

# INTEGRITY PROGRAM

## ADMINISTRATION POLICY CONTRATUAL



## 1. Objective

Guidelines to be followed by the Montreal Group and its employees in the administration of Contracts with public and private clients.

## 2. General Provisions

### a) Scope

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

### b) Concepts

- Client: An individual or legal entity, public or private, or a non-personalized entity to which the Montreal Group sells, supplies goods or provides services, in exchange for remuneration, whether domestic or foreign.

- Public Client: Any client, at a national level, that is part of the direct and/or indirect administration of the Federal Government, States, Federal District and Municipalities, including, but not limited to, public companies and mixed-capital companies.

Internationally:

- State bodies and entities or diplomatic representations of a foreign country, at any level or sphere of government;

- Legal entities controlled, directly or indirectly, by the public authorities of a foreign country, at any level or sphere of government;

- Legal entities controlled, directly or indirectly, by the government of a foreign country;

- Those who, even temporarily or without remuneration, hold public office, employment or function in state bodies, entities or diplomatic representations of a foreign country;

- Legal entities controlled, directly or indirectly, by the government of a foreign country or in public international organizations.

### c) Initial Provisions

I. Employees of Montreal must observe ethical standards in all their professional activities, acting with honesty and uprightness in all commercial relations, with a view to fulfilling the contractual commitments assumed by the Company.

II. Contracts with clients must comply with the conflict of interest rules set out in the Code of Ethics.

III. Montreal will not tolerate reprisals for those who report, in good faith, conduct that does not comply with the Code of Ethics and the company's values.

IV. Montreal employees must treat all clients, both public and private, with dignity and respect, seeking to satisfy their interests through strict compliance with contractual obligations.

V. Failure to comply with the rules described above will result in a finding of liability and application of the sanctions provided for in the Code of Ethics.

## d) Client Contract Management

VI. In order to ensure a reliable and secure database of information on the company's current contracts, a contract management dossier must be created for each project underway, so as to make it possible to analyze and control the information and documents on contracts, measurements and negotiations with the Montreal clients.

1. The Regional Directorates are responsible for drawing up and maintaining this dossier Directors, who must provide the documentation when requested by the Compliance Department Compliance.

VII. The following procedures must be observed in contract management and in the preparation of this dossier:

1. Registration form: with the minimum amount of information and documents to allow full identification of clients (qualifications, address, telephone number, e-mail address, etc.);

2. Documents relating to the contract: a copy of the proposals submitted, the procedures for expressing interest from the private sector, tender notices, clarifications to the tender notice, contracts and any amendments;

3. Documents: sent or received from the client, by any means;

4. Minutes of meetings: held with clients, where applicable, to discuss ongoing contracts.

VIII. The conclusion of verbal contracts or contractual changes with private clients should be avoided by Montreal employees.

IX. All contracts, amendments or other contractual modifications must be approved by the Director responsible for the Contract.

1. The Director responsible must send the Contract to the Compliance Department for risk analysis in the event of any doubts as to the Compliance in the event of any doubts as to the risks involved in formalizing the agreement.

X. The signing of contractual amendments must be justified in detail in the corresponding contractual instrument and/or be supported by studies, legal opinions, technical documents, calculations and other elements that motivated the signing of the corresponding contractual amendment.

XI. The registration data of contracting companies must be forwarded to the Compliance Department, which, in the event of possible risks, must carry out the necessary due diligence to ascertain the risk involved in the contract.

1. If it is found that politically exposed people are connected to the contracting company, either as members of the senior management or through third parties, the Compliance Department must express its opinion prior to formalizing contracts or amendments.

1.1 In the event that it is impossible, for business reasons, for the Compliance Board to analyze and express its opinion in the cases described above, the opinion must be made as soon as possible and attached to the contract file, even if it is untimely.

1.2 If a high risk is detected in the contract, the Compliance Board must convene the Compliance Committee to analyze the situation and, if necessary, decide to terminate the contract.

XII. It is the duty of the Executive Board responsible for the contract, as well as the respective Compliance agents, to report suspicious activities or operations in client relationships.

XIII. In the event of suspected acts of corruption or extortion, the fact must be reported to the Compliance Board for careful assessment and adoption of the appropriate measures.

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