

***Criminal
compliance policy***



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Management Solutions, as an international consulting firm focusing on the provision of business advisory, finance, risk, organization, technology and process-related services, hereby outlines its Criminal Compliance Policy with the aim of communicating, both to Management Solutions professionals (hereinafter MS or the Firm) and to all our stakeholders, our firm commitment to rigorously complying with the criminal legislation applicable in all countries in which we provide services, and states that engaging in any criminal action (both in the services we provide to our clients and in our internal management activities) is strictly forbidden.

Although this policy is applicable to all MS professionals, regardless of the type of contract that governs their employment or business relationship, position, or geographical area in which they conduct their work (including

students on work experience), it is especially relevant for members of the management team, since they also have the duty to ensure that their teams comply with this Policy, as well as to resolve the doubts and concerns raised to them by staff.

The Compliance Committee has been created as the highest guarantor of the supervision, monitoring and control of the Firm's criminal compliance obligations, having been granted autonomous powers of initiative and control in order to effectively carry out its work. As a second line of defense, the Compliance function is responsible for ensuring compliance with criminal law in the Firm, supervising the controls performed and making sure that the actions decided upon are implemented, as well as promoting any criminal compliance issues that may be identified as relevant to the Firm.

In order to avoid any resulting economic, reputational and/or

criminal impact, the Firm has implemented a Criminal Compliance Management System and is committed to continuously improving it. This System represents a model of organization and management that has the appropriate monitoring and control measures in place in order to prevent crimes of a criminal nature or to significantly reduce the risk of such crimes being committed, thus implementing the level of control that is required by law.

The aforementioned Criminal Compliance Management System provides for the definition, review and achievement of criminal compliance objectives; establishes performance measurement indicators for related processes; develops a robust criminal compliance information and documentation system; structures a Control Model that includes a Control and Review Plan, audits and certification by independent organizations; ensures communication and awareness raising about the importance of the Firm's entire Control Framework in general and Criminal Compliance Policy in particular; is regularly

reviewed by both the Compliance Committee and the Partners Committee, and is subject to continuous improvement.

Zero tolerance for non-compliance is materialized by the fact that everything is subject to the Firm's disciplinary and sanctioning powers, in accordance with the principles and rules provided for by the legislation in force, and it is imperative that all professionals report to the Global QA Head any instances of non-compliance of which they might be aware (which will be managed ensuring anonymity and therefore avoiding any kind of retaliation against those reporting in good faith).

Management Solutions, Professional Consulting Services

Management Solutions is an international consulting firm whose core mission is to deliver business, risk, financial, organisation, technology and process-related advisory services.

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