

CODE OF ETHICS AND BEHAVIOR OF THE PROVIDER

Guide to commercial practices aligned with the Eurofarma Group.

INTRODUCTION

Dear partner,

Eurofarma is proud to strengthen the vision and values of the company on a day-to-day basis, through practices based on transparency and ethics, the foundation for conducting our business.

We understand that our vision and values do not apply exclusively to associates/collaborators, but they also extend to all audiences with whom Eurofarma has a relationship.

In order to align Eurofarma's practices together with suppliers and service providers, we make the **Supplier Code of Ethics and Conduct** available in the next few pages, with indications that will guide all their business relationships with Eurofarma.

Employing the principles in this guide enables you, Eurofarma's supplier and service provider, to improve continually the compliance with workers' rights, labor standards and other human rights issues that make up the production process.

Various guiding principles of this Code are also found in the UN Global Compact, of which Eurofarma became a signatory in the year 2015 and it is truly an important reference for companies that wish to dive deeper in the subject.

Contribute to best business practices. Adopt the prompts.

Good reading!

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Mission, Vision and Values

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Mission

Promote access to health and quality of life with treatments at a fair price and a profitable operation that ensures access to health and quality of life with treatments at a fair price and a profitable operation, which ensures the sustainable growth of the company and the sharing of the value generated with employees and society.

Vision

We will be one of the three largest regional-capital pharmaceutical companies in Latin America, leaders in medical prescription in Brazil and a reference in innovation and sustainability. With growing profitability and 10% of the portfolio protected, 30% of sales will come from international operations.

Values

Agility

Dynamism and simplicity are part of our DNA. To remain competitive, these attributes must be present in all Company operations and processes.

Commitment

Competition and commitment to Eurofarma promote employee appreciation and growth. Therefore, whenever possible, our prestigious talents through internal use.

Sustainable Development

The good management of human, financial and natural resources is based on the development of employees, financial strength, healthy business practices and actions for the preservation of the environment: fundamental points for the balance of our operations.

Focus on Health

Our business model is based on participation in all pharmaceutical segments, through Business Units, International Operations and affiliates, maintaining permanent dialogue, strength and formalization of strategic alliances.

Entrepreneurship

To anticipate the future, we create new and better ways of conducting Eurofarma in all areas, going beyond the innovation inherent in Research and Development activities, our leadership is open to the "new" and maintains the avant-garde spirit of the Company.

Ethics

In line with the Company Code, laws and regulations in force, the behavior of our employees is bound by ethics and transparency in all actions and operations carried out in and on behalf of Eurofarma.

Equality (Diversity)

We ensure a favorable and impartial environment where respect reigns. For this, we establish commitments related to diversity, justice and equality in relations between collaborators and other publics.

Reinvestment

Believing that taking risks is an integral part of dynamic and successful business activity, generating positive results promotes the growth of the Organization through the reinvestment of resources in the business itself.

Respect

We pride ourselves on our track record, origins and ability to excel. Our history is built to reflect our commitment to the growth of our employees and to the development of the countries in which we operate, maintaining respect for the people and cultures with the ones we interact.

Result (performance)

We recognize the different contributions to the achievement of our objectives, and we share the wealth generated with collaborators and society, through meritocracy programs, expansion of access and social investments.

These values will guide the organization and will help us in the searching for a future with greater prominence, guiding us in relationships with our stakeholders and engaging teams to add value to society as a whole.



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Labor rights



Suppliers must be aligned with our ethical standards and committed to respecting the human rights of workers, and to treat them with dignity and respect. We do not admit movements contrary to the Convention of Labor Laws.

Labor elements include:

1) Free choice employment

Suppliers must not use any type of forced, bonded or enslaved labor, or labor originating from involuntary prison.

2) Combating child labor

We do not accept illegal practices, such as the use of child labor, slave labor or any other type of exploitation that Eurofarma does not admit. We condemn the exploitation of people for work, especially child labor.

Eurofarma does not acquire products and services from a supplier that employs or has forced (slave) and compulsory labor and child labor, fulfilling the legal minimum age and place for work. We strongly support the development of workplace learning programs for the educational benefit of youth.

