

CODE OF ETHICS AND CONDUCT

Dear Associates,

We at Oncoclínicas conduct our activities ethically, defending fundamental principles of respect for life, transparency and honesty.

The Code of Ethics and Conduct reflects Oncoclínicas' commitment to integrity and, together with our values and corporate culture, plays a key role in building the foundations for the success of our business.

It has rules that must be followed by all Associates in the performance of their duties and its guiding principles are compliance with the laws and regulations applicable to our activities and the adoption of the highest business ethics standards.

It is our duty to know the values and rules included in this code and in the other company policies, to practice them in our daily lives and to disseminate them in our value chain.

Yours sincerely,

Dr. Bruno Lemos Ferrari
Chief Executive Officer

Cinthia Maria Ambrogi
Chief Legal, Compliance & ESG Officer

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Our public commitments and recognitions

Our company is a signatory to the **Business Pact for Integrity and Against Corruption of Ethos Institute**, an OSCIP (Civil Society Organization of Public Interest) the mission of which is to encourage and promote social responsibility in the corporate environment.

The signatory entities of the pact are committed to the disclosure of anti-corruption legislation and fight against any form of bribery, also working for transparency and mobilization to promote business ethics.

Also, in the same area, we have adhered to the **Brazil Pact for Business Integrity**, an initiative of the Office of the Federal Comptroller General (CGU) that encourages companies that operate in the country to voluntarily make a public commitment to business integrity.

We have also adhered to **EPHiC - Ethical Principles in Health Care**, an initiative of IFC (*International Finance Corporation*). EPHiC is composed of ten guiding principles of the performance of the entities that make up the segment, aiming to bring ethics, cooperation and reliability in the offering of health services by the private sector.

The company is part of the **UN Global Compact Brazil Network**, a voluntary initiative that aims to promote corporate sustainability and compliance with the Sustainable Development Goals (SDGs).

Our compliance program has been recognized by the **Pro-Ethics Seal** for two consecutive biennials (2018-2019 and 2020-2021).



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1 – PURPOSE

To disclose to Associates and Third Parties the values and rules to be followed in the performance of their activities.

2 - TARGET AUDIENCE

The Code of Ethics and Conduct applies to all Associates and Third Parties working at or for Oncoclínicas.

3 - DEFINITIONS

Public Agent(s): all those who exercise, even if temporarily or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, commission, position, employment or public function in Brazil or abroad. For the purposes of this code, all those who hold a position, employment or function in a quasi-governmental entity will also be considered Public Agents, as well as those who work for a contracted or accredited service provider company for the execution of a activity typical of the Public Authorities; political party (and its employees); and candidates for national and foreign public positions. Their relatives, in the direct line, up to the second degree, the spouse, the partner, the stepchild and the stepdaughter will also be considered Public Agent(s).

Close Friend(s): the one with whom one has a very close relationship, of great trust; with whom one has frequent contact at home, on trips, etc.

Compliance Channels: channels made available by Oncoclínicas so that its Associates and third parties can make questions about compliance and report any suspected violations of the Code of Ethics and Conduct and its policies. Contact can be made by telephone, at 0800-591-8829, by email oncoclínicas@canaldeintegridade.com.br or through the website <https://www.canaldeintegridade.com.br/oncoclínicas/>. The reports are considered confidential and can be made anonymously.

Code of Ethics and Conduct: It is the Code of Ethics and Conduct of Oncoclínicas that, together with the policies and other internal rules, defines the expected conduct of Associates and Third Parties in the performance of their functions.

Associate(s): All those acting on behalf or representation of Oncoclínicas, including members of the Board of Directors, officers (in accordance with the Articles of Incorporation or otherwise), employees and medical service providers. The members of the COAUD (Audit Committee), the Fiscal Council (when installed) and non-medical service providers do not fall within the definition of Associates, but are subject to the terms of this policy for reasons of governance, thus being called Specific Users.

Corruption: It is the act or effect of corrupting someone or something with the purpose of obtaining unlawful advantages.

Compliance Area: The Compliance Area acts as the company's second line of defense, being responsible for the compliance function. The Compliance Area, through the Compliance Board of Officers, reports directly to the Chief Legal, Compliance and ESG

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Board of Officers. It consists of specialized professionals, who do not have a reporting relationship with Oncoclínicas' operational areas, with total autonomy and independence to request and access all Oncoclínicas' documents. All its members, including Chief Legal, Compliance and ESG Officer, have formal guarantees to avoid arbitrary punishment and allow them to carry out their activities autonomously.

