

CODE OF
ETHICS AND CONDUCT

ETHICS
INTEGRITY
RESPECT
VALUES
TRANSPARENCY
SUSTAINABILITY
QUALITY
CONDUCT
CREDIBILITY

MESSAGE FROM THE CEO

To the employees,

Mitre Realty is the synthesis of more than 58 years of Mitre's Family experience in civil construction, adopting modern management practices and good customer relations.

We've always been guided by the seriousness and transparency, and after completing numerous projects, we are fulfilled and can say that we have made a major contribution to the development of our partners and employees, and we have made the dreams of many costumers come true.

But to continue growing in these days, we must be ready for new challenges, fully engaged and aware of our high standards of responsibility, credibility, quality, sustainability and commitment to our stakeholders.

We've taken a huge step in this direction with the establishment of our Risk and Compliance Department, and now, with the introduction of the Code of Ethics and Conduct, we are restating our commitment to a management guided by transparency, innovation, quality, socioenvironmental responsibility and long-term relationships.

With this important document, we bring together our guidelines and rules for expected conduct and behavior, defining our relations with our employees as we grow in a sustainable manner, maintaining the quality of our products and our costumer's satisfaction.

This Code of Ethics and Conduct, among with Mitre's values, must, therefore, guide our behavior, not just the executives and employees, but every person involved in our business routine, upon within the internal relations and the customer (public and private), partners, suppliers and third-parties relationships.

I invite you to appreciate what we, together, implemented at Mitre Realty, the Code of Ethics and Conduct.

Let's move forward and grow together.

Fabricio Mitre
Chief Executive Officer



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OUR PRINCIPLES AND VALUES

SENSE OF OWNERSHIP

- We treat our work as if it belongs to us;
- We are responsible for our decisions and in charge of our careers;
- We are passionate about making our business happen.

ENCHANTMENT

- Our company consists of PEOPLE;
- We make clear and conscious choices for the sustainability of the business and the quality of our products;
- Our priority is the satisfaction of our customers, partners and employees.

MERITOCRACY

- We face challenges as opportunities;
- We value people who perform especially well;
- We recognize the efforts that produce quality results.

ETHICS

- We behave ethically;
- We deliver on our promises;
- We value respect in our relationships, actions and decisions.

FOCUS ON RESULTS

- We are results-driven; a goal set is a goal reached;
- We are never wholly satisfied, we want more!
- We believe that quality in delivery is crucial for success.

COLLABORATION

- We go forward together towards the same objective;
- We are always ready to help;
- We value the transmission of knowhow.

INTRODUCTION

Our Code of Ethics and Conduct was approved by the Board of Directors on November 28, 2019, and amended on January 28, 2020. It is based on respect for human beings, society, the environment, safety, quality of life, integrity and transparency. It's an extremely important action to summarize our values and ethics and it's the product of a joint effort between our CEO, officers and employees.

The Code brings together the main regulations, directives, rules for conduct and guidelines for our business activities. It applies to all Mitre Realty's companies, their leaders and employees, and it governs our relations with customers, suppliers, banks, partners, investors and competitors.

The Risks and Compliance Department is responsible for applying this Code and everyone, leaders and employees, must be familiar with, comply with and disseminate its contents and behave accordingly.

You are responsible for complying with the Code and for submitting an immediate report – directly to the Risks and Compliance Department or through the Ethics' Communication Channel – if you become aware of anything improper; and this also applies if you suspect or are uncertain of what to do.

Acknowledging, complying with and being aware of the contents of this Code are essential for working in this Company, whether you are a manager or an employee.

Acknowledgement must be made by signing (electronically/physically) the Mitre Realty's Code of Ethics and Conduct Commitment Form.

Failure to comply with any of the rules of this Code will lead to the imposition of internal and legal sanctions, besides a possible termination of your employment contract or service agreement.

Mitre Realty is committed to revise the Code of Ethics and Conduct periodically, jointly with all the Company's departments, improving it when necessary, seeking its constant advancement.

You can find the Code of Ethics and Conduct in our company's website and intranet.

