



Code of Ethics and Conduct



GOVERNMENT
RELATIONS



INFORMATION
SECURITY



OCCUPATIONAL
SAFETY



ACCOUNTING
RECORDS



INTELLECTUAL
PROPERTY



PERSONAL
DATA
PROTECTION

ENVIRONMENT



CUSTOMS
SECURITY,
SUPPLY CHAIN
AND AEO



HEALTH



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1. MESSAGE FROM THE CEO

Dear All,

Bionovis has clear rules of integrity and compliance and does not condone any kind of unethical conduct, bribery, kickbacks, undue advantage, corruption, among other behaviors and activities that may violate national or foreign anti-corruption legislations.

Bionovis' values include the principles of Responsibility, Integrity, Ethics, Innovation, Quality and Commitment. Everyone must conduct business with respect for these values, as well as having correct and respectful attitudes in professional relationships between Employees, Shareholders, Third Parties, Suppliers, Customers, Patients, Market, Public Administration and Society.

This Code of Ethics and Conduct is the main guideline for aligning and guiding everyone's professional behavior, while also reinforcing the need to guarantee a good, diverse, inclusive, ethical, honest and safe working environment. Everyone must consult it and comply with it in full!

All communication channels are available and open. Please use them at all times to express doubts, criticisms, complaints, suggestions, in short, any manifestation that you deem important for the maintenance and construction of a healthy, ethical and fair work environment. Your contribution is essential!

More important than doing the right thing is not doing the wrong thing!

I am counting on you!

Odnir Finotti
CEO

2. Introduction

2.1. Concepts

Shareholders: Shareholders: Are the companies that own Bionovis' common and registered shares. Their representatives form the Board of Directors.

Public agents: Are individuals, public servants or not, in the public administration who carry out paid or unpaid activities, such as civil servants, politicians and public office holders. Anyone who holds, even temporarily or without remuneration, by election, appointment, designation, contract or any other form of investiture or relationship, a term of office, position, job or function in the direct, indirect or foundational public administration. Also considered Public Agents are any official or executive of a public international organization; any official or executive of a political party or any member of a political party or candidate for political office. Members must pay attention to the quarantine period for public officials after taking office to ensure compliance with applicable legislations.

Moral Harassment: Exposure of the employee to humiliating and embarrassing situations, causing them humiliation and/or exposing them to vexatious situations in the workplace, in front of colleagues, suppliers, customers and themselves, whether these practices are carried out within hierarchical relationships (vertical harassment), when they are practiced between co-workers who occupy the same hierarchical position (horizontal harassment) or even when they are carried out against superiors (upward harassment). Non-exhaustive examples: disrespect, aggression, mistreatment, ridicule, inferiorization, racism, homophobia, etc.

Sexual harassment: can be defined as embarrassing someone with the intention of obtaining a sexual advantage or favor, with the perpetrator taking advantage of their position as hierarchical superior inherent in the exercise of employment, position or function (article 216 - A of the Criminal Code), as well as conduct of a sexual nature manifested physically, by words, gestures or other means, proposals or impositions to people against their will, causing them embarrassment and violating their sexual freedom (Primer on sexual harassment by the International

Labor Organization and the Public Prosecutor's Office), regardless of the existence of a hierarchical or subordinate relationship.

Parallel Activities: Non-exhaustive examples of parallel activities are: giving lectures, teaching, party political and religious activities, selling products via catalog, volunteer work, etc.

Gifts: It covers any type of item, object or material personalized with the company logo and of low unit or aggregate value, such as calendars, pens, notebooks, diaries, cups, bottles, among others. It is generally distributed in large quantities to a wide variety of audiences, without distinction or conflict of interest.

Whistleblowing Channel: It is the means of communication for reporting situations and cases of violation of the corporate rules of the code of ethics and conduct, legislations, regulatory standards and internal procedures.

Customers: These are companies or individuals who pay some kind of money (R\$, US\$, €, among others) to purchase Bionovis' pharmaceutical products or services.

Employees: These are all people who have a statutory, employment or direct contractual relationship and who provide and perform work activities and functions for Bionovis.

Competitors: These are companies that operate in the same industry as Bionovis.

Board of Directors: These are the members representing the Shareholders who have the task of taking note of and resolving on Bionovis' actions and strategies.

Corruption: Effect or act of corrupting someone or something, by means of money or something of value, with the purpose of obtaining or securing any kind of improper advantage by means considered illegal, illicit or immoral.

Statutory Directors: These are the members elected by the Board of Directors to

coordinate and implement the actions and strategies decided upon at Bionovis.

Donation: Definitive and irreversible transfer of money, goods or services to companies or individuals.

Due Diligence: It is a prior process of gathering registration, integrity, economic-financial, fiscal, legal and reputational information on companies or individuals who intend to do business with Bionovis.

Entertainment: These are activities and events offered or received with the purpose of promoting and remembering the company's brand, providing leisure, recreation or entertainment for its participants, such as: artistic shows, plays, operas, dance shows, music concerts, sporting or motoring events, celebratory meals, among others.

Suppliers: These are individuals or legal entities who supply some kind of product, material, technology, service, among others, to Bionovis.

Managers: These are employees who hold leadership and people management positions, such as Directors, Managers, Coordinators and Supervisors.

Hospitalities: These are offers of service or expenses for transportation, meals, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted between the parties.

Payment facilitator: It is a financial payment that can constitute a bribe and is made with the intention of speeding up an administrative process. It is a payment made to a public or government official that acts as an incentive for the official to complete some action or process quickly, to the benefit of the party making the payment.

Partners: These are companies that have some kind of partnership agreement or contract for the productive development of pharmaceutical inputs, medicines, technology transfers, training and research and development - R&D.

Sponsorship: This is the provision of financial, human or physical resources by Bionovis directly to a cause, event or activity, with counterparts.

Politically Exposed Person (PEP): Any individual who holds or has held a prominent public position or function in a government body or international organization, in Brazil or abroad. Immediate family members and/or people close to these individuals are also considered PEPs.

Presents: It covers any type of item, object or specific material, without the company logo, of medium or high unit or aggregate value and which do not fall under the definition of Gifts. It is generally distributed in small quantities to specific companies or individuals.

Health Professional: They are all professionals qualified to prescribe or dispense medicines, limited to doctors, dental surgeons and pharmacists.










Health-Related Professionals: These are all other professionals who may interact with Products Subject to Health Surveillance and/or who relate to patients or Institutions in the Health Area, both in the private sector and as Public Agents, such as: nurses, biomedical professionals, among others.

For misleading advertising: Any form of information or communication of an advertising nature that is wholly or partially false, or in any other way, even by omission, capable of misleading the consumer about the nature, characteristics, quality, quantity, properties, origin, price and any other information about products and services (Article 37, §1, CDC).

Quality: It means the degree to which a set of properties inherent in a product, system or process meets requirements. It is therefore understood that Quality can be considered as the sum of actions to ensure that products have the required quality for their intended use, and is the responsibility of everyone who acts directly or indirectly in the design of the product or its distribution. Bionovis is governed by national regulations to guarantee the quality, safety and efficacy of the products

manufactured, packaged and/or distributed here and the safety of the patients who use these medicines. All the General Guidelines for Good Manufacturing Practices for Medicines are described in the Quality Manual and Procedures approved in the Se Suite system.

