

CIMED CODE OF CONDUCT



> TABLE OF CONTENTS

Message from Management	3
1. Vision and Values	5
2. Purpose	5
3. Objective	7
4. To Whom It Is Intended	7
5. General Considerations	7
6. Relationships and Behavior in the Workplace	10
6.1 Harassment, Prejudice and Discrimination	10
6.2 Working Conditions	11
6.3 Safety at Work	11
7. Conflict of Interest	12
7.1 Personal and kinship relations	13
7.2 Commercial Activities	15
8. Gift And Entertainment	15
9. Sponsorships and Donations	16
10. Information Security	18
10.1 Confidentiality	18
10.2 Accesses	19
10.3 Asset protection	20
11. External Relationships	22
11.1 With customers and Consumers	22
11.2 With suppliers and service providers	22
11.3 Medium of communication	23
11.4 With the environment and social	25
11.5 With public entities and government agencies	
– Fighting corruption	26
11.6 With Pharmaceutical Market and Competitors	27
11.7 With unions and Associations	27
12. Financial Controls and Records	29
13. Money Laundering Prevention	29
14. Guidelines and Instructions	29
15. Communication channels	30
16. Cimed Attitude	31
17. Disciplinary Measures	32
18. Notes	34
19. Term of Commitment	35



MESSAGE FROM MANAGEMENT

Our purpose is to provide health and welfare to all Brazilians, that is what drives us. We want to take Cimed even further and, to do so, we count on a team of about 5 thousand professionals who, every day, build an improved company.

To continue growing in the same direction, we rely on our **Code of Conduct**, which establishes the standards of behavior expected by our employees and business partners, always based on our **values and Cimed way of being**.

This material is a guide to the actions and decisions of our daily lives, with transparency, ethics, professionalism and mutual respect, without leaving aside the constant innovation, excellence in serving our customers and the quality of our medicines and products.

These guidelines apply to all Cimed stakeholders, that is, employees, suppliers, service providers and all those with whom we relate, whether customers, competitors, public authorities or the press.

We count on you to make a commitment to practice and share our values and ethical principles, which guide this Code and our company.



*For over 40 years, our purpose has
been to provide health and well-
being for all Brazilians.*

> 1. VISION AND VALUES

VISION

To be the biggest and the best.

VALUES

- **FLYNOW** – We are brave, innovative, agile and bold. We believe we can accomplish what has never been done.
- **YELLOW BLOOD** – Team spirit strengthens us, energizes us and guides our attitudes;
- **SUCCESS IS NOT FOR THE LAZY** – We are determined and always take the initiative in pursuing our goals;
- **PACE, ROUTINE and RITUAL** – Planning, organization and discipline are fundamental to make decisions and act quickly and efficiently; and
- **PEOPLE AT HEART** – We always put people's needs at the heart of our business.

> 2. PURPOSE

For over 40 years, our purpose has been to provide health and well-being for all Brazilians.

Since the foundation, we believe that health has no social class. We know that every Brazilian, in every corner of the country, deserves a high quality product at a fair price to take care of their health and the well-being of their family. Through a unique and verticalized business model, which integrates the entire productive ecosystem, from raw material to delivery to stores and drugstores, we make possible our main purpose: to ensure that excellent quality medicines and products are affordable for the entire population.



*we strengthen our purpose as a
company, offering parameters and
guidelines for conducting activities.*

> 3. OBJECTIVE

The Code of Conduct establishes the **behaviors that guide CIMED's business and relationships**, through corporate governance and employees, in an ethical, transparent and professional manner.

With these guidelines, we strengthen our purpose as a company, offering **parameters and guidelines for conducting activities**, protecting public and professional interests and contributing to CIMED's results being increasingly sustainable.

The content presented here defines the basic **principles that should guide our conduct in any situation**, but it does not mention all situations of ethical conflicts that may arise.

> 4. TO WHOM IT IS INTENDED

The Code applies to CIMED, as well as to all its **managers, employees, third parties, suppliers and service** providers who relate to the company, regardless of their hierarchical position or area of operation.

