to the Grupo GPS Ethics Channel (“Ethics Channel”), which can be accessed by calling 0800 049 4200 or via the website <https://www.canaldeetica.com.br/grupogps/>.

Access to the Ethics Channel can be made anonymously or not, and any retaliation against anyone who makes communications or reports in good faith is forbidden. Retaliation

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characterizes violations to this Code of Ethics and Conduct, which can, therefore, lead to the application of the disciplinary measures provided for herein.

#### **4.3 Penalties in case of violation:**

The violation of the principles and standards contained in this Code of Ethics and Conduct will submit any employee who commits it to the following disciplinary measures, as applicable: (i) oral or written warning; (ii) suspension; (iii) termination; (iv) dismissal for cause, without exclusion to the adoption of legal measures related to damage compensation and communication to the competent authorities, when applicable.

In case of violations committed by third parties, it may result in the termination of the relationship with the Company and the adoption of appropriate legal measures.

The measures mentioned above will be deliberated by the Ethics Committee, when applicable, and applied according to the criteria of proportionality, gradualness and immediacy.

#### **4.4 Confidential information:**

We prohibit our employees from unduly disclosing confidential information of the Company, nor from using it to obtain personal advantage or to third parties. The exchange of information about Grupo GPS among employees is allowed, provided that is known by the employees due to their ordinary activities and in the interest of Grupo GPS.

Any information related to material facts, sale of assets, goals, indicators, strategies, performance, plans, commercial proposals, data, among others, to which our employees, service providers or suppliers have privileged access due to their activities, must be absolutely preserved with total secrecy and confidentiality. Leaders must ensure that subordinates and third parties do the same.

The Material Act or Fact Disclosure Policy and the Securities Trading Policy of Grupo GPS complement the guidelines set forth herein.

Grupo GPS values the treatment of personal data under the terms of the provisions set forth in Brazilian Data Protection General Law n. 13.709 from August 14<sup>th</sup> 2018 and in the Privacy and Personal Data Protection Policy of Grupo GPS.

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## **5. Quality, Safety, Health and Environment:**

### **5.1 Quality:**

**5.1.1** We are committed to promote continuous improvement, constantly seeking excellence in the services provided.

**5.1.2** The Quality, Safety, Health and Environment Policy of Grupo GPS complements the guidelines set forth herein.

### **5.2 Safety:**

**5.2.1** It is the responsibility of everyone to act in an intrinsically safe manner, observing standards of conduct for individual and collective safety in the workplace, notifying promptly their Leader on any imminent danger or situation that implies, even potentially, in lack of safety in the work environment.

**5.2.2** We perform any activity in safe conditions and refuse to perform the job in case of any sign of unsafety.

**5.2.3** Similarly, we perform all activities with Personal Protective Equipment (PPEs) and appropriate tools.

**5.2.4** We prohibit working under the influence of medication, alcohol, or other prohibited substances and/or that might create unsafe conditions.

**5.2.5** Every work accident, regardless of its apparent level of severity and the immediate assistance to the involved person, must be immediately reported to the involved persons' Leader, either by the involved person when in conditions to do so or by those who witness it or becomes aware of the fact.

**5.2.6** The report of any lost-time work accident is mandatory and must come to the attention of Grupo GPS Executive Management within 24 hours, being the responsibility of all employees to ensure the adequate flow of communication.

### **5.3 Health:**

**5.3.1** We have the commitment to comply with relevant legislation and other applicable requirements and to provide adequate working conditions for safety, health and environment, safeguarding the physical integrity and the health of our employees;

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**5.3.2** All employees must be submitted to a clinical evaluation before being hired and the beginning of their activities, and it is mandatory that the occupational physician issues the respective OHC (Occupational Health Certificate), according to Normative Act n° 3.214/78, ruled by NR-7 (Normative Rule n° 7 from the Labor and Social Security Ministry).

**5.3.3** The OHC must be updated periodically according to medical indication. In addition to the admission medical exam, according to the Occupational Health Medical Control Program, the following are mandatory: periodic, return to work, change of role and dismissal.

#### **5.4 Environment:**

**5.4.1** We respect the environment and are fully committed to protective measures, pollution prevention and sustainable development. We develop Leadership with the responsibility for generating sustainable results.

#### **6. Relationship with Employees and Work Environment:**

**6.1** We strive for compliance with the Consolidation of Labor Laws, Decree n.º 5.452/43 and subsequent amendments – as well as respect for relevant conventions and collective bargains.

**6.2** We respect individual freedom, free association for the defense and coordination of economic and/or professional interests of our employees, as well as the worktime agreed with them under the terms of the Law.

**6.3** We strive for human dignity and respect diversity of gender, age group, ethnicity, culture, and sexual, political and religious orientation, as well as any type of disability.