Compliance Group: Group comprised by the officers of the Legal, Compliance and ESG, Scientific, Human Resources and Technical Boards of Officers of the Holding, with the participation of representatives of the other Boards of Officers, when necessary. It reports to the Compliance Committee and is responsible for promoting the broad internal (to employees) and external (to customers, suppliers, partners and interested third parties) disclosure of the Compliance Channels, the Code of Ethics and Conduct and its policies; determining the sanctions and remediation plans to be adopted in cases of violation of the Code of Ethics and Conduct and its policies, and other functions provided for in its regulations or as determined by the Compliance Committee.

Oncoclínicas: Covers Oncoclínicas do Brasil Serviços Médicos S.A. and all subsidiaries, controlled companies, affiliated companies, or companies that are in any way part of its structure.

Money Laundering: Process by which values, assets or rights originated, directly or indirectly, from criminal activities are transformed into assets of apparently legal origin.

Kinship: Relationship between spouses, partners, or relative, by consanguinity or affinity, in a direct or collateral manner, up to the third degree, that is, father, mother, grandmothers, grandfathers, siblings, children, stepchildren, nephews, nieces, uncles, aunts, cousins, grandchildren, in-laws, brothers-in-law, sisters-in-law, sons-in-law and daughters-in-law.

Legal Entities Equivalent to Public Bodies (PJE):

- (a) Public entities, including any independent agencies, bodies or other legal entities legally considered parties to the direct or indirect administration or Foundations of any of the Branches of the Federal Government, States, Federal District, Municipalities and Territories (Executive, Legislative and Judicial Branches);
- (b) Public companies or mixed-capital companies with a government participation of at least 50%, or that annually receive more than 50% of their income from the public authorities. Entities that receive subsidies, tax and financial incentives from public entities. Ex.: health self-management;
- (c) For criminal purposes, individuals with a position, title or function in quasi-governmental entities or who work for a service provision company contracted or accredited to perform the activity of the Public Authorities are equivalent to public officials; and
- (d) The physician and the administrator of a hospital entity accredited with SUS [Unified Health System] exercise a delegated public function and, therefore, are equivalent to public officials for the purpose of applying criminal legislation.

Politically Exposed Person (PEP): Individuals who perform or have performed, in the last five years, in Brazil or in foreign countries, territories and dependencies, relevant positions, jobs or public functions, as well as their representatives, family members and

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close associates. Resolution No. 29, Article 1, paragraph 1 of the COAF [Financial Activities Board] presents a list of people who are considered PEP.

Third Parties: Legal entities (including their employees and subcontractors) or individuals hired to work with or for Oncoclínicas, including any service providers, business partners, customers and suppliers, except physicians.

4. PRINCIPLES AND VALUES

In the essence of Oncoclínicas, the patient is the center of everything. It is for them that we seek the most advanced treatments and the highest level of quality and safety. It is for them that we work and dedicate ourselves, daily, to offer a comprehensive, individualized and multidisciplinary service, respecting the concept of integration of the care chain in all our fronts of action. Our mission is to beat cancer with a highly qualified clinical staff and the most advanced technologies, with professionalism, integrity, humanism and responsibility.

Thus, to achieve excellence throughout our care line, below are the principles and values that must be observed by all Associates of Oncoclínicas in the performance of their activities:

- Integrity
- Teamwork
- Owner spirit
- Simplicity, objectivity and resolution (SOR)
- Result
- Respect
- Meritocracy
- Leadership

5 - GUIDELINES

5.1 - Conduct and Personal Relationship

Oncoclínicas values a healthy and harmonious work environment. To this end, we require our Associates and Third Parties to adopt a cordial, responsible and respectful attitude in their professional relationships. In the performance of their duties, the Associates must:

- Provide our patients and other people with whom they have professional interactions with a respectful, courteous, efficient and humane treatment;
- Participate in training and qualification, as requested, including, but not limited to, those related to this Code of Ethics and Conduct and its policies;
- Protect the heritage of Oncoclínicas and protect its image;
- Only carry out activities for which they feel able and properly trained, seeking guidance from the leadership and/or related area to resolve any doubts;

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- Communicate to leadership if they are under medical treatment that requires the use of medication that impairs the performance of their duties. Oncoclínicas does not allow its Associates to work under the influence of alcoholic beverages or illicit drugs;
- Collaborate for the proper accomplishment of tasks and guide with patience those who request help;
- Provide clear and accurate information;
- Refrain from discriminatory acts of any nature based on gender, sexual orientation, nationality, religion, origin, ethnicity, physical condition, etc.;
- Refrain from practicing any acts that can be understood as harassment, sexual or moral harassment and bullying; and
- Refrain from selling, buying or advertising any merchandise or service, whether personal or from third parties, on any of Oncoclínicas' premises.

