

**Mundi Consulting CODE OF ETHICS
SUSTAINABLE BUSINESS POLICIES**

ANTI-CORRUPTION POLICY

Mundi Consulting defines the following guidelines to establish principles of action against corruption in business, formalizing practices that are common sense, but which reflect Mundi Consulting's vision on how to act in relation to the issue of corruption.

This Policy is applicable to all employees, executive management bodies and management board of Mundi Consulting, as well as suppliers, individual consultants and business partners, other entities that may eventually participate in the projects developed by Mundi Consulting, in terms of any action involving the practice or attempt of corruption or bribery.

Mundi Consulting does not tolerate any of the following types of corruption:

- **Active Corruption:** Promising, offering or giving, directly or indirectly, an undue advantage or benefit to people from another entity, national of each country or international, to make them practice, omit or delay action in favor of Mundi Consulting.
- **Passive Corruption:** Directly or indirectly requesting or receiving an undue advantage or benefit for a Mundi Consulting employee or another person, or accepting a promise to provide such advantages/benefits.

Corruption risk actions and areas

Mundi Consulting defines the following behavior practices in the business environment, which must be considered and taken care of, as they potentially cause bribery and corruption practices and which are not acceptable at Mundi Consulting:

- **Payments to Public Officials:** payments are prohibited, whatever the purpose of facilitating processes related to awarding or signing contracts; securing or contracting business based on any undue advantage; obtain confidential information about business opportunities, offers or activities of competitors; obtain the relaxation of government controls; causing an employee to commit or omit an act, violating their legal duties.
- **Interactions with Government Officials:** in order to avoid any improper act, Mundi Consulting requires that all interactions with Government officials be carried out with great care, in accordance with local law and applicable international legislation, and always with prior authorization from the General Director.
- **Business Courtesies:** in marketing or promotion activities, it must be considered the actions to be implemented, to avoid offers that could be interpreted as a request or a means of influencing any decision with a view to obtaining or maintaining business or ensuring an undue advantage for Mundi Consulting. Business courtesies are prohibited when they are excessive or disproportionate and violate the Code of Ethic, including the provisions related to the conflict of interest policy.
- **Facilitation Payments:** Employees and members of Mundi Consulting's management bodies are prohibited from giving or authorizing, directly or indirectly, any facilitation payments. Payments to public institutions, previously authorized by the management of Mundi Consulting, must always be accompanied by a formal discharge receipt or a written confirmation of the legality of the payment.
- **Contributions and Donations:** any contribution or donation that may be made by Mundi Consulting can only be given to institutions in good faith and intended for appropriate purposes, and cannot be in

violation of Mundi Consulting's Code of Ethics or local law. Charitable contributions can never be used as a condition to influence any act or decision.

- **Consortia and Subcontracting Agreements:** Before initiating a consortium or subcontracting agreement, Mundi Consulting must adopt measures, with due institutional articulation and obtain internal validations. These measures shall include, where appropriate, that consortium or subcontracting partners agree to respect the Mundi Consulting Code of Ethics and the Supplier Partners Code of Conduct.
- **Improper Business Practices:** improper actions that lead to obtaining advantages or benefits in business, including offering or receiving any commissions or rewards, are prohibited; payments without contractual ties, which have nothing to do with the business; negotiations involving very low prices for the benefit of third parties or themselves; travel or employment for family members of others; and others not specified, but included in Mundi Consulting's Code of Ethics.

Management of anti-corruption policies

Reporting and management mechanisms should be implemented:

- Any employee who is aware of any activity that may violate this Policy must immediately report this activity to the Coordinator of the project where he/she is inserted, who, if different, must report to the Area Manager of Mundi Consulting responsible for the Project.
- The matter, reasoned, must be reported to the Quality/Compliance Area, which, in conjunction with the General Director, will assume leadership of the matter, and the following procedures may be triggered:
 - Conducting an internal investigation at Mundi Consulting, to verify the facts, including statements by the person(s) involved;
 - Statements by entities where the situation occurred;
 - Reporting the matter to the Management Board of Mundi Consulting.
- Carrying out of the internal verification process and preparation of a substantiated report on the situation, by the Manager of the Quality/Compliance Area, with proposals for action and submission of the report to the Management Board of Mundi Consulting.
- Implementation of accountability measures decided upon and validated by the Management Board of Mundi Consulting.
- Assessment of adjustments and improvements to Mundi Consulting's Quality Process and Code of Ethics, to improve the prevention of bribery and corruption.