In addition, all our employees are frequently trained to follow the ALCOA+ principles:

-  **Attributable** - Who carried out an action and when?
-  **Readable** - Can you read the data file throughout its life cycle?
-  **Contemporary** - Documented at the time of the activity.
-  **Originals** - Original registration or a certified copy.
-  **Accurate** - No errors or edits without documented corrections.
-  **Complete** - All data, including any tests, processes, repetitions or re-analyses carried out.
-  **Consistent** - Processes are always carried out in a similar way.
-  **Durable** - Recorded in official quality system documents and duly validated.
-  **Available** - Can be accessed for review and audit or inspection during the lifecycle of the record.

Representatives: These are companies or individuals who represent and speak on behalf of Bionovis at audiences, meetings, conventions, customers or prospects, congresses, fairs, cocktail parties, lectures, courses, training sessions, workshops and events in general, whether national or international.

Risks: These are the events that threaten and negatively impact Bionovis' actions, strategies, reputation and business continuity.

Bribery: Action that consists of inducing someone to perform a certain act in exchange for money, material goods or other private benefits.

Third Parties: These are all the people who provide services and carry out activities and work functions for Bionovis, but have direct links with another company.

2.2. What is a Code of Ethics and Conduct?

This Code of Ethics and Conduct (“Code”) is the set of guidelines and information on our business principles, which define the conduct that everyone at Bionovis, as defined below, must follow.

2.3. Why have a Code?

Our principles of ethics and conduct were defined at the founding of the Company and have been maintained and improved ever since.

The formalization of a document serves as a reference guide, which can answer day-to-day questions and support relations between the Company’s employees and between them and third parties, shareholders, suppliers, customers and public agents, which must be followed by everyone to whom it applies. It also makes it possible to understand the responsibilities we share and alerts us to important ethical and legal issues that may arise.

2.4. Who does the Code apply to?

This Code applies to all Bionovis’ employees, regardless of their type of relationship with the Company, hierarchical position or level of responsibility, as well as to representatives and third parties acting on behalf of Bionovis, shareholders, suppliers, customers and public agents (“professionals”). All professionals are responsible for upholding the principles described herein.

2.5. What am I expected to do about the Code?

Everyone must understand and comply with the Code. In addition, they must support others to do the same. It is everyone’s obligation to report any suspected violation of the Code to the Whistleblowing Channel.

Anyone who fails to comply with the Code will be subject to disciplinary measures and may be prevented from dealing with or acting on behalf of Bionovis.

Bionovis' main directives are:

- You must understand and act in accordance with applicable laws and this Code;
- You must contribute to our ethical culture;
- Live our values;
- Use the communication channels to report in good faith any violation of the law or this Code, even if it is only a suspicion, which must be reported, whether it concerns you or others;
- Get help to make decisions when necessary;
- In all situations cooperate and contribute to the Company's investigations;
- Never act or allow retaliation against someone who has made a warning or report in good faith about non-compliance with the law or this Code;
- Managers must encourage compliance with this Code and act by example.



3. MISSION, VISION AND VALUES

3.1. Mission

Researching, developing, manufacturing and marketing high-quality complex biopharmaceuticals to improve patients' lives.

3.2. Vision

To be the most important biopharmaceutical company in Latin America and to operate globally.

3.3. Values

Responsibility, Integrity, Ethics, Innovation, Quality and Commitment.

4. Values

4.1. What are the principles that guide our work? What are we made of?

4.1.1. Responsibility

Act with simplicity and take responsibility. Be aware of the impact that our activity can have on society, always seeking to benefit patients.

4.1.2. Integrity

Act with honesty and professionalism, whether in business or relationships with employees, third parties, representatives, patients, society, the market, partners, suppliers, customers and shareholders.

4.1.3. Ethics

Act ethically, transparently and respectfully. Show respect and consideration to others regarding their differences, doing the right thing and acting based on the truth. Inspire the behavior of others through consistency between what you say and what you do.

4.1.4. Innovation

Be the largest biopharmaceutical company in Latin America, conquering technology and knowledge dominance to produce biological medicines and develop innovative biopharmaceuticals.

4.1.5. Quality

Ensure the efficacy and safety of the medicines produced, mastering all the technology combined with the highest quality standards in the world.

4.1.6. Commitment

Make lasting commitments and fulfill them, seeking to carry out their activities with excellence to ensure that patients' needs are met.

5. Behavior

5.1. Our way of being

5.1.1. Collaborative Spirit

Promote actions and sharing information that lead to the fulfillment of the Company's strategies. Understand your role in the organization and the impacts it can have.

5.1.2. Constructive Indignation

Show non-conformity and move to seek the best. Recognize your position and seek information and knowledge in order to evolve and excel in delivering results that are consistent with the needs of the business. "Doing what we already do well better."

5.1.3. Empathy

Put yourself in the other person's shoes, understand their difficulties and suggest actions, facilitate the process and contribute to achieving success and results.

5.1.4. Creative Thinking

Associate previously unassociated ideas, imagine actions, situations or scenarios that could contribute in an unusual way to the solution or improvement of an issue.

5.1.5. Adaptability

Adapt to new situations, maintaining effectiveness when experiencing significant changes in activities or the work environment.

5.1.6. Connectivity/Attentive

Keep up to date and connected with the outside world, with a vision of the best market practices to bring solutions that generate returns for the organization and the shareholder.



6. BIONOVIS' COMMITMENTS OF CONDUCT

Bionovis is publicly committed to establishing relationships and doing business with ethics and integrity, complying with national and international legislation and regulatory standards, especially Anti-Corruption, Anti-trust, Tenders and other applicable legislations.

Therefore, the purpose of this Code is to clarify and guide everyone on what attitudes should be observed when carrying out their activities and duties. Therefore, it is everyone's duty:

- To look after the image of a solid and reliable Company that operates in the market in an honest, fair, transparent and ethical manner;
- To comply with current and applicable legislation, whether national or foreign;
- To comply with the Company's internal rules;

- To practice competition in a clean and honest way;
- To respect human relationships, based on principles of equality, individuality and dignity, with relationships free from prejudice in any form, whether based on origin or social condition, religion, gender, color, ethnicity, age, sexual orientation, political preferences, hierarchical rank, physical condition, or any other form of discrimination.

Aligned with the Company's values and behaviors, this Code is a valuable tool for strengthening Bionovis' vision and mission.

7. Internal Relations

7.1. Employees

Bionovis values a decent, responsible and fair work environment, understanding that this is fundamental for its employees to carry out their activities properly and achieve professional and personal development. To this end, it seeks to promote relationships based on:

- Mutual respect among employees through fair, equal and non-discriminatory treatment;
- Healthy leadership, managers who provide conditions for development and decent treatment for all team members;
- Employees who carry out their activities in a professional manner and with the necessary skills to perform their duties properly;
- Equal opportunities in selection processes for internal promotions and hiring new employees; providing equal pay for men and women doing work of equal value or performing the same job;
- Intolerance of moral and sexual harassment, and whenever such practices are identified, they should be reported through the Whistleblowing Channel;
- Transparency and a permanent "open door" policy, so that all employees can feel comfortable and are encouraged to access the Human Resources area and

the company's senior management whenever there is a demand;

Bionovis values employees who have personal and professional attitudes based on the Company's values and encourages its employees:

- Act in accordance with Bionovis' guidelines and directions;
- Face up to their mistakes honestly and transparently;
- Let managers know about errors and mistakes as soon as possible so that problems do not escalate;
- Question and report any irregularities, violations, misconduct and/or situations contrary to Bionovis' principles and values to the Whistleblowing Channel.