> 5. GENERAL CONSIDERATIONS

CIMED's adoption of ethical and behavioral principles reflects the type of organization we are a part of. All employees must know and respect the legislation and regulations applicable to CIMED, this Code of Conduct and the company's policies and normative instructions. Any violation of CIMED's internal laws, regulations and policies will be considered a serious misconduct, subject to the application of legal sanctions and disciplinary measures.

Whenever you are faced with what you think is a situation that has ethical or behavioral implications, before making any decision, ask yourself:

- Is this conduct in line with the values and guidelines described in the Code of Conduct?
- Is it in accordance with the
- legislation? Does this action make
- me comfortable? Is it ethical?
- Would my family or friends find this conduct correct?

If the answer is NO to any of the questions, DON'T ASK. Negative responses are warning signs that the decision or activity in question may be inappropriate. The omission is also considered an unethical attitude, subject to punishment.

If you have questions or identify any situation that violates this Code of Conduct and/or current legislation, contact your manager or report the case on the CIMED Attitude channel. The information provided through CIMED Attitude is always treated with secrecy and confidentiality.



We are committed to promoting an ethical, safe and healthy work environment for all.

> 6. RELATIONSHIPS AND BEHAVIOR IN THE WORKPLACE

CIMED is committed to promoting an ethical, safe and healthy work environment for all. In this context, we have adopted the following practices:

6.1 HARASSMENT, PREJUDICE AND DISCRIMINATION

CIMED does not accept or tolerate any type of harassment, discrimination or prejudice between employees, third parties, suppliers, service providers or customers, such as:

- Discrimination of race, color, ethnicity, gender, age, marital status, belief, sexual orientation, gender identity, persons with disabilities, appearance, origin, political conviction or any other form of prejudice;
- Favors or preferences arising from personal, hierarchical affinity or working time;
- Attitudes, words or gestures that may be characterized as bullying or sexual harassment; and
- Intimidations, humiliations, threats or abusive attitudes, whether through gestures, words or behaviors against the moral and physical integrity of any person.

DIFFERENCE BETWEEN MORAL AND SEXUAL HARASSMENT

Moral harassment is the practice of repetitive and prolonged conduct of offensive and/or humiliating content, whether of a descent nature (the aggressor is the victim's hierarchical superior), horizontal (aggressors are the victim's own colleagues) or ascending (subordinate or group of subordinates persecutes a superior).

Sexual harassment can be defined as unwelcome advances of a sexual nature, request for sexual favors, exposure of inappropriate material, or any other unwelcome verbal, written, or physical conduct of a sexual nature in the workplace. It can occur through physical attempts, innuendo, messages, image exposures, or any situation that might make another person uncomfortable and sexually offended.

6.2 WORKING CONDITIONS

We do not accept that suppliers, third parties and service providers adopt inappropriate working conditions, use slave labor, child labor or adopt conduct that encourages the informal economy.

6.3 SAFETY AT WORK

CIMED acts responsibly in occupational health and safety and all employees, third parties, suppliers or service providers who perform activities on Cimed's premises must comply, in addition to the determinations provided for in specific laws or regulations, with the rules below:

- Respect **internal policies and regulations**, follow all Occupational health Safety procedures and current legislation;
- Always use the **Personal Protective Equipment (PPE)** provided for their safety according to the risks of the activities carried out and the respective areas;
- The **consumption of alcoholic beverages and other illicit substances** that may affect work performance and pose a risk to your safety and that of your colleagues is forbidden; and
- **It is not allowed, under any circumstances, to carry any kind of weapon on CIMED's premises** except in the exercise of the surveillance and security function, as determined by CIMED and with the proper documentation and authorization legal.

If the employee or third party identifies a situation that represents a risk to the life or integrity of other employees, they must immediately communicate to their manager.

> 7. CONFLICT OF INTEREST

Conflict of interest occurs when personal or third party interests override the legitimate interests of CIMED.

The employee **must not participate, directly or indirectly, in any initiative of companies and institutions that may be considered as a competitor of CIMED** during the term of the employment contract.