Associates and Third Parties must also consult the Fight against Moral Harassment Policy and the Fight against Sexual Harassment Policy for more information on the topics.

5.2 - External Contacts, Press and Social Media

Out of respect for its patients, customers, Associates, Third Parties and the community in general, Oncoclínicas maintains an open channel with the press, public agencies and interested parties, including professional bodies and unions, and is committed to communicating clearly and accurately. To achieve this purpose, the following rules must be observed by all Associates and Third Parties:

- All professional contact with the press, as well as public statements about the business of Oncoclínicas and the activities of Associates and Third Parties - with regard to their performance as a business partner of Oncoclínicas - including in social media and discussion forums on the Internet, symposiums and seminars, must be previously approved by the Corporate Communication area (comunicacao@oncoclinicas.com);
- There must be an open channel for dialog with employers' associations and employees' unions. Oncoclínicas respects the right of free association of its Associates and Third Parties to unions and other class representative bodies.

Associates and Third Parties must also consult the Social Media Use Policy for more information on the topic.

5.3 - Use and Protection of Values and Assets of the Company

It is the duty of all Associates and Third Parties to protect the values and assets of Oncoclínicas, such as its facilities, equipment, furniture, vehicles, intellectual property, which includes, for example, our brands, secrets, models, business plans, know-how (knowledge), methods and processes, and values in kind, including cash, checks and negotiable instruments in general. To this end, we require that Associates and Third Parties:

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- Use the assets and values exclusively for the appropriate performance of their activities;
- Report to the leadership any suspicions of deviations of assets and values;
- Adopt the necessary measures to protect the assets and values in their custody;
- Refrain from using, for their own benefit or that of third parties, any rights and assets of the company that may be protected by intellectual property rights, including trademarks, patents, inventions, software and works subject to copyright. Developments that may be protected by intellectual property rights arising from or related to the performance of the activities of Associates and Third Parties are the property of Oncoclínicas, unless there is a specific contractual provision to the contrary.

5.4 - Occupational Health and Safety

Oncoclínicas guarantees adequate working conditions in all its establishments, carrying out preventive and corrective actions, focusing on the safety and well-being of all. Associates and Third Parties are key elements for the achievement of this objective and must:

- Be aware of the rules and procedures for carrying out their professional activities, preserving their physical integrity and the physical integrity of patients, other Associates and Third Parties and of all those who may be affected by their actions;
- Necessarily use the personal protective equipment (PPE) recommended for their activity;
- Carry out admission, periodic and dismissal medical examinations;
- Report any incidents or situations that may pose a risk to the integrity, health or safety of patients, other Associates and Third Parties.

5.5 - Environment

Oncoclínicas conducts its activities taking into account its responsibilities for the preservation of the environment. Associates and Third Parties must actively contribute to the achievement of this objective, adopting the following conducts:

- Act in a preventive manner in relation to potential risks to the environment, promoting the rational use of resources, such as water, paper, electricity, etc.;
- Observe current legislation and best practices in the conduct of waste management and treatment actions.

Associates and Third Parties must also consult the Sustainability Policy for more information on the topic.

5.6 - Treatment and Confidentiality of Information

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The information of Oncoclínicas to which Associates and Third Parties have access is, as a rule, confidential. Unauthorized disclosure of this information may harm Oncoclínicas. Associates and Third Parties must adopt the necessary measures to maintain the confidentiality of the information under their custody and responsibility, and they are required:

- Not to disclose or share confidential information with people who do not need such information for the performance of their activities;
- Not to delete, destroy or copy information produced in the performance of their activities. All data, models, documents, spreadsheets and other materials produced by our Associates and Third Parties in the performance of their activities belong to Oncoclínicas, unless expressly provided otherwise in writing;
- To obtain from our business partners a commitment to treat Oncoclínicas' sensitive information as confidential;
- To refrain from using confidential information of Oncoclínicas for their own benefit or that of third parties;
- To sign confidentiality instruments, if so requested, confirming their commitment to treat Oncoclínicas' information as confidential.