Bionovis understands that privacy is everyone's right, and that it is necessary and fundamental for a healthy existence. Therefore, the Company ensures respect for the individuality of its employees and recommends that they conduct their lives in a correct, fair and upright manner, seeking to avoid situations that could reflect negatively on their reputation or the Company's image.

7.2. Respect, Diversity and Inclusion

Bionovis' policy is to promote Respect, Diversity and Inclusion, in addition to provide equal employment opportunity and support to our employees regardless of age, race, color, religion, sex, sexual orientation, gender identity, nationality, citizenship status, disability, physical condition, differing abilities, time with the company or any other characteristic and fully comply with all laws prohibiting discrimination, positive or negative, in all phases of employment (including, but not limited to, hiring, training, development, compensation, promotions, transfers, dismissals, use of facilities and selection for special programs). To remain competitive in every business scenario, Bionovis must actively recruit, retain and develop the most talented candidates from a wide range of walks of life, disciplines and backgrounds. Any kind of harassment or discrimination based on age, race, color, religion, sex, sexual orientation, gender identity, nationality, citizenship status, length of service or any other characteristic is prohibited. Any employee who is involved in such

harassing or discriminatory activity will be subject to disciplinary action, which may include termination of the respective employment agreement or direct or indirect link with Bionovis in any capacity, in accordance with the applicable legislation. Our goal is to behave in a socially responsible manner, ensuring compliance with this Code and applicable laws.

7.3. Prohibition of Child Labor and Forced Labor

Bionovis will not allow work to be carried out by people who are not of the minimum legal age required by the country's legislation, and applies the same prohibition to its suppliers. Exceptions to this rule apply to government-authorized professional training or apprenticeship programs that are clearly beneficial to the people taking part. In addition, Bionovis strictly prohibits child labor and forced labor in its operations and supply chain.

Bionovis rejects human trafficking and modern slavery, in accordance with law 13.344/2016.

Bionovis also seeks to respect, support and foster an atmosphere of inclusion, curiosity and engagement for everyone.

Bionovis recognizes that its workforce needs to mirror its customers, stakeholders and communities. If a regional imbalance is identified, Bionovis will seek to make improvements over time, bringing support and visibility to underrepresented target groups.

7.4. Protecting the confidentiality of private data

Bionovis takes very seriously any obligations arising from applicable legislations on privacy and protection of personal data, including, but not limited to, Federal Law No. 13,709/2018 ("Brazilian General Data Protection Act" or "LGPD").

8. External Relations

8.1. Shareholders

The relationship of Bionovis with its shareholders is based on transparency and the search for the best corporate governance practices.

Bionovis undertakes to:


- Disclose true information in a timely manner;
- Have veracity and accuracy in the financial statements;
- Cooperate with internal and external audits, providing all relevant information requested;
- Not to disclose unofficial information that could cause financial or image damage, or benefit others.


8.2. Public Administration, Public Agents and Politically Exposed Person (PEP)


As part of Bionovis' commitment to adhere to and respect the anti-corruption legislation and internal policies related to the fight against corruption, the practice of promising, offering or giving, directly or indirectly, undue advantage to the Public Administration, Public Agent and Politically Exposed Person is prohibited (PEP), Brazilian or foreign, or the third party related to it, in Brazil or abroad.

Therefore, no employee, individual or legal entity representing or speaking on behalf of Bionovis may, directly or indirectly, make, offer or promise payment or any undue advantage to any Public Administration, Public Official and Politically Exposed Person (PEP) or third party related to it, national or foreign, violating the current Anti-Corruption Law, national or foreign.

If any Public Official or Politically Exposed Person (PEP) makes any proposal that violates the current Anti-Corruption Law, national or foreign, or this Code, the employee must promptly reject the proposal and report it to the Whistleblowing Channel. Thus:

 Bionovis complies with the Anti-Corruption legislation in force in the country and interacts with the Public Administration in an ethical and transparent manner. Thus, it does not carry out or condone corrupt practices, bribe payments or offering undue advantages;

 In addition to this Code, the relations with the Public Administration, Public Official or Politically Exposed Person (PEP) must follow their own Code of Ethics, and in the event of conflict, the most restrictive must prevail;

 Only people previously authorized by the Statutory Directors and trained will be able to interact and carry out any type of relationship, agreements, contracts, meetings and communication with the Public Administration. Bionovis does not wish, under any circumstances, to obtain business or advantages by offering or promising an undue advantage.


If an employee is questioned or contacted by a representative of the Public Administration, Public Official or Politically Exposed Person (PEP), they must forward them to the area responsible for contact or request guidance from the respective manager.


8.3. Community

Bionovis' relationship with the community is based on social responsibility, transparency, mutual respect and compliance with current legislation.

8.4. Competitors


Competing companies are considered to be those that operate in the same market or market segment as Bionovis. Therefore, the Company:

 Seeks healthy competition with its competitors, maintaining an ethical, cordial and respectful relationship;

 It does not allow comments that could affect and jeopardize the image of competitors or contribute to the dissemination of false information about them;

 It does not hire or condone the hiring of companies or individuals for the purposes

of industrial espionage, illegal obtaining and use of competitor's strategic and/or confidential information;

 It does not admit any practice that could constitute a violation of the economic order.


8.5. Consulting Services


Bionovis may hire individuals or legal entities for the Consulting service, provided that they are formalized contractually and with objects, rights and duties aligned with its strategic positioning and through the prior Due Diligence process.


Financial transactions must be made directly into the bank account of the contracted individuals or legal entities and never into third party accounts.


8.6. Donations


Bionovis may make donations, as long as they do not generate the need for paying in return or the obtaining of undue advantages and that the benefited companies are subject to the prior Due Diligence process. Thus:

 Donations must enhance Bionovis' institutional image, benefit the community and be aligned with the Company's marketing and institutional interests;

 Donations must be made to the requesting company, through financial transactions made directly into its own bank account, never of third parties;

 Donations must be made to the requesting company, where the logistics of delivering goods, materials or objects of any nature must be made directly to its own business address, never of third parties;

 Due care must be taken to ensure that beneficiary of donations have resources and sustainability mechanisms to guarantee their existence, regardless of Bionovis' donations. Furthermore, care must be taken to make donations to entities that comply with current legislation;

 The benefited company must act with ethics, integrity and account for the donations received, as well as undertake not to pass them on to other companies or individuals with inappropriate, illegal or illicit activities, under the penalty of full

refund of the donation and legal liability;

- It is prohibited for legal entities to make any donations for party political purposes;
- Donations must respect Bionovis internal rules and be authorized, registered and accounted for;

8.7. Suppliers

The hiring of suppliers by Bionovis goes through the Integrity Due Diligence process, analysis of technical and business requirements. Relations with them are guided by the following principles:

- All candidates for supply or provision of services must go through the Due Diligence process, financial assessment, without any form of privilege;
- The presentation or indication of suppliers by employees, directors, advisors, shareholders or any other hierarchical level will not imply favoritism and the conflict of interest established and mapped in the item “Relatives of Employees” must be followed;
- Bionovis seeks to establish relationships with suppliers that comply with current Brazilian legislation, as well as foreign legislation, if applicable;
- Suppliers must undertake to comply with this Code, as well as Bionovis will seek to respect the Code of Ethical Conduct of its suppliers;
- Supplier companies or service providers that have Bionovis’ employees or shareholders, as partners or shareholders, will go through the same hiring process as other candidates, without privileges of any nature and must follow the established and mapped conflict of interest in the item “Relatives of Employees”;
- Bionovis will not negotiate with suppliers or service providers through intimidation, embarrassment or manipulation of information and considered disreputable before the Public Administration, that is, appearing on the Sanctions page of the national Transparency Portal website or on international restrictive lists.