3) Non-discrimination

Eurofarma does not allow any act of discrimination against people, combats this, and values the diversity of race, color, origin, sex, sexual orientation, disability, age, marital status, religion, social class and nationality, among others.

4) Salary, benefits and working hours

As Eurofarma, you, supplier and service provider, must remunerate your employees with wages, benefits and working hours in accordance with applicable local laws and standards.

Our suppliers and service providers should not hire collaborators to work beyond the limit of regular or overtime hours, established in the applicable law.

5) Freedom of associations and entities of children class

Suppliers must respect the rights of workers, as defined by local laws, to freely associate, join or not join labor unions, seek representation, and join workers' councils.

6) Harassment

We act and fight effectively to prevent any type of moral and sexual harassment, and we expect the same position from our suppliers.



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Occupational Safety and Health

Suppliers and service providers are responsible for complying with all Laws and Regulatory Standards on Work Safety and Health, and all established legal devices, such as:

1) Management of occupational and process hazards and risks

Associates should demonstrate personal commitment to job and process safety, through attitudes such as informing the manager and the Labor Safety area of any deviations or insecurity they have observed.

Leaders must demonstrate their commitment to safety issues, seeking the resolution/solution of problems, considering that safety is an Eurofarma's value.

2) Worker protection

Suppliers and service providers will be fully responsible for overseeing the effective use of Personal Protective Equipment (PPE) appropriate by function and activity, with the intention of preventing work accidents for their employees, as well as, properly training them in compliance with the Internal Hygiene and Occupational Safety Standard.

3) Hygienic and safe facilities

Eurofarma promotes a safe, clean

work environment, in adequate facilities and protected against dangerous materials or conditions.

We expect all our suppliers and service providers to maintain the same standards in their factories, whether in administrative or productive areas, complying above all with local laws and regulations that govern working conditions.

Eurofarma strictly prohibits cruel or unusual disciplinary practices in the workplace and suggests to its suppliers and service providers the continuous search for adherence to the best management practices.



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Environmental Responsibility



Eurofarma is highly recognized for its permanent commitment to protecting the environment, health and well-being of its employees and customers. We recognize that there are aspects of the manufacturing process that cause impacts to the environment; however, we are responsible for minimizing these impacts in the development of innovative solutions.

We value suppliers and service providers that are involved in actions aimed at sustainable development, such as social, environmental and social inclusion projects and programs. In addition to those that use natural resources responsibly, promoting balance with a focus on the tripod of sustainability: economic, social and environmental.

Eurofarma promotes environmental education programs with the aim of raising awareness among its collaborators, partners and the community. Therefore, we expect our suppliers to follow them as well:

- Application of policies and commitments to produce goods and services using exclusively sustainably managed raw materials, monitoring the environmental

aspects of its process to contribute to improvements with a focus on reducing environmental impacts and conserving the environment;

- Complying with the environmental legislation in force in the country and the Eurofarma guidelines presented to the suppliers in the act of internal integration carried out by the Environmental Management area;
- Promotion and participation in actions aimed at sustainable development, with social, environmental and diverse programs and projects with social inclusion;
- Guarantee of systematic and rigorous use of sustainable criteria in the management of forestry and industrial operations;
- Adoption of principles and practices of ethical conduct made explicit in formal documents, such as contracts, codes of conduct and ethics, sites, etc.;
- Development of long-lasting strategic alliances with other suppliers in order to increase

competitiveness and the generation of value for interested parties;

-  Preservation of dialogues and listening processes for your network of stakeholders (audiences impacted by your operation);
-  Establishment of constructive relationships with stakeholders, based on transparency and trust;
-  Definition of those directly responsible for the Environmental Management System and who seek continuous improvement of environmental performance in their processes, products and services.

Environmental authorizations

Suppliers must comply with all applicable environmental regulations. All permits, licenses and information records and restrictions will be obtained, and operational and communication requirements will be followed.

