

INTEGRITY PROGRAM

COMPLIANCE POLICY



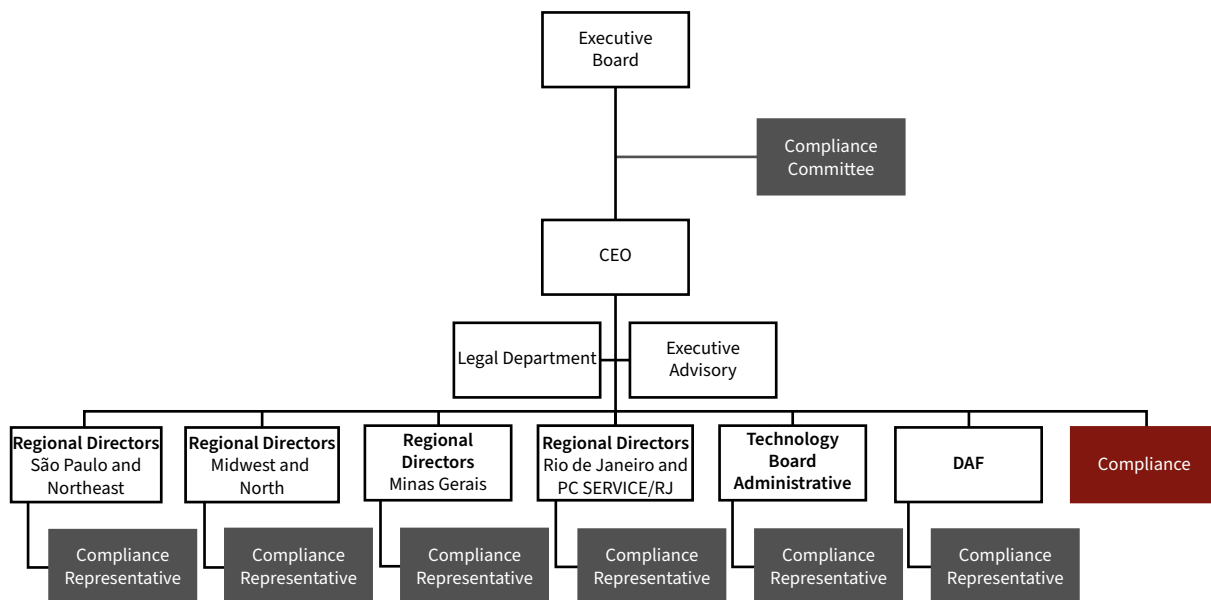
1. Objective

Guidelines to be followed by Montreal in the structuring, duties and responsibilities of the Board of Directors, the Compliance Committee and the Compliance Representatives.

2. General Provisions

a) **Scope:** The provisions of this Policy are applicable throughout Montreal. Montreal, and may serve as information for external audiences.

b) Compliance structure:



Montreal Compliance structure will be based on a 3-tier system: Compliance Board Committee and Compliance Representatives.

It is the responsibility of all Montreal Compliance bodies to:

- Ensuring that employees act in accordance with the law and internal policies;
- Promoting integration between business areas;
- Disseminate the ethical culture;
- Continuously monitor the Integrity Program.

c) Initial provisions

The entire structure must mainly meet the following demands:

- Risk analysis and preparation of the Compliance Report;
- Validation of opportunities and contractual monitoring;
- Communication and training;
- Application of sanctions;
- Proposals for changes to the Code of Ethics and related policies;
- Routine continuous monitoring of the area;
- Managing the confidential channel and investigating complaints.

• RISK ANALYSIS AND PREPARATION OF THE COMPLIANCE REPORT:

The Compliance Department will be responsible for the Compliance Report. This is the document containing all the evidence of the Compliance Program applied in the last financial year.

The Compliance Department will be responsible for the risk analysis listed in the Profile Report, which should prioritize strategic risks and may include a report on the investigation of complaints and internal investigations conducted.

• VALIDATION OF OPPORTUNITIES AND CONTRACTUAL MONITORING:

It will be up to the Compliance Department - directly or via delegation to the Compliance agents - to get to know its clients, suppliers or partners, and to monitor purchasing processes, bidding processes, as well as new contracts or contract renewals.

