

## **Mundi Consulting CODE OF ETHICS**

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## **CODE OF ETHICS – Mundi Consulting**

### **MESSAGE FROM THE MANAGING PARTNER**

Dear

Mundi Consulting is an international consultancy that develops management consulting activities aimed at designing and implementing solutions for corporate, institutional and business partners, seeking to develop management practices and knowledge transfer based on the highest standards of ethics, social and corporate responsibility.

With this spirit, we have created Mundi Consulting Code of Ethics!

The continuous implementation of ethical and compliance practices assumes great importance in developing the activity by all our employees and by Mundi Consulting itself. We intend to increasingly adopt internal conduct documents, in line with the best international practices. Mundi Consulting's Code of Ethics aims to frame the application of ethical practices and conduct in business development, as well as the performance of activities by our employees and partners.

With this focus in mind, we conceived Mundi Consulting Code of Ethics, assuming a commitment to ethical and compliance principles, aligned with the values of an activity that began in 1988, and principles emanating from the UN Global Compact, seeking to continue our growth with a motivation and ethical attitude.

As sustained in our signature, "Together we create value", we count on everyone to create and offer an added value a value that is increasingly sustainable and lasting!

*Franklin Chagas*  
*Managing Partner*

## Part I. ETHICS BACKGROUND

### Mission and Vision

Mission and Vision of Mundi Consulting, which have guided the development of our activity along the long journey since our creation in 1988, reflect and always intend to reflect a commitment to ethics, integrity and quality in the reliable services where Mundi Consulting create value.

#### Mission

Provision of management consulting and training services, aimed at creating value for its customers, employees and partners.

#### Vision

To be a consultancy of excellence in the areas of management, training and economic development, recognized at national level in each of the markets where it operates, and by international reference entities.

### Subscription Principles and Values

Mundi Consulting's signature, "Together we create value", represents the principles of developing activities that create value together with customers and partners, based on the values that rules doing business.

#### Values

- **Value creation.** As an ultimate goal in the relationship with customers and partners.
- **Solution Customization.** Each client and each situation is managed individually and uniquely.
- **Quality of Services.** We plan, execute and evaluate our work with quality, in accordance with the best international practices.
- **Integrity and Independence.** We base our actions on the strictest principles of ethics, independence and professional impartiality.
- **Partnership with Stakeholders.** We consider all entities with which we interact as a partner that wants to achieve common goals with us.

### Implementation of Good Deontological Practices

Mundi Consulting is recognized for the quality of its services, working with several institutions in the markets where it operates. We have the responsibility to position ourselves in order to intervene with respect to the values, behaviors and conducts in which we see ourselves. In addition to issues related to environmental footprints and social impact, Mundi Consulting intends to develop a business path with responsible behavior in all areas, with greater transparency towards the organizations and institutions present in the market.

To this end, it is important to have a transparent and reference framework for the decisions and management acts that are implemented. This is the reason why the Code of Ethics was created for the development of Mundi Consulting's activity, a guide for the development and regulation of Mundi Consulting's businesses.

The Code of Ethics thus reinforces the importance of developing business and consulting activities, in all markets where we operate, based on international standards, laws and practices aligned with Mundi Consulting's policies, values and standards.

## **Contents of the Code of Ethics**

Mundi Consulting's Code of Ethics, containing the general principles, is complemented by several procedures and implementations, namely the 1) Conflict of Interests Policy, 2) Gifts and Entertainment Policy, 3) Anti-Corruption Policy, and 4) Diversity Policy and Inclusion.

An internal approach is also part of the Code of Ethics – ETICA Approach – which allows employees and members of Mundi Consulting's management bodies to reflect on the practical applicability of the code to the company's activity and business and to report situations that should be considered in the process of continuous improvement intended to be implemented.

Finally, a Code of Conduct for Third Parties is also integrated, developed from the Code of Ethics, defining the standards that Mundi Consulting expects to be followed by all Suppliers with whom it does business, hoping that these standards will be followed by everyone who collaborates with these Suppliers.

