

# INTEGRITY PROGRAM

## CODE OF ETHICS



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## I - PRESENTATION

### 1. Message from the Board of Directors

Montreal continues to conduct its business under the highest standards of integrity, based on compliance with ethical and regulatory principles.

The Code of Ethics reflects our attitude and values, which must be practiced by everyone, ensuring that our objectives are achieved with responsibility and integrity.

### 2. Message from the Chairman

Those of us who strive for excellence recognize the difficulties of maintaining high standards of delivery and quality of relationships.

For this reason, we do not seek to evolve exclusively in the field of technology, but we encourage the enrichment of new skills to deliver effective results, and we invest in the development of an ethical culture in order to promote the integrity of our relationships. We are constantly evaluated by our clients and partners, guaranteeing the sustainability of our business.

This code is intended to stimulate dialogue on best practices and behavior. This way, each of our employees will be able to rely on their managers and the Compliance Committee to share their doubts and/or experiences.

## 3. How to use it

The purpose of this Code of Ethics is to:

- Establish our commitment to ethics and integrity;
- Stimulate debate on ethics;
- Spread the culture of integrity in business;
- Help resolve ethical dilemmas that may arise;
- Setting limits on the actions of the Montreal Group and its employees;
- Guide Montreal employees towards an ethically responsible institutional culture.

If you have any doubts about the consequences of your actions, and these are not covered by the Montreal Group Code of Ethics, you can always consult the Compliance Committee.

## 4. Applicability

The rules presented here will apply internally to all members of Montreal, and externally to all members of Montreal.

Furthermore, this Code of Ethics ensures that employees are aware of and committed to the rules, principles and policies in force. In this way, any transgressions will be considered contractual infringements.

If any employee breaks the law by acting contrary to the company's rules, Montreal will not be held liable, and the offender will be solely responsible for their actions as well as those contained in the Individual Employment Contract and other rules and regulations in force.

## II - CODE OF ETHICS

### 1. Ethical Values

Montreal conducts its actions with a focus on the following values, which must be followed and respected by all:

#### Compliance

Observe and comply with current national legislation, principles, technical standards and policies.

#### Integrity

Ensure the company's reputation and integrity, and it is not acceptable for misconduct or corruption to be part of the conduct of business and relations between employees.

#### Protection of Personal Data

Exercise care and respect for privacy rights, handling personal data with responsibility and integrity.

#### Training

Investing in the certification of our professionals in the main technologies available on the market, so that they remain committed to the results of each project developed and act in an integrated manner with the IT, business and client areas.

#### Agility

Improving our management to build solid results and speed up decision-making processes, with the aim of providing clients with greater reliability.

## Reliability

Cultivating and maintaining our partnerships and strategic alliances with the main companies in the IT market.

## Quality

Conducting and monitoring our projects according to the best market practices and investing constantly in optimizing our processes.

## Tradition

We operate nationwide and in various market segments, maintaining our tradition of developing projects in the financial sector, industry, commerce and services, in both the public and private spheres.

## 2. Corporate Governance

Montreal observes corporate governance practices, integrating related parties and seeking balance in relations between senior management and its shareholders, including minority shareholders. Business is conducted using the principles of transparency, fairness, accountability and corporate responsibility.

Business activity is conducted not only through compliance, but above all through ethics, with reports and balance sheets that are complete, unambiguous and made available with complete transparency to the outside world and to the competent public bodies.

## 3. Respect for the individual

Montreal is committed to respecting everyone and we repudiate any discriminatory acts. We promote diversity, equality and inclusion in all our environments and interpersonal relationships.

Any form of discrimination is prohibited, such as those related to gender, age, origin, religion, sexual orientation, physical appearance, health, special needs, trade union membership or political orientation.

We guarantee the safety and physical integrity of our employees, as well as health, hygiene and safety conditions in the workplace.

We encourage the dissemination of knowledge, promoting employee development, seeking to improve everyone's skills and allowing them to be reassigned to an area that best suits their situation, at any hierarchical level.

We seek to increase employee motivation and commitment through programs that improve their quality of life. We frequently hold free educational events, as well as partnerships with educational and health institutions.

We protect the confidentiality of all those involved in ethical complaints, in order to preserve rights and safeguard the neutrality of decisions, and any form of retaliation is prohibited.

We recognize employees' right to free association, respecting and valuing their participation in trade unions.