Examples of relationship situations that can generate conflict of interest and should be avoided:

- Insinuate, accept or demand (including indirectly, through their family members or personal contacts) the **favoring, material or financial advantages** that an employee receives from one of our suppliers or service providers;
- Participate directly or indirectly in **companies that supply or obtain goods or services from CIMED;**
- Performing, by the employee, other **professional activities that may interfere with CIMED's business**, even if performed outside working hours;
- Provide third parties, intentionally or unintentionally, with any **data, privileged and/or confidential information**, or use such information for personal benefit;
- Act as a member of the board of directors of entities / associations, councils/ committees, or as a consultant to any individual, company/**organization that competes or that does or seeks to do business with CIMED;**
- **Relationship** between employee and supplier or service provider that compromises the impartiality of the business;

- **Any unjustifiable favoritism** directed by the employee to a particular client, supplier or service provider to the detriment of others or CIMED's own interests, especially when this professional maintains any commercial or personal relationship with the beneficiary; and
- **Parallel activities** that are carried out by the employee **during working hours** or with the use of CIMED resources.

In addition, there are other situations that may characterize conflict of interest, as follows:

7.1 PERSONAL AND KINSHIP RELATIONS

The **affective relationship of employees with direct subordination** or within the same Management can, in certain circumstances, generate a conflict of interest. If there is a relationship, the employee must communicate to his immediate manager, who will communicate to the Human Resources area for evaluation of conflict of interest.

The hiring of family members of employees (first degree: parents, spouses, children) is allowed when there is no direct subordination.

In cases where there is no hierarchy, but where there is influence from one party on some career decision, result or activity of the other, the conflicted employee must be absent from decision making.

In case of hiring new employees or transferring areas or units, it is up to the employee to inform the relationship in advance to the immediate manager, declare the fact in the Transparency Term, a document available on the Intranet, delivering it to the Human Resources area.

Examples of diverse and/or relationship situations that may occur during your professional performance at Cimed and that must be declared:

- Are any of your first-degree relatives (parents, spouse or children) a partner or have a leadership position in a company that provides products for CIMED?
- Do you have any first-degree relatives or people with whom you have an emotional relationship who started working at the company?
Are any of your relatives a public agent, that is, have passed a public tender and work in a public agency and/or companies that provide services to a public agency?
- Do you provide any type of service (e.g., self-employed, contractor or employee) to another company?
- Are you a partner or do you have any representation or performance in another company independent of the field of activity?

Even information, which falls broadly under the hypotheses narrated, which you believe has no direct interference with the business, must be declared spontaneously.

Any real or situation in relation to the Conflict of Interest must be declared in the Transparency Agreement, available on the Intranet, and immediately send to the Risk Management and Internal Audit area for acknowledgement. For cases of personal relationships or kinship, the form must be delivered to the Human Resources area.

For more information, see the **Conflicts of Interest policy**, available on the intranet.

Situations in which the real Conflict of Interest is identified, it will be evaluated by the Ethics and Conduct Committee.

7.2 COMMERCIAL ACTIVITIES

CIMED does not allow the trade of any products or services on its premises, such as the sale of cosmetics, food, catalogues or clothing, provision of financial consultation services, among others. It is also not allowed that these activities are carried out with the use of CIMED resources.

> 8. GIFT AND ENTERTAINMENT

Inappropriate gifts and entertainment opportunities can harm CIMED and lead to improper business decisions.

Employees are prohibited from requesting or accepting gifts that exceed the value of R\$ 200 (two hundred Reais), courtesies and advantages for their own benefit or that of third parties, including requests for gifts of any value on behalf of CIMED for internal draws, which characterize impairment of their professional situation and/or CIMED's commercial and business dealings.

Employees are allowed to participate, free of charge, offered by third parties, in fairs and events, courses, congresses, seminars, as long as they are related to the area of activity.

In cases where **refusal is unavoidable**, gifts received by employees must be sent immediately to the Human Resources area of the location or focal point in the cases of Distribution Centers for proper treatment, informing their immediate manager about the fact.