The obligations listed above also apply to the treatment of sensitive and confidential information of Oncoclínicas' business partners - suppliers, customers, patients, among others - to which Associates and Third Parties have access.

Associates and Third Parties must also consult the company's Privacy Policy for further guidance on the treatment and storage of sensitive information, personal data and compliance with the requirements of the General Data Protection Law and the Relevant Act or Fact Disclosure Policy.

5.7 - Ethical Issues in Scientific Research, Training and Development

Oncoclínicas seeks to promote the improvement of its Associates and Third Parties, and, to that end, promotes and encourages participation in development activities and scientific research, in order to improve patient care, as well as to discuss issues related to their treatment (review of cases). Associates and Third Parties who participate in this type of activity must observe the following:

- It must be ensured that in research involving human subjects, participants have clearly understood the purpose of the research and the potential risks to which they will be subjected;
- The necessary measures must be taken to protect the privacy of patients;

All information from the development of these scientific productions will be duly safeguarded and will be the property of Oncoclínicas. Oncoclínicas' intellectual property

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covers ideas and creations developed internally or in partnerships and includes its trademarks, patents, copyrights, software registrations, etc.

Associates and Third Parties must also consult the Internal Rules of the Research Committee.

5.8 - Conflicts of Interest

A conflict of interest occurs when the individual interests of Associates and/or Third Parties in the performance of their professional activities prevail or appear to prevail over the interests of Oncoclínicas and/or improperly influence their work. Some situations that may imply a conflict of interest are listed below:

- Kinship relationship and affective relationship between Associates and Third Parties are allowed, provided that there is no level of hierarchical subordination, influence and management among those involved;
- Associates and Third Parties may not carry out activities that are or may be in conflict with the interests of Oncoclínicas, except for particularities of profession and area of activity, such as physicians who work in more than one institution;
- It is not allowed to maintain other businesses or activities that impair the ability to deliver and carry out activities at Oncoclínicas.

Every Associate will sign a Transparency Statement (Exhibit I) and may be requested, at any time, to provide periodic confirmations/ statements in this regard.

Additional guidance on this topic is available in the Policy on Related-Party Transactions and the Policy on Conflict of Interest Management.

5.9 - Gifts and Presents, Entertainment, Invitations to Events and Networking

The offer of presents, entertainment and hospitality is common in the business world and can play an important role in the construction and maintenance of contact networks; however, it is necessary to adopt certain measures and limits to prevent these offers from being understood as undue advantages.

Associates and Third Parties must not request, accept or receive money, benefits, favors, presents, promises or any other advantages that have or appear to have the purpose of influencing the performance of their activities or that are offered as a reward for an act or omission arising from their work. The following are guidelines on this topic:

Gifts and presents

- Associates and Third Parties may not request gifts and presents from our business partners;
- Associates and Third Parties may accept gifts and presents voluntarily offered by our business partners, subject to the following limitations:

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- The gift or present must have a market value of up to three hundred reais (BRL 300.00);
 - The offer of the gift or present must be occasional and usually related to celebrations or festive dates (example: company birthday, Christmas, tribute to the professional's day);
 - The gift or present may not have, or appear to have, the purpose of influencing the performance of the Associate's or Third Party's duties or be offered as a reward for an act or omission arising from their work.
 - If the Associate and Third Party accepts the gift or present and, upon receiving it, identifies that it is a product that has a market value above three hundred reais (BRL 300.00), they must return it to the business partner.
- Associates and Third Parties must not accept, under any circumstances, the offer of money or equivalent, such as purchase vouchers.

Entertainment

- It is forbidden to accept invitations to sport, artistic and entertainment events in general.