## 4. Relations with suppliers

We establish our relationships with reputable service providers and suppliers, observing contracting processes, compliance with current legislation, ensuring quality, as well as the economic and social viability of the services contracted and products purchased.

We are diligent, and we require everyone who has any business relationship with Montreal to know, observe and respect our Code of Ethics.

We demand an ethical profile in the management of suppliers, repudiating practices of unfair competition, child labour, forced or compulsory labour, terrorist financing, money laundering, cybercrime, criminal organization, and other conduct typified as a crime.

### 5. Relations with public authorities

We are constantly evaluated on our practices, and we recognize the importance of the Public Authorities as a client, a partner, and as a supervisory agent of our activities.

It is forbidden to offer, deliver or promise, directly or indirectly, any undue advantage to a public official, or to a third party related to them.

We also prohibit any kind of contribution, donation, provision of favors, payment of travel and other expenses for public officials that is in disagreement with the rules set out in this Code and in the Montreal Group's internal rules.

### 6. Donations to Electoral Campaigns

Montreal does not make donations to electoral campaigns, in accordance with the decision of the Supreme Court in the judgment of ADI 4.650, reported by Justice Luiz Fux.



## 7. Money Laundering Prevention

We remain committed to the prevention of money laundering, recognizing the fundamental role of all companies in the process of continuous monitoring.

The crime of money laundering is characterized by a set of commercial and/or financial operations that seek to incorporate resources, goods and values of illicit origin into the country's economy, and which develop through a dynamic process, on a transitory or permanent basis.

Montreal adopts measures capable of mitigating risks related to money laundering, whether for clients, partners or suppliers. We are diligent in getting to know the parties with whom we deal, through KYC (Know Your Client) due diligence.

Identifying clients and keeping records of all operations conducted by the company are part of our routine, and are fundamental measures for mitigating risks arising from Money Laundering.

## 8. Combating Corruption

Any form of corruption is prohibited, such as offering or promising any undue advantage to a public official or politically exposed person, directly or indirectly.

- It is forbidden to offer goods, gifts, advantages or services to public officials or politically exposed persons;
- Hiring at the request of public officials is prohibited;
- It is forbidden to pay expenses to public officials.

Remember: Regardless of the value of the act committed, any type of direct or indirect advantage is an act of corruption, subject to the penalties and sanctions of Law No. 12.846/2013 (Anti-Corruption Law).

Montreal does not condone any corrupt practices. If deviations of this nature are identified, those responsible will be subject to the sanctions provided for in the Code of Ethics, without prejudice to the national legislation in force.

It should be remembered that Law No. 12.846/2013 provides for the objective liability - regardless of the determination and characterization of guilt - of legal entities for unlawful acts committed against the national or foreign Public Administration.

The following are considered illegal acts:

- Corruption;
- Frustrating or defrauding tenders;
- Obtaining undue advantage from contract modifications or extensions;
- Manipulating or defrauding the economic-financial balance;
- Hindering inspection or investigation activities.

Administrative and judicial sanctions:

- A fine of up to 20% of gross revenue for the previous financial year;
- Wide dissemination of the condemnatory decision;
- Registration in the National Register of Punished Companies (CNEP);
- Repair of damage or forfeiture of assets;
- Prohibition from receiving benefits from public institutions;
- Suspension, interdiction or dissolution of the legal entity.

Remember: regardless of the financial loss, the punishment will cause serious damage to the company's image and reputation. It is therefore essential that all employees know and comply with the provisions of the Anti-Corruption Law and the company's Code of Ethics.

## 9. Respect for Privacy and Protection of Personal Data

Montreal affirms its commitment to the privacy and protection of personal data in its operations and business relationships. We treat personal data with respect for its owner, employing administrative and technical measures to protect against the misuse and leakage of personal data.

We are committed to the integrity of personal data and sensitive data, and it is expressly forbidden to use it for commercial purposes outside the interests of the Montreal Group, and especially to use it for any discriminatory or segregating act that violates fundamental rights and guarantees.

Our activities are carried out in accordance with good faith and the other principles inherent in the processing of personal data.

## 10. Confidentiality

We are committed to protecting the intellectual property of Montreal and our suppliers, combating piracy and the leakage of privileged information.

The unauthorized disclosure, exploitation or use of confidential knowledge, information or data, usable in industry, commerce or the provision of services to which the employee has had access through their contractual or employment relationship, is prohibited at any time, even after the contract has ended.

