

INTEGRITY PROGRAM

RELATIONSHIP POLICY WITH SUPPLIERS



1. Objective

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

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

- **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.

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	TO	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.

XIV. Whenever possible, product purchases should be made directly from manufacturers or their representatives, observing the evaluation criteria below:

- Does your company have a quality management system?
- Are the products supplied guaranteed?
- Are the products packaged properly?
- Do you offer payment facilities?
- Do you offer after-sales support?

XV. Proposals should only be accepted on letterhead, with the signature of the person responsible, with their name legible and contact telephone number.

XVI. Any purchase worth more than R\$50,000.00 (fifty thousand reais) must be supported by a Contractual Instrument or Commercial Proposal containing the rights and obligations of the parties.

XVII. Urgent purchases may only be made if there is an imminent loss of revenue, breach of contract or damage to the company's image.

a. In these cases, there is no requirement for a quote, quotation and signature from the supplier, as long as the justification is formalized and signed by the Director responsible, leaving it on file for future proof.

MONTREAL



MONTREAL

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