Invitations to Events and Networking

- Associates may accept invitations to networking events, such as lunches and dinners, provided that such event is not used to influence their performance or decision in relation to the supplier, customer or business partner, and must consider that the cost of the event cannot be disproportionate in relation to the financial relevance of the relationship between the parties or the size of the supplier, customer or business partner. When the above does not apply, Associates must pay their own expenses, requesting subsequent reimbursement, as prescribed in the Policy on Advance and Reimbursement of Expenses;
- When the Associate is invited as a speaker or participant in a professional improvement event, the trip may be fully subsidized by the event organizer. The invitation may not have, or appear to have, the purpose of influencing a business decision of the event organizer in relation to Oncoclínicas and vice versa, and the hospitality offered (air tickets, lodging, transportation, registrations for the event and meals) must be of reasonable value and compatible with the nature of the event. Furthermore:
 - The grant offer may not be extended to the family members of the speaker or guest, or other individuals indicated by them;
 - The participation in said event must be submitted to the prior approval of the direct leadership of the Associate and the Compliance Area, through the Compliance Channels. In addition, all Associates may be requested, at any time, to provide detailed information and documents and proof related to expenses of events to which they have been invited;
- The cost of air tickets, lodging and other expenses by our business partners for technical visits and the like must be previously approved by the Compliance Group. The Associate who receives such an offer shall request approval by the Compliance Channels.

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The offer of presents, entertainment and invitations to events and networking for business partners must be made observing criteria of reasonableness and convenience with regard to the values, frequency and nature of the offer and must aim to promote Oncoclínicas' business. The Associate who wants to make the offering must seek the approval of their Executive Board and the Corporate Communication area, through the e-mail comunicacao@oncoclinicas.com, and must make sure that the offer is compatible with the compliance rules of the business partner.

All offers, made or received, must strictly observe the limitations imposed by the legislation in force, in particular the regulations that deal with the medical conduct and the relationship of health professionals with the pharmaceutical industry.

Offers in violation of the terms of the Code of Ethics and Conduct shall be refused.

5.10 - Third Parties

The existence of a solid and transparent relationship with our supply chain is fundamental to the success of our business. We reinforce, below, some basic principles for the process of acquisition of materials and services:

- Selection and hiring are carried out based on technical, professional and ethical criteria, through a predetermined and non-discriminatory process;
- Purchasing practice involves decision making based on price, quality, quantity, delivery and assistance;
- Call for tenders and quote requests are made in a clear and fair manner for all participants in the competitive bidding;
- The hiring of Associates or former Associates, directly or through consultancies, dismissed for less than one year from Oncoclínicas must be approved by the Compliance Group;
- Only with the approval of the Compliance Group will it be allowed to hire Third Parties with Kinship with Associates. In the event that the Third Party provides services or markets products directly related to the Associate's activity, the Compliance Group must be involved to assess the possibility of establishing means to continue with the hiring, removing any conflicts of interest, which will be a condition to continue with any hiring;
- No Associate or Third Party is allowed to offer or promise payment in the form of money, services, or any undue advantages, in order to influence decisions in favor of Oncoclínicas;
- Contracting is carried out only with Third Parties that comply with the laws in force and applicable to their activities, including labor, environmental, criminal and, if applicable, foreign laws;
- Associates and Third Parties are prohibited from promising, offering, giving, directly or indirectly, to any Public Agent or third party related to them, any payment in

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cash, presents, services, entertainment or other benefit that may characterize undue advantage, under penalty of termination of the agreement entered into with Oncoclínicas.

- All Third Parties are encouraged to report any illegal, unethical or inappropriate behavior involving Oncoclínicas in its Compliance Channels.

5.11 - Shareholders, Partners and Capital Markets

Oncoclínicas conducts its business aiming at a good relationship with the market, communicating in a transparent and accurate manner. The following conducts reflect this commitment and must guide the actions of our Associates and Third Parties:

- A good relationship between Oncoclínicas and its members and shareholders must be ensured, regardless of the number of shares they hold;
- Only authorized Associates and Third Parties may have relationships with members, shareholders and the capital market and, even so, as long as they are in compliance with Oncoclínicas' policies, controls and procedures and with the applicable legislation;
- The use of inside information for their own benefit or for the benefit of third parties is prohibited. Misuse of this information is unlawful and may result in civil, administrative, and criminal penalties. The provisions of the Trading Policy must be observed;
- Oncoclínicas must generate and maintain its accounting records and information in strict consistency with the existing laws, standards and best practices, creating a reliable basis for assessing and disclosing its operations, focusing on the accuracy and veracity of the information.