## **Part II. RESPONSIBLE BUSINESS**

### **Environmental management**

Mundi Consulting manages its businesses and activities taking into account the protection of the environment and the constant effort to achieve maximum efficiency in the use of natural resources. Mundi Consulting assume a compromise to continuously update its environmental practices based on the best techniques available so far.

Mundi Consulting's environmental commitment considers the following intervention principles:

- Ensure compliance with environmental legislation and regulations applicable to the activity developed, in the several markets where we are present.
- Promote, whenever possible, the performance of services that allow the efficient use of natural resources, through recycling and reuse.
- Integrate environmental criteria into the different types of services offered: management consultancy and economic development, institutional capacity building and staff training.
- Support and implement initiatives aimed at preventing, mitigating or responding to climate change.
- Promoting a responsible attitude and contributing to environmental awareness, either by involving employees through awareness training or by implementing environmental requirements in the selection and evaluation processes of suppliers.

### **Sustainability Management**

Mundi Consulting is constantly concerned with the practical application of the concept of sustainability, namely in the management of resources and the promotion of economic, social and environmental growth, in line with the sustainable development agendas.

Mundi Consulting's commitment to sustainability stems from its responsibility to develop initiatives aimed at ensuring the environmental, economic and social sustainability of future generations, namely:

- Incorporation of economic, social and environmental development practices in projects carried out by Mundi Consulting in all markets where we operate.
- Cooperate and intervene with government agencies, public institutions and private organizations in the states where we operate, to carry out structural measures with a positive impact on sustainability.

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- Promote and carry out knowledge transfer events, projecting the good future management of existing resources, with the adoption of methodologies and management practices that enhance the application of lasting results.
  - Create manuals and management instruments that encourage the dissemination and dissemination of good sustainability practices in projects developed in the different markets in which we are present.
  - Associating with partner entities that share the same commitment to sustainability and that implement environmental practices and social and economic development.

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- Create manuals and management instruments that encourage the dissemination and dissemination of good sustainability practices in projects developed in the different markets in which we are present.
- Associating with partner entities that share the same commitment to sustainability and that implement environmental practices and social and economic development.

### **Connection to Communities**

Mundi Consulting supports the development of the communities, through the implementation of a social responsibility policy that privileges the human and economic support provided to the various institutions and organizations with which we work. We also support projects for the preservation and dissemination of the historical and cultural heritage of the communities around us.

Mundi Consulting's commitment to promoting activities aimed at the development of communities is particularly focused on:

- Supporting changes with a positive impact on communities, in order to contribute to a more sustainable society, providing services that contribute to inclusive environments, whether institutional, business or social.
- In supporting the resolution of social problems in the communities, together with other partner organizations.
- Respecting the customs and traditions of the countries where Mundi Consulting operates, together with local stakeholders.
- Participating in legislative and regulatory discussion processes with a view to defending the public interest, in line with the guidelines of government authorities, professionals and other entities promoting social and economic development.

- Promoting the involvement in community activities that are aligned with the values defended by Mundi Consulting, not conveying personal political opinions or those of Mundi Consulting and not assuming a political, religious or other similar position, unless integrated and articulated with the entities for which we work.

## **Part III. CLIENTS PARTNERS**

### **Objectivity and Independence**

Mundi Consulting develops its activity based on the legislation and regulation of the markets where it operates, always seeking to act with independence and objectivity in all its projects and not taking positions and positions that may be against the independence and objectivity intended in developing the projects of consultancy.

We develop management solutions with objectivity and in a determined regulatory environment, both in terms of project execution and financing, and complying with the local laws of each market and local and international regulations related to financing.

Adherence to fundamental principles of integrity and objectivity is essential for the independent development of consultancy and training activities, free from personal interests that could influence the purpose of the services.

### **Situations of possible Conflicts of Interest**

Mundi Consulting assumes the commitment, in the planning, development and execution of projects, to identify and take the initiative to resolve, in accordance with mechanisms defined for the purpose, all situations that may be considered as conflicts of interest and/or sensitive situations that we are aware of and that may occur and intervene with the performance of the services.

The identification and management of the resolution of conflicts of interest, meaning situations that may interfere with the objective and independent performance of services, and sensitive situations, meaning situations that may have market or commercial reputational implications in the relationship with clients, must be developed either at the beginning or during the provision of services.