It is **forbidden to offer and/or receive**, in any capacity, gifts, in personal name or from CIMED, **in any economic form** (money, shares, securities, checks, deposits, etc.).

The donation of corporate gifts and the offering of entertainment for legitimate commercial purposes must comply with CIMED's internal policies and cannot generate practices harmful to the business or acts of corruption.

Employees of the CIMED group are prohibited from offering any type of gifts, gifts, entertainment, hospitality or to cover any type of expenses of public agents.

For more information, see the **Promotional Materials and Gifts Management policy**, available on the intranet.

> 9.SPONSORSHIPS AND DONATIONS

CIMED sponsors and makes donations for actions related to its purpose and brand positioning and which can generate social impact and strengthen CIMED's brand. Aspects related to the suitability of the Institution/Project, integrity diligence and formal request for appeal must be observed. Donations and sponsorships must be made in accordance with the Donations and Sponsorships Policy, available on the intranet.



*Information Security: Everyone's
responsibility*

> 10. INFORMATION SECURITY

10.1 CONFIDENTIALITY

All information that is not in the public domain is considered confidential, since such data may affect the result and the dynamics of CIMED's business.

Given the characteristic of our segment, we have a series of information that is extremely relevant to the continuity of the business and that, if not treated with the necessary confidentiality, can bring financial and image losses to CIMED, as well as to customers, suppliers and employees. Therefore, **any information that, if disclosed, may cause damage to CIMED, should be considered as confidential information.** Public information, are all those disclosed by CIMED on the website and/or social media.

Some examples of confidential information:

- Disclosure of products before launch;
- Research and development of new products;
- Unauthorized disclosure of price lists and commercial information;
- Business results or sensitive information about CIMED's confidential transactions/operations; and
- Personal data of employees, third parties and customers.

Any and all information defined as confidential, which needs to be shared with customers, suppliers, or any other person or company outside CIMED, unless the need for disclosure arises from an obligation or legal determination, must have the Confidentiality Agreement completed according to the situation and signed by those involved.

Employees are prohibited from leaving confidential information on printers, meeting rooms, unlocked computers or work desks. Disposal of information and/or documents must be carried out in accordance with the Information Classification and Treatment policy. Complete **destruction of the material is requested before disposal.**

In addition, employees **should not deal with CIMED's confidential matters on public social media, talks in elevators, external meetings and training**, means of transport, restaurants, hotels, airports or any other public places.

Any requests for CIMED data for academic work by employees or not, invitations to lectures, press interviews, classes, visits or any types of activities involving CIMED should be sent to the Institutional Communication area for analysis and direction.

The **intellectual production resulting from the work at CIMED** or that has any relation to our activities, **is the sole and exclusive property of CIMED**, and therefore must also be safeguarded. Thus, it is not allowed to copy, photograph, film, capture screen, reproduce, transmit or distribute documents, files, models, methodologies, formulas, research, projects, analyzes and any other assets legally considered as industrial property, produced by you or by colleagues in the performance of their activities.

10.2 ACCESSES

The employee is solely responsible for their passwords (electronic means and systems) for performing the accesses, which are personal and non-transferable. **Never disclose or share your passwords** to your managers or co-workers, nor to those closest to you. Thus, you guarantee the security of CIMED's information and data, as well as that you are the effective author of the actions associated with your user.

For more information, **see the Information Security policy**, available on the intranet.

10.3 ASSET PROTECTION

CIMED's equity is composed of physical assets (equipment and facilities) and intangibles (brands, photos, software, videos, among others). **It is the responsibility of the employees to use the resources carefully and diligently**, consciously, without personal or third party purposes, even if in moderation, within the current legislation, and without any intention of damaging them.

Employees are also responsible for the integrity, availability, confidentiality, legality and authenticity of information assets, which can be classified as database and files, contracts and agreements, system documentation, information on research and development of products, business continuity plans, recovery procedures, audit tracks and stored information.

The use of physical resources must follow the guidelines of the Information Security policy, available on the intranet. **Illegal copies of software, use of counterfeit goods** and access to websites unrelated to work activities are not allowed.