Bionovis understands that the failure to comply with applicable legislations or the

existence of unethical conduct constitutes a breach of trust. Therefore, violations of this Code or legislation by suppliers will be analyzed by Bionovis and will be subject to appropriate disciplinary measures, which may result in termination of the agreement.







8.8. Press

Bionovis maintains relationships with the press based on true information. To avoid the disclosure of undue information or in incorrect situations, only statutory directors or people indicated and guided by them are authorized to speak on behalf of Bionovis. Any request for information, interviews, among others, must be forwarded to the Communication and Marketing Area, by email: marketing@bionovis.com.br

8.9. Bidding Process

Bionovis takes any obligations arising from applicable legislations on bidding processes very seriously, in accordance with the Federal Law No. 14.133/2021 (“Law on Bidding and Administrative Contracts” or “New Bidding Law”).

Therefore, in compliance with the Brazilian anti-corruption legislation, it is prohibited for any employee, representative or third party to:

-  Frustrate or defraud, through adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
-  Prevent, disrupt or defraud the performance of any public bidding procedure;
-  Repel or seek to remove a bidder, through fraud or offering an advantage of any kind;
-  Fraud a public bidding process or contract arising therefrom;
-  Create, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract;
-  Obtain an undue advantage or benefit, fraudulently, from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the act calling for public bidding or in the respective

contractual instruments; or Manipulate or defraud the economic-financial balance of contracts entered into with the public administration.

8.10. Inspection Agencies






Bionovis is committed to complying with all applicable legislations, national and foreign, and emphasized the importance of inspection agencies in relation to its activities and field of activity.

Everyone at Bionovis must cooperate and respond to inspections and investigations, providing information, data, documents, etc., with accuracy, cordiality, respect and good faith.

8.11. Patients

Bionovis' focus is on its patients, therefore, it seeks to understand their needs, identify opportunities and ways to exceed their expectations.

Bionovis knows that maintaining the highest quality standards for its products is essential to its success and, therefore, demonstrates its respect for patients through the following attitudes:

-  Use of materials and processes accepted by the country's official regulatory agencies;
-  Respect for health;
-  Not carrying out false advertising;
-  Respect for the secrecy and confidentiality of information received regarding patients;
-  Compliance with current legislation in the country.

Bionovis provides in its website www.bionovis.com.br, a Tell Us channel, Pharmacovigilance option, for patients to report doubts, complaints, suggestions, adverse events, among others.

8.12. Partners

Bionovis understands that established partnership relationships are marked by responsibility, respect and ethics. Thus, the following are desired attitudes from both parties in partnership relationships:

- Maintaining confidentiality regarding the other party's strategic information;
- Ethical behavior in relation to shared technologies, data and information;
- Respect the provisions of the Company's internal policies;

Respect the other party's Code of Ethics and Conduct. In the event of conflict between this Code and the other party's Code of Ethics and Conduct, the more restrictive shall prevail.

Both for suppliers and other business partners, Bionovis demands the respect and promotion of human rights in its activities, throughout its production chain and in the regions where it operates (in accordance with the Universal Declaration of Human Rights). Therefore, it seeks to establish business relationships with companies that share the same principles and values, rejecting the use of labor similar to slavery or child labor. All companies subject to this Code must provide decent working conditions for their employees, in addition to:

- Working hours, remuneration, benefits, health and safety requirements, in accordance with the labor legislation of each country;
- Respect and value differences between gender, origin, ethnicity, sexual orientation, religious practice, political and ideological conviction, social class, special needs, marital status or age.

8.13. Sponsorships

Bionovis may sponsor individuals or legal entities, provided that they are formalized contractually and with objects, rights and duties aligned with its strategic positioning and through the prior Due Diligence process.

Bionovis will exclusively sponsor cultural activities, sports, corporate or entertainment events, congresses, fairs, meetings, webinars, workshops, among

others, always with the purpose of advertising, new business or that are aligned with its strategy and/or with best practices in your segment.

Financial transactions must be made directly into the bank account of the contracted individuals or legal entities hereby sponsored and never into third party accounts. In the event of sponsorship of objects, materials or other things of value, Bionovis reserves the right to make payments directly to the source or establishment.

The individuals or legal entities hereby sponsored must account, whenever requested by Bionovis, and cannot allocate the resources, or part thereof, to third parties.

Sponsorships must be approved in advance by the Marketing, New Business, Compliance or Statutory Directors areas, as needed.

Bionovis will not sponsor, finance or fund any activities or situations that are considered incompatible with the corporate environment or immoral, illegal, illicit acts, provided in the anti-corruption legislation, national or foreign, or without specific regulation.

8.14. Health Professionals and Health-Related Professionals

Bionovis may hire Health Professionals or Health-Related Professionals, provided that they are formalized contractually and with objects, rights and duties aligned with its strategic positioning and through the prior Due Diligence process.

Financial transactions must be made directly into the hired professionals' own bank account, or that of their company, and never into third party accounts.

Professionals must comply with the rules of conduct in this code, as well as the national and foreign anti-corruption legislation.

8.15. Union

Bionovis respects free association, recognizes trade unions as legal representatives of employees and seeks constant dialogue to resolve labor and union conflicts.

8.16. Human Trafficking and Slavery in the Supply Chain

All Bionovis' suppliers and direct service providers must comply with law No. 13,344/2016 and Bionovis' policies against slave labor, child labor, human trafficking and slavery within the supply chain. Such topics of concern are included in the Supplier Qualification audit program.

Bionovis maintains internal responsibility for contracted people to meet company standards regarding slavery and human trafficking and requires its employees who deal with suppliers to report any suspected or detected violations in operations, as well as in the supply chain, which allow notification by other employees through the **whistleblowing** channel.

9. Conflict of Interest


Conflict of interest arises when the personal interests of the employees or third parties conflict with the interests of Bionovis, generating possible private favoritism. Conflict of interest is present in the day-to-day lives of companies, whether in their relationships with suppliers, representatives, third parties, customers, partners, public bodies or even among employees. Therefore, it is necessary to deal with it honestly and transparently so that Bionovis' interests are always preserved.

All conflicts must be reported to the Whistleblowing Channel as soon as they are identified by Bionovis' employees and/or partners so that they can be formally registered and processed.

It is everyone's duty to keep information on conflicts or potential conflicts of interest up to date.

9.1. Relatives of Employees

When relatives¹ act in a relationship of direct or indirect subordination, situations may occur in which the Company's interests do not prevail. Therefore, Bionovis accepts the hiring of employees' family members, as long as the following criteria are considered:

 The hiring or promotion of a family member of a Bionovis' employee will only occur if the candidate meets the necessary requirements for the position, without

¹ Bionovis understands as family relationships that may characterize a conflict of interest those existing between: parents, spouses, partners, children, stepchildren, sibling, grandchildren, grandparents, brothers-in-law, uncles, first cousins and nephews, fathers-in-law, mothers-in-law, sons-in-law and daughters-in-law.

privileges of any nature;

- They cannot act in direct subordination, considering the same directorate/reporting line;

- Bionovis does not recommend that relatives act as peers and report to the same manager. Hiring, internal promotions and transfers that generate this type of situation must be previously validated with the Human Resources and Compliance areas;

- Business relationships with suppliers, representatives, third parties, partners and customers who are related to a Bionovis' employee must be reported to the Compliance area;

- The hiring and management of the contract of suppliers, representatives, third parties, customers and partners cannot be carried out by a family employee or by a person who has any other type of relationship with the other party. The Statutory Directors or the Compliance area are responsible for indicating who will manage the contract.

