

# Code of Ethics and Conduct



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Code of Ethics and Conduct / version 5

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**Dear associates,**

We, at Grupo Oncoclínicas, conduct our activities with ethics, advocating the fundamental principles of respect to life, transparency and honesty.

The Code of Ethics and Conduct translates the commitment of Grupo Oncoclínicas with integrity and, together with our values and corporate culture, perform a key role in building the foundation of a successful business.

It brings rules that should be followed by all Employees when performing their roles and its guiding principles are compliance with the rules and regulations applicable to our activity and the adoption of the highest corporate ethical standards.

It is our duty to know the values and rules expressed in this document and in the remaining company policies, enforcing them on a daily basis and disseminating them throughout our value chain.

Best regards,

**Dr Bruno Lemos Ferrari**

Chief Executive Officer

**Cinthia Maria Ambrogi**

Legal and Compliance Officer



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## 1. Objective

Disseminate to Employees and Third-Party providers the values and rules to be followed when performing activities in the organization.



## 2. Target Audience

The Code of Ethics and Conduct applies to all Employees and Third-Party Providers that work at Grupo Oncoclínicas.



## 3. Definitions

**Public Officials:** people who perform, even if temporarily or without pay, by election, appointment, designation, hiring or any other form of inclusion, any public role, job, or function in Brazil or abroad. In this document, Public Officials are considered any person who has a role, job or function in state-related entities, who work in companies that are contracted or partners in provision of services of typical activities to the Public Administration; political parties (and their employees), and candidates running for national or international public office positions.

**Close Friends:** anyone who has close proximity and relationship of trust with someone else, who visit each other homes or travel together.

**Compliance Channels:** channels provided by Grupo Oncoclínicas to Employees and Third-Party Providers to ask questions about compliance and report any suspicion of violation to the Code of Ethics and Conduct and its policies. The contact may be by phone 0800-591-8829, email [oncoclinicas@canaldeintegridade.com.br](mailto:oncoclinicas@canaldeintegridade.com.br) or through the website <https://www.canaldeintegridade.com.br/oncoclinicas>.



Reports are confidential and may be anonymous.

**Code of Ethics and Conduct:** It is the Code of Ethics and Conduct of Grupo Oncoclínicas, and together with the set of policies and internal rules, it defines the expected conduct for Employees and Third-Party Providers in the performance of their jobs.

**Employees:** Everyone that acts on behalf or under the name of Grupo Oncoclínicas, including shareholders, partners, associated members, board members, executive officers, members of the clinical staff and employees.

**Corruption:** It is the act or effect of involving someone or something in actions that intend to lead to illegal advantages.

**Compliance Area:** The Compliance Area serves a second line of defense of Grupo Oncoclínicas, being responsible for compliance in the organization. Compliance, through the Compliance Management, reports directly to the Legal and Compliance Office. It comprises specialized professionals that do not work or report to the operational areas of Grupo Oncoclínicas, being fully independent and autonomous to request access to all documents that belong to Grupo Oncoclínicas. Its attributions are described in chapter six of the present document.

**Compliance Group:** The Compliance Group is a support group to the Compliance Area, reporting to the Compliance Committee. The Compliance Group is formed by the executive officers of the Legal, Compliance, Medical, Human Resources and Finance areas, counting on the participation of representatives from the other executive areas whenever necessary. Its members do not work or report to the operational areas of Grupo Oncoclínicas. Its attributions are described in chapter six of the present document.

**Grupo Oncoclínicas:** It includes Oncoclínicas do Brasil Serviços Médicos S.A and all its subsidiaries, controlled, colligated and affiliated companies that are part of the organization.

**Money Laundering:** Process through which amounts, assets or rights originated directly or indirectly from criminally punishable activities are transformed into assets with apparently legal origin.



**Kinship:** Relationship between spouses, social partners, or relatives by consanguinity or affinity, as straight or collateral line up to third degree, that is, father, mother, grandparents, siblings, children, stepchildren, nieces and nephews, uncles and aunts, cousins, grandchildren, parents-in-law, brothers-and sisters-in-law, sons- and daughters-in-law.

**Politically Exposed Person (PEP):** Individuals that perform or have performed relevant public jobs, positions or functions in the past five years, both in Brazil or in other countries, as well as its representatives, family members and close associates. Resolution No. 29, Article 1, § 1 of Council for Financial Activities Control (COAF) presents a list of people considered as PEP.

