

# INTEGRITY PROGRAM

## GIFTS AND HOSPITALITY POLICY HOSPITALITY



## 1. Objective

Guidelines to be followed by the Montreal Group when granting gifts, presents, entertainment and travel to third parties.

## 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

- **Third party:** Public or private employee who maintains business relations with the Montreal Group, whether as a client, partner, representative, supplier, consultant, dispatcher, consortium member, tax authority or member of any other entity with which Montreal Group employees interact in their duties.
- **Toasts:** Items with a commercial value of less than R\$ 100.00 and containing the company logo. Examples: diaries, calendars, key rings, etc.
- **Gifts:** Goods of patrimonial value or any object of interest to its recipient and which would be distributed as a courtesy or on the occasion of special events or commemorative dates.
- **Entertainment:** Parties, concerts, lunches, cocktail parties, among other activities.

### c) Initial Provisions

- I. It is forbidden to offer or receive gifts, presents, entertainment or travel, regardless of value, if this would constitute an undue advantage or any benefit for the Montreal Group.
- II. The granting of gifts, presents, entertainment or travel that has been requested by a public official or private entity is prohibited.
- III. It is mandatory for Montreal Group employees to report any acts contrary to the provisions of this annex to the Compliance Board, for the adoption of the appropriate measures.
- IV. In the event of doubts about the adoption of any conduct - even if requested by their superior - the Montreal Group employee should consult a Compliance agent or the Compliance Board itself.
- V. The Montreal Group 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.

Failure by employees of the Montreal Group to comply with the rules described in this appendix will result in Group employees will result in the determination of responsibility and application of the sanctions provided for in the Code of Ethics.

## d) Gifts and Presents

I. Montreal Group employees are authorized to receive and offer gifts, provided they comply with the provisions of this annex.

II. The preparation of gifts bearing the Montreal Group brand is the exclusive responsibility of the area designated by the company.

III. Giving or receiving a gift will only be allowed up to a maximum unit value of R\$ 300.00 (three hundred reais), and must be approved by the Regional Board, after analysis by the respective Compliance agent.

- In the case of a gift offered to a civil servant, the maximum unit value is R\$ 100.00 (one hundred reais).

- In the event of receiving a gift above the amount stipulated in this Appendix, the employee must refuse it or forward it to the Compliance agent responsible for their unit so that the appropriate measures can be adopted.

IV. It is forbidden to offer any advantages or services, such as job offers, private services or problem solving of any kind.

## e) Entertainment

V. Montreal Group employees are not authorized to offer or accept invitations or participate in entertainment that could constitute a conflict of interest.

VI. Invitations to give or participate in entertainment must comply with the limit of R\$ 300.00 (three hundred reais) per person.

VII. The granting or receipt of an invitation to entertainment in excess of the amount described above must be previously authorized by the Director of your Unit and communicated to the Compliance agent of the same Unit.

## f) Travel

VIII. Travel expenses will only be allowed if (i) they are related to the promotion, demonstration or presentation of Montreal Group services and solutions or (ii) visits to the premises and facilities of the Departments due to current contracts.

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X. The Montreal Group will not cover the travel expenses of relatives or friends of third parties.

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