

Compliance, Ethics and Professional Operations Manual

33Visual has adopted this policy framework to guide its professional conduct across Corporate Storytelling and Aerial Intelligence projects, including photography, video, interviews, field documentation, drone operations, inspections, 3D models, photogrammetry, progress monitoring, and the handling of technical or sensitive information.

Entity	33Visual
Applies to	clients, collaborators, vendors and related third parties
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Purpose and scope

The purpose of this Manual is to establish clear principles of conduct, compliance, safety, confidentiality and responsible information handling for 33Visual's professional activities.

This Manual applies to employees, directors, partners, collaborators, vendors, subcontractors, representatives and third parties participating in projects performed by or on behalf of 33Visual, regardless of client, location or type of service.

The policies described here are general and may be supplemented by specific requirements from each client, contract, site, jurisdiction or project.

01 Ethics and professional conduct

33Visual acts with honesty, integrity, responsibility and respect in its relationships with clients, communities, authorities, collaborators, vendors and third parties.

Everyone participating in 33Visual projects must conduct themselves professionally, avoid misleading or abusive behavior, respect site rules, and act consistently with the company's values.

33Visual does not tolerate fraud, falsification of information, intentional concealment of risks, abuse of trust, discrimination, harassment, retaliation or any conduct that may affect the safety, reputation or integrity of a project.

02 Anti-bribery and anti-corruption

33Visual prohibits offering, promising, authorizing, requesting, receiving or giving bribes, improper payments, illegal commissions, personal benefits, excessive gifts or any improper advantage intended to obtain, retain or influence a business relationship, contractual decision, authorization, permit, payment or business advantage.

This policy applies to public officials as well as individuals, companies and representatives in the private sector.

Gifts, courtesies, meals, travel or hospitality must be reasonable, occasional, transparent, connected to a legitimate business purpose, and permitted by law, the applicable contract and the client's policies.

Any request for an improper payment, personal favor, unauthorized commission or irregular benefit must be reported through the reporting channel established in this Manual.

03 Anti-money laundering and counter-terrorism financing

33Visual is committed to not knowingly participating in operations that facilitate money laundering, terrorism financing, concealment of proceeds from illegal activity, evasion of legal controls or transactions for unlawful purposes.

The company may conduct reasonable reviews of clients, vendors, collaborators or third parties when the type of project, jurisdiction, payment method, contractual structure or available information warrants it.

33Visual may decline, pause or request additional information about a transaction when reasonable red flags exist, such as unusual payment structures, refusal to provide basic information, unjustified use of intermediaries, high-risk jurisdictions or instructions inconsistent with the nature of the project.

04 International sanctions and restricted parties

33Visual will not knowingly contract with, provide services to, make payments to, or maintain business relationships with persons, entities, organizations, governments or territories subject to applicable sanctions or restrictions issued by competent authorities.

When reasonably necessary, 33Visual may review public sanctions or restricted-party lists, including those maintained by authorities in the United States, United Nations, European Union, United Kingdom, Mexico or other jurisdictions applicable to the project.

33Visual's vendors, subcontractors, representatives and collaborators must confirm, when requested, that they are not subject to sanctions and are not acting on behalf of or for the benefit of a sanctioned person or entity.

If a potential sanctions-related risk is identified during a project, 33Visual may temporarily suspend the relevant activity, review the situation and determine whether the project may continue in compliance with applicable law and contract terms.

05 Conflicts of interest

People participating in 33Visual projects must avoid situations where personal, family, financial or professional interests may interfere, or appear to interfere, with the interests of the company, the client or the project.

A conflict of interest may include personal relationships with procurement decision-makers, financial interests in vendors, simultaneous work with competitors, receipt of personal benefits, or any situation that could compromise professional objectivity.

Potential conflicts of interest must be disclosed promptly for review and proper management.

06 Due diligence of clients, vendors and collaborators

33Visual may conduct reasonable identification, review and assessment processes for clients, vendors, subcontractors, collaborators or related third parties, according to the nature, location, sensitivity and risk level of the project.

The review may consider corporate information, experience, technical capabilities, legal compliance, insurance, certifications, reputation, relationship with restricted parties, safety history and ability to comply with client and 33Visual policies.

33Visual expects related third parties to act with integrity, comply with applicable law and respect the principles of this Manual.

07 Confidentiality and sensitive information

33Visual recognizes that many projects involve confidential, sensitive, strategic, technical, operational, financial, reputational or critical infrastructure-related information.

Client information, unpublished materials, locations, construction plans, industrial processes, interviews, field data, images, videos, models, reports and technical files must be handled carefully and shared only with authorized people and for project-related purposes.

33Visual may enter into confidentiality agreements when required by the client or the nature of the project.

08 Privacy, image capture and personal data

33Visual seeks to respect the privacy, dignity and image of people who may appear in photographs, videos, interviews, drone captures, 360° tours, 3D models or other materials generated during its projects.

When a project involves interviews, testimonials, portraits, public communication materials or identifiable use of people, 33Visual will seek to obtain the appropriate authorizations from the client or the individuals involved, as applicable.

During field operations or aerial capture, people, vehicles, license plates, facilities or activities may be captured incidentally. When necessary, 33Visual may apply editing, access restrictions, anonymization or prior approval before publication or expanded delivery of materials.

09 Data handling, storage, retention and delivery

33Visual handles different types of files and data, including photography, video, audio, interviews, aerial imagery, orthomosaics, point clouds, 3D models, photogrammetry files, reports, planning documents and digital deliverables.

