

# CODE OF CONDUCT





## MESSAGE FROM THE BOARD

Working in the health care industry means making a commitment to life. This statement is especially true when referring to orphan medication, a challenge sector in which we are constantly facing situations that require us to go beyond our professional qualities to achieve clarity and discernment when it comes to our values, mission and vision. For this reason, this document is essential to remind us of the best ways to formalize the expectations of the company when it comes to ethics and the conduct of its employees and third parties in propagating our culture.

The contents of this document are applicable to and must be fulfilled by all employees and third parties, regardless of department or position.

Read this Code of Conduct carefully and disclose it while putting its principles to practice. You must also sign the term of commitment at the end of this document.

The Board

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## SCOPE OF THIS CODE OF CONDUCT

For the purposes this Code of Conduct, scope of its contents and the obligation to fulfill them extends to all employees, interns, advisors, independent service providers and third parties who work on or directly collaborate with the company's activities.

The President shall be responsible for disclosing the contents of the Code of Content.

## MISSION, VISION AND VALUES



### Mission

Provide fast, reliable and consistent access to the best therapeutic treatments for rare illnesses available in the world.



### Vision

A world where unfulfilled medical needs are rare.



### Values

Excellence, transparency and purpose

## INTEGRITY, RESPECT AND LOYALTY

### INTEGRITY

We understand that acting with integrity implies honesty, retention and impartiality.

### RESPECT

Respect means acting with consideration to actions, opinions and needs of others, respecting social, ethnic and cultural differences, including sexual orientation.

### LOYALTY

Acting with loyalty and commitment, defending Multicare's goals and interests.



INTEGRITY, RESPECT  
AND LOYALTY ARE  
FUNDAMENTAL VALUES AT  
MULTICARE

# DEFINITIONS

## **FOREIGN PUBLIC ADMINISTRATION:**

Governmental agencies and entities or diplomatic representations from foreign countries, at any government level, legal entities controlled by the government of a foreign country and international public organizations.

## **NATIONAL PUBLIC ADMINISTRATION:**

State agencies, services and representatives and other public entities whose purpose is to ensure collective needs such as security, education, health and well-being are satisfied.

## **CARTEL:**

An agreement between companies in order to control a market, determining prices and restricting competition, thus negatively affecting consumers due to price hikes and restricted offers for products or services, often making it impossible to acquire them.

## **THINGS OF VALUE:**

Money, gifts, trips, entertainment, job offers, sponsorships and scholarships, and anything else that might have considerable value.\*

## **LOYAL COMPETITION:**

The company's own means of developing competition, according to legal stipulations and ethical standards.

## **PUBLIC SERVANT:**

Any public agent (national or foreign) who works in government organizations, either full or part-time, regardless of having decision-making powers.

## **MONEY LAUNDERING:**

Simulating a financial operation to justify amounts obtained through illegal or undeclared means.

## **PUBLIC BIDDING:**

An administrative procedure in which government administrative entities hire private companies to provide products or services, competing with other participants and according to the requirements found in the Notice.

## **PUBLIC AGENCY:**

Direct and indirect administrative sector at the Federal, State and Local levels, covering entities governed by private law under the control of the public powers its instituted foundations.

## **DATA PROTECTION:**

Protection of information on natural, identified or identifiable persons.

## **BRIBERY:**

Offering, donating or delivering something of value or money, with the purpose of influencing someone, be them a public servant or company employee, so that they act unethically regarding their professional duties

## **INFLUENCE PEDDLING:**

Soliciting, demanding or obtaining, for oneself or others, an advantage or promise of advantage, for the purpose of influencing an act by a public service fulfilling his or her duties.

\* Amount in the Donations and Personal Benefits topic found in page 26





## CONSOLIDATING THE COMPANY'S VALUES BY PUBLISHING AND PRACTICING THE CONTENTS OF THIS CODE

### PURPOSE OF THIS CODE OF CONDUCT

- Establishing the guidelines and parameters for the relationship between employees, customers, providers, competitors, the press, society and government agencies.
- Consolidating the company's values by publishing and practicing the contents of this code.
- Creating mechanisms to control and survey the conduct expected of our employees.

## CONFLICT OF INTEREST

Conflict of interest can be defined as actions with specific interests at the detriment of those of the Company. Therefore, our employees may not participate, directly or indirectly, in companies competing with Multicare or that represent Multicare in the relationship with companies with direct or indirect interest and that could influence their decisions.

When a conflict of interest situation is determined, the employee shall relay the fact in written form to his or her immediate superior and to the Compliance Officer.

## RELATION WITH PROVIDERS, CUSTOMERS, COMPETITORS, THE PRESS, EMPLOYEES AND SOCIETY.

The company is assessed on its collective performance and on the perception of the people with which it engages in commercial relations. Therefore, we must always act to earn the trust and respect of all of the Company's target audiences and related persons.