• COMMUNICATION AND TRAINING:

Corporate training sessions will be held on a regular basis, with the aim of fostering a culture of integrity in business, through the presentation of topics related to ethics, the fight against corruption, the prevention of money laundering, broad exposure of the confidential channel, and other related issues.

Compliance training and communications will be monitored by the Compliance Committee, which should promote actions capable of reaching all levels of Montreal. Other areas may serve as facilitators of compliance training and communication actions.

Training of Compliance Officers:

The members of the Compliance Committee must be regularly qualified and trained.

To this end, the broad qualification of those responsible is promoted, encouraging - and documenting - in-depth study of the relevant topics.

Training the Board of Directors and Executive Officers:

It is essential that directors and officers undergo corporate training that addresses the main themes of the Code of Ethics and related policies.

Training for Managers, Supervisors and Coordinators:

Managers, supervisors and coordinators will be exposed to compliance issues, with a focused approach on the Code of Ethics and related policies. The compliance content will be presented, and they will be subjected to an examination of their perception of the subject, and at the end the employee will be able to request the respective certificate of completion.

Communication to new employees:

New employees will be introduced to the Code of Ethics and related compliance policies at the time of their induction.

• APPLICATION OF SANCTIONS:

In the event of irregularities, the Compliance Committee must identify the responsibility of those involved and decide whether to apply the appropriate sanction, taking into account the sanctions provided for in the Code of Ethics, namely: Warning, Suspension or Termination of the contractual or statutory relationship.

• PROPOSED CHANGES TO THE CODE OF ETHICS AND RELATED POLICIES:

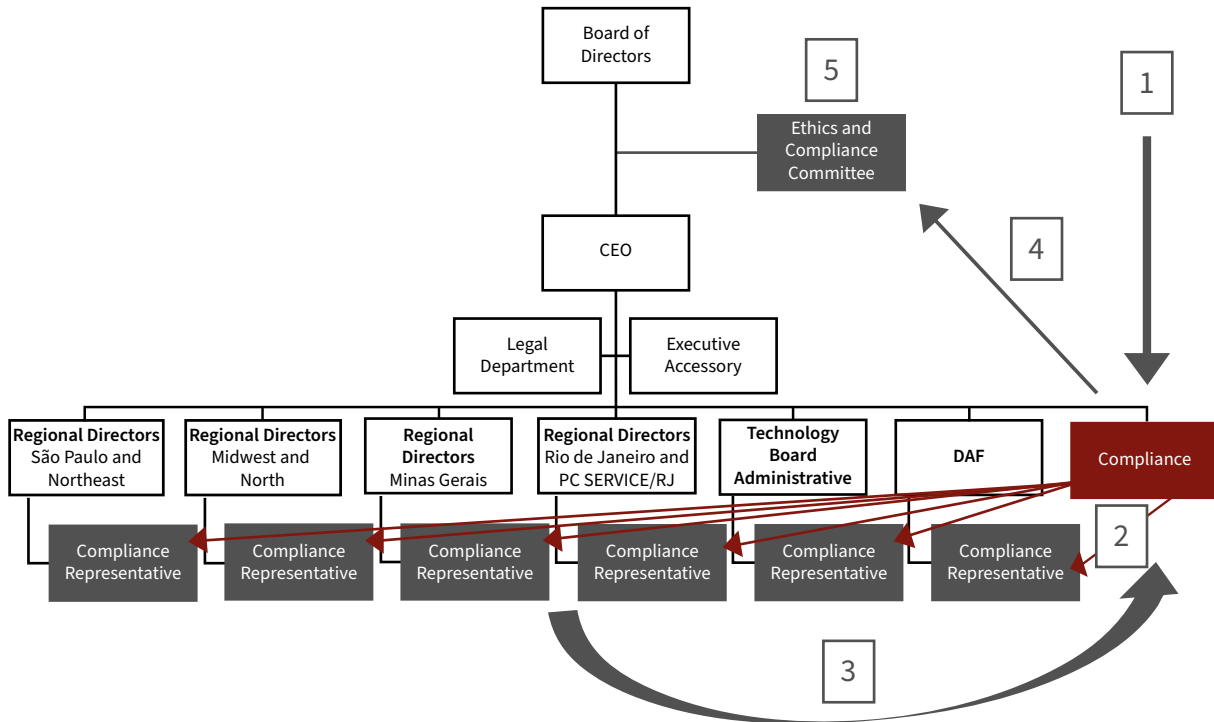
The Compliance Committee is responsible for proposing changes to, updating or maintaining the Code of Ethics and related policies, in order to make them more appropriate to the challenges faced by the company in managing its activities.