Waste and emissions

Suppliers will have systems in place to guarantee safety in the handling, movement, storing, recycling, reuse or administration of waste for its proper final disposal. All the generation and elimination of waste, atmospheric emissions and discharges of waste into water, with the potential to adversely affect human health or the environment, will be minimized and properly managed, controlled or adequately treated before its release into the environment.

It will be the responsibility of the supplier to present the respective proofs of final destination of wastes, which must adopt the suppliers accredited by the Environmental Management Area, as well as the appropriate segregation of the wastes, maintaining the standards established by Eurofarma through Integration Training.

Spills and Releases

Suppliers must have systems

in place to prevent and prevent accidental spills and releases to the environment, establishing containment barriers that may be able to store the maximum volume conditioned in the container or equipment, added/increased by 10% in relation to the total volume.

The supplier will be responsible for the environmental recovery of the impact caused in case of proven negligence in not acting in a preventive manner to avoid situations of spillage and emissions to the environment.

Sustainability and conservation of natural resources

Suppliers should act in their activities to protect and conserve natural resources and biodiversity. They must prevent pollution / contamination to mitigate environmental impacts by adopting, for instance, measures that contribute to the reduction of water consumption, energy, atmospheric emissions and waste generation.



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Integrity in Business

Eurofarma's supplier selection and evaluation, competition and negotiation policy are clear and objective and, under no circumstances, does it take personal characteristics or beliefs into consideration as selection criteria. The Corporate Integrity area performs verifications prior to contracting suppliers, in order to identify possible involvement in irregular practices that may in some way negatively impact its reputation in the market.

Fair Competition and Antitrust

- 🛡️ Respect for fair and free competition;
- 🛡️ We reject any anticompetitive conduct by our suppliers, as it violates free competition and healthy competition. The penalties for violations of competitive legislation are severe, and can reach the company and the collaborators involved;
- 🛡️ The practice of anti-competitive actions (antitrust) is morally reprehensible in our environment, as well as a crime provided by law. We do not admit such practices.

Anti-corruption, bribery, illegal payments and other corrupt practices

Eurofarma suppliers are not authorized to accept and offer money, services, loans or preferential treatment from whoever it may be - collaborators, clients, suppliers or allies, in exchange for an existing or future business relationship with Eurofarma.

- 🛡️ We repudiate corruption and carry out our activities according to the legislation in force in Brazil and in the other countries where Eurofarma operates. We ensure transparency and trust; therefore, our suppliers and service providers must share the same principles.
- 🛡️ We value companies/allies that are members/affiliates of the Integrity and/or anti-corruption Programs of their respective countries and good corporate governance practices.

Relationship with Public Administration Representatives

The relationship with representatives of the Public Administration must be maintained with ethics, integrity and transparency. No offer, promise, payment or delivery of money, presents, services, entertainment or any other benefit that characterizes an undue advantage, that has the appearance of impropriety or that violates the Anti-Corruption Law may be made, directly or indirectly, to any public agent.

Conflicts of interest

The trust that the client places in our institution must be the same that we have with our collaborators and suppliers. For this reason, the company offers them full support to point out situations that may be configured as a possible conflict of interest, advising them on the attitudes to solve such.

 Facilitating business with Eurofarma due to family or friendship ties is a reprehensible practice.

Presents and Gifts

It is common market practice to exchange courtesies to bring closer and strengthen the relationship between business partners. For this reason, in general, Eurofarma allows giving and receiving gifts, presents and entertainment.

However, it is important to establish criteria to avoid negative consequences for Eurofarma, its collaborators and partners, with suspicions of undue influence in decision-making on a business, created by potential conflict of interest.

Consider the following criteria:

The offer and acceptance of the following paragraphs is normally allowed:

-  Occasional meals;
-  Tickets for sporting, cultural or scientific events;

- 🛡️ Promotional items that commonly receive a corporate brand (ex, diaries, pens, mousepads and pen-drives), on commemorative dates;
- 🛡️ Consumable products such as a box of chocolates and drinks bottles.

