



CODE  
OF **ETHICS**



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# MESSAGE FROM THE CEO



QGMI's mission as a global company is to bring development wherever we go, always guided by our Values.

It is our Values that make us overcome the challenges imposed by an increasingly competitive and demanding world, not only with quality, but also with image, reputation, and transparency in business.

In a world in which business develops at great speed, at companies like QGMI, which is marked by diversity and multiculturalism and where all Employees play a key role, absolute commitment to ethics and transparency is an essential factor for us to be recognised and respected in the markets in which we operate.

As the QGMI Chairman, I have a duty not only to promote business development, but also to ensure that it is based on pillars that lead to sustainable growth.

But this duty is not exclusive to the management, but to all employees who, based on an ethical culture, are the true vectors for the creation of a safe environment that promotes the generation of business opportunities, employment, and trust of our partners.

Furthermore, it is important to ensure that not only we, as Partners, act ethically, but also the whole chain of our business relationships whether as business partners, customers, suppliers or third parties, who in synergy with QGMI pursue and promote a common goal.

Today, a company's image and reputation are some of its most important assets, in addition to its people and its ability to generate results.

Therefore, at QGMI we encourage the dissemination of good practices inside and outside the company, and we do not tolerate illegal or improper conduct that violates or is at odds with our Values.

This attitude has led us to act in accordance with the precepts, values, and mission of QGMI. It is essential to take an active role by reading, observing, and disseminating our values and the conduct set out in this Code of Ethics. Only in this way, united by the same purposes, will we contribute to the growth of QGMI and feel proud to be part of it.

**Gustavo Dantas Guerra**

CEO



# OUR VALUES



## WORK VALUE THAT ENNOBLES AND DIGNIFIES

Working with passion and synergy in order to build a lasting company and dignified people.

## RELIABILITY HONOURING OUR COMMITMENTS

Complying with integrity and efficiency our commitments and thus transmitting reliability and respect to all our Clients, Employees, and Society.

## QUALITY MAKING THE BEST AND WELL DONE

Ensuring continuous improvement of our products and services, satisfying our clients and recipients, with engineering solutions.

## LOYALTY INTERACTING WITH TRANSPARENCY AND COMMITMENT

Company-Employee relationship is based upon the same objectives, aiming for mutual cooperation for sustainable growth.



# SCOPE

For QGMI, complying or doing the right thing is not limited to complying with laws, standards, and regulations.

That is why we have developed a rigorous Compliance Programme that seeks to identify, prevent, and deal with the image and reputation risks that the organisation may endure in carrying out its business activity.

Our Code of Ethics is the basis of this Compliance Programme, in which we find a guide to the behaviour and conduct expected of our Employees, as well as of all those who act on behalf of QGMI, directly or indirectly, such as suppliers, sub-contractors, representatives, consultants, agents or third parties, which we call 'Business Parties'.

Because we operate in many countries and regions, this Code of Ethics is international in scope and must be complied with by all our Business Units, wherever they may be. It is everyone's duty to protect the name and reputation of our company.

Below you will find a list of behaviours that we expect everyone to commit to.





# COMMITMENTS

## Work environment

At QGMI we are multicultural and are committed to a respectful, inclusive, and dignified work environment.

Therefore, all employees must treat others with respect, dignity, and equality. Any abuse of power, discrimination, threats, intimidation, violence, moral or sexual abuse will not be tolerated. Furthermore, we do not tolerate individuals or companies that permit child or forced labour, sexual exploitation, and human trafficking.

We make it our priority to maintain a safe working environment and to this end we provide the appropriate facilities and protective equipment for each activity, considering the legislation on the prevention of occupational hazards. Thus, all QGMI employees must follow the recommendations, protocols, and procedures, as well as the health and safety regulations in force.

It is strictly forbidden to go to work while carrying or under the influence of drugs, alcohol, or narcotics. This applies to both internal work and any external activities where employees are representing or carrying out work on behalf of QGMI.





## QGMI Assets and Resources

QGMI places at the disposal of its Employees the appropriate goods and resources for the development of its activities. It is the duty of all employees to use such goods or resources only for the development of their professional activities, and they must also ensure their conservation, avoiding their inappropriate use.

## Environment

At QGMI we have a strong commitment to the environment and biodiversity, which is why we rigorously comply with all the applicable laws, standards, and regulations. The preservation and responsible use of natural resources is an essential requirement for us. We are committed to protecting and remedying any specific impacts that may occur as a result of our activities.

QGMI guarantees that its activities, and those of our suppliers, will always be covered by the necessary licences and authorisations.

The preservation and responsible use of natural resources is an essential requirement for us.

## Interaction with Public and Private Stakeholders

QGMI is a company with a presence in many countries and therefore our Partners interact with a wide range of groups such as: Customers, Suppliers, Public Authorities and Agents, Public and Private Banks and Media (Business Parties). The image of the company is reflected in the conduct of our employees; therefore, we promote our values and train our employees to act positively, creating an ethical and sustainable business network, in which we can support our activities.

