

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

CONFLICT OF INTEREST POLICY

Mundi Consulting defines the following guidelines to establish rules for screening situations of conflict of interest, being a guide for Mundi Consulting and its collaborators to identify and resolve actual or potential situations of conflict of interest. These guidelines are in line with the standards of the UN Supplier Code of Conduct.

Within the scope of developing consulting activities and projects, there are material/reputational risks or commercial impact resulting from conflicts of interest that may arise in the relationship of Mundi Consulting, or its collaborators, with Clients, Shareholders, Collaborators, Suppliers or Partners, Other Stakeholders, Members of the Management Board, or other Persons relevant to Mundi Consulting's activities.

Identification of situations of potential conflicts of interest:

- Presence of interests, economic or not, of the employee or member of the management bodies and their family members in suppliers, customers, competitors or public bodies that interact with Mundi Consulting in kinship relationships.
- Use by the employee or member of Mundi Consulting's management bodies, of their position or information/business opportunities obtained in the exercise of their functions for their own benefit or third parties.
- Existence of relationships between employees or members of Mundi Consulting's management bodies with people who hold public office and who have functions that should not privilege a professional relationship with Mundi Consulting.
- Insistence on developing continuity projects with public entities for whom Mundi Consulting has developed a first project, in which the specific regulation requires public tender processes to implement and/or defines that continuity projects cannot be developed by those who had implemented the first project.
- Possibility of develop auditing, financial or consulting services in projects that were implemented by Mundi Consulting or by Consortia in which Mundi Consulting participated.
- Existence of interests and direct or indirect financial relationships with competitors, suppliers or clients of Mundi Consulting, enhancing the existence of potentially conflicting relationships.
- Use of Mundi Consulting's non-public information for personal gain or advantage, or for the gain or advantage of a third party, in order to obtain contract services.
- Existence of practices for offering management solutions, carried out by employees on a personal level, different from the management solutions offered by Mundi Consulting within the scope of the work it's offered for client entities.
- Development of services for direct competitors of Mundi Consulting's services, unless included in specific situations and formalized agreements in this sense.
- Existence of practices of offering or receiving gifts or benefits to a third party, while assessing whether the possibility of entering into an employment or business contract with Mundi Consulting is being discussed.

This list is not exhaustive and will be reviewed and updated annually.

Management of Conflicts of Interest

- Due to their relevance and possible consequences, real or potential situations of conflict of interest must always be disclosed to the Coordinator of each Project developed by Mundi Consulting, who must report to the Quality/Compliance Manager, who, in a second analysis, must report to the General Director of Mundi Consulting.
- If there are situations of conflict of interest that have to be resolved in the commercial processes or in the development of a project, they must be resolved by the General Director, in articulation with the Quality/Compliance Manager, and instructing the Proposal or Project Coordinator on the procedures to be followed.