9.2. Affective relationship between employees

The personal lives of its employees are respected by Bionovis. Therefore, the affective relationship between its employees will be accepted as long as there is no direct subordination relationship between those involved, considering the same directorate/reporting line. These relationships described herein must be reported to the Human Resources and Compliance areas.

Bionovis does not recommend that employees in these conditions act as peers and report to the same manager. Hiring, internal promotions and transfers that generate this type of situation must be previously validated with the Human Resources and Compliance.

9.3. Parallel Activities

Parallel activities are those that employees carry out outside their working hours, whether paid or not. Employees are free to engage in such activities, provided that they do not negatively impact their performance or the Company's image and do not constitute an act of competition for Bionovis. Furthermore, other aspects must be observed, such as:

- It is prohibited to carry out parallel activities during working hours or on the Company's premises;
- The use of Bionovis' assets for such activities, including those regarding intellectual property, is prohibited;
- It is prohibited for employees to participate in the management or boards of directors of companies competing with Bionovis, as well as to develop external activities that could characterize any type of conflict of interest with the Company's business;
- In order to ensure transparency in our business, we recommend that invitations to assume managerial and leadership roles, functions and positions, i.e. members, directors, management or coordination in any company be shared in advance with the Compliance area and resolved by the Ethics Committee and/or Statutory Directors;
- The use of Bionovis' internal confidential information in lectures, workshops, hearings, meetings, conventions, congresses, fairs, conferences, cocktails, courses, training, workshops and events in general, national or international or classes must be previously authorized by the manager, at least manager.
- Invitations to give lectures as a representative of Bionovis must be validated and authorized by the manager, at least manager.

10. GIFTS, PRESENTS, ENTERTAINMENT AND HOSPITALITY



In some situations, gifts, presents and hospitality may be offered or received between individuals and legal entities, such as at the end of the year. It is essential to ensure transparency in relations between Bionovis and its suppliers, representatives, shareholders, third parties, partners, customers and public agents and to respect this Code and internal policy regarding these situations.

Offering or receiving them must never be made with the intention of influencing any decision of Bionovis or vice versa, as well as obtaining undue advantages, therefore, they must respect the following rules:

The receiving:

- Consult the policy that describes the receiving rules in advance;
- Receiving the gift, present, entertainment or hospitality must be carried out

formally and within corporate environments;

🔵 **Gifts** for corporate use (in the workplace), such as headphones, bottles, cell phone holders, notebooks, diaries, notepads, pens, self-adhesive pads, calendars, etc. may be accepted as long as their market value is less than or equal to up to **twenty percent (20%)** of the minimum wage in force in Brazil, and/or that they have the logo of the company and/or the offering event;

🔵 **Presents** are considered to be items or objects, for corporate use or not, that are not classified as Gifts or that have a value greater than **twenty percent (20%)** of the minimum wage in force in Brazil;

🔵 Gifts and Presents received must be delivered to the Compliance area for raffle or appropriate destination;

🔵 Entertainment and/or Hospitality may be received as long as they are for professional purposes, are within the market value, occur for the execution of a proposal or contract, presentation of a product, technology, service, publicity, publicity or with clear purposes and objectives and that are previously authorized by the manager (at least manager) and the Statutory Directors;

🔵 Entertainment, Hospitality and other events without professional purposes or with a value above market value must be rejected. In case it is not possible to reject them, they must be delivered to the Compliance area for raffle or appropriate destination. In the case of doubts, consult your immediate manager (at least manager) or the Compliance area in advance;

🔵 It is prohibited to receive any gift, present, hospitality or entertainment from the Public Administration, which may violate the Anti-Corruption and Conflict of Interest Laws in force.

It is important that receiving gifts, presents, hospitality and entertainment do not require pay in return. In other words, upon receiving any of these items, the Bionovis' employee must not reciprocate with favors, money, privileges, confidential information, promises, favors, benefits, extension of contracts or any other form of undue advantage.

The offering:

- Consult the policy that describes the receiving rules in advance;
- Only people previously authorized by the Statutory Directors may offer gifts, presents, hospitality and entertainment;
- The offering of **Gifts** and **Presents** may be made, as long as their market value is less than or equal to up to **twenty percent (20%)** of the minimum wage in force in Brazil and that they are approved by the Statutory Directors;
- Entertainment and/or Hospitality may be offered as long as they are for professional purposes, are within the market value, occur for the execution of a proposal or contract, presentation of a product, technology, service, publicity, publicity or with clear purposes and objectives and that are previously approved by the Statutory Directors;
- There must be prior authorization from the Statutory Directors on what and when to offer, following good practices in corporate and business relationships and market values;
- The supplier, representative, partner, third party or customer must be aware of that they cannot transfer the gift, present, hospitality or entertainment offered by Bionovis to any other third party. If acceptance is impossible, it must be rejected immediately;
- Do not offer or receive presents, gifts, hospitality, entertainment, money, payment facilitator or any other benefit in exchange for favors or privileges or engage in acts of bribery, kickbacks, corruption or undue advantage.

The Code of Ethics and Conduct of the company to which the gift, present or hospitality will be offered must be respected, with the most restrictive prevailing.





Offer, in the case of public agents:

The Bionovis' employees must not offer or receive money, or any other benefit, in exchange for favors or privileges, or engage in acts of bribery, corruption or undue advantage. With regard to public administration, gifts, presents, meals, hospitality and

entertainment may constitute an undue advantage and, therefore, are always prohibited. Exceptionally, Bionovis may offer gifts and hospitality, pursuant to the terms provided in the Conflict of Interest Law in force and in the internal policy. Only people previously authorized and trained by Bionovis will be able to interact and carry out any type of relationship, agreements, contracts, meetings and communication with the Public Administration. Bionovis does not wish, under any circumstances, to obtain business or advantages by offering or promising an undue advantage with the Public Administration, Public Agents and Politically Exposed Persons (PEP). Remember that offering any gift or hospitality to a public official outside the terms of the Conflict of Interest Law in force and of the internal policy may constitute illicit conduct. If you have any doubts about best practices in relationships with the public sector, consult the policies that describe the rules in advance, contact your immediate manager (at least manager) or the Compliance area.

Events sponsored by third parties

When suppliers or potential suppliers, customers and partners offer hospitality and invite Bionovis' employees to events for professional purposes sponsored by them, the following guidelines must be followed:

-  Consult the policy that describes the receiving rules in advance;
-  If the invitation is not intended for a specific position, the area manager must define which employee will participate in the event. If the invitation is intended for a specific position, the manager must decide whether or not the employee will participate in the event;
-  Bionovis may bear the costs and expenses of the employee's travel, accommodation and food, in accordance with the Internal Policy;
-  The situations mentioned must be approved by the immediate manager (at least manager). Bionovis has a select group of employees who do not need prior approvals, since it is part of their duties to participate in corporate events of other companies, however, they must act ethically and transparently, as well as be accountable whenever requested.