1 RELATIONSHIP WITH OUR EMPLOYEES

I. HEALTH AND SAFETY OF EVERYONE ABOVE ALL

We want our employees to feel safe in our work environment. Health and Safety conditions are a relevant matter to the management and a constant focus of our attention. That's why our policy states that people's lives and integrity are above any other objectives.

Health and Safety are everyone's responsibility and we must all demonstrate our commitment to these two important matters. Every employee is responsible to set an example, to guide and to monitor the correct use of Personal and Collective Protection Equipment, specially in the construction sites.

While the company invest and provides equipment, resources, develop standards and trainings, employees must comply with the law and with internal rules and practices.

Reporting situations of risk and seeking for a solution with perseverance are an example of this commitment. Leaders must treat Health and Safety precautions seriously, solving problems with the adequate sense of priority.

II. RESPECT FOR THE ENVIROMENT

Respect for the environment transcends age, gender, function, social status and profession. Everyone has a duty to care for the future of the planet.

Mitre Realty see it as inherent in its purpose as a company to see that its employees, customers, suppliers and real estate developments protect the environment by: distributing thermal mugs and bottles to employees to reduce the use of disposable items in the office; planting trees in the surroundings of our projects; and by obeying the laws relating to the environment. These are some of the things we do to take care of the place we live in and to encourage others to do the same.

Our business transforms the environment, so we must respect it and work sustainably.

We seek to contribute to sustainable development with solutions to reduce the environmental impact of our inputs, operations, products and services.

III. PEOPLE RESPECTED, COMMITTED AND ACCOMPLISHED

Respect for human rights, working relationships and for those we live with and deal with is essential, in every situation.

Commitment to the organization is to identify and get involved with the Company and its objectives as if they were yours, and to have a sense of ownership.

Personal accomplishment is to be satisfied with your work, with the Company, to want to achieve things, to be entrepreneurial, and to have a positive attitude.

Respect, commitment and personal accomplishment are equally important. They are achieved in a pleasant and positive work environment which we all help to build.

IV. WORK ENVIRONMENT

We must all treat others respectfully and with dignity. Our Company will not tolerate any type of discrimination based on race, social status, age, gender, color, religion, nationality, sexual orientation, beliefs, civil status, position, function, or mental or physical capacity.

Moral or sexual harassment is inadmissible in a civilized and respectful work environment. Intimidation, insults or aggression on Company premises or while at work, against colleagues or anyone else, will not be tolerated.

To clarify this matter, you can find below some examples, but not limited to:



- Threats;
- Humiliating treatment;
- Verbal insults;
- Demeaning nicknames;
- Mocking;
- Blackmailing for your own or another's benefit



- Whistling;
- Comments with sexual contents;
- Unwanted approaches in person or via social media;
- Request for sexual favors;
- Exhibition of inappropriate material or any other improper conduct, verbal or physical, of sexual nature, in the workplace.

V. FAIR TREATMENT AND EQUAL OPPORTUNITIES AT WORK

Mitre Realty encourages diversity in its staff and seeks to offer a work environment where everyone is treated fairly, without any kind of discrimination.

Race, social status, age, gender, color, religion, nationality, sexual orientation, beliefs, civil status, position, function, mental or physical capacity – none of these must influence career decisions.

Decisions on hiring, promotion, dismissal, transfer, compensation and training must be based on work-related criteria, such as academic qualifications, experience, skills, performance, values and leadership.

Slave labor and child labor are practices we will not tolerate.

2 EMPLOYEES ADMISSION

Employee recruitment must be fair, transparent, and free from any type of discrimination or favoritism.

Relatives may not be hired in the same reporting line, and pressure to admit, promote or dismiss an employee is not acceptable.

The existence of close relatives in decision-making positions in the Company, or any other situation not mentioned in the Code, must be reported to the Risks and Compliance Department for analysis.

3 EMPLOYEES PRIVACY, CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

We respect the privacy of our employees, our customers, suppliers and business partners, and nobody on our staff is authorized to share personal data on any employee of Mitre Realty or any firm with which we do business, or to record and share the content of meetings without the consent of the participants.



I work in the Human Resources department and I received a phone call from a bank asking for the phone number and home address of one of our employees. Can I provide these details?