### Customers

- The relationship with our customers shall be focused on transparency, availability and honesty. All of our actions must be clear and objective, aiming to preserve the integrity of our Company and of our customers, respecting contractual conditions and not taking improper advantage of executed contracts.
- We must always make ourselves available, looking for satisfactory solutions, whenever possible, for our customers' problems.
- All of our customers' confidential information must be protected.
- The relationship with our customers must be founded upon the continuous improvement of our services.
- We are vehemently against anti-competitive actions, monopolies or any other conducts that go against the market's good practices or that are considered a breach of the principles of freedom of competition.



## Providers

Providers are essential partners for our business, and we are proud to be working with them. The relationship of mutual trust and respect that we have with our providers is one of the key foundations of our activities and we must always aim to preserve it.

- Under no circumstance will we provide false information for the purpose of negotiations or omit facts and/or circumstances which, if exposed, could make negotiations with a provider unfeasible.
- Similarly, employees and third parties on behalf of Multicare shall not demand discounts, products, services or goods sold by the provider for personal use, nor receive anything of value of personal use as well.
- Employees are prohibited from maintaining any employment relations, be them continuous or casual, with provider companies.

\* Amount in the Donations and Personal Benefits topic found in page 26

## Interactions with Interfarma's code of conduct

This document is aligned with the Code of Conduct of Associação da Indústria Farmacêutica de Pesquisa (Interfarma). We understand that the document signed by Interfarma represents the ethical aspirations of all of our providers.

## Interactions with the code of conduct (providers and customers)

Multicare respects and supports the ethical and good conduct mechanisms of all of its Providers and Customers. This means we respect the determinations of all Codes of Conduct of our partners, but always with a bilateral outlook.

## Competition

Multicare understands that loyal competition is the basic element of all market operations and relations, and, based on this principle, the company aims to continuously improve the quality of its services.

# LIFE IS SOCIETY'S MOST PRECIOUS ASSET, AND ALL OF OUR ACTIVITIES MUST BE GEARED TOWARDS PRESERVING IT



## Society

As a health care company, Multicare has a great amount of social responsibility.

Life is society's most precious asset, and all of our activities must be geared towards preserving it.

Multicare's work must always be focused on social development, spreading knowledge and promoting healthy discussion in society, taking special care to be a vector of market development and, thus, contribute towards helping the public have access to the latest advances in medical science through a safe and efficient service.

## Press

Multicare firmly believes in freedom and acknowledges that the means of communications are essential to it. Therefore, whenever requested, Multicare will provide its cooperation with the press' activities. However, only spokespeople approved by the President shall convey any information or opinion regarding the Company. This determination is also applicable to social and digital media. Any requests from the press shall be immediately forwarded to the Communications Department.

We must always base our relationships with the press with respect and, especially, urgency, as the speed with which we respond to communications could affect our image in society.

## Environment

All of our activities must strictly follow environmental standards and laws, optimizing the use of natural resources, sustainable development and preserving nature and biodiversity.

Any environment damages caused by emergency situations shall be communicated to the relevant entities, Providers and other stockholders.



## Political parties

No employee or third-party, on behalf of Multicare, is authorized to:

- Issue any political opinions.
- Support or make donations to political candidates or parties.
- Use company resources for political purposes.
- Act on behalf of, or represent the company in politics.

Employees or third parties shall contact the Compliance Officer if they have any questions.

## EMPLOYEES

The ability to bring together good professionals is an accurate of a company's success.

It is the duty of all employees to promote a work environment founded upon respect, meritocracy and professional development.

We believe this will allow us to provide the ideal environment to attract new talents, while developing and retaining new ones.

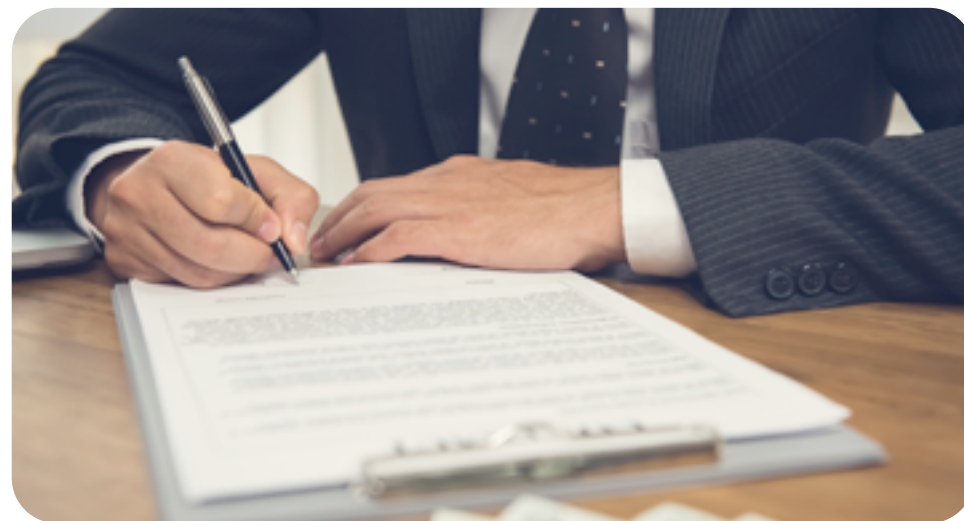
All of our employees must be committed to treating co-workers and job candidates with respect and dignity, protecting the health and well-being of everyone at work. Harassment of any kind will not be tolerated, including moral and physical harassment, as well offensive comments on race, ethnicity, personal beliefs, religion, sexual orientation, age, gender identity, nationality, medical condition (as defined by public laws), mental or physical disability or other characteristics protected by the applicable law.