The company seeks to maintain reasonable practices for organization, backup, access control, secure transfer and file preservation according to the nature of the project, contractual agreements and client instructions.

Materials may be delivered through transfer platforms, client-designated repositories, cloud services, physical drives or other agreed methods.

Retention periods may vary by project. When the client requires deletion, special preservation, restricted access or delivery of source files, this should be agreed in writing.

10 Field safety and professional operations

33Visual prioritizes the safety of its team, client personnel, third parties, communities, facilities, assets, the environment and site operations.

Before and during field activities, 33Visual may review objectives, access, permissions, site conditions, risks, weather, equipment, work roles, personal protective equipment, operating zones, communication and emergency procedures.

The 33Visual team must comply with client and site safety rules, including inductions, work permits, PPE use, access restrictions, escort requirements, authorized schedules and specific protocols.

33Visual reserves the right to pause, modify or cancel an activity when unsafe conditions exist or risks cannot be reasonably mitigated.

11 Drone operations and Aerial Intelligence

Drone operations conducted by 33Visual must be planned and executed in accordance with applicable law, required authorizations, site conditions, airspace restrictions, operational safety and the scope authorized by the client.

Activities may include aerial photography and video, photogrammetry, visual inspection, progress monitoring, 3D models, mapping, technical documentation, thermal capture or other Aerial Intelligence services.

Before flying, 33Visual may review weather conditions, equipment status, batteries, firmware, permits, obstacles, uninvolved people, vehicle traffic, power lines, structures, takeoff and landing zones, and possible emergency areas.

The remote pilot or person responsible for the operation has authority to make safety decisions, including delaying, modifying or canceling a flight if conditions are not appropriate.

12 Use of materials, portfolio and case studies

33Visual respects the confidentiality, intellectual property, brand guidelines and contractual restrictions of its clients.

The use of project materials for portfolio, publications, presentations, awards, social media, website, commercial materials or case studies is subject to contractual agreements, client authorizations and project sensitivity.

For confidential, sensitive, critical infrastructure, industrial, mining, community-related or unpublished projects, 33Visual will seek prior client approval before publicly using identifiable project materials.

When appropriate, 33Visual may prepare anonymized, partial or non-sensitive versions of case studies to show technical capabilities without revealing confidential information.

13 Human rights and labor rights

33Visual recognizes and respects the fundamental human and labor rights of all people connected with its activities, including employees, collaborators, vendors, subcontractors, clients, communities and third parties.

33Visual seeks to conduct its activities in a manner consistent with human dignity, equal opportunity, fair treatment, non-discrimination and safe and respectful working conditions.

33Visual does not tolerate discrimination based on national or ethnic origin, place of residence, race, color, sex, gender, gender identity or expression, sexual orientation, age, physical appearance, language, religion, marital status, pregnancy, maternity, disability, medical condition, socioeconomic status, political affiliation or any other status protected by applicable law.

Decisions related to recruitment, selection, engagement, project assignment, training, professional development, compensation, transfer, discipline or termination of a professional relationship must be based on capabilities, experience, performance, legitimate project requirements and objective criteria.

33Visual supports equality, diversity and inclusion and seeks to maintain a professional environment in which all people are treated with respect, including people from historically vulnerable or underrepresented groups.

Any form of workplace harassment, sexual harassment, intimidation, violence, threats, abuse, humiliation or retaliation is prohibited in the workplace and during activities related to 33Visual projects.

33Visual seeks to ensure that working conditions, schedules, compensation, rest periods, safety and other applicable conditions meet at least the requirements of applicable law and established contractual agreements.

33Visual rejects forced labor, human trafficking, servitude, labor exploitation and any work performed under threat, coercion, retention of identity documents or unjustified restriction of freedom.

33Visual does not employ or permit the labor exploitation of minors. The age of any person engaged or assigned to a project must comply with the applicable legal minimum working age and compulsory education requirements.

No minor may participate in hazardous activities, drone operations, work at height, entry into mines, industrial plants, construction zones or any other work restricted by applicable law.

33Visual expects its vendors, collaborators and subcontractors to respect these same principles and may request information, declarations or reasonable evidence of compliance when warranted by the nature of the project.

Any potential human rights or labor rights concern may be reported through 33Visual's compliance channel, without retaliation against anyone submitting a good-faith report.

14 Incidents, deviations and follow-up

Any incident, relevant deviation, accident, near miss, loss of information, unauthorized access, contractual breach, ethical concern, safety situation, human or labor rights concern, or potential violation of this Manual should be reviewed and documented in proportion to its severity.

33Visual may take corrective actions, reinforce procedures, inform the client when appropriate, restrict access, replace vendors, suspend activities or implement additional measures to prevent recurrence.

Reporting channel

33Visual encourages employees, collaborators, clients, vendors, subcontractors and related third parties to report in good faith any concern related to ethics, compliance, safety, human rights, labor rights, discrimination, harassment, confidentiality, privacy, data handling, corruption, bribery, sanctions, conflicts of interest or any conduct contrary to this Manual.

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Reports should include, when possible, a clear description of the matter, date, location, related project or client, people involved, witnesses and any supporting documentation.

33Visual will review each report promptly and confidentially, to the extent reasonably possible. 33Visual prohibits retaliation against anyone who submits a good-faith report or participates in a review.

This channel does not replace emergency procedures. If there is an immediate risk to health, safety, life, property or the environment, the applicable emergency procedure must be followed first.