No, you cannot; and you may not even confirm any information which the bank possesses. These are personal details that belong to the employee in question, and you may not give them on to third parties.



A company contacts our sales department and asks for personal details of our customer so that they can propose a partnership. Can this information be given?

No, the information is confidential and no one in our Company may disclose it. Information of this nature can only be shared with express authorization from the customer.



I decided to record a meeting, not to miss any important details and to be able to review what was said. Is this a problem?

Yes, the discussions between the participants at meetings are confidential. Information of this nature can only be recorded and shared with express authorization from the participants.

4 CARE AND PROPER USE OF COMPANY ASSETS AND RESOURCES

The care and proper use of assets and resources of Mitre Realty contribute to productivity and results.

You are responsible for the company's assets and resources, directly or indirectly, and you must look after them. It is important to use them properly, i.e. for business purposes. They may not be used for your personal benefit.

Company's assets and resources must be protected against loss, damage, theft and improper or illegal use.

Find below examples of Mitre Realty's assets, but not limited to these:

- ✓ Installations, equipment and its parts;
- ✓ Computers and software;
- ✓ Fixed and mobile phones;
- ✓ Copy machines;
- ✓ Office material and other supplies;
- ✓ Vehicles.

You must be particularly careful when using IT resources provided by the Company, such as email and internet access, and obey the guidelines of this Code and the Information Technology Security Policy. When using social networks, you must always respect Mitre Realty values and the contents of this Code.

You are not permitted to transmit or access improper content, as defined in this Code or by law.

Some examples of improper content, but not limited to it:

- ✓ Pornography and obscene material;
- ✓ Aggressive or offensive information;
- ✓ Discrimination;



- ✓ Terrorism;
- ✓ Commercialization of products not related to our business;
- ✓ Chain letters;
- ✓ Religion;
- ✓ Party-political material;
- ✓ Games.



May I use the computer to access the internet and search for something not related to work?

Personal use is permitted, as long as it is occasional and limited. Personal use must never affect your work. Accessing internet banking, checking exam results or finding the phone number of a doctor are examples of permitted use.

5 CONFIDENTIAL/PRIVILEGED COMPANY INFORMATION

Information is an extremely important asset for Mitre Realty. The improper disclosure of information, even by mistake, can lead to financial loss or irreparable damage to our reputation.

Employees must treat all non-public information as confidential. This means protecting it from improper access or disclosure.

You may only disclose confidential information or information belonging to the Company if you have been authorized to do so. Company information may not be photocopied or scanned during or after a business relationship. The use of confidential/ privileged information to your benefit or someone else's is a crime and subject to labor or criminal sanctions.

Some examples of ways you can protect confidential information, but not limited to it:

- ✓ Don't discuss Company's business in public;
- ✓ Use a password to access files;
- ✓ Don't share password;
- ✓ Keep documents in locked cabinets;
- ✓ Destroy documents before you throw them away.



I was about to throw away some files in my department when I was told that they might contain confidential information. What type of information is considered confidential, that I should destroy before throwing it away?



Confidential information is information that might damage the Company if disclosed.

Some examples are:

- ✓ Details of employees, customers and suppliers;
- ✓ Meeting records;
- ✓ Price lists;
- ✓ Investment or expansion plans;
- ✓ Business results;
- ✓ Business policies and management practices;
- ✓ Important projects, such as takeovers;
- ✓ Records of new trademarks or patents;
- ✓ Information on companies we do business with.

6 INTELLECTUAL PROPERTY

Name, trademark, projects and innovations developed by employees, as well as patents and inventions created in the normal course of business, are property of Mitre Realty and will remain so even after the end of the employment relationship.

7 CONFLICTS OF INTEREST

This matter is of extreme importance and everyone, leaders and employees, must make every effort to avoid conflicts of interest in our activities and relationships.

Once a year, all our leaders and employees must sign the Conflicts of Interest form provided by the Risks and Compliance Department.

If you become aware of any conflict situation you must report it to the Risks and Compliance Department for analysis.

Some examples of conflict of interests, but not limited to it:

- ✓ Accept a position or work for another company or entity;
- ✓ Hold securities or relations with a competitor company;
- ✓ Have relatives working for a competitor company or one of our suppliers;
- ✓ Have a relative with decision-making position in a company that does business with us.