• ROUTINE CONTINUOUS MONITORING OF THE AREA:

The Compliance Committee has the function of issuing internal regulations, and can carry out compliance tests on operations, procedures and registrations, implement internal control mechanisms, as well as reviewing controls and flagging failures that could generate actual or potential financial losses.

• MANAGING THE CONFIDENTIAL CHANNEL AND INVESTIGATING COMPLAINTS:

Complaints will be received through institutional channels, from the internal or external public, or through personal complaints. In this sense, if the whistleblowing channel is used, it will be up to the Executive Board to determine the investigation, which will be carried out by Compliance agents. Anonymity and the prohibition of any manifestation of retaliation will be guaranteed.



In the table above, the complaint handling flow should observe:

1. The complaint is received and forwarded to the Compliance Department, which must screen the complaint to check whether it contains the minimum elements required for an investigation;
2. The Compliance Department will forward the complaints to the Compliance agents for investigation;
3. After due investigation, a report must be sent to the Compliance Board with the results of the Board with the results of the investigation requested;
4. If any serious irregularity is found, the occurrence will be forwarded to the Compliance if any serious irregularity is found, the occurrence will be forwarded to the Compliance Committee so that it can take the appropriate steps, requesting information and possibly carrying out exploratory or confrontational interviews, if necessary. If there is no risk or seriousness, the Compliance Board may close the complaint.
5. In the event of irregularities being identified, the Compliance Committee will be responsible for ascertaining liability and determining the application of sanctions.

d) Compliance Officer

The duties of the Compliance Officer include:

- To enforce the ethical principles and values of Montreal, which must be followed by everyone, without exception;
- Promote broad knowledge and implementation of ethical values in the actions of all employees;
- Analyze any complaints of non-compliance with the provisions of the Code of Ethics, guaranteeing the confidentiality of the issues and the people involved in the case;
- Ensuring the confidentiality of complaints or infractions, except in the case of legal testimony;
- Act in an integrated manner with the business areas to analyze and improve processes;
- Draw up a Risk Report at the beginning of the year, in which the main risks to which the company is subject are analyzed;
- Draw up a Compliance Report at the end of the year, reviewing the area's progress and documenting the actions taken by the Executive Board.

e) Compliance Committee

The Compliance Committee is the advisory body to the Compliance Board on issues involving violations of Montreal ethical values.

The duties of the Ethics Committee include:

- Act confidentially in all matters;
- Receive and deal with complaints about deviations from the company's ethical values, mainly through the Confidential Channel;
- Evaluate and discuss reported cases based on Montreal Code of Ethics
Montreal Code of Ethics;
- Contribute to updating Montreal Code of Ethics and related policies;
- Acting in a preventive manner in ethical demands arising from the conduct of employees and third parties;
- Informing the Compliance Director of any investigations and recommendations that the Committee deems appropriate;

- Periodically inform the Board of Directors of the status of the cases analyzed by the Committee;
- Organizing, protecting and making available evidence of the Compliance Program;
- Collaborate in drawing up the training and communication plan;
- Collaborating on the preparation of profile and compliance reports.

f) Compliance Representatives

The Compliance Representatives' duties include:

- Provide support to the Compliance Committee in Compliance demands occurring in the Regional Offices;
- Support the Compliance Committee in the continuous monitoring of the Compliance Program;
- Acting preventively in ethical matters arising from the conduct of employees and third parties.

g) Sanctions

Failure to comply with any of the provisions listed in the Code of Ethics and related policies 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.

h) Communication channels

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

All employees have a duty to report violations of the Code of Ethics, internal policies and standards, or current legislation.

For this purpose, 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 communications made will be analyzed by the Compliance Board 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 any questions and coordinating investigations into.

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.