**Third-Party Providers:** Corporate entities (including their employees and contractors) or individuals hired to provide products and services to Grupo Oncoclínicas. The reference to acts and conduct expected of Third-Party Providers in this document is related to the performance of quality of Grupo Oncoclínicas providers, except if expressed otherwise.



## 4. Principles and Values

Patients are in the center of everything we do at Grupo Oncoclínicas. They are the reason why we pursue more advanced treatment and the highest level of quality and safety. We work and dedicate our efforts daily to our patients to offer comprehensive, individualized and multidisciplinary care, respecting the concept of integration of the oncology chain in all our initiatives. Our mission is to beat cancer thanks to a highly qualified clinical team and the most advanced technologies, with professionalism, integrity, people-centered values and responsibility.

Thus, to reach excellence in our line of care, we describe below the principles and values that should be respected by all employees of Grupo Oncoclínicas in the performance of their activities:

- Integrity Teamwork Ownership
- Simplicity, objectivity and resolution Outcomes
- Respect Meritocracy Leadership





## 5. Guidelines

### 5.1 Conduct and Personal Relationship

- Grupo Oncoclínicas favors a healthy and harmonious workplace. To that end, we expect our Employees and Third-Party Providers to have polite, responsible and respectful behaviors in their professional relationships. When performing their activities, Employees should:
- Address patients and people they encounter professionally with respect, politeness, efficiency and people-centered mind.
- Take part in training and capacity building programs, as requested, including, among others, those related with the Code of Ethics and Conduct and its policies;
- Protect the facilities of Grupo Oncoclínicas and safeguard its reputation;
- Perform only the activities they feel they are apt and properly trained to execute, seeking the support of the leadership and/or the related area to answer any questions they might have;
- Inform the leadership if they are under medical treatment that requires use of medications that may hinder their work performance. Grupo Oncoclínicas does not allow Employees to work under the influence of alcohol or illegal drugs;
- Support others to properly execute the tasks and patiently guide those that require help;
- Provide clear and precise information;
- Refrain from any discrimination based on gender, sexual orientation, nationality, religion, origin, ethnicity, physical disability, etc.;
- Refrain from performing any acts that may be understood as moral or sexual harassment and bullying; and
- Refrain from selling, buying or advertising any products or services, from personal or third-party businesses, anywhere within Grupo Oncoclínicas facilities.





## 5.2 External Contacts, Press and Social Media

Grupo Oncoclínicas, in respect to its patients, clients, Employees, Third-Party Providers and the community in general, has an open channel with the press, public agents and stakeholders, including trade associations and unions, committing to adopt clear and precise communication with them. To reach this goal, the following rules should be complied by all Employees and Third-Party Providers:

- Any professional contact with the press, as well as any public manifestation about Grupo Oncoclínicas businesses and the activities of Employees and Third-Party Providers, in relation to their work at Grupo Oncoclínicas, including posting in social media and internet discussion forums, and participation in symposia and seminars, should be previously approved by Corporate Communication (comunicacao@oncoclinicas.com);
- There should be an open channel to interact with the trade associations and the employees. Grupo Oncoclínicas respects the right of free association of its Employees and Third-Party Providers to workers' unions and other representative trade associations.

Employees and Third-Party Providers should also refer to the Social Media Use Policy for further information about the topic.

## 5.3 Use and Protection of Company Values and Assets

All Employees and Third-Party Providers should safeguard the assets of Grupo Oncoclínicas, such as the facilities, equipment, furniture, vehicles, intellectual property, which includes specifically our brands, trade secrets, methods and processes and amounts in cash, such as moneys, checks and credit bonds in general. To that end, it expects Employees and Third-Party Providers to:

- Use the assets and properties exclusively to appropriately perform their activities;
- Report to the leadership any suspicion of deviation of assets or money amounts;



- Adopt the necessary measures to protect the assets and amounts under their care;
- Refrain from using, for their own or third-party benefits, any rights or assets of the company which are protected by intellectual property rights, including brands, patents, inventions, software and works subject to copyrights. Any developed work subject to intellectual property rights resulting from or related to the performance of activities by the Employees and Third-Party Providers are proprietary to Grupo Oncoclínicas, except if otherwise stated under a specific contract disposition.