Pornography websites, online games, or others that may put CIMED at risk of prosecution, civil action, loss of reputation or whose potentially offensive nature may create disturbance in the workplace are expressly prohibited from access in the workplace or during office hours.

All content distributed by CIMED's electronic system (emails, telephone, instant communicators and intranet) is the property of CIMED. Therefore, **such information may be monitored and collected without prior notification**.



*Our customers and consumers are
the most important pillar to
achieve our mission.*

> 11. EXTERNAL RELATIONSHIPS

11.1 WITH CUSTOMERS AND CONSUMERS

Our customers and consumers are the most important pillar to achieve our mission. **We must ensure respect and a high level of service** to always maintain a healthy and trusting relationship with our audience.

The duty of all CIMED employees is to serve customers with **clarity, ethics, promptness, courtesy, efficiency and positive attitude**, prioritizing needs in search of a long-term relationship, with respect to CIMED's business policies and corporate objectives, preserving the custody of information of operations and the confidentiality of data of our customers and consumers.

11.2 WITH SUPPLIERS AND SERVICE PROVIDERS

In the selection of suppliers and service providers, we consider technical, transparent and objective criteria for purchases of products or services, as well as, we require compliance with all legal and ethical requirements defined in the Code of Conduct and in the policies and normative instructions of CIMED.

In all purchases of goods and services, we seek the best cost-benefit ratio, always maintaining quality within the technical standards, the applicable legislation in force and in compliance with the commitments and established schedules. In addition, any family and/or personal ties with other employees of the company are considered, avoiding potential conflicts of interest and objective aspects that may bring some damage to the internal environment of the company.

We highlight that we form partnerships with suppliers that reject practices that promote aggression, contamination or damage of any kind to the environment, compromising sustainable development.

We do not tolerate any acts of corruption or fraud and therefore our suppliers and service providers cannot be linked to or involved in any illegal activities. In addition, **we do not authorize suppliers or service providers to speak or act on behalf of CIMED, nor provide services that have not been previously and formally authorized.**

If negotiation or business relationship meetings are held during a lunch or dinner, employees may accept or offer the meal, provided that it does not interfere or may interfere with decision making with respect to the contracted supplier.

11.3 MEDIUM OF COMMUNICATION

- **CIMED Image**
Employees are not allowed to associate CIMED's image with pejorative public demonstrations that cause damage to CIMED's image, or that demonstrate illegal practices or even religious, political, cultural, ethical, sexual orientation, gender, race and color apologies.

Our relationship with the press is based on mutual respect, ethics and professionalism. The dissemination of information to the external public is the sole responsibility of our press office. The Institutional Communication area is responsible for appointing the spokespersons and mediating, with the press office, contacts with media outlets and the press in general.

Only authorized spokespersons can speak to the media, yet through the press office. It is not allowed for other employees to speak on behalf of CIMED, without express authorization to do so. In case of a press approach, the employee must notify and forward the contact to the Institutional Communication area, without expressing the opinion or exposing brand and product information to the media on behalf of CIMED.

- **Social Media**

Social media is part of our reality and strategy. The Internet is a public environment, with rapid repercussion and coverage, both from CIMED and about you, with the impossibility of permanently deleting something that has been made public.

Significant publications on social media positively reinforce CIMED's image, however, when carried out inappropriately, they can cause damage to the company's image. In this sense, we count on the support of our employees and third parties so **that something that can be interpreted as:**

- discriminatory opinion;
- hate speech, which incites hostility or violence against a person or group by virtue of race, religion, national origin, sexual orientation, gender, physical condition;
- political positioning or any other personal characteristic;
- crime against the honor of persons or companies; and
- apology for crimes.

Product launches or innovation initiatives are confidential data owned by CIMED. Employees or third parties are not authorized to disclose such content on their social networks (or by any other means), prior to the official disclosure made by CIMED.

In addition, **no employee or third party is authorized to create pages and profiles on social media on behalf of the company CIMED or its subsidiaries.**

Employees can share through their profiles on social media only the contents that have already been previously published by the official channels of CIMED.