### **Fighting Bribery and Corruption**

Mundi Consulting does not tolerate any bribery or corruption initiative, and repudiates any form of obtaining undue economic or property advantages, whether personal or corporate, either directly or through partners.

As corruption, Mundi Consulting understands the making of inappropriate payments or the promise or attribution of other incentives, carrying out activities that are not legal or that may constitute an abuse of power, aiming at obtaining personal gains or advantages in specific processes.

By bribery, Mundi Consulting understands the initiative to offer, promise, give, accept or ask for money, or gifts with value, as rewards for performing some unethical or inappropriate action, which aims to unduly influence a certain decision.

### **Money Laundering**

Mundi Consulting does not tolerate the practice of economic crimes and money laundering, and must refrain from participating in processes or projects in which this type of situation is likely to occur.

As economic crimes, Mundi Consulting understands that they are unlawful and unethical acts carried out with the purpose of obtaining financial or economic gains.

Mundi Consulting understands money laundering to be unlawful economic actions or activities carried out by individuals or legal entities, with concealment of the origin of goods, income or capital obtained illegally and their subsequent transformation into legal reused money or capital, without identifying the source of the funds.

## **Part IV. OUR EMPLOYEES**

### **Job Opportunities and Equality**

Mundi Consulting defends the development of work with conditions that guarantee respect for human rights and the fundamental principles of work, as expressed in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work, of 1998, amended in 2022.

The commitment assumed by Mundi Consulting is to offer job opportunities to all, developing hiring and employment practices based on non-discrimination based on race, ethnicity, color, age, gender or gender identity, sexual orientation, political convictions, citizenship, nationality, religion, disability, family situation, economic class, military status or any other situation not related to the merit of the person or the function to be occupied.

### **Healthy and Safe Work Environment**

Mundi Consulting ensures its employees a safe and healthy working environment and conditions, not allowing any form of harassment or “bullying” and seeking continuous dissemination of risk prevention standards in the workplace.

Mundi Consulting ensures the payment of its employees' salaries, keeping records of these payments. Cases of salary reduction, when existing, refer only to situations provided for in the applicable law, regulations or collective agreement. Wages, working hours and other working conditions practiced by Mundi Consulting must not be less favorable than the market conditions applicable in the markets where Mundi Consulting develops its activity.

Mundi Consulting ensures the health and safety conditions for developing activities in the markets where they are developed, including equipment, materials and insurance, including health insurance.

### **Personal development**

Mundi Consulting is committed to guarantee its employees adequate remuneration for the development of the functions they perform, adding incentives resulting from the achievement of positive results, personal and professional evolution, the qualifications obtained, always in line with the growth of the business and activity.

We are committed to guarantee the continuous learning of Mundi Consulting employees, with the objectives of promoting their personal and professional development, encouraging the sharing of experiences and consolidating a Mundi Consulting culture. We invest in the ability to innovate, solve complex problems and create conditions for career growth.

### **Child Labor and Non-Discrimination**

Mundi Consulting does not tolerate child labor, not employing children younger than the minimum working age allowed by law. Work, as a general rule, is always formalized with work contracts for an indeterminate term, guaranteeing adequate conditions in the workplace in order to safeguard the health, safety and morale of workers.

Mundi Consulting ensures equal opportunities, without discrimination based on race, color, sex, religion, political opinion, national origin or social origin and any other reason of discrimination that could compromise the fundamental values and principles of the Countries where we operate.

### **Human Rights and Harassment**

Mundi Consulting supports and respects the protection of internationally proclaimed human rights, subscribing to the Universal Declaration of Human Rights of the United Nations and ensuring that it is not complicit in human rights abuses.

Mundi Consulting provides and maintains an environment in which all employees are treated with dignity and respect, and any situation involving the threat of violence, harassment or verbal or psychological abuse and/or sexual exploitation and abuse is not tolerated.

### **Conflict of Interests and Anti-Corruption Practices**

Mundi Consulting employees develop services on an exclusive basis, not being able to develop other consulting activities in competition with Mundi Consulting, having the duty to keep confidential and keep confidential all information related to Mundi Consulting activities and information to which they have access that is not public knowledge.