## 5.4 Occupational Safety and Health

Grupo Oncoclínicas provides appropriate working conditions in its facilities, including preventive and corrective actions, focused on safety and well-being of everyone. The Employees and Third-Party Providers are key elements towards the execution of this goal and they should:

- Pay attention to the rules and procedures for the execution of their professional activities, preserving the physical integrity of themselves, the patients, other Employees and Third-Party Providers and everyone who is ultimately affected by their actions;
- Wear the personal protective equipment (PPE) required for the activity in hand;
- Undergo hiring, periodic and dismissal medical tests;
- Report any incidents or situations that may pose a risk to the integrity, health or safety of patients, other Employees and Third-Party Providers.



## 5.5 Environment

Grupo Oncoclínicas performs its activities aware of its responsibility to preserve the environment. Employees and Third-Party Providers should actively contribute to reaching this goal by adopting the following behaviors:

- Act preventively concerning potential risks to the environment, promoting rational resources use, such as water, paper, electric power, etc.;
- Comply with the existing legislation and the best practices in waste management actions.

## 5.6 Information Management and Confidentiality

Information at Grupo Oncoclínicas, to which Employees and Third-Party Providers have access, is in general confidential. Unauthorized disclosure of the information may be harmful to Grupo Oncoclínicas. The Employees and Third-Party Providers should comply with the Disclosure Policy and adopt the necessary measures to maintain the secrecy of information under their responsibility and they are required to:

- Not to disclose or share confidential information with people who do not need access to said information to perform their activities;
- Do not delete, destroy or copy information generated by the performance of their activities. All data, models, documents, spreadsheets and other materials produced by our Employees and Third-Party Providers in the performance of their activities belong to Grupo Oncoclínicas, except if otherwise expressly written;

Obtain from our business partners the commitment to deal with sensitive information as confidential information belonging to Grupo Oncoclínicas;

Refrain from using confidential information belonging to Grupo Oncoclínicas for their own or third-party benefit;



- Sign confidentiality agreements, if requested, confirming their commitment to address Grupo Oncoclínicas information as confidential.

The obligations listed above are also applicable to the management of sensitive and confidential information of Grupo Oncoclínicas business partners - suppliers, clients, patients, among others, to which Employees and Third-Party Providers also have access.

Employees and Third-Party Providers should refer to the Privacy Policy of the company for any further information about the management and storage of sensitive information, personal data and compliance with the requirements of the Brazilian General Data Protection Regulation.

## 5.7 Ethical Issues in Scientific Research, Training and Development

Grupo Oncoclínicas supports the improvement of its Employees and Third-Party Providers and, to that end, it promotes and encourages the participation in development activities and scientific research studies, to improve patient care and discuss treatment-related issues (case review). Employees and Third-Party Providers that participate in this type of activities should comply with what follows:

- We should ensure that research studies that involve humans provide clear information to subjects about the study purpose and the potential risks;
- The necessary measures should be adopted to protect patients' privacy;

All information resulting from these scientific studies should be properly safeguarded and will be proprietary to Grupo Oncoclínicas; Intellectual property of Grupo Oncoclínicas encompasses the ideas and creations developed internally or in partnership and includes brands, patents, copyrights, software registration, etc.



## 5.8 Conflicts of Interest

A conflict of interest takes place when the individual interests of the Employees or Third-Party Providers in the performance of their professional activities prevail or seem to prevail over the interests of Grupo Oncoclínicas and/or inappropriately influence their work. Additional guidance about the topic is provided by the Policy on Transactions with Related Parties and in the Conflicts of Interest Management Policy. See below some situations that may lead to conflicts of interest:

- Employees and Third-Party Providers may be romantically involved or become relatives provided that there is no relation of subordination, influence or management between them;
- Employees and Third-Party Providers may not perform activities that are or may conflict with the interests of Grupo Oncoclínicas, except in cases of specific occupations or areas of work, such as physicians that work for more than one organization;
- It is not allowed to have a second business or activities that harm their capacity to deliver the results and to perform their activities at Grupo Oncoclínicas.

All Employees, when receiving the Code of Ethics and Conduct, will sign the Statement of Transparency (Annex 1) and may be asked, at any given time, to provide information and periodic confirmation of its content.

## 5.9 Freebies and Gifts, Entertainment, Invitation to Events and Networking

The offer of gifts, entertainment and hospitality are common in the business world and may play an important role in the construction and maintenance of contact networks. However, it is necessary to adopt measures and limits to prevent these offers from being understood as inappropriate advantages.