The offer and acceptance of the items below is never allowed:

- 🛡️ Money or equivalent (store gift vouchers, stocks, loans, etc.);
- 🛡️ Luxury accessories, electronic equipment or sports equipment;
- 🛡️ Travel and hotel services;
- 🛡️ Any present that is given as part of an agreement that provides for something in return.

To be considered appropriate, courtesy changes through items not specified above must represent values up to 1/3 of a current minimum wage.

Eurofarma does not permit that the acceptance of personal presents, directly or indirectly affect decisions, facilitate business or benefit to third parties.



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Confidentiality of Intellectual Property



Suppliers shall act in a way that is consistent with applicable laws and data protection, including privacy and security protections that are appropriate to the sensitivity of personal information collected or otherwise processed by the supplier on behalf of Eurofarma. Suppliers must have appropriate organizational structures and procedures that ensure the protection of personal information against loss, destruction, alteration, disclosure, use or accidental, unauthorized or illegal access.

To guarantee the existing standard, the exploration of the Eurofarma brand or other domain brands of this, whether in objects, communications, advertising, presentations, uniforms, sites or other materials and/or vehicles, must have prior knowledge and authorization from the director of the Corporate Communication area.

Eurofarma and the suppliers agree to do not deposit any industrial, direct author or similar direct property rights for the protection of intellectual property based on the information received from the other party.



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Management System



Eurofarma may conduct regular assessments at the facilities of its suppliers and service providers, as well as send monitoring questionnaires to ensure compliance with this Code of Ethics and Supplier Behavior.

The high administration of suppliers and service providers that maintain business relationships with Eurofarma must commit to the adoption of this Supplier Code of Ethics and Behavior and disseminate it in the other spheres of their company, in a language understood by the workers.

In addition to that, the supplier must direct efforts in the sense of:

- ✓ Participating in Eurofarma's monitoring activities, when requested, provided that be informed in advance;
- ✓ Ensure that the requirements of this Code of Ethics and Behavior are met by the suppliers and obtain their commitment to comply with them, whenever is possible;
- ✓ Promptly implement repair actions and corrective actions to address what is not in compliance.



Listening channel

The Listening Channel, available to Eurofarma’s internal and external audiences, is a proactive, transparent, independent, impartial and anonymous communication tool for reporting violations or suspected non-compliance with any of the points described in this Code of Ethics and Supplier Behave.

Any complaint received by Eurofarma will be treated confidentially. No retaliation to the employee or the supplier will be made for reporting in good faith.

The formal complaint channel is available at:
www.contratoseguro.con.br/grupoeurofarma

Complaints can also be made through the following telephone numbers:

Argentina: 0800-345-3145

Bolivia: 800-104 612

Brazil: 0800-6021834

Chile: 800 914 489

Colombia: 01-800-5189605

Costa Rica: 8000320029

El Salvador: 8006414

Ecuador: 1800 001 131

Guatemala: 1800 300 0189

Honduras: 80027916003

Mexico: 800 681 8206

Nicaragua: 18002202475

Panama: 8002030093

Paraguay: 9800120003

Peru: (0800) 78148

Dominican Republic: 1 (809) 200-1590

Uruguay: 000 416 205 2735

Terms of observance and commitment

I hereby declare that I am in accordance with **Eurofarma Supplier's Code of Ethics and Conduct**. I have read and understood its contents and will abide by the rules contained in this document.

I make a commitment to report to the Corporate Integrity Area - *Compliance* of the Eurofarma Group any behavior or situation that is, or appears to be, in disagreement with the guidelines and recommendations set forth in this Code.

I also undertake to disseminate **Eurofarma Supplier's Code of Ethics and Conduct**, as well as the guidelines contained in the **Code** to my representatives, employees, suppliers and/or contractors who are directly or indirectly involved in the provision of services and/or supply of materials to the Eurofarma Group.

I also make a commitment to evaluate my internal processes in order to adapt them to the guidelines set out in this Code, as well as to the best market practices.

Signature:

Name of the representative:

Position:

Company's Name:

Place and Date:



Grupo Eurofarma