Mundi Consulting does not tolerate the offer or receipt of any type of gift, entertainment or any other situation that may compromise the impartial, objective and exemplary performance of the agreed and contracted services. Mundi Consulting employees cannot accept or offer any offers, gifts, benefits or invitations of a personal nature from third parties for themselves, their family members or on behalf of another person.

Mundi Consulting follows the highest standards of moral and ethical conduct, respecting local laws, assuming not to engage in any form of corrupt practices, including, but not limited to, extortion, fraud or bribery. Mundi Consulting does not tolerate any behavior that includes the practice of acts of corruption, influence peddling, improper receipt or offer of an advantage or payment or receipt of any benefits, or any other situation contrary to the provisions of this Code.

### **Work Organization and Freedom of Association**

Mundi Consulting recognizes that its employees may have the right to organize themselves and carry out collective activities related to the promotion of the defense of their interests, namely those of a professional, recreational and socio-cultural nature, as an expression of the principles of responsibility, solidarity, communion of objectives and interests, community spirit, free negotiation. It also recognizes that it has a duty to protect its employees from any action that may be discriminatory in relation to the exercise of these rights.

Mundi Consulting prohibits forced or compulsory labor in any form.

## **Part V. SUPPLIER PARTNERS**

### **Business Relations with Partners and Suppliers**

Mundi Consulting selects its business partners, defines its work teams to develop projects, articulates with partner entities, and subcontracts consulting professionals or specialists, in accordance with the principles set out in this Code of Ethics.

Mundi Consulting develops activities with international and national business partners, who comply with the defined selection criteria and comply with both the applicable legislation and the requirements demanded by local and international donors.

Relationships with suppliers are developed according to processes of transparency and strict observance of the agreed conditions, in an atmosphere of reciprocal trust and a high sense of technical, ethical and social demand, with respect for the contractual relationships assumed.

### **Responsible Leadership of Partner Works**

Mundi Consulting always assumes responsible leadership for the work carried out by partners, organizations or individuals, integrating the Consortia and Project Teams that constitute the workforce used in projects with the entities for which Mundi Consulting provides services and develops consultancy projects.

Those responsible for projects by Mundi Consulting must lead and be rigorous in the management of the Teams, including compliance with the ethical and conduct standards defined by Mundi Consulting, and must promote the training, monitoring and evaluation of their teams, in a sense of continuous improvement and transparency.

### **Confidentiality and Professional Secrecy**

Mundi Consulting assumes that partners, suppliers and employees who are mobilized to participate in projects led by Mundi Consulting are also subject to professional secrecy, in particular in matters that they have become aware of and used for the purposes of developing projects. Likewise, they must reserve and describe the facts and information they are aware of and respect the rules defined by Mundi Consulting regarding the confidentiality of information.

Mundi Consulting also hopes that partners and suppliers employees refrain from disclosing information considered sensitive or relevant, and information that, due to its content, may have a negative reputational impact for Mundi Consulting, or for the commercial relationship between Mundi Consulting and partner entity.

### **Conflict of Interests and Conciliation**

Mundi Consulting expects Mundi Consulting's partners and suppliers to immediately report any situation that may constitute a conflict of interest, as well as all situations that they become aware of through associated entities or subcontracted consultants, within the scope of the Contract with Mundi Consulting, which may constitute a conflict of interest situation.

Mundi Consulting's partners and suppliers must avoid situations likely to give rise to conflicts of interest when intervening in Mundi Consulting's decision-making or project management processes.

In the event of conflict of interest situations, Mundi Consulting expects collaboration and initiative from partners and suppliers to regularize and resolve the situation.



### **Code of Conduct for Partners and Suppliers**

Mundi Consulting prepared and delivers a Code of Conduct to partners and suppliers, with the aim of ensuring that the work developed by them is developed with the highest standards of ethics and conduct and are in line with Mundi Consulting's Code of Ethics.

Non-compliance with the Code of Conduct by partners or suppliers may result in the application of penal measures or other legally applicable measures, and may even determine the termination of any contracts with Mundi Consulting.