If the employee identifies the misuse of CIMED names/brands on social media, the employee must immediately inform his manager and/or report on the CIMED Attitude Channel.

For more information, **see the Institutional Communication policy**, available on the intranet.

11.4 WITH THE ENVIRONMENT AND SOCIAL

At CIMED, we respect and protect the environment. **Our environmental management is rigorous and we require the same commitment** from our employees, third parties, suppliers and service providers.

We renew our ISO 14001 certification annually, which reiterates our socio-environmental commitment through an effective Environmental Management System, that seeks to reduce the impacts of manufacturing operations and adequate environmental control.

CIMED's relationship with society **is guided by respect for laws and conventions that deal with essential human rights and the protection of sustainability.** In all its relationships, CIMED observes ethical and transparent standards, cooperating with the population of our surroundings.

11.5 WITH PUBLIC ENTITIES AND GOVERNMENT AGENCIES – FIGHTING CORRUPTION

CIMED employees, third parties, suppliers and service providers have the obligation to comply with all laws and regulations applicable to CIMED's sectors of activity, as well as laws that prohibit corruption practices worldwide, including Anti-corruption Law, Administrative Misconduct Law and Bidding and Administrative Contracts Law.

CIMED repudiates and does not tolerate the practice of any act of corruption, bribery or kickback by its employees, third parties, suppliers and/or service providers, in the active or passive form, through acts, omissions, creation and/or maintenance of favoring situations in the form of facilitation payments or other irregularities.

The objective liability provided for in the Anti-Corruption Law exempts the proof that the harmful acts against the public administration, national or foreign, have been practiced with intent or guilt, that is, if an employee or a third party practices conduct prohibited before this law, even if without intention or willingness to commit it, CIMED may be civilly and administratively liable.

Therefore, employees and third parties are prohibited from:

- defraud, manipulate, prevent or frustrate bids and administrative contracts;
- To promise, offer or gives directly or indirectly an undue advantage to a public official or a third party related to a public official;
- Use an individual or a legal entity as agent in order to conceal or misrepresent their real intention or the identity of the beneficiaries of acts that have been practiced;
- Finance, fund, sponsor or in any way subsidize the practice of illegal acts foreseen in the Anticorruption Law; and
- hinder investigation or inspection activity, or intervene in the performance of public agencies, entities or agents, including regulatory agencies.

In addition, CIMED also repudiates and does not tolerate any type of corruption, including any act of financing, funding, sponsorship or granting of any aid to obtain undue advantages, direct or indirect, in the private environment.

For more information, see the **Anti-Corruption and Money Laundering Prevention policy**, available on the intranet.

11.6 WITH PHARMACEUTICAL MARKET AND COMPETITORS

We believe in fair and fair competition for the sustainable growth of the market in which we operate. We respect our competitors and establish healthy and ethical competition, underpinned by our negotiating capacity, applicable standards and legislation.

We build relationships based on our organizational values, focusing on the transparency of relations between the pharmaceutical industry and health professionals, as well as condemning attitudes of corruption, competitors, cartel formation or acts that may defraud the mechanisms that oversee the sector.

CIMED does not allow its employees or third parties to disclose rumors or uncertain information about products or services of competitors, direct or indirect, as such an attitude can cause irreparable damage to the internal environment and the market.

11.7 WITH UNIONS AND ASSOCIATIONS

CIMED values the relationship with union and associative entities and its importance in the relationship with employees. We respect the free association of employees and collective bargaining, recognizing their legitimacy and complying with collective agreements and conventions.



CIMED provides everyone with an exclusive channel for reporting situations considered unethical.

> 12. FINANCIAL CONTROLS AND RECORDS

CIMED maintains transparent, accurate and complete accounting and financial records in compliance with the law, applicable accounting standards, internal controls and accounting policies.

CIMED employees are responsible for ensuring that financial records truly reflect the Company's financial reality, and that CIMED's internal control standards are always up to date.

> 13. MONEY LAUNDERING PREVENTION

Money laundering is understood as the act where someone, through some activity, tries to attribute the appearance of legality to financial resources obtained through illicit acts, so that these resources have a lawful origin.