Montreal reaffirms its commitment to the Intellectual Property Law and other related legislation, and reserves the right to preventively dismiss employees involved without prejudice to the filing of appropriate civil and criminal measures.

## 11. Information Security

Montreal aims to guarantee the protection, confidentiality, integrity, authenticity, availability and privacy of information by reaffirming its commitment to information security, providing efficient management in all its operations and processes so that they are aligned with the organization's business strategy.

A set of Information Security Policies has been established and all the provisions of these Policies must be complied with by everyone who acts on behalf of the Montreal Group. Group, at various levels and in compatibility with the needs of their roles and responsibilities.

Montreal also establishes an Information Security Management structure made up of technical and administrative processes and controls, as well as an Information Security Committee, responsible for ensuring that the premises, processes and policies for Information Security are maintained and continuously improved.

## 12. Company Image Association

In the interest of the organization's reputational integrity, no employee, directly or indirectly, to use their connection with the Montreal Group for political or partisan activities.

We recommend that employees use their social networks prudently and responsibly, even privately, in view of the associated reputational risk. Any form of discrimination, apology for crime, intolerance, or act that affronts fundamental rights, does not reflect Grupo Montreal's stance.

## 13. Conflicts of Interest

Conflicts of interest occur when an attitude or intention of a particular employee violates or may violate the interests of Montreal.

In our daily lives, we may encounter numerous situations involving conflicts of interest. You should inform your manager or contact the Compliance Committee directly whenever you notice or suspect a conflict of interest, whether with the government or the private sector.

The interests of Montreal must always prevail within the law. It is not permitted to obtain undue advantages for oneself or for third parties, using one's position or privileged information.

Any business dealings which may involve companies owned by employees of the Montreal Group or by third parties linked to them must be reported to the Director responsible for the area and to the Compliance Director, who is responsible for assessing and exposing the risks.

## 14. Communication channels

All employees must know, disclose and comply with this Code in order to carry out their activities properly. It is extremely important for the Montreal Group to know what problems are faced and possible violations related to this Code or the national legislation in force. Only in this way can we adopt the necessary measures to resolve undesirable situations and prevent future violations from occurring.

All employees have a duty to report violations of this Code, as well as other internal rules and current legislation.

To this end, Montreal **Confidential Channel** is available at <https://www.canalconfidencial.com.br/grupomontreal/> and a toll-free hotline at 0800 741 0019, from Monday to Friday, from 9:00 a.m. to 6:00 p.m., through which employees can report violations of this Code in their daily activities. The **Confidential Channel** is open to all interested parties, whether employees or the public.

Any reports made will be analyzed by the Compliance Department and may be referred to the Ethics Committee, a body created specifically to ensure the application of this Code. The Committee will be responsible for answering questions and coordinating investigations into complaints.

Communications involving violations or suspected violations of the personal data of employees or third parties who in any way have a business relationship with the Montreal Group may be forwarded to the Personal Data Protection Committee.

The **Personal Data Protection Committee** can be contacted at: [comite.lgpd@montreal.com.br](mailto:comite.lgpd@montreal.com.br).

The Data Protection Officer (DPO) can be contacted at: [dpo@montreal.com.br](mailto:dpo@montreal.com.br).

**Important:** Everything will be done confidentially so as not to expose the members or the company to third parties.

Reports made in good faith by an employee will not be retaliated against in any way. On the other hand, it is a violation of this Code to make false accusations or provide incorrect or untrue information.

Montreal only encourages reports made in good faith, with responsibility and commitment.

## 15. Sanctions

Failure to comply with any of the provisions listed in this Code will subject those responsible to internal sanctions, according to the nature and seriousness of the infraction committed.

All Montreal employees, without exception, will be subject to the following sanctions if they are involved in any infraction:

- 1- Warning;
- 2- Suspension;
- 3- Termination of the contractual or statutory relationship.

The Compliance Committee will be responsible for applying the sanctions described.

The Compliance Committee will always be available to help you interpret and apply this Code of Ethics in your daily activities.

### Nature of the changes

Date	Rev.	Location	Modifications
08/16/2017	00	Local Legal Network and Portal/Intranet.	Preparation of the document.
09/15/2022	01	Local Legal Network and Portal/Intranet.	The policy has become a separate document from the old code of ethics



Access our channels and learn more about this and other topics.