**6.4** We prohibit the carrying of weapons of any kind in the workplace, except by employees authorized to do so when carrying out their regular duties as a consequence of the security services developed by specialized companies of Grupo GPS.

**6.5** We condemn and prohibit any and all forms of moral and/or sexual harassment, as well as any type of violence, threats, embarrassment and/or disrespect in the workplace.

**6.6** We respect the freedom of each employee to join or not join legally constituted associations or organizations.

**6.7** We expressly prohibit the performance of political party or religious activities in the workplace.

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**6.8** During the performance of their work activities, our employees must wear the uniforms provided to them, and the display of morally and good customs offensive messages is prohibited.

**6.9** We prohibit the practice of private commercial activities in the workplace.

## **7. Relationship with Customers:**

**7.1** We develop and provide services that add concrete benefits to our Customers. Our commitment to meeting the needs of our Customers must drive our day-to-day. We plan and recommend services based on a professional analysis of the cost/benefit relationship, tailored to the real needs of each Client.

**7.2** We immediately communicate and formalize any impossibility of complying with the rules or internal proceedings of our Customers.

**7.3** We immediately report to our Customers all occurrences or incidents that expose them to personal, property, or health and safety-related risks.

**7.4** We treat our Customers with respect, and each one of our employees must be committed to complying with the applicable legislation to their activities.

**7.5** We prohibit using our Customers' information for any purpose without their express consent.

**7.6** We do not conduct business, sign contracts or commit with our Customers without observing the competent analysis and approval processes.

**7.7** We do not unduly appropriate our Customer's or third parties' technical knowledge nor disclose information from our Customers or third parties unduly.

## **8. Conduct in human security activity:**

**8.1** We perform asset surveillance activities, complying with applicable Law, emphasizing the following mandatory aspects for employees working in this segment:

**8.1.1** Carry, during worktime, the Brazilian National Vigilant Card – CNV – and functional badge.

**8.1.2** Update the vigilant formation course recycling.

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**8.1.3** Keep restricted to the site defined for their performance, observing the details of the personal security and armed escort activities.

**8.1.4** Only use firearms, non-lethal weapons, ammunition or bulletproof vests that are owned by the specialized company to which the employee is linked.

**8.1.5** Never deliver a firearm, non-lethal weapon, ammunition or bulletproof vest that is under their responsibility to any person other than their substitute assigned to the job location or their direct leader.

**8.1.6** Store a firearm, non-lethal weapon, ammunition or bulletproof vest only in locations previously defined by their leaders.

**8.1.7** Never handle a firearm or non-lethal weapon unnecessarily, nor point them at any person, unless the use of it is imminent, in the manner and within the limits of the Law, thus avoiding accidental shots that might hit oneself and/or other people.

**8.1.8** When handing over the service to your substitute or when handing over the weapon in use to your direct leader, you must ensure that it is unloaded and open. The loading or unloading must be carried out with the gun barrel pointed towards the sandbox, when available, or towards the ground.

**8.1.9** When taking up your job, you must check the conditions of the weapon, which will be under your responsibility, its manufacturing number, a copy of its registration (mandatory at the workplace); its quantity, type and condition of the ammunition (according to the number of loads assigned to the work station); number of bulletproof vests and its conditions. Any discrepancies/changes must be immediately communicated to your direct leader or to the operational basis of the specialized company to which you are linked.

**8.1.10** Thefts, robbery or loss of weapons, ammunition or bulletproof vest, as well as gunshots, whether accidental or not, must be immediately reported by the employee to their direct leader, or directly to the operational base of the specialized company to which they are linked.

## **9. Relationship with suppliers and service providers – third parties:**

**9.1** We only contract with third parties with high ethical standards, based on technical criteria, aiming for a lasting relationship, without prejudice to the principles of free initiative and fair competition.

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**9.2** It is our duty to conduct a compliance risk assessment, whose objective is to understand and evaluate the corruption risks that we may be exposed to as a result of our relationship with third parties.

**9.3** Employees are therefore prohibited to ask to a third party to get involved or tolerate any conduct that the employees themselves are prohibited from practicing, under the terms of this Code of Ethics and Conduct and of the Law.

## **10. Relationship with competitors:**

**10.1** We are committed to fair competition and a free market. Therefore, we respect our competitors and work under ethical and legal terms, seeking the protection and development of the markets where we operate. We do not practice and we repudiate acts and operations that harm free competition through anti-competitive conduct, respecting the Brazilian Competition Defense Law (Law n. 12.529/2011).

**10.2** We recognize that class associations and unions entities perform a fundamental role in society. We also recognize that such organizations constitute a forum for interaction between competitors, which is why some precautions must be taken under the perspective of the Brazilian Competition Defense Law. We must leave meetings, events or any other form of legitimate interaction of its associates/affiliates in case a discussion on sensitive matters arises in relation to free competition (prices, discounts, margins, market share or any other sensitive information between competitors) and report this fact in order to Grupo GPS takes the measures deemed appropriate.