10.1. Business meals

Only people authorized by the Statutory Directors may hold/participate in business meals. Bionovis has a select group of employees who do not need prior approvals, since it is part of their duties to participate in meetings, corporate events of other companies, whether or not there is a need for business meals, however, they must act ethically and transparently, as well as be accountable whenever requested.

Thus:

- Consult the policy that describes the specific rules and the limit value in advance;
- The employee with a higher position must pay for the meal and request a refund, in accordance with the internal procedure;
- Commercial or representation events that allow the consumption and expenditure on meals require approval from the Statutory Directors;
- In the case of meals with current or potential suppliers, customers or other partners, each party must bear their own expenses, except when previously approved by the Statutory Directors. Such meals should never generate an obligation to pay in return;
- Unnecessary spending should be avoided on meals;
- The offering of business meals or hospitality to any public official is not permitted, unless they are in accordance with the Conflict of Interest Law or with the specific policy and approved by the Statutory Directors.



11. HSE

HEALTH, SAFETY AND ENVIRONMENT

We adopt the best management practices in relation to Health, Safety and Environment (HSE), which allow Bionovis' processes to be more efficient and the Company to be aligned with the highest standards in force in the market. Actions to reduce the occurrence of accidents and incidents at work and environmental impacts are essential to protect our direct and indirect employees and all those with whom Bionovis interacts.

Reciprocally, everyone in the company plays an important role in reducing environmental disasters, work-related accidents and incidents. It is essential that everyone takes an active stance, seeking to guarantee and increase the quality and safety of activities, adopting good health practices and always making correct use of Personal Protective Equipment (PPE) suitable for the functions performed.

11.1. Safety and Health

Bionovis considers the health and safety of employees to be a Non-Negotiable Value. As such, it keeps Health and Safety procedures up to date to ensure that all employees are properly trained to carry out their activities safely, as well as to protect their property and assets.

Bionovis encourages its employees and visitors to:

- Report to the HSE area and CIPA (Internal Commission on Accident Prevention) all work-related accidents and incidents that may occur on the Company's premises or at its service, with employees, third parties, partners or service providers;
- Maintain cleanliness, organization and safety in workplaces;
- Use the mandatory PPEs to carry out activities and ensure that they are correctly used, stored and that others do it so;
- Inform the HSE area and CIPA of any risk situation in the work environment that they identify;
- Not to store, consume, or be under the influence of any type of narcotics and/or alcoholic beverages on the Company's premises or at its service;
- Report to the manager whenever they are undergoing medical treatment that involves the use of medications that interfere with reflexes and that could affect their or their co-workers' safety;
- Respect the Anti-Smoking Law of the State of São Paulo – Law No. 13.541/2009.

It is prohibited for unauthorized employees to carry weapons on company's premises.

11.2. Environment

Bionovis, aware of the need to manage natural resources, works to maintain its production chain in compliance with the current environmental legislation. To this end, it constantly works to comply with the environmental legislation applicable to its operation. Committed to the environment and future generations, Bionovis'

energy matrix comes from 100% renewable sources.

Furthermore, it demands the same ethical stance from its partners and service providers and the guarantee of compliance with the environmental standards.

Bionovis encourages and stimulates its employees or visitors to:

- Report to the HSE area any activity or professional conduct that does not comply with the current environmental laws;
- Carry out conscious consumption of energy inputs, water, as well as the appropriate disposal of waste following selective collection;
- Report to the HSE area any suspicious activity or conduct by employees or third parties that may affect or violate environmental standards.

12. ASSETS AND RESOURCES







Bionovis' assets and resources include: facilities, equipment, vehicles, software, systems, telephony, office supplies, whether owned, rented or leased, as well as inputs, semi-finished and finished products.

When Bionovis entrusts resources and assets to its employees, they must use them responsibly, in accordance with the following rules:

- Use the resource/asset appropriately and carefully, seeking to avoid unnecessary wear and tear and waste;
- Observe the need for preventive maintenance, whenever necessary;
- Use the resource/asset always aiming at cost control;
- Observe and follow the current legislation whenever they are in possession of

any Company's resource or asset;

-  Use only programs and assets licensed by the Company;
-  Not to use work systems and tools to carry out illegal or inappropriate acts, obtain personal advantage, access or disseminate offensive or immoral content, interfere with third parties' systems, participate in virtual discussions, etc.;
-  Report to the immediate superior (at least manager) any situation that indicates the possibility of loss, misuse or theft of assets;
-  Use the resources/assets only to carry out activities carried out by the Company, and use for any other purpose is prohibited.

The materials provided by Bionovis will be received by the employees upon signature of a delivery term and, upon dismissal of the employee, they must be returned in an appropriate state of conservation and use, except for natural wear and tear from use.

Consider and observe the rules defined in the Manual MA-TI-001 – Information Security in Electronic Media. According to such document, Bionovis reserves the right to control and monitor corporate media, as well as having free access to files stored on the equipment that make up its assets/resources. The Company also has the right to control and monitor access to the Internet and all corporate equipment interconnected to its information technology system (examples, but not limited to: computers, tablets, smartphones, telephones, etc.).

The e-mail, computer and cell phone made available for corporate use are Bionovis' property and, therefore, may be monitored, in order to ensure that they are used responsibly and in compliance with the other rules contained in this Code. In this regard, it is prohibited to send inappropriate, offensive, obscene messages, as well as chain letters or pyramids.

Bionovis also has the right to collect, at any time, its corporate equipment for verification purposes.

With the purpose of reinforcing the information and data security, all files and work materials must be saved on the Company's own server, avoiding storage on computers, tablets, smartphones, telephones and any other corporate equipment.

13. Customs security, supply chain and AEO – Authorized Economic Operator


Bionovis maintains management processes that minimize existing risks in its foreign trade operations and demonstrate commitment to customs compliance and logistics chain security criteria.

Thus, the company demonstrates the ability to satisfactorily manage risks related to the physical security of cargo and tax and customs compliance. Bionovis aims at increasing its value in international logistics and meets strict requirements related to the logistics chain, as failure to follow it could affect its operations.

Demonstrating reliability in international trade also occurs through certifications. An example is the AEO (Authorized Economic Operator) certification, granted by the Federal Revenue Service to operators in the logistics chain who meet the safety, compliance and reliability criteria established in their AEO program, regulated by Normative Instruction RFB 1.985/2020.

In compliance with all provisions, Bionovis encourages and guides its employees to adopt the following measures:

- Report any potential and/or actual incidents and/or acts with non-compliance involving customs security and the national and international logistics chain;
- Avoid unreasonably accessing data in the systems, as well as not unduly altering any information;
- Not to access cargo handling and storage areas without due authorization;
- Participate in and cause to comply with safety-related training provided by Bionovis;
- Ensure the integrity and safety of materials;
- Cause to comply with the internal flow of materials and goods as practiced by Bionovis;
- Act with good faith and ethics regarding such matters;
- Carry out inventory analyses, highlighting the study of resupplies without presenting unnecessary excesses, ensuring the reliability of acquisitions according to the production plan;

 Not to provide differentiated and/or personalized service to suppliers, thus ensuring impartiality in the acquisition of raw materials and consumable products;

14. Intellectual Property and Secrecy

Bionovis believes that its employees, suppliers, representatives, third parties, customers and partners are always willing to act in the best way so that Bionovis is a reference in the market. Therefore, it is essential that Bionovis' Intellectual Property is respected.