For our business to be sustainable, it is essential to operate in an environment of responsible competition. As such, we strictly comply with all standards and precepts of competition practice and our Employees are prohibited from engaging in any illegal or improper practices.

Although specific laws exist in each country for the protection of the public interest and the definition of illegal and improper practices, in

general, these laws prohibit conduct in which an undue advantage or benefit is offered to Public Authorities or Public Officials. For this reason, QGMI requires its Employees to act with integrity and ethics and to deal with authorities in accordance with best market practice, in strict compliance with the law as far as meetings, business dealings and negotiations are concerned.

Thus, it is strictly forbidden for QGMI, its Employees and Third Parties to promise, offer or grant any undue advantage, monetary or otherwise, to public or private agents and third parties related to them. Furthermore, it is also forbidden to make payments to accelerate administrative procedures (facilitation payments), to carry out any act that may, directly or indirectly, affect the competition of a public or private bidding procedure, as well as those actions aimed at corrupting representatives of the Public Administration or the private market in order to obtain undue advantages by executing, altering, extending, or terminating a public or private contract.





payments, or entertainment may be accepted when they are within the limits set by applicable law and QGMI Policies.

Our Employees must be aware of and comply with the law, as well as our Policies, and claiming lack of knowledge will not be accepted as an excuse for non-compliance.

### Contributions to political parties

Donations to a campaign, political party, or candidate on behalf of QGMI are strictly prohibited, whether financial or otherwise.

Donations to entities or organisations, whose objectives are aligned with the social and cultural activities supported by QGMI, may be made provided they comply with internal procedures and are approved by the Compliance Body.

All donations must be recorded and documented in accordance with applicable legislation and our Policies.

### Gifts and Entertainment

Accepting gifts and entertainment from Business Parties or offering them to the same in exchange for gaining an advantage or influence is conduct that decreases QGMI's credibility and ability to generate business. Such conduct can lead to the perception that the company's business is not earned on its own merit, which damages the company's reputation and image.

Thus, our Employees must not offer gifts, payments and/or entertainment invitations to third parties or potential business partners nor accept them if this offer or acceptance could be construed as influencing the transaction. Gifts,

### Conflict of Interest

All activities carried out by QGMI Employees must be based on the company's Values, always following best practices, and not seeking to prioritise personal interests over organisational interests.

In the event that personal and/or family interests are not aligned with those of QGMI, all Employees must actively work to prevent these, as well as outside activities, financial interests or conflicts in working relationships, from influencing the way business is conducted on behalf of the company.

The most common examples of conflicts of interest are:

- › Employee, or family member, who has previously worked for competitors, suppliers or customers;
- › Suggesting family members and/or friends as new hires;
- › Investing in company assets or assets potentially linked to its activity (insider trading);

- › Performing services for another company or organisation within a role that is incompatible or may conflict with your former role at QGMI;
- › Engaging the services of a company owned by an employee and/or family member to provide services to QGMI; Etc.

In the event that an Employee may be in a situation of conflict of interest, they must inform their hierarchical superior and/or the Compliance Area of the situation so that they can advise them on the most appropriate conduct in each case, always in accordance with the Code of Ethics and the Policies in force at QGMI.

### Accounting Records

The accuracy, clarity, and timeliness of QGMI's accounting and financial records are an essential requirement for the legitimacy of our business. Therefore, all transactions must be properly recorded in accordance with the applicable laws of the countries in which we operate and our Policies.





At QGMI, information is also an essential asset for the development of its activities and therefore must always be treated with care and responsibility.

### Information Stealth

Nowadays, information is an asset that circulates with great speed and can cause a lot of damage to organisations.

At QGMI, information is also an essential asset for the development of its activities and therefore must always be treated with care and responsibility.

We routinely disclose information to various audiences, both internal and external. Some of this information is confidential and must be treated as such, especially that which is disclosed within the company, whether in communications, reports, audits, IT systems, etc.

All data produced and handled by employees in the course of their work is also the property of and accessible to QGMI, and each employee

must keep this information confidential, as well as any other information they may receive during the performance of their duties, keeping the files in secure places with limited access.

Furthermore, great care must be taken to avoid talking about confidential matters in public spaces (airports, restaurants, lifts, toilets, etc.) and common sense must be used when disclosing this type of information on the Internet and social media, as the image and reputation of QGMI is at play.

If you identify information security issues, whether concerning the company or third parties, you should seek help from the IT or Compliance Area.



# DISCIPLINARY ACTION

We expect all our Employees to act in line with our Code of Ethics and Company Policies.

Ethical conduct is the best way to strengthen QGMI's image, since people are the heart of the company.

In the event of a breach and/or violation of the conduct described in this Code of Ethics, QGMI Policies and Applicable Laws, disciplinary action appropriate to the severity of each case will be taken.

Disciplinary Measures include:

- 1 Verbal warning
- 2 Written warning
- 3 Suspension for up to 30 (thirty) days from employment, where permitted by applicable law
- 4 Dismissal

Before applying the penalties listed above, Employees may be required to immediately discontinue the inappropriate conduct not tolerated by the company and set out in this Code of Ethics.