5.12 - Use of IT Systems

Oncoclínicas provides all technology supplies necessary for the performance of the duties of its Associates and, under certain circumstances, also provides these supplies to Third Parties. Associates and Third Parties are required to observe the following in relation to the use of Oncoclínicas' devices, network, email, phones, cell phones, software, hardware and other technology tools (hereinafter referred to as "IT tools"):

- The IT tools used by Associates and Third Parties in the performance of their duties belong to Oncoclínicas;
- Oncoclínicas is the sole and exclusive owner of the information produced and transmitted through IT tools, as well as through the Internet and/or telephony, and may access and use it at its sole and exclusive discretion;
- Oncoclínicas may monitor all information and data provided in the means of communication, devices and spaces owned by it;
- The IT tools must be used solely for the performance of the duties of the Associate and the Third Party with Oncoclínicas;

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- The installation of software without the approval of the Information Technology (IT) area is prohibited;
- It is the duty of Associates and Third Parties to ensure the confidentiality of their passwords and logins.

Additional guidance on this topic is available in the IT Asset Management Guideline and Access Management Guideline.

5.13 - Competition

Oncoclínicas defends fair competition and requires its Associates and Third Parties:

- To refrain from practicing any acts that may be understood as anticompetitive conduct;
- Not to promise or offer, directly or indirectly, any undue advantage to a competing bidder or third parties interested in bidding;
- Not to share strategic information with competitors, customers and third parties;
- To respect competitors and their products;
- To seek and use information about the market and competition obtained from legal and reputable sources;
- To deal with representatives of competing companies observing the legal rules and limits.

Additional guidance on this topic is available in the Competition Policy.

5.14 - Relationship with Public Agents

The interaction of Associates and Third Parties acting on behalf of Oncoclínicas with Public Agents or politically exposed persons must occur in a transparent, cordial, diligent and ethical manner and in accordance with laws, regulations and internal policies.

The holding of meetings with Public Agents to discuss public agreements, licenses and/or imports must be preceded by a formal written request, with a suggestion of date, time, place, participants and subject to be discussed.

These meetings must preferably be held at public agencies, offices or buildings during business hours or during shifts duly established in the agency's operating rules. These formal audiences and meetings shall be attended by least two representatives of Oncoclínicas.

Oncoclínicas undertakes to cooperate and not to create obstacles to any actions carried out by Public Agents in which it is involved.

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Additional guidance on this topic is available in the Policy on Relationship with Public Agents, FCPA, anti-corruption and money laundering.

5.15 - Fight against Corruption and Money Laundering

Oncoclínicas rejects any business practice that may be characterized as a violation of Money Laundering and Anti-Corruption legislation, including, but not limited to, Law 12,846/2013 and its regulations, the FCPA and the UK Bribery Act, as well as Laws 8,429/1992 and 8,666/1993. It is the duty of all Associates and Third Parties:

- Not to promise, offer, give, directly or indirectly, to any Public Agent or third person related to them, any payment in cash, presents, services, entertainment or other benefit that may be characterized as undue advantage;
- Not to use an intermediary, either an individual or a legal entity, to conceal or dissimulate their real interests or the identity of the beneficiaries of the actions carried out;
- To refuse the practice of any acts that are or appear to be related to the Money Laundering activity;
- With regard to bids and contracts with the public authorities, the following conducts are prohibited:
 - i. To frustrate or defraud, upon agreement, arrangement or any other measure, the competitive nature of the public bidding procedure;
 - ii. To prevent, disrupt or defraud the performance of any act of the public bidding procedure;
 - iii. To remove or try to remove a bidder, by means of fraud or offer of any kind of advantage;
 - iv. To defraud a public bidding or an agreement resulting therefrom;
 - v. To manipulate or defraud the economic and financial balance of contracts entered into with the public authorities.

Additional guidance on this topic is available in the Policy on Relationship with Public Agents, FCPA, anti-corruption and money laundering.

5.16 - Disciplinary Measures

Any violation of the Code of Ethics and Conduct and its policies will be investigated in compliance with applicable laws and the interests of Oncoclínicas, so that the appropriate measures can be taken.

Failure to comply with the provisions set forth herein may subject the offender to civil, labor and administrative penalties, which include oral and/or written warning, suspension, termination of the employment contract, suspension or termination of the contract with

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the Third Party, without prejudice to the adoption of legal measures related to the restitution of damage.

Additional guidance on this topic is available in the Guideline for the Application of Disciplinary Measures.