Multicare respects and protects the privacy of its employees. Therefore, disclosure of personal or private information, or information limited to professional activities only, such as compensation, benefits, records, medical information, among others, is strictly prohibited. The use illicit drugs and alcohol during work hours is also prohibited. Employees must also refrain from being under the influence of this substances within the Company. Any attempts to harm the health and well-being of our employees will be considered a serious violation.

## RELATION WITH THE GOVERNMENT, REGULATORY AGENCIES, PUBLIC ADMINISTRATION AND PUBLIC REPRESENTATIVES (NATIONAL AND/OR FOREIGN)

Multicare's work is transparent and constructive towards all agencies, entities, institutions and government levels. All employees must provide complete, clear, accurate information in all public communications and documents sent to government agencies.

Multicare does not tolerate any practice deemed illegal or immoral. Bribes given by employees or third parties to public servants or government representatives with the goal of obtaining preferential treatment or even execute a contract in favor of the Company will not be tolerated.



According to Brazilian Mo. 12846/13 (Anti-corruption Law - On Acts against National or Foreign Governments), the actions below are strictly prohibited to employees or third parties when conducting their work activities:

## MULTICARE DOES NOT TOLERATE ANY PRACTICE DEEMED ILLEGAL OR IMMORAL.

- Promising, offering, giving, authorizing and/or influencing to provide, directly or indirectly, an advantage of any kind to a public servant or any related individual;
- Funding, sponsoring or instigating illicit activities;
- Using an individual person or legal entity as a proxy to hide or dissimulate one's actual interests or the identity of beneficiaries of practiced actions;
- Hindering, through adjustments, deals or any other means, the competitive nature of the public bidding process, as well as the bid itself and its resulting contract;
- Prevent, hinder or defraud the bidding procedure;
- Force or encourage someone to leave the bidding process through fraud or providing an advantage of any kind;
- Obtaining any improper advantages or benefits in a fraudulent manner, including of modifications or extensions of contracts executed with the government, without legal authorization, upon being called for the public bid or on the respective contractual documents;
- Manipulating or defrauding the financial and economic balance of the contracts executed with the government;
- Hindering the investigation or inspection efforts by government entities, agencies or representatives, or intervening with the, including against the actions of regulatory agencies and financial inspection organizations.

## DONATIONS AND GIFTS

Multicare employees shall be permitted to provide or receive gifts if the following conditions are fulfilled:

- The gift must not influence company negotiations or the process of negotiations.
- A maximum of only three gifts may be received in a year.
- The gift must not exceed 1/3 of the total minimum wage.

If an employee receives a gift that violates the above conditions, the gift must be cordially returned, information those who provided it about the existence of the Code of Conduct and later informing the Compliance Officer of the event.

Sending and/or receiving gifts and donations to/from government representatives and any employees who may have any kind of relation with government entities.

## INVITATIONS AND TRIPS

Invitations or expenses related to trips, such as transport, accommodation and meals may be paid or reimbursed by the Company to third parties, as the trip in question is tied to professional activities or scientific events with actual relation to the development of the company's activities and only upon prior authorization by the Compliance Committee.

Similarly, our employees may have their travel expenses paid by suppliers, as long as this is for professional purposes only and without ulterior commercial intentions, and only upon prior authorization by the Compliance Committee.

## HANDLING CONFIDENTIAL INFORMATION

All employees, suppliers and service providers must preserve the confidentiality of the Company and its commercial partners' non-public information. Employees, suppliers and service providers shall never use this information for their own benefit or those of third-parties. This includes protecting passwords used to access internal systems and e-mail accounts, along with strategic information, including, but not limited to, investments, financial results and operational data.