8 MONEY LAUNDERING

We will not tolerate the practice of money laundering in any transaction involving the Company. Such cases will be subject to the penalties imposed by law.

9 INTEGRITY IN ALL OUR DEALINGS

We are an upright company and we do all our business honestly. We do the right thing for ourselves and for others. We respect our business partners (stakeholders) and our employees, we honor our contracts and our activities are guided by ethical values and principles and undertaken in accordance with the law.

10 RELATIONSHIP WITH STAKEHOLDERS

We at Mitre Realty believe that having an honest relationship with suppliers, customers, investors, competitors, the public sector, unions and other stakeholders is essential for our existence and success. The integrity and honesty that we expect from everyone we have dealings with must be the way we treat them.

I. SUPPLIERS

It is crucial to maintain a relationship based on integrity and honesty with our suppliers, acting accordingly to the applicable laws and respecting the human rights and the environment.

Necessity, trading terms, quality, expertise and reputation should be the only factors determining our choice of business partners. Leaders and employees must never negotiate with a supplier in return for favors or personal advantages, or to someone's benefit.



A friend has a company that makes window frames and they are going to take part in the next bid for supply of this material. I would like to help him and thought I might tell him the amount of budget we have available and the value of the current contract, so that he can position his offer in line with what we are prepared to pay. Is there anything wrong in this?

Yes, it's wrong. You cannot under any circumstances transmit privileged information to one supplier only, and so give them an advantage over the others. Remember that the essential premises for engaging suppliers are equality and integrity in the process. Furthermore, by providing details of the budget and existing contract, you are breaking the confidentiality agreement we have with the current supplier.

II. CONTRACTING SUPPLIERS

Every supplier engaged by Mitre Realty can have their background analyzed.

Leaders and employees must previously inform the Risks and Compliance Department if a company with which they have a close relationship, for instance if it belongs to them, to their family members or to their friends, is bidding for a contract, or has already been engaged.

III. CUSTOMERS

Honesty and transparency are essential in dealings with customers. We must be totally open when offering our products. Leaders and employees must never offer or advertise something which they know cannot be fulfilled or disclose personal details of customers.

Our key objective is to satisfy our customers, and so we must have a relationship based on;

- ✓ Serve our customers without privilege or discrimination;
- ✓ Always fulfill our commitments;
- ✓ Pay special attention to delivery dates and quality of services;
- ✓ Provide a first-class after sales service through our Customer Service Center;
- ✓ Respect the right to privacy of our customers and the confidentiality of all the information they provide, none of which may be revealed without their express authorization;

- ✓ Be transparent in providing information about our products, ensuring that customers use them conscientiously and correctly in technical and sustainable terms;

IV. COMPETITORS

At Mitre Realty we believe that quality, competitiveness and the ability to adapt are fundamental for the long-term future of our business, when market conditions are even more demanding. We believe that a competitive market can help our business to grow, to develop and to persist.

Leaders and employees must obey the principles of free competition.

All market information that is legitimately needed for the business must be obtained through a transparent and correct process, not by illegal means, and without giving the competition details of our own business. You must not under any circumstances discuss sensitive, confidential matters with competitors, such as current or future prices, profit margins, discount policies, sales territories, marketing plans, expansion plans, measures to make it difficult or impossible for other competitors to enter the market, and so on.

V. PUBLIC SECTOR

Relations between Mitre Realty's leaders and employees with government officials must be based on ethics, transparency, honesty and collaboration.

It is expressly forbidden to promise, offer or grant, directly or indirectly, any undue advantage or type of payment, commission or fee to a government official, or via a third party or a nominated person, except as permitted by law, in order to obtain a benefit, to pay a bribe or to receive special treatment.

Leaders and employees of Mitre Realty, our suppliers and service providers, are obliged to comply with all the laws applying to our area of business (laws, regulations and rules in general), and with the laws forbidding corrupt practices, which might result in liability for the Company, including Law No. 12.846/2013 (the "Anticorruption Law").