Intellectual Property is understood as the application of the knowledge of its employees and partners that adds value to Bionovis through patents, brands, formulas, procedures, internal processes, *know-how*, technical information among other confidential information that, if disclosed to companies and unauthorized people, could favor competitors and even violate the General Data Protection Act. All processes, activities, materials, campaigns, budgets, projects, drawings, reports, spreadsheets, Power point presentations, art, images, videos, opinions, responses, among others, that are prepared by the employees in carrying out their duties are also considered as Bionovis' Intellectual Property. In the event of dismissal, prior notice or dismissal of an employee, the employee is not allowed to take and take with them any confidential information from Bionovis, and sharing it, by any means, is expressly prohibited and subject to legal liability.

Therefore, it is prohibited to copy, transmit or distribute any information accessed due to professional activities performed, nor to use internal materials and content for personal purposes.

Before disclosing any information about Bionovis' procedures, processes, formulas or products, consult your immediate manager, at least manager, and/or Statutory Directors. Remember that information should only be disclosed if it is essential for the recipient to carry out some activity, be it an employee, representative, partner, supplier or third party.

Areas which, by virtue of their activities, have a specific need to share strategic and/or confidential information, such as, but not limited to, Research & Development (R&D), New Business (BD), Innovation, Intellectual Property and Communication, must formalize confidentiality agreements with their partners before sending the

information. These agreements must be carried out with the guidance of the legal area and/or the Compliance area, when necessary.

15. Political and Religious Activities

Bionovis respects the political and religious activities carried out by its employees, observing the following restrictions:

- Not to use Bionovis' image or any of its products to carry out political campaigns or religious preaching;
- The position held by the employee cannot be used to support a candidate or political party, nor a religious institution;
- Political and religious activities must not be carried out on the Company's premises and/or at its service, such as leafleting, or in any way characterize embarrassment or violation of the freedom to profess or not profess any religion;
- The exercise of political and religious activities must not cause any favor or detriment to the employee's performance;
- Employees who are affiliated or wish to become affiliated to any national or international political party must notify their immediate manager and the Compliance area in advance, as well as updating the term of conflict of interest whenever necessary;
- Employees who periodically make or wish to make political, national or international donations must notify their immediate manager and the Compliance area in advance;
- Bionovis respects all political and religious activities, but it has no obligation or the commitment to publicly declaring any type of vote or support. Employees are free to declare their vote or support, as long as it is not linked to the name, image and brand of Bionovis.



16. SOCIAL MEDIA

Bionovis understands the importance of social media as a means of socializing and expressing its users' political, sporting and cultural positions. Therefore, it is understood that the employee must behave in accordance with Bionovis' values both in the real and virtual world.

It is part of everyday life to share information on social media, but it is needed to be careful with what is being posted. An example is information about products presented at conventions and internal meetings that have not yet been officially launched on the market. As they are confidential, they should not be disclosed or shared on the Internet or via social networks to the external public. In the case of products that have already been officially launched, the advice is to share the content published on the official communication channels maintained by the company (website, official social media pages, etc.).

The use of social media should not affect the performance of professional activities.

As the employee is responsible for the content inserted on their social profiles or those of third parties, it is important to be aware of some issues:

- Do not post or make derogatory judgments or negative opinions about Bionovis, other employees, partners, clients, consumers or competitors, and may be subject to disciplinary action in the event of non-compliance;
- Make posts only at the request, recommendation and guidance of the Marketing team;
- Do not disclose information that is not in the public domain, i.e. that has not yet been disclosed in the media by the Company itself;
- Do not share or replicate articles or comments that jeopardize the Company's image;
- Do not share medicine packaging or advertise it;
- Do not create personal identities online using Company's brands, images, products or professional names other than your own.



17. CONFIDENTIALITY OF INFORMATION

Bionovis has very important information for the continuity of its business that could influence share prices and cause financial, reputational and image damage to the Company, its partners and, consequently, its employees.

Therefore, it is essential to ensure the confidentiality of internal information and not to disclose it without the prior knowledge of the immediate manager (at least the manager), the Compliance, Privacy and Information Security areas, even if it is not marked as confidential. Only persons designated by Bionovis are authorized to speak on its behalf.

Bionovis considers as confidential information, but not be limited to, the following:

- Suppliers' data, purchases, commercial conditions;

- Hiring and discontinuing contracts with representatives;
- Customers' information;
- Sales figures, margins, discounts, price lists, statistical and commercial data;
- Business expansion strategies or plans;
- Wages, benefits, bonuses, commissions and any other form of remuneration;
- Hiring or dismissal of employees;
- Software, management reports and documents in general;
- Culture and operational technology;
- Contracts or strategic plans;
- Lawsuits;
- Technical or product development;
- Intellectual property;
- Company's trade secrets;

Some useful attitudes for maintaining confidentiality:

- Maintain the confidentiality of passwords for computers, e-mail, systems and electronic devices;
- Sharing or borrowing system users and passwords is prohibited;
- Do not disclose information that affects Bionovis' image and results without prior authorization;
- Bionovis' strategic and confidential information must not be transmitted to employees, representatives, partners and third parties who do not use it in the performance of their tasks;
- Be discreet when talking about Bionovis matters in public places, especially if it is confidential information. Analyze whether the place and time are appropriate;
- Always report any irregularities, violations, deviations or information security

incidents you become aware of to the Whistleblowing Channel;

- Maintain the confidentiality of information accessed as a result of the professional activity carried out at Bionovis. Confidentiality shall continue even after eventual termination of employment agreement with Bionovis or the termination of commercial or contractual agreements;

- Professional and corporate communication must be conducted through official Bionovis' tools and channels and all information must be properly traceable and stored;

- Documents and files must be properly destroyed before being deleted.

Areas which, by virtue of their activities, have a specific need to share strategic and/or confidential information, in addition to personal data, such as, but not limited to, Research & Development (R&D), New Business (BD), Innovation, Intellectual Property and Communication, must formalize confidentiality agreements with their partners before sending the information. These agreements must be entered into with the guidance of the Legal Department, the Compliance Area and the DPO/ Data Protection Officer.

Bionovis requires its employees, representatives, partners, suppliers and third parties to be committed to the confidentiality of information and privacy, especially the General Data Protection Act in force, national or international, under the penalty of disciplinary measures and liability.

No one should disclose confidential information for their own benefit or that of third parties.

Every employee who joins Bionovis must execute a confidentiality agreement.

18. Privacy and Personal Data Protection

18.1. The Privacy and Protection

Bionovis values the protection of all personal data under its responsibility, including information about its employees, suppliers, customers and partners. To this end, it is committed to comply with the obligations defined by applicable legislations on the subject, including the Federal Law No. 13.709/2018 ("General Data Protection Act" or "LGPD").






Bionovis has set up an Internal Committee for Data Protection and Privacy (CPDP). The committee is responsible for promoting data protection and privacy, supporting senior management and acting as a tactical interface with information security and privacy processes, contributing with actions and measures to comply with the provisions of the General Data Protection Act (LGPD - Law No. 13.709/2018).

The Committee reports to the President/CEO and is made up of a multidisciplinary team from various areas, such as: Compliance, Information Technology, Marketing, Procurement, Workplace Safety, Quality and Human Resources.


It is the duty of all Bionovis' employees, representatives, third parties, suppliers and partners to ensure the protection of any personal data accessed as a result of the professional activity carried out in the Company, respecting the policies, standards and procedures that establish the personal data processing processes under the responsibility of Bionovis.