## PROTECTION OF PERSONAL DATA AND COMPLIANCE WITH THE GDPR

All personal data processed by Multicare to render their services is considered confidential, and will be handled and stored in accordance with the privacy policy and the General Personal Data Protection Law, with the proper adoption of relevant security measures. As such, all employees, suppliers and service providers are responsible for preserving the privacy and security of the personal data belonging to Multicare, its business partners and its customers, and not use them for their own benefit for the benefit of third parties.

To ensure that any information remains confidential, employees or any other individual must communicate directly to the company's Data Protection Officer (DPO) in the event there is any suspicion of data leakage, inquiries from customers or third parties, or even a need for further information, through the following email: [dpo@multicarepharma.com](mailto:dpo@multicarepharma.com)





THE TRANSMISSION OF DEFAMATORY COMMENTS, IMAGES OR FILES THAT ARE OFFENSIVE OR ARE, IN ANY WAY, DISCRIMINATORY IS STRICTLY PROHIBITED

## PROTECTING ASSETS AND PROPERTY

The commitments below must be taken up by everyone:

- Personnel must conserve any materials or equipment given to them and avoid wasteful use and unnecessary expenses.
- All electronic communications equipment is owned by the Company. They are provided as tools to help employees perform their tasks.
- Electronic communication resources must be used solely for professional purposes. The transmission of defamatory comments, images or files that are offensive or are, in any, discriminatory is strictly prohibited.
- Employee access to any website through Multicare's servers is restrict to the development of the company's activities.

Multicare reserves the right to block and/or monitor internet usage within the company without prior warning, including through mobile devices, emails and messages. Inappropriate use of internet access is strictly prohibited.

## CONDUCT AND COMMITMENT WITH SUPPLIERS AND SERVICE PROVIDERS

All suppliers and service providers must be committed to the principles laid out in this document, especially in relation to the following:

- Fulfilling the current legislation, rules and regulations.
- Notifying the Director of the contracting area and the Compliance Officer of any conflicts of interest, as defined in this document.
- Ensuring relations with the company are based on ethics, fairness and transparency.
- Repudiating child labor or any other form of mandatory work.
- Fulfilling policies related to gifts, donations and invitations to trips, as exposed in this document.
- Ensuring an environment in which all individuals are treated with respect, ensuring freedom of expression and fighting against all forms of prejudice.
- Notifying the proper areas through our Ombudsman Channels of any breaches to this Code of Conduct in relation to the concepts of ethics and conduct defined herein.

## COMPLIANCE COMMITTEE AND COMPLIANCE OFFICER

Multicare's code of conduct aims to cover a majority of situations in an objective manner. However, there may be daily situations that may not be contemplated in this code. In this case, we suggest that our employees consult with the Compliance Officer.

We've also created the Compliance Committee to direct any questions and take all necessary measures for each situation. If you have any questions or reports to make, contact your immediate manager. If, however, you do not feel comfortable to do so, please contact our Ombudsman Channels.

Remember that, the moment you become aware of the contents of this code, you will also be responsible for fulfilling its obligations. Therefore, you are obligated to report any suspicious or non-compliant actions.

Multicare's Compliance Committee shall be responsible for investigating all reported cases until a decision can be made. No retaliations shall be made against any employees for reporting on suspicious actions.

## SANCTIONS

The rules and standards of this code must be fulfilled by everyone.

Violating this code will result in disciplinary measures, from verbal and written warnings to contractual termination, or termination of contractual relations in the case of Service Providers.

If an employee or third party becomes aware of any violations, the employee or third party shall report the event through the Ombudsman Channels.

THE MOMENT YOU BECOME  
AWARE OF THE CONTENTS OF  
THIS CODE, YOU WILL ALSO BE  
RESPONSIBLE FOR FULFILLING  
ITS OBLIGATIONS

## TERM OF COMMITMENT

All directors, advisors, employees, supplier customer and service provider at Multicare shall be responsible for knowing, accepting, fulfilling and disclosing this Code of Conduct, ensuring all of its conditions are met.

All personnel shall also take care to prevent and detect conduct that is incompatible with this document, reporting any violations through the Ombudsman Channels. The Term of Commitment, renewed yearly, shall be filed in the Human Resources Department after signed.

I, \_\_\_\_\_, am aware of the existence of Multicare's Code of Conduct and agree with its contents, knowing it is now part of my obligations as an Employee. I am committed to complying with the terms of the Code of Conduct.

\_\_\_\_\_, \_\_\_\_\_ 20\_\_

Name: \_\_\_\_\_

Signature: \_\_\_\_\_



## **OMBUDSMAN**

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The logo for Multicare Pharma features a stylized white graphic of two overlapping curved lines above the company name. The word "multicare" is written in a bold, lowercase sans-serif font, and "pharma" is written in a smaller, lowercase sans-serif font directly below it.

**multicare**  
pharma