



FALCONI

CONSULTORES DE RESULTADO

**SUMMARY OF THE POLICIES
AND RULES OF THE FALCONI
COMPLIANCE PROGRAM**

June 2017

POLICIES

1. Code of Ethics and Conduct

It aims to guide and clarify the conduct and expected position of FALCONI Group employees, third parties and partners, as well as contributing to preventing, detecting and solving any act potentially damaging to FALCONI, its subsidiaries and / or affiliates and its Employees.

2. Compliance Policy

Establishes principles, guidelines and compliance functions at all levels of the FALCONI group, evidencing the need for compliance with legal and regulatory requirements by all Employees and Third Parties.

3. Anti-Corruption Policy, Money Laundering, Competiton and Relations with Public Authorities

It complements the anti-corruption provisions provided for in the Code of Ethics and Conduct and establishes guidelines for the external relations, interactions and contacts of Partners, Employees, third parties and partners with Public Agents, in order to avoid acts against public administration.

4. Gifts and Hospitality Policy

It establishes the guidelines for the delivery, offering, promise and receipt of gifts, gifts, entertainment and other benefits by FALCONI Members, FALCONI Group employees, third parties and partners, acting on behalf of FALCONI, its subsidiaries and / or affiliates.

5. Procurement Policy for Suppliers and Partners

It establishes the guidelines and procedures for the evaluation of potential partners, consortiums, representatives, consultants, suppliers, subcontractors and service providers, in order to give FALCONI employees, as well as its subsidiaries and / or associated companies the ability to evaluate contracting and avoid exposure to risks that can be previously identified and mitigated.

6. Travel Policy

Establishes the guidelines for making trips to service by FALCONI Group employees, third parties and partners, whether with expenses incurred by FALCONI Customers or group companies.

7. Standardization Policy

Establishes the guidelines for the implementation and operation of FALCONI's standardization system.

RULES

1. Rule for the Treatment of Inappropriate Behaviour

Establishes procedures for the reception, classification and investigation of complaints received and / or identified regarding inappropriate conduct as provided for in the Code of Ethics and Conduct, other internal and external policies and norms, as well as discipline application of sanctions when applicable.

2. Standardization Rule

Establishes the configuration of the FALCONI Standardization System, defining the applicable documents, its hierarchy and the procedures for disclosure, control and evaluation of the standardization of the company.

3. Travel Rule

It establishes the rules and procedures for travel in the service of FALCONI Group employees, third parties and partners, including conditions for air and land transportation, lodging, food, travel advance, accounting and travel expenses.

MANAGEMENT PROCESS STANDARD

1. Management Process Standard of Standard Creation, Control and Evaluation

Establish the flow chart and agents for the creation, control and evaluation of the standards in the FALCONI Group, in addition to the Standardization rule.