5.17 - Compliance Channels and the Duty to Report Suspected Violations

Any attitude that is not in accordance with the principles established in this code, in the policies of Oncoclínicas or in the applicable legislation and regulation must be reported through the Compliance Channels, anonymously or not. Any suspicions are encouraged to be reported. The Compliance Area will be responsible for investigating all reports made and adopting the necessary measures to investigate the cases that come to its attention, observing the principle of presumption of innocence (regarding which it may rely on the assistance of other areas of the Company, such as the Compliance Group, Internal Audit, Legal, Human Resources, among others, and/or external advisors, as applicable, or recommend the contracting of independent investigation).

Reporting is the duty of all Associates and Third Parties who suspect any violations.

The Compliance Channels are maintained by an independent company and contact can be made by telephone, at 0800-591-8829, by email oncoclinicas@canaldeintegridade.com.br or through the website <https://www.canaldeintegridade.com.br/oncoclinicas/>. The reports are considered confidential and can be made anonymously. Secrecy about the identity of those who report or participate in the investigation of suspected violations of the Code of Ethics and Conduct is ensured, observing the legal limits. Oncoclínicas will not tolerate any retaliation against those who, in good faith, have reported a possible violation of the Code of Ethics and Conduct, directed someone to do so or collaborated with an investigation. Any form of retaliation against a whistleblower in good faith will be subject to the disciplinary measures provided for in this Code.

The reports made through the Compliance Channels will be received by a specialized third party company, which will carry out an initial screening of the information. Then, such reports will be directed, as a general rule, to the Compliance Area, observing the restrictions applicable in case of involvement of one of its members.

Upon receipt of a report, the Compliance Area will assess whether the circumstances of the report substantiate a reasonable suspicion of violation of this Code and other integrity policies, as well as applicable legislation. If a reasonable suspicion is confirmed, the Compliance Area will carry out the investigation of the report. At the end of the investigation, the Compliance Area will prepare a report with the summary of the facts found and submit it to the Compliance Group, which will decide on the merits of the report and, as the case may be, on the application of disciplinary measures.

If there are indications of involvement of any member of the Compliance Area or the Compliance Group or members of its reporting chain in facts that are the object of complaints, the individuals involved will not participate in the investigation or decision regarding the application of disciplinary measures.

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If there are indications that any member of the Audit Committee or senior management of the Company (such as CEO or Board of Officers) is involved in the reported fact, the investigation must follow a specific flow defined in the Internal Rules of the Compliance Group.

If there are indications that any member of the Board of Directors is involved in the denounced fact, the record will be forwarded to the Board itself, which will be responsible for assessing it impartially and autonomously and determining any measures to ensure the soundness of its investigation (such as the contracting of specialized external advisors), excluding from any act or resolution the member allegedly involved.

Under no circumstances will the offending Associate participate in deliberations on the imposition of disciplinary measures on themselves.

The Audit Committee will be periodically informed of the activities carried out by the Compliance Area and the Compliance Group.

6- RESPONSIBILITIES

Associates:

- Fit their behavior with the Code of Ethics and Conduct and related policies;
- Ensure that business partners the management of which is under their responsibility know the values included in the Code of Ethics and Conduct and related policies, and that they conduct their activities in line with these values;
- Report any suspected violations through the Compliance Channels, contributing to the continuous improvement of Oncoclínicas.
- Participate in mandatory Compliance training. The new Associates must carry out the training within thirty (30) days from the date they join the company, and, at least once a year, all Associates must participate in reinforcement sessions. The delay and/or refusal to participate in training subjects Associates to disciplinary measures.

Leaders:

- Reinforce through communication the values included in this Code of Ethics and Conduct and related policies;
- Ensure that their teams comply with the guidelines established herein and other internal rules of Oncoclínicas;
- Ensure that their teams participate in mandatory training on the Code of Ethics and Conduct and its policies.

Compliance Area:

- Responsible for periodically monitoring the integrity program, as well as suggesting and developing the necessary mechanisms for the evolution and maturity of

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the integrity program, executing the guidelines defined by the Compliance Group and coordinating the meetings of the Compliance Group, in addition to performing other activities related to the compliance program, including the presentation of proposals for editing, review and interpretation of the Code of Ethics and Conduct and its policies, the investigation of suspected deviations, the conduction and analysis of background checks, production and disclosure of monitoring reports, and coordination of the annual compliance training and communication program.

Compliance Group:

- Responsible for promoting the broad internal (to employees) and external (to customers, suppliers, partners and interested third parties) disclosure of the Compliance Channels; for determining the sanctions and remediation plans to be adopted in cases of violation of the Code of Ethics and Conduct; for defining changes to the Code of Ethics and Conduct and its policies; among other functions determined by the Compliance Committee or Audit Committee.

