# **INTEGRITY PROGRAM**







## 1. Objective

Guidelines to be followed by Montreal and its employees when dealing with suppliers.

#### 2. General Provisions

## a) Scope

• The provisions set out in this Policy are applicable throughout Montreal and may be used by external audiences.

## b) Concepts

- **Fixed assets:** Durable goods of a permanent nature, intended for use in the company's operations, which form part of its assets.
- **Service Provider:** Any natural or legal person, public or private, national or foreign, as well as non-personalized entities, which carry out activities involving the provision of services, or the supply of materials and goods.

### c) Initial Provisions

- I. Suppliers must comply with the rules set out in the Montreal Code of Ethics.
- II. In the case of participation in Consortia, anti-corruption clauses must be included in the Memorandum of Association.
- III. Montreal will not allow reprisals to those who report, in good faith, conduct that does not comply with the Code of Ethics and the company's values.
- IV. Failure to comply with the rules described above by Montreal employees will result in the determination of responsibility and application of the sanctions provided for in the Code of Ethics.

## d) General Rules

- V. Purchases of materials and assets and other expenses must be preceded by price quotations and must comply with the Authorization Matrix set out below.
- a. Pricing may be waived in exceptional cases, duly justified by the Director responsible and approved by the CEO.

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#### RELATIONSHIP POLICY WITH SUPPLIERS



- b. Purchases of the same nature and type, carried out on a repetitive basis, will be cumulative for the purposes of the Authorization Matrix.
- VI. All product purchases must be preceded by a price quotation, in accordance with "Purchasing Process" and "Approval Workflow", available on the corporate portal.

## e) Authorization Matrix

VII. The levels and values of autonomy for making expenditures are as follows:

LEVEL	FROM	то	AUTONOMY
1	<	50.000	Responsible director
2	50.001	100.000	Responsible director and one more director
3	100.001	1.000.000	Responsible director, the managing director and the CEO

VIII. Expenditure in excess of R\$ 1,000,000.00 must be submitted to and approved by the Board of Directors.

# f) Purchasing Guidelines

- IX. When contracting services, the contracting Board must complete the Service Supplier Evaluation form.
- X. The Service Supplier Evaluation form must be attached to the contract:
  - a. A new form must be completed for each contract;
- b. The Directorates must not approve payments for contracts that do not meet the requirements set out in this Annex.
- c. For contracts with a term of more than 12 months, the Board of Directors of each Regional Office will be responsible for determining the need to update the supplier's data.
- XI. The information filled in on the form is the sole responsibility of the manager of the contracting Board, who must guarantee its veracity and integrity.
- XII. Purchase requests must include all the technical information so that the purchasing area can begin the process of selecting suppliers for quotation.
- a. Requests with insufficient and/or incomplete information must be rejected by the unit responsible for the purchase.
- XIII. As far as possible, a rotation should be promoted in the selection of suppliers, in quotations for the same item, avoiding vices or targeting a single supplier.