VI. TRADE UNIONS

Mitre Realty does not practice or allow any type of discrimination against employees joining unions, and we maintain respectful and cordial relations with the unions themselves.



11 POLITICAL, ASSOCIATIVE AND COMMUNITY ACTIVITIES

Mitre Realty respects the right of employees to take part in political, community, associative and other activities not directly related to work. However, you may not carry on these activities during working hours, or use Company resources for the purpose, or involve the Company's name, trademark or any other asset belonging to the Company.

12 POLITICAL DONATIONS

Mitre Realty does not make donations of any kind to politicians or political parties, political campaigns or candidates for public office, as determined by Law 13.165 of September 25, 2015. Leaders and employees may not make any type of donation in the name of the Company.

13 COUSTESY GIFTS, PRESENTS AND HOSPITALITY GIFTS

These must be given or received transparently and may not be used as a way of influencing any business decision. You may only accept courtesy gifts, presents or hospitality gifts in accordance with the rules and amounts indicated in our internal regulations.

14 ACCOUNTING RECORDS

All accounting books and other records must be transparent and accurate, subject to Brazilian accounting principles and standards, and must be kept diligently and independently, with proper organization and safekeeping of documents.

15 IMAGE AND REPUTATION

Building and reinforcing the image and reputation of Mitre Realty depends, among other things, on the way we behave when dealing with stakeholders. So the way we act, both inside and outside the Company, must always be in line with our Values.

When using social media, such as Facebook, Instagram etc., you may use our trademark in personal posts, if this does not compromise our image or reputation. There must be no connection with conduct that we don't approve, and you must not post any confidential information.



As a member of the staff and representative of the Company, you must be careful how you behave in public places, whether working or in your private capacity. You must be prudent and diligent, and not expose Mitre Realty or your own career to any risk. This is the case both on Company premises and elsewhere, when you are taking part in training or events, using the Company's car or in other situations when your employer can be identified.

16 ETHICS COMMUNICATION CHANNEL

If you have any doubts or queries about Company processes, policies, rules or internal procedures, or about the law, ask your immediate superior or the Risks and Compliance Department.

If you become aware of, or merely suspect, any illegal action or violation of the Code or any internal procedure, you must use our Ethics Communication Channel, emailing a report to canaldeetica@mitrerealty.com.br or completing the form you will find on the intranet or internet. Reports can be anonymous if you wish, and whenever possible should be accompanied by information or facts in evidence.

The Channel guarantees absolute secrecy and confidentiality of the information provided, and your report will be treated impartially and transparently.

Mitre Realty does not allow any form of retaliation, discrimination or sanction against a person expressing a real concern in good faith.

The Ethics Communication Channel is available to all employees, suppliers, partners, customers and the public at large. The Risks and Compliance Department is responsible for receiving reports submitted on the Ethics Communication Channel by the internal and external public, for investigating them and for taking the necessary action, with the support of other Company department if technical knowhow is required.

17 DISCIPLINARY MEASURES

The practice by leaders and employees of illegal or illicit acts, which violate or could violate laws or regulations, and violations or suspected violations of this Code or the policies or procedures of Mitre Realty, will result in the following disciplinary measures, as appropriate: (i) a verbal or written warning; (ii) suspension; or (iii) dismissal, followed by legal measures for reimbursement of losses and reports to the competent authorities.

Disciplinary measures will be applied by:

- Officer in charge, in the case of non-compliance by a member of the staff;
- CEO, in the case of non-compliance by an officer;
- Board of Directors, in the case of non-compliance by the CEO;
- other directors, in the case of non-compliance by a member of the Board.

If suppliers or service providers commit violations, the relationship may be terminated, and if necessary, legal measures may be taken.

18 REGULAR TRAINING COURSES

Mitre Realty has a regular training program for leaders and employees about the need to comply with the provisions of this Code, for the qualification and awareness about the conduct, principles, concepts and procedures outlined herein.

Courses are conducted by the Risks and Compliance Department in line with the Annual Training Plan.

19 DEFINITIONS/GLOSSARY

CODE OF ETHICS AND CONDUCT – a set of rules and guidelines determining how the Company should act and defining what is expected of employees and stakeholders acting for the benefit or in the name of Mitre Realty.