# COMPLIANCE POLICIES

QGMI's Compliance Programme consists of a Code of Ethics and a set of Internal Policies. They can be found on our website and Intranet.

They are as follows:

- **Criminal Compliance Policy**
- **Anti-Corruption Policy**
- **Partnerships and Associations Policy**
- **Know Your Supplier Policy**
- **Gifts and Entertainment Policy**
- **Conflict of Interest Policy**
- **Ethical Channel and Disciplinary Measures Policy**
- **Donations and Sponsorship Policy**
- **Personal Data Protection Policy**
- **Information Security Policy**
- **Communication with the Press Policy**
- **Know Your Employee Policy**
- **Know Your Client Policy**
- **Antitrust Policy**



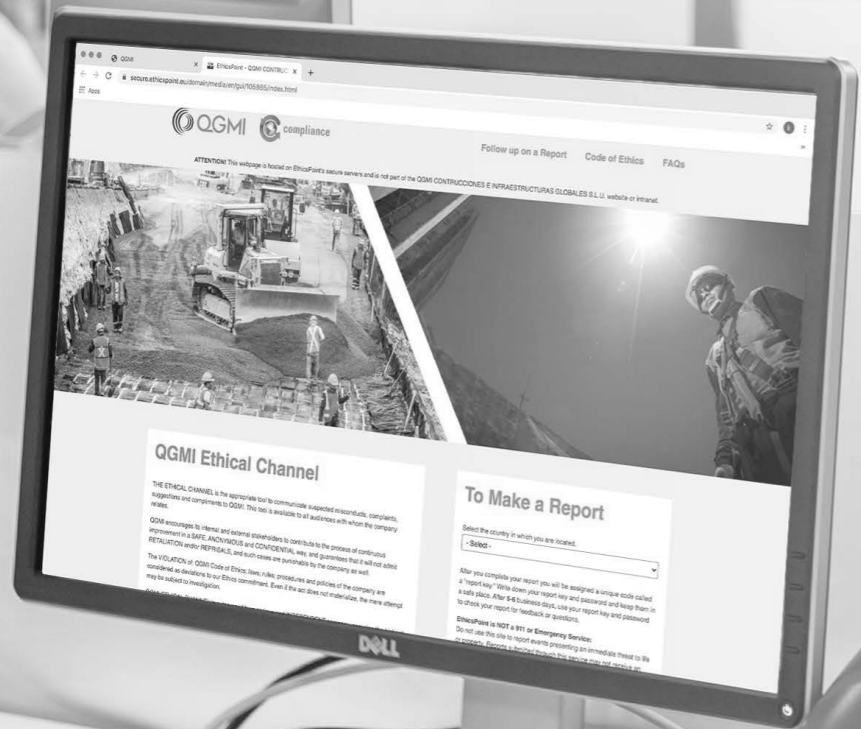
# ETHICAL CHANNEL

At QGMI we believe that communication is key to achieving continuous improvement.

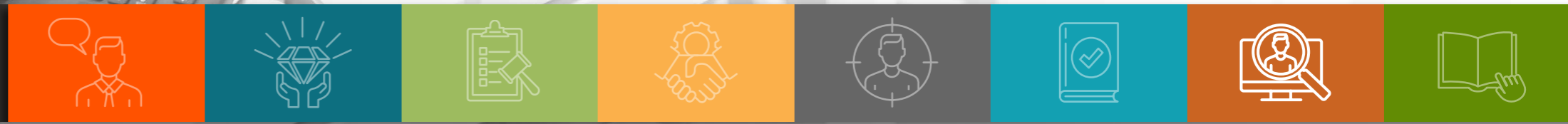
For this reason, we encourage our Employees and Third Parties to report any suspicious behaviour and/or violations of expected behaviour that they may have observed, and to make their reports through our Ethical Channel.

All reports received will be treated securely, anonymously, and confidentially and action will be taken to avoid retaliation against those who use it.

To ensure that the investigation is as efficient as possible and to enable its correct outcome, it is important that the whistleblower provides as much information as possible and always in a responsible manner.



 [LINK TO ETHICAL CHANNEL](#)





# GLOSSARY

## › Public Administration

All bodies, services and agents instituted, directly or indirectly, by the public authorities with the aim of carrying out administrative management in the public interest.

## › Business Party (Parties)

Third parties with whom QGMI interacts in the different countries, environments, and markets in which it operates, including: customers, competitors, business partners, governmental and regulatory authorities, public and private banks, shareholders, suppliers, consultants, agents and/or third parties in general.

## › Employee

Anyone who holds a position or function at QGMI or its subsidiaries, affiliates, and branches.

## › Common Values

Pillars that guide the conduct of the company and its Employees, forming a set of common concepts.

## › Company

Institutional representation of QGMI, including its subsidiaries and affiliates.

## › Private Market

Refers to non-governmental or public companies, banks, associations, etc.





[www.qgmi.eu](http://www.qgmi.eu)