## **Part VI. MANAGEMENT OF DATA AND CONFIDENTIAL INFORMATION**

### **Information and Knowledge Management**

The management of privileged information assumes total importance in the activity developed by Mundi Consulting, and its use or improper disclosure is not tolerated. For all intents and purposes, privileged information is considered to be all information and knowledge that Mundi Consulting has access to within the scope of the works carried out, that are in development or to be developed, and that cannot be publicly disclosed.

Mundi Consulting's commitment implies the protection of the information that we have access during the implementation of projects, including its safeguarding through backups, for the period of time that is defined.

### **GDPR Compliance and Confidentiality**

Mundi Consulting ensures the data protection required by the RGPD legislation – General Data Protection Regulation, which is applicable, namely, professional and personal data, regardless of the form they may have and the physical or electronic support in which they are. Likewise, and whenever required, Mundi Consulting undertakes to support and collaborate with the entities with which it relates, in identifying beneficial owners, for the purposes of the central registration of beneficial owners.

Mundi Consulting respects the confidentiality of information and data belonging to its partners, customers and suppliers, its employees and any other partners with whom it relates during the planning, development and execution of projects.

Mundi Consulting expects that the partner entities with which it relates will also assume the commitment to develop the same operating standards in relation to the protection and confidentiality of the data obtained.

### **Intellectual Property and Copyright**

Mundi Consulting is committed to ensure compliance with applicable legislation on intellectual property rights and copyright, whenever necessary, and to respect and protect the intellectual property and copyright of third parties, whether partners, whether they are subcontracted.

Mundi Consulting expects that the third parties with which it relates will also respect the intellectual property rights and copyright of Mundi Consulting or the entities with which Mundi Consulting interacts in the scope of planning, development and execution of projects. Any changes in terms of use of intellectual property rights or copyrights must be subject to a formalized written agreement between the parties involved.

### **IS/IT Security**

Mundi Consulting is committed to protect the information entrusted to it, as well as physical documents and electronic files or information technologies, ensuring the implementation of an information control system.

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Mundi Consulting expects partner entities to use security control systems that meet Mundi Consulting's requirements resulting from the processes in which they relate to Mundi Consulting.

### **Use of Social Networks**

Mundi Consulting is committed to use social media platforms responsibly and be cordial and respectful. Mundi Consulting expects the Partners with whom it relates to avoid making unprofessional, defamatory, discriminatory and prohibited communications, and that are an attack on good customs, on their communication platforms. Partners should only communicate on behalf of Mundi Consulting when expressly authorized to do so.

## **Part VII. COMPLAINTS AND SUGGESTIONS FOR IMPROVEMENTS**

### **Complaints and Reporting Resources**

Mundi Consulting has the following channels available to be used by anyone wishing to report processes that do not respect the rules of the Mundi Consulting Code of Ethics.

- By phone: +351 213617230
- By email: [etica-conduta@mundiconsulting.net](mailto:etica-conduta@mundiconsulting.net)
- Directly to the Quality Manager, who oversees Mundi Consulting's Code of Ethics.
- Directly to the Director General of Mundi Consulting.

### **Corrective Measures and Update**

If any of these situations occur, in some of the planning, development and execution phases of the projects, triggered either by the employees or by the employees of the Entities with whom Mundi Consulting is working, the following will be implemented:

- Reporting to the Quality Area Manager, which is part of the Code of Ethics.
- Hearing of the UEN Manager responsible for the project activity in question.
- Reporting to the General Manager (DG) of MundiServiços of the facts that occurred.
- Analysis by the General Manager of the situation that occurred, verifying:
  - The measures to be implemented from a collective point of view, namely whether unethical behavior will be subject to disciplinary action.
  - Reporting the event to the MundiServiços Management Board, which should schedule a session to discuss and determine any preventive measures to be implemented, so that the situation does not happen again.
  - The need to address new awareness and sensitization actions in the fight against unethical behavior.
- Implementation of measures issued either by the DG or by the Management Board, managed by the Mundi Consulting Manager who is asked to manage the event.

The Quality Area Manager must update Mundi Consulting's Code of Ethics every two years, including the Sustainable Business Policies and the Code of Conduct of Mundi Consulting's Supplier Partners, which must be published and disclosed at the beginning of the odd years.