**10.3** In case we occupy positions in associations or union entities, we must ensure that we are not involved in any anti-competitive conduct and ensure that the information to which we have access as part of our position is always aggregated and historical, preventing the exposure and/or disclosure of sensitive data from competitors.

## **11. Relationship with government entities and with the community:**

**11.1** The relationship of Grupo GPS with government bodies must always be guided by ethics, transparency, morality and integrity and with strict observance and compliance with Brazilian laws, including Anti-Corruption Law n. 12.846/2013, as well as updates and additions that may be edited. Any matters and interests of Grupo GPS before government bodies must be treated impersonally, without any political connotation.

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**11.2** We do not offer and/or receive any payments, gifts or any other benefit or advantage to/from any civil servant, employee or agent of public bodies or intermediary who performs, even temporarily or without remuneration, a public position or function, or is appointed, designated or hired by public bodies, or any other form of investiture or bond, mandate, position, employment of function in the Legislative, Executive or Judiciary branches, national or foreign, independently of whether this person is appointed or elected (for purposes of this Code of Ethics and Conduct, service concession companies are equivalent to government entities).

**11.3** We immediately report to the Ethics Channel any signs of irregularities or suspicious that may be identified in our routines, preventing acts of corruption and bribery.

**11.4** We must inform the Ethics Committee if, in the last 5 (five) years, we have worked or still hold a position, job or relevant public function, in public bodies, public companies, mixed private-public ownership companies, public services concessionaries or permit holders, agencies and public foundations, including Class Councils, as well as if we have any blood or affinity relatives in the same condition.

**11.5** We maintain neutrality towards political parties and candidates to political office positions.

**11.6** We strongly repudiate and prohibit human trafficking and the smuggling of migrants and immigrants.

**11.7** We repudiate and prohibit child and/or slave labor.

## **12. Relationship with shareholders:**

**12.1** We value and take care of our shareholders' investments, in order to generate growth and financial returns for them, maximizing the value of our companies.

**12.2** The relationship and communication with our shareholders are based on transparent policies and guidelines with precise, adequate, complete and reliable information and in accordance with legal provisions and regulations defined by the competent bodies. The secrecy and confidentiality of information must be strict and it will only be released for disclosure by previously authorized people, in accordance with legal provisions and regulations defined by the competent bodies.

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### **13. Sponsorship, donations and contributions:**

**13.1** We value cultural and social initiatives that aim to benefit the communities where we operate and, observing legal requirements, we contribute to such initiatives, including sponsorships to third sector entities.

**13.2** Entities receiving sponsorship will be previously assessed regarding their reputation and legality. Before formalizing any sponsorship, we will check other aspects further, such as the reputation of the recipient entity, social impact and public interest.

**13.3** Sponsorships will be made within the limits of the amount provided for in the corresponding legislation. If the corresponding legislation does not indicate a legal limit, the amount of the sponsorship will be previously established and approved by the Ethics Committee.

### **14. Prevention to corruption, fraud and money laundry:**

**14.1** We are committed to comply with the Brazilian Law applicable to prevent and combat corruption, fraud and money laundering. We do not allow and do not tolerate any form of corruption, fraud or bribery, whether or not involving public agents.

**14.2** Our employees, suppliers and service providers must fully comply with the precepts and rules of the Brazilian Anti-Corruption Law, as well as with the internal rules, policies and procedures of Grupo GPS applicable to the matter. We are committed to update, disclose and offer trainings to such audience.

### **15. Conflict of interests and related parties:**

**15.1** Our business decisions will always be made in the best interests of Grupo GPS. The power to decide granted to our employees cannot be used for other objectives than promoting the interests of Grupo GPS. Personal relationships or interests (including the interests of family and friends) should never influence a decision.

**15.2** Our employees are bound by and must comply with the provisions of the Grupo GPS Related Parties Transaction Policy.

**15.3.** In case the employee identifies or suspects of a conflict of interest situation, he/she must inform his/her immediate Leader so that appropriate measures can be taken.

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## **16. Gifts, benefits and expenses:**

**16.1** We prohibit requesting, offering or accepting gifts, benefits or payment of expenses, independently of the time or reason, with the purpose of influencing or rewarding business decisions, exchange of favors or undue advantages.

**16.2** No employee should accept or offer gifts or any other kind of benefits, favors, rewards or personal advantage related to suppliers, service providers, Customers or government agents who maintain or will maintain a direct or indirect relationship with Grupo GPS.