Compliance Committee:

- Advisory and permanent committee, formed by members appointed by the Board of Directors and reporting to said Board. Its mission is to ensure compliance with the company's Code of Ethics and Conduct and compliance policies and to support the development of Oncoclínicas' compliance program. It supervises the work of the Compliance Group.

7 - TRAINING

Oncoclínicas has a mandatory training program for all Associates and applicable to certain Third Parties, for qualification and awareness of the conduct, principles, concepts and procedures provided for in this Code. Such training will be carried out at least annually.

8 - FINAL CONSIDERATIONS

Associates, upon receiving this Code of Ethics and Conduct, whether in physical or virtual form, and/or during periodic training, will confirm their knowledge and agreement on the content of the Code of Ethics of Conduct and Compliance Policies.

Although the purpose of this code is to cover most situations involving issues related to ethics and conduct in our activities, new situations may arise. The Compliance Area or the Compliance Group must be consulted in case of any doubts about the Compliance program or in case of situations that require additional solution or guidance, in order to ensure that the values included in this Code of Ethics and Conduct are preserved.

All agreements entered into by Oncoclínicas with third parties must include clauses ensuring compliance with the laws applicable to its activities and the adoption of values consistent with those contained in the Code of Ethics and Conduct and related policies.

The Compliance Group is responsible for solving any conflicts between the content of this Code of Ethics and Conduct and other internal rules of Oncoclínicas.

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The application, review and updating of the Code of Ethics and Conduct and related policies are the responsibility of the Compliance Area and the Compliance Group and will follow the internal rules and approval levels defined by law, the company's bylaws and the document Rules for Standardization of Policy Documents, Guidelines, Directions, Regulations of Assistance Committees, Programs, Plans, Protocols and SOPs.

Any review and/or update of the Code of Ethics and Conduct and related policies will be submitted for approval by the Chief Legal, Compliance and ESG Board of Officer.

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EXHIBIT I

| Transparency Statement | | |
|--|------------|-----------|
| <p>In accordance with our commitment to integrity and following best compliance practices, we ask that you complete the questionnaire below. The core purpose of this statement is to give visibility to Oncoclínicas about potential conflicts of interest, so that we can act with a focus on the prevention and mitigation of related risks.</p> <p>Before completing this statement, we recommend reading the Policy on Management of Conflicts of Interests of Oncoclínicas, which can be found on the website: https://www.grupooncoclinic.com/o-grupo/programa-de-compliance/.</p> <p>The Compliance Team remains available to answer any questions related to the questionnaire, via email compliance@oncoclinic.com.</p> | | |
| Questionnaire | | |
| Full Name | | |
| Individual Taxpayer's Register (CPF): | | |
| Position: | | |
| Unit: | | |
| Area/Department: | | |
| Questions | Yes | No |
| Do you or any of your Relatives hold the position of Public Agents? If so, inform below name/position/institution. | | |
| Do you have an affective relationship and/or Kinship with an Associate and/or supplier/customer of Oncoclínicas? If so, inform below name/position/company. | | |
| Do you or any of your Relatives work in companies competing with Oncoclínicas? If so, inform below name/position/company. | | |
| Are you or any of your Relatives a partner or do you or any of your Relatives have a Relevant Equity Interest in any company that is a customer, supplier, service provider of Oncoclínicas? If so, inform below name/company. | | |
| Do you have Close Friends who are suppliers and/or work in strategic positions of Partnership/Leadership at Oncoclínicas? If so, inform below name/position. | | |
| Do you hold a management position in any class entity and/or civil association (e.g. patient associations, medical societies, etc.)? If so, inform below which class entity and/or civil association. | | |
| <i>[Directors and Officers]</i> Do you hold a position of Director (Management or Advisory)/Officer in other companies? If so, inform below the company name. | | |

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Use this space if you feel the need to provide further details on one of your previous answers or to describe any relationship you have that may generate a potential conflict of interest, if this was not covered by the previous questions.

Acting in accordance with our Code of Ethics and Conduct and Oncoclínicas' policies, the Associate shall undertake to report the occurrences set forth above, whenever a potential conflict of interest different from those declared herein arises.

Any personal data obtained as a result of completing this form will be considered restricted access and treated as confidential, under the terms of the general data protection law.

[Place and Date]

Signature