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### **Coordination of the Ethics area**

The activities of the Code of Ethics at Mundi Consulting are led by:

Name: Rui Osorio

Function: Manager of the Quality/Compliance Area

Sub-area integrated in the Quality Area where the Code of Ethics is inserted: Compliance.

Contacts: etica-conduta@mundiconsulting.net – Phone: + 351 213617230

### **Annex 1. ETICA Internal Approach**

Mundi Consulting, as a management consulting entity that develops activities according to **the Problem → Diagnosis → Solution → Implementation → Evaluation** model, requests that all its employees and members of management bodies use the **ETHICS Approach** to reflect on the practical applicability to the activity and business of Mundi Consulting, and the communication and reporting of situations that must be considered and analyzed within the scope of the continuous improvement process of Mundi Consulting's activity.

Approach

**E** - Event

**T** - siTuation

**I** - Initiative

**C** - Concretization

**A** – Accompaniment

Consisting of:

➤ **E**, from **Event**.

Refers to activities to identify the **PROBLEM** or situation that is intended to be resolved with a consultancy or training process, when faced with a situation that may not be correct and that may have reputational and commercial impacts on the activity and functioning of the company.

Questions that may be asked to the employee that may justify the report:

- Does the problem or area where we are going to intervene fit in with the mission and values of Mundi Consulting?
- Am I or is Mundi Consulting being asked to do something that I think is wrong?
- Am I convinced that there is unethical or illegal behavior by someone in this situation?
- Do I have doubts that the decision being taken is not the most correct one in ethical terms?
- What would be the impact on Social Communication of the knowledge of this situation?

➤ **T**, from **siTuation**.

It refers to the **DIAGNOSIS** activities of situations that are being analyzed and that may not be being considered in the best way and that it will make sense to report them, due to the impact that this diagnosis has in terms of the people or entities affected, as well as the effects legal, commercial and reputational consequences arising from the current situation.

Questions that may be asked to the employee that may justify the report:

- Who is affected by this situation: myself, colleague(s), business area, company, customers, partners, community?

- Are some laws and regulations not being complied with?
- Does it have commercial effects on the relationship with customers/suppliers/partners?
- Does it have any reputational effects on the image of Mundi Consulting?
- Will it have an impact in the medium and long term on the purpose of Mundi Consulting?

➤ **I**, from **Initiative**.

Refers to the activities in which Mundi Consulting presents the **SOLUTION** or recommendations that are being produced in a project and that may raise doubts that they may be the best, and it will be worth rethinking whether there are not other preferable alternatives for the parties interested.

Questions that may be asked to the employee that may justify the report:

- Will this be the best choice to make and will it be an ethical choice?
- Are there alternative options that may not represent an unethical action?
- Does it make sense to report to someone if it is the best option to take?
- Should I question others about whether it is worth reporting?

➤ **C**, from **Concretization**.

It consists of the **IMPLEMENTATION** activities of the consultancy or training project to be developed, aiming to solve an identified problem situation that was previously diagnosed and defining a future path to be followed, and in which activities of some duration and continuity will be or will be carried out that may not be consistent with Mundi Consulting's principles and values and Code of Ethics.

Questions that may be asked to the employee that may justify the report:

- Does the implementation of the solution feel right?
- Can I sleep at night knowing that the process is continually being implemented?
- Would it bother me if others knew that I knew about this matter?
- Have I thought about what a reasonable person would think about what is going on?
- Should I consult someone to question whether what is being done is not in accordance with the Mundi Consulting Code of Conduct?

➤ **A**, from **Accompaniment**.

It consists of the **EVALUATION** that will be developed of a project or activity or service and that the recommendations or suggestions to be produced may not be in accordance with Mundi Consulting's Code of Ethics.

Questions that may be asked to the employee that may justify the report:

- Who should I report and communicate these situations to in the structure of Mundi Consulting?
- Is Mundi Consulting justified in communicating the situation that occurred to interested external parties?
- Does it make sense to have the report for this type of situation reviewed so that it does not happen again and be incorporated into the Mundi Consulting Code of Ethics?
- What did I learn from this situation about what not to do and what justifies reporting?