**16.3** It is permitted to offer or receive gifts and benefits, or bear expenses with Customers' representatives, suppliers or service providers, as long as based on proportional criteria and that do not exceed the amount of R\$ 500,00. In case of doubt, the employee must seek authorization and orientation of his/her immediate leader.

**16.4** The receipt of gifts of symbolic value, such as small institutional advertising gifts containing the logo, such as pens, key chains, diaries, card holders, etc., and, as long as spontaneously offered, are permitted.

## **17. Accounting and Tax Controls:**

**17.1** We follow the most rigorous principles and accounting standards to report financial information accurately, completely and up-to-date, and we have appropriate internal policies, controls and processes to ensure that the accounting and financial reporting complies with corporate and tax legislation. Our employees must make their best efforts to comply with legal requirements and support the efforts of Grupo GPS on what is needed to ensure the viability and compliance with these guidelines.

**17.2** The integrity of Grupo GPS's financial records is fundamental to the operation of its business and this is the key in the maintenance of truth and trust for our shareholders and investors. We must ensure that all transactions are duly recorded, classified and presented in accordance with accounting practices adopted in Brazil and with the International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB). No employee may insert or remove information in the company's books or records in a way that intentionally hides or distorts the true nature of any financial or non-financial transaction or result.

**17.3** The employees involved in the preparation of financial reports must always provide a complete, fair, accurate, timely and understandable disclosure in reports and documents that Grupo GPS files or submits to investors, government agencies, tax authorities and other public

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communications. Comments on financial reports and perspectives to third parties will only be made by authorized official spokespersons.

## **18. Procedures to be adopted in the event of violations of standards and procedures:**

**18.1** It is the duty of all employees and third parties that maintain a relationship with Grupo GPS to report any and all acts or suspicious of violations of this Code of Ethics and Conduct, of the policies of Grupo GPS and/or of the current legislation through Grupo GPS own and confidential channel – the Ethics Channel – which is managed by an independent company and guarantees the confidentiality and anonymity of the whistleblower in good faith.

**18.2** The Ethics Channel can be accessed by calling 0800 049 4200, or via the website <https://www.canaldeetica.com.br/grupogps/>

**18.3** The Ethics Channel guarantees full confidentiality, secrecy and anonymity to the whistleblower in good faith when communicating any violations. We expressly prohibit retaliation against employees who report a violation or possible violation or collaborate with related investigations.

**18.4** All reports received will be immediately and appropriately investigated. After the investigation, in case of confirmation of a conduct that has violated the rules of the Code of Ethics and Conduct, of other Grupo GPS policies and/or applicable legislation, immediate and exemplary corrective measures will be taken, always in accordance with the circumstances, severity and applicable Law.

## **19. General Provisions:**

**19.1** This Code of Ethics and Conduct will be in force for an indefinite period, starting from its approval by the Grupo GPS Board of Directors, and may be updated at any time.

**19.2** Periodic training will be carried out on the need to comply with the provisions of this Code of Ethics and Conduct.

## **20. Publication, receipt and commitment:**

**20.1** In order to publicize this Code of Ethics and Conduct, it will be published on the Company's official websites ([gpssa.com.br](http://gpssa.com.br) and [ri.gpssa.com.br](http://ri.gpssa.com.br)).

**20.2** Despite the publication on the Company's websites, this Code of Ethics and Conduct may be distributed electronically or physically.

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**20.3** All employees and third parties who have a relationship with Grupo GPS must sign a form of acceptance and commitment to the provisions of this Code of Ethics and Conduct, whether by specific term or contractual provision.

## **21. References:**

**21.1** – GPSSA Material Act or Fact Disclosure Policy (Confidentiality of information – clause 4.4)

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/1918f5e8-689b-dac6-0d9e-d1b0e2867bdc?origin=1>

**21.2** – GPSSA Securities Trading Policy (Confidentiality of information – clause 4.4)

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/e99e9157-9306-5938-d5fa-fc6e9d556440?origin=1>

**21.3** – Grupo GPS Privacy and Personal Data Protection Policy (Confidentiality of information – clause 4.4)

[https://gpssa.com.br/wpcontent/uploads/2021/10/Politica\\_de\\_Privacidade\\_e\\_Protecao\\_de\\_Dados\\_Pessoais.pdf](https://gpssa.com.br/wpcontent/uploads/2021/10/Politica_de_Privacidade_e_Protecao_de_Dados_Pessoais.pdf)

**21.4** – Grupo GPS Quality, Safety, Health and Environment Policy (Quality – clause 5.1.2)

<https://www.gpssa.com.br/wp-content/uploads/2022/06/Politica-de-QSSMA.pdf>

**21.5** – Grupo GPS Related-Party Transactions Policy (Conflict of interest and related parties – clause 15.2)

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/57637c44-ff55-c197-b3fe-6ad06ff52c58?origin=1>

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