The Employees and Third-Party Providers should not solicit, accept or receive money, benefits, favors, gifts, promises or any other advantage that may have or seem to have the objective of influencing



the performance of activities or that are offered as reward for act or omission to act resulting from their work. See below some additional information about this topic:

### **Gifts and freebies**

- The Employees and Third-Party Providers should not solicit freebies and gifts from our business partners;
- Employees and Third-Party Providers are allowed to accept freebies and gifts that are voluntarily offered to them by our business partners, respecting the following limitations:
  - The freebie or gift should have a market value up to R\$100 (one hundred Reals);
  - The offer of freebie or gift should be one-off and related to celebrations or special holidays (such as company anniversary, Christmas, professional day celebration);
  - The freebie or gift must not have or seem to have the purpose of influencing the performance of the Employees or Third-Party Providers or be offered as a reward for act or omission to act resulting from their work.
- Employees and Third-Party Providers must not accept, under any circumstances, the offer of money or equivalent, such as coupons.

### **Entertainment**

- It is forbidden to accept invitations to sports and artistic events or entertainment in general.

### **Invitations to Events and Networking**

- Upon accepting an invitation to a networking event, such as luncheons or dinners, Employees should preferably pay for their own expenses, asking for reimbursement of the company, as provided by the internal policies of Grupo Oncoclínicas;



- When the Employee is invited to be a speaker or participant in a professional improvement event, the travel expenses could be fully paid by the event organizer. The invitation must not have or seem to have the purpose of influence a business decision of the event organizer in relation to Grupo Oncoclínicas and vice-versa and the offered hospitality (plane tickets, hotel accommodation, transportation, registration for the event and meals) should be within the reasonable and compatible amounts for the nature of the event. In addition:

- The offer to pay must not be extended to family members of the guest speaker, or other people indicated by him/ her;

- The participation in the event should be submitted for previous approval by the direct leader of the Employee and the Compliance Area of the group, through the Compliance Channels. Moreover, Employees may be requested at any given time to provide detailed information and submit documents and confirmation related to the expenses resulting from the event to which they have been invited;

- The cost of plane tickets, hotel accommodation and other expenses incurred by our business partners in technical visits and similar activities should be previously approved by the Compliance Area. The Employee who is invited should request the approval through the Compliance Channels.

The offer of gifts, entertainment and invitations to events and networking with business partners should be made respecting the reasonability and convenience criteria of amounts, frequency and nature of the offer and should be intended to promote the businesses of Grupo Oncoclínicas. The Employee who wants to make such an offer should seek the approval of its area and Corporate Communication, through email [comunicacao@oncoclinicas.com](mailto:comunicacao@oncoclinicas.com) , making sure that the offer is compatible with the compliance rules of the business partner.

All made and received offers should strictly respect the limitations imposed by the legislation in place, especially the regulations that address medical conduct and relationship between healthcare professionals and the pharmaceutical industry.

Offers which are against the dispositions of the Code of Ethics and Conduct should be refused.

## 5.10 Third-Party Providers:

The existence of a solid and transparent relationship with our supply chain is essential for the success of our business. We reinforce some basic principles in the process of material and service acquisition below:

- Selection and hiring are based on technical, professional and ethical criteria, adopting a predetermined and non-discriminatory process;
- The procurement practice involves decision making based on price, quality, quantity, delivery and support;
- Price bidding and requests for quotes are presented in a clear and fair fashion to all participants of the process;
- The hiring of Employees or former Employees, directly or through consulting companies, in case of employees dismissed less than one year before, should be approved by the Compliance Group;
- Third-Party Providers who are relatives of Employees will only be hired after the approval of the Compliance Group. In case of Third-Party Provider who provides services or sell products directly related to the activity of the Employee, the Compliance Group should be involved to analyze the possibility of confirming the hiring by excluding potential conflicts of interest, which will be a condition for the hiring;
- Employees or Third-Party Providers are not allowed to offer or promise to pay in cash, services or any other means inappropriate advantages to influence the decisions in favor of Grupo Oncoclínicas;
- Only Third-Party Providers who comply with the existing and applicable legislation, including labor, environmental, criminal, and if applicable, international rules, will be hired;

Employees and Third-Party Providers are forbidden to promise, offer, give, direct or indirectly, to any Public Agent or third-party related to it, payment in moneys, gifts, services, entertainment or other benefits that may characterize inappropriate advantage, under risk of terminating the contract celebrated with Grupo Oncoclínicas.





- All Third-Party Providers are encouraged to report any illegal, not ethical or inappropriate behaviors involving Grupo Oncoclínicas through its Compliance Channels.