COMPLIANCE – as in the verb “to comply”, it means acting in accordance with a rule, an internal instruction, a command or a request; in other words it is a set of disciplines to ensure fulfillment of laws and regulations, business policies and guidelines established for the activities of the institution or company, and to avoid, detect and deal with any deviation or non-conformity that may occur.

ETHICS COMMUNICATION CHANNEL – this is our exclusive channel for reporting any illegal act or violation of the Company Code of Ethics and Conduct or of any internal procedure of which someone may become aware, even if it is only a suspicion.

VALUES – establish Mitre Realty’s commitment to employees, society and its stakeholders.

ETHICS – a set of rules and precepts guiding the values and morals of an individual, a social group or a company.

MORAL HARASSMENT – any type of action, gesture or words that, by repetition, affects a person’s self-esteem or assurance, making them doubt themselves or their competence, damaging the work environment, the victim’s career progress or their employment stability. Some examples are: setting tasks with impossible deadlines; moving someone from an area of responsibility to a trivial function; taking credit for the ideas of others; ignoring or excluding a member of the staff, only addressing them through a third party; persistently holding back information; spreading malicious rumors; always criticizing; underestimating efforts (article 1, sole paragraph, Municipal Law No. 13.288/02).

SEXUAL HARASSMENT – to try to obtain a sexual favor or advantage by using seniority or the ascendancy inherent in the exercise of employment, position or function (Federal Law No. 10.224, of May 15, 2001).

CORRUPTION – the act or effect of corrupting or being corrupted, dishonest, fraudulent or illegal behavior involving the exchange of money, values or services for personal benefit.

FRAUD – any false or deceptive act, or action in bad faith, intended to cheat or mislead someone, or to avoid fulfilling a duty.

MONEY LAUNDERING - a process whereby profits from illegal activities are “laundered” or concealed so as to appear to be of legal origin. Those responsible for this operation arrange for the proceeds of illicit or criminal activities (such as drug trafficking, corruption, arms dealing, prostitution, white collar crime, terrorism, extortion, tax fraud, etc.) to be faked or hidden, seeming to be the result of legal trading activities and thus naturally absorbed by the financial system.

BRIBE – inducing someone to do something in exchange for money, material goods or other personal benefits.

POLITICAL DONATION – money given to election campaigns, candidates or campaign finance committees.

GOVERNMENT OFFICIAL – anyone providing any type of service to the State, in a public function, in the broadest sense, referring to any public activity. The Law of Administrative Misconduct (Law No. 8429/92) defines a government official as “all those persons that

exercise, even temporarily or without compensation, by election, appointment, designation, engagement or any other type of investiture or bond, a mandate, position, employment or function in the entities mentioned in the previous article". It is therefore a genus of which species are the public servant, the government employee, outsourcers and fixed-term contractors.

CONFLICT OF INTEREST – this arises when, because of a personal interest, an employee can be influenced or incentivized to act against the guidelines of the Company, taking a decision not in accordance with their responsibilities; in other words, any situation where there is a conflict between the personal interests of an employee and those of the Company.

COUSTESY GIFTS – a souvenir with a company logo, distributed as a courtesy or for advertising purposes, on a regular basis or on the occasion of historical or cultural commemorative events or dates.

PRESENTS – any item, service or cash given ostensibly as a symbol of friendship or a manifestation of appreciation or gratitude, or on a commemorative date.

HOSPITALITY GIFTS – any type of invitation for entertainment, meals, receptions, tickets for shows, social or sporting events or training courses.

THIRD PARTIES – suppliers, customers, business partners, investors or any service provider acting for the benefit or in the name of the Company.

Issued on: 11/28/2019

MITRE REALTY CODE OF ETHICS AND CONDUCT COMMITMENT FORM

I confirm that I have read and understood and am in agreement with all the provisions of this Code of Ethics and Conduct.

I undertake to comply in full and to disseminate the provisions of the Code, and to ensure that others comply with them.

I undertake the responsibility of reporting to the Risks and Compliance Department or via the Ethics Communication Channel any conduct or situation of which I become aware that violates the values of the Company or the guidelines in the Code of Ethics and Conduct.