18.2. The Conducts

These are indispensable conducts:

-  To comply with all the rules defined through Bionovis' policies, standards and procedures on personal data privacy and the protection;
-  To participate in training and other awareness-raising activities on the processing of personal data;
-  To provide due support to Data Controller for the performance of activities and acts necessary to comply with the applicable privacy and data protection legislations, including, but not limited to, the provision of information necessary to fulfill requests from data subjects and/or competent authorities;
-  To look after the application of the General Policies for Information Security and Personal Data Protection;
-  To inform Bionovis' Data Controller in case of suspicion or confirmed occurrence of accidental or illicit situations of unauthorized access, destruction, loss, alteration, communication or any form of processing of personal data in non-compliance with the applicable legislation and/or Bionovis' policies, procedures and other internal

rules on privacy and data protection. Any communications must be addressed to the channel: dpo@bionovis.com.br;

 To collaborate with internal and external audits that aim at monitoring Bionovis' level of maturity in relation to applicable privacy and data protection legislations.









19. Ethics and Integrity Management at Bionovis

More than establishing culture and ethical behavior guidelines, Bionovis recognizes the importance of maintaining and reinforcing ethics and integrity within the Company through the following instruments.

19.1. Compliance Area

Responsibility for Ethics and Integrity Management at Bionovis lies with the Compliance area, jointly with the Ethics Committee and the Presidency.

The Compliance area is independent, with direct access to the CEO and has the following responsibilities:

-  Analyze situations not provided in this Code and applicable Policies to define how to proceed;
-  Clarify doubts and advise on how to act in the face of possible ethical dilemmas;
-  Analyze situations of non-compliance with this Code and applicable Policies in order to recommend actions to be taken;
-  Manage the Integrity Program;
-  Manage Compliance/Integrity Risks;
-  Manage the Whistleblowing Channel and coordinate corporate investigations, with total professionalism, secrecy and confidentiality;
-  Direct the occurrences and complaints received for investigation, including externally when necessary;
-  Report completed investigations to the Ethics Committee for information and resolution;

- Report Compliance statistics;
- Review periodically the Compliance Policies and update them whenever necessary;
- Review periodically this Code and update it whenever necessary.

19.2. Ethics Committee

The Ethics Committee is the body responsible for voting and resolving on disciplinary measures to be applied to those responsible for irregularities, violations or misconduct, which are investigated and proven by the Compliance area.

The Ethics Committee has specific regulations with its own duties and responsibilities.



20. WHISTLEBLOWING CHANNEL

The Whistleblowing Channel should be used to report irregularities, violations and deviations from this Code, its Policies, the Anti-Corruption Law in force, national or foreign, as well as any unethical, illegal or illicit conduct, through the following addresses.

- 📞 Telephone: **0800 810 8031**
- ✉ E-mail: bionovis@denuncias.contatoseguro.com.br
- 🌐 Website: www.contatoseguro.com.br/bionovis
- 📱 Application: **Contato Seguro (IOS e Android)**

These channels can also be used to report suspicious activities that jeopardize the security of the logistics chain or customs compliance.

The Whistleblowing Channel can be used in an identified or anonymous form to register a complaint in good faith and never with the sole intention of unfairly, immorally or unfairly harming the person or company being reported.

Everyone will have the full right of defense, to be heard and to tell their side of the story, and must present the evidence (conversations, documents, photos, videos, etc.) that proves, supports and substantiates what has been said or presented.

The channels are open to all audiences who do or do not have some kind of interaction, contact and relationship with Bionovis and it is essential to use them correctly, making consistent and truthful reports.

Whistleblowers in good faith are guaranteed confidentiality, secrecy, protection and non-retaliation when using any of the Whistleblowing Channel addresses.

Every complaint made through the Whistleblowing Channel will be strictly investigated by the Compliance department or a specialist company hired by the company and the conclusion will be brought to the attention of the Ethics Committee, which will decide on disciplinary measures to be applied to the person responsible for the wrongdoing, according to the severity, occurrence and recurrence of the proven act.

The whistleblower must periodically follow up the complaint made and respond, within the time limit, to all additional requests made by Bionovis, under the penalty of invalidation of the complaint for failure to provide the minimum information necessary for a rigorous and assertive investigation.

21. Violations of the Code

Violations of this Code must be reported and registered in the Whistleblowing Channel so that the internal corporate investigation process can be initiated.

Everyone, including members of the Board of Directors, is subject to appropriate disciplinary and contractual measures according to the seriousness and occurrence of the irregularity, violation or misconduct found. In cases of recurrences, disciplinary measures may be increased to the next level.

Everyone has the duty to immediately report any violation of this Code, Bionovis' policies and the Anti-Corruption Law, national or foreign, and failure to do so will also be considered non-compliance and therefore subject to appropriate disciplinary measures.



22. FINAL CONSIDERATIONS

Everyone is responsible for ensuring Bionovis' ethics, integrity, image and reputation. Therefore, it is everyone's responsibility to know and apply the guidelines of this Code, Policies, Laws, as well as other internal regulatory documents, in order to guarantee an environment and relationships based on high standards of ethical conduct and Bionovis' values.












Managers and leaders play a fundamental role in Bionovis' Ethics Management and are considered an important communication channel for guidance and clarification of doubts from employees, third parties, representatives, partners, suppliers and others.

Non-retaliation

Bionovis will not tolerate any form of retaliation against any person or company that has made a report in good faith about irregularities, violations and misconduct, and the person responsible for the retaliation will be subject to disciplinary measures.

23. Tips for Reflection

When in doubt about an action or decision, reflect and answer the following questions:

-  Does this action bother me or make me uncomfortable?
-  Do you agree with Bionovis' values?
-  Do you agree with the Bionovis' Code of Ethics and Conduct?
-  Do you agree with Bionovis' policies, standards and procedures?
-  Will this action have an impact on Bionovis' reputation or breach the Anti-Corruption Law?
-  Will this action affect other people?
-  Is it something I would proudly tell my family about?
-  Is it something that can take my sleep away?
-  Would I like to receive such treatment?
-  If it were my Company, would I want my employee to have this attitude?
-  If I were to comment on this action, practice or activity, would the people in my relationship (personal, family, community, etc.) find the situation acceptable?

If you still have doubts, consult your immediate manager, at least your manager, or the Compliance Area.

24. Approval

This Code of Ethics and Conduct is approved by the Presidency/CEO, whenever it is updated.

Edition 2023/2024 – Revision in November/2023.



25. Statement of Knowledge and Commitment (Employees)

Full Name: _____

Registry: _____

Area: _____

I hereby declare that I have received a copy of the Bionovis' Code of Ethics and Conduct and I am aware of its full content, undertaking to accept and practice all the rules, guidelines and other policies applicable to it.

I undertake to comply with it in full under the penalty of being subject to the appropriate disciplinary measures, including termination of my employment agreement with cause, in accordance with current labor legislation.

() I am aware and agree.

Signature: _____

Date: ____ / ____ / ____

26. Statement of Knowledge and Commitment (Third Parties)

I, _____,
enrolled with the Individual Taxpayer's Registration CPF under No. _____, hereby declare that I have received a copy of the Bionovis' Code of Ethics and Conduct and am aware of its full content, undertaking to accept and practice the guidelines and other policies applicable to it.

I undertake to comply with it in full under the penalty of being subject to the appropriate disciplinary measures, contract termination measures and current legislation.

() I am aware and agree.

Signature: _____

Date: ____ / ____ / ____

