

PREVENTION STANDARD CONFLICT OF INTEREST BMV GLOBAL GROUP



1. OBJECTIVE

The objective of this Policy is to establish procedures for consulting BMV Global Group Employees on situations involving a possible Conflict of Interest in the exercise of their position or function.

2. APPLICATION AND SCOPE

This Standard applies to all Employees regardless of the position or function they occupy, Chief Executive Officer, Directors and Advisors, including during vacations and other paid or unpaid leaves and absences. It is the responsibility of all Employees, CEO, Directors and Advisors of the BMV Global Group to act in order to prevent or prevent a potential Conflict of Interest and to protect privileged information.

CONFLICT OF INTEREST IN THE BMV GLOBAL GROUP

I - Definitions

- 1 Conflict of Interest is the situation generated by the confrontation between public and private interests, which may compromise the collective interest or improperly influence the performance of the function. 2 For the purposes of applying the provisions of this rule, an Employee is anyone who exercises, even if temporarily or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, commission position, charge, employment or role within the BMV Global Group.
- 1.1 The Chief Executive Officer, Directors and members of the Board of Directors will be treated in this rule as Administrator.

II Guidelines on Conflict of Interest

- 1 The occurrence of a Conflict of Interest does not depend on the existence of damage to property, and/or the receipt of any advantage or gain by the Employee, Administrator or Fiscal Councilor.
- 2 Every Employee, Administrator or Fiscal Councilor, in the exercise of their activities, must grant equal treatment to individuals and legal entities that have relationships with the BMV Global Group, in compliance with the principle of isonomy, respecting the specific situations in which there is provision for differentiated treatment to meet public and institutional interests.

III - Conflict of Interests During the Exercise of the Position or Function

- 1 Conflict of Interest constitutes, including when on vacation, other leave or during a period of paid or unpaid leave, the Employee, Administrator or Fiscal Councilor who:
- a) disclose or make use of privileged information, for their own benefit or that of a third party, obtained as a result of the activities carried out;
- b) carry out an activity that involves the provision of services or the maintenance of a business relationship with an individual or legal entity that has an interest in the decision of the Employee, Administrator, Fiscal Councilor, or a collegial body in which they participate;



c) carry out, directly or indirectly, an activity that, due to its nature, is incompatible with the duties of the position or function, considering as such, including the activity carried out in related areas or matters; d) perform an act for the benefit of the interest of a legal entity in which the Employee, Administrator, Tax Advisor, their spouses, partners or relatives, blood or similar, in a direct or collateral line, up to the third degree, and who may be for them, participate benefited or influence their management acts; e) receive a gift from anyone who has an interest in the decision of the Employee, Administrator, Fiscal Councilor or a collegial body in which they participate outside the limits and conditions established in the Code of Ethical Conduct and Integrity or other regulations in force.

IV - Conflict of Interest after Exercising the Position or Function

- 1 Situations that constitute a Conflict of Interest after carrying out the position or function are considered to be the BMV Global Group Employee who:
- a) at any time, disclose or make use of privileged information obtained as a result of the activities carried out;
- b) for the purposes of this Standard, privileged information is that which concerns confidential matters or that which is relevant to the strategic decision-making process of the BMV Global Group, which has economic or financial repercussions and which is not widely public knowledge.