

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

**GIFTS & ENTERTAINMENT POLICY**

Mundi Consulting defines the following guidelines to establish rules on the offer of gifts and entertainment activities, integrated in the Code of Ethics, complying with the United Nations standards and in line with the best international practices in this matter.

Mundi Consulting understands that gifts and entertainment (including meals) can help to reinforce commercial relationships and, in certain cultures, can and should be used. Offering or receiving gifts and entertainment must not be done with the intent to gain undue advantage, but only if it is appropriate, reasonable for promotional purposes, consistent with local practice and in accordance with the law. Any doubt about the pertinence and common sense of any gift or entertainment, should be consulted with the Compliance area.

Gift and Entertainment Guidelines:

- Any offer/receipt of gifts and entertainment (of any value) to Government officials, Ministries, Government Agencies or Public Institutions, must be approved by the Compliance Area.
- Any offer/receipt of gifts, gifts and entertainment to employees or members of the management of private entities, with a value equal to or less than 50.00 EUR (fifty euros), or equal or equivalent value in foreign currency, does not need to be approved of the Compliance Area. Above 50.00 EUR (or equivalent amount in foreign currency), as well as the offer of subsequent gifts, regardless of the amount, in each calendar year for the same entities, requires prior approval from the Compliance Area.
- Every Mundi Consulting employee who is confronted with the possibility of making an offer/receipt must consider whether doing so could configure situations of: influencing business decisions; generation of expectations to obtain benefits; generation of discomfort; configuration of exchange of favors; signs of facilitation of streamlining processes; damages to Mundi Consulting. If the answer is YES to any of these situations, the offer/receipt should not be made.
- The offer/receipt of brides and entertainment activities that do not comply with the aforementioned points, including the values and approval of the Compliance area, must be refused or returned. If refusal or return is not possible, the same must be communicated to the Compliance area.
- Business travel with third parties should not be considered gifts and entertainment, provided there is a clear business purpose and the costs are reasonable and proportionate. The funding of business trips cannot, under any circumstances, be extended to family members and other people not directly related to the purpose of the trip. Likewise, Mundi Consulting does not accept personal travel by its employees.
- Invitations to events, training courses and seminars can be offered and/or accepted, provided that: they are addressed to the company and not to a person; are of a strictly professional nature; do not include spouses and/or family members as guests, unless essential and previously approved; there is no contractual process in which the supplier participates. Such invitations must be previously approved by the General Director, as well as by the Compliance Area.
- It is expressly prohibited to accept or offer gifts in cash, regardless of the amount involved, or documents equivalent to cash, such as vouchers or similar documents.
- Mundi Consulting expects its employees to report any acts that may represent a bad application of this policy, established in the Code of Ethics.

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

**Gift and Entertainment Management**

- The management of procedures in this policy on gifts and entertainment applies to all of Mundi Consulting, including employees and management bodies, who must be aware of and implement these guidelines. The Compliance area has the task of clarifying any doubts related to gifts and entertainment activities, as well as verifying and communicating the rules established in this policy.
- The authorizations and decisions provided for in this policy must comply with a double validation, firstly by the Manager of the Quality Area/Compliance Subarea, and, secondly, by the General Manager of Mundi Consulting.
- If there are situations of non-compliance or those resulting from the application of this policy, the Quality/Compliance Area Manager is responsible for the procedures to be adopted, in articulation with the General Director.