CIMED does not agree with such practices and adopts internal policies to prevent and monitor any suspicious occurrences. If any act of money laundering is identified, it will be properly reported to the competent authorities.

For more information, see the Anti-Corruption and Money Laundering Prevention policy, available on the intranet.

> 14. GUIDELINES AND INSTRUCTIONS

CIMED conducts training, recycling, and dissemination of content and guidance guidelines focused on compliance and anti-corruption, mandatory for all employees and third parties summoned, for qualification and awareness of the conduct, principles, concepts and procedures provided for in this Code of Conduct and other policies and internal standards of CIMED.

> 15.COMMUNICATION CHANNELS

We must address our concerns internally, solving our doubts and discomforts using the following means:

- **Your Manager** for risks and problems related to processes, procedures, controls and work strategy. If necessary, go to his superior;
- The **Human Resources area** for issues related to the environment and working conditions, relationship, personal duties, among others;
- The **Risk Management and Internal Audit area** for questions regarding the Code of Conduct, Transparency Term, policies or normative instructions; or
- The **Cimed Attitude Channel** for situations that violate the Code of Conduct, current legislation or our policies and normative instructions.

> 16. CIMED ATTITUDE

CIMED makes available to its employees, suppliers, service providers and the general public an **exclusive channel for reports of situations considered unethical**, which violate this Code of Conduct, policies, internal normative instructions and/or current legislation.

We encourage every employee, supplier or service provider **to foster a work environment where everyone feels comfortable communicating their concerns about ethical issues** without fear of retaliation.

Retaliation against anyone who reports concerns or doubts about misconduct will not be tolerated and disciplinary action will be enforced.

Reports are received anonymously, thus ensuring confidentiality, absolute secrecy and proper treatment of each situation, without conflicts of interest.

All information is handled without tracking, completely protecting the identity of the employee or third party. **Reports can be made at any time through the website www.atitudeetica.com.br/atitudedecimed or by calling 0800 882 0403.**

All reports received are investigated using a specific methodology and, depending on the complexity, specialized services are contracted to assess the veracity of the reported facts, including a survey, if necessary, of supporting documents. The result of the investigation of the procedural cases is presented to the Ethics and Conduct Committee to know and monitor the most relevant cases with applicable disciplinary measures, regardless of the hierarchical level of those involved, without prejudice to the applicable legal penalties.

Both those responsible for investigating the reports and the members of the Ethics and Conduct Committee are responsible for maintaining the confidentiality of all reports received and for the application of this Code of Conduct.

> 17. DISCIPLINARY MEASURES

Violation of the principles and conduct described in this Code of Conduct, as well as current legislation and regulations and CIMED's internal policies and normative instructions, subject employees to the following disciplinary measures, as applicable:

- (I) oral warning; written
- (II) warning; suspension;
- (III) dismissal for cause, without prejudice to the adoption of
- (IV) legal measures related to compensation for damages and communication of the facts to the competent authorities.

Employees dismissed for violation of the Code of Conduct will not be entitled to payment of amounts related to bonus programs, awards, PLR or any other additional incentive program.

If the violation is committed by third parties, suppliers and/or service providers, CIMED may determine the termination of the relationship and, if necessary, the adoption of legal measures against those involved.

Disciplinary measures will be applied by the Ethics and Conduct Committee, which **will consider the seriousness of the acts practiced and the consistency of the evidence obtained**. In addition, if a violation of laws and regulations is detected, **CIMED may communicate the fact to the competent authorities**.

For more information, see the Consequences policy, available on the intranet.

> 18.NOTES

> 19. TERM OF COMMITMENT

I declare that I have received, read, been aware of and understood the CIMED Code of Conduct.

I undertake to fully comply with it in my activities related to CIMED, including respecting the commitment not to disclose confidential information, either during or after the term of my relationship with CIMED. Also, I agree to comply with current legislation, all internal policies and normative instructions adopted by CIMED, and to act in good faith and in an ethical manner before public and/or private agencies and agents.

Full name: _____

Area: _____

Position: _____

Workplace: _____

Date: _____

Signature: _____