### 5.11 Shareholders, Partners and Capital Markets

Grupo Oncoclínicas conducts its businesses focusing on good relations with the market, communicating in a transparent and precise fashion. The following conducts translate this commitment and should guide the actions of our Employees and Third-Party Providers:

- We should ensure the good relationship between Grupo Oncoclínicas and its partners and shareholders, regardless of the number of shares they hold;
- Only authorized Employees and Third-Party Providers will have contact with partners, shareholders and the capital market representatives, but provided that they are in compliance with the policies, controls and procedures of Grupo Oncoclínicas and the applicable legislation;
- It is forbidden to use privilege information for its own or third-party benefit. Inappropriate use of information is illegal and may result in civil, administrative and criminal sanctions. We should respect the dispositions of our Negotiation Policy;
- Grupo Oncoclínicas should manage and maintain the accounting records and information in consistency with the legislation, rules and existing best practices, creating a reliable basis for analysis and dissemination of its operations, focusing on information accuracy and truthfulness.

### 5.12 Use of IT Systems

Grupo Oncoclínicas provides all necessary technology resources for the performance of Employees' roles and, in some circumstances, provide these resources to Third-Party Providers as well. Employees and Third-Party Providers should follow the rules below concerning the use of devices, network, emails, telephone, mobile phone, software and hardware and the other technology tools of Grupo Oncoclínicas (collectively referred as IT tools):



- IT tools used by Employees and Third-Party Providers in the performance of their roles belong to Grupo Oncoclínicas;
- Grupo Oncoclínicas is the sole and only owner of the information produced and transmitted through the IT tools, such as through internet and/or telephone systems, which may be accessed and used at its own discretion;
- Grupo Oncoclínicas may monitor the information and data transmitted through its communication means, devices and sites of its ownership;
- IT tools should be solely used for the performance of the activities that the Employees and Third-Party Providers have with Grupo Oncoclínicas;
- It is forbidden to install software without the approval of the Information Technology Area;
- Employees and Third-Party Providers must keep secrecy of their login and password information.

### 5.13 Competition

Grupo Oncoclínicas advocates loyal competition and expects Employees and Third-Party Providers to:

- Refrain from practicing any acts that may be understood as anticompetitive conducts;
- Not promise or offer, directly or indirectly, any inappropriate advantage to bidding competitors or related parties interested in a bidding process;
- Not share strategic information with competitors, clients and third parties;
- Respect competitors and their products;



- Seek and use information about the market and the competition obtained from legal and appropriate sources;
- Relate with representatives of the competitors respecting the rules and the legal limitations.

Additional instructions about this topic are provided by the Policy on Competition.

#### 5.14 Relationship with Public Officials

The interaction of Employees and Third-Party Providers, acting on behalf of Grupo Oncoclínicas, with Public Officials or Politically Exposed People should be transparent, cordial, diligent and ethical, as provided by the laws, rules and internal policies.

Onsite meetings with Public Officials to discuss public contracts, licenses and/or imports should result from formal written requests suggesting the date, time, place, participants and topic to be discussed.

These meetings will be held preferably at public buildings, offices or sections, at working hours or during the shifts previously agreed within the agency working hours. These formal meetings and hearings should count on the participation of at least 2 (two) representatives of Grupo Oncoclínicas.

Grupo Oncoclínicas is committed to collaborate and not to create any hurdles to actions executed by Public Officials in processes in which they are involved.

#### 5.15 Anticorruption Actions and Money Laundering

Grupo Oncoclínicas rejects any business practices that may be characterized as violation of the legislation of Money Laundering and Anticorruption, including but not limited to Law 12.846/2013 and its regulations, FCPA and UK Bribery Act, as well as laws 8.429/1992 and 8.666/1993. The duties of Employees and Third-Party Providers are:

- Not to promote, offer, give, directly or indirectly, to any Public Official or third party related to it, payment in cash, presents, services, entertainment or other benefits that may characterize inappropriate advantages;

- Not to use individual or corporate intermediaries to hide or dissimulate their real interests or identity of beneficiaries of the said acts;
- Refuse the practice of any acts that are or seem to be related to Money Laundering;
- Concerning bidding processes and contracts with the public administration, the following conducts are forbidden:
  - i. Stop or act inappropriately by making adjustment, combination or any other mechanism to the competitive character of the public bidding proceeding;
  - ii. Prevent, disturb or perpetrate fraud to any public bidding proceeding;
  - iii. Exclude or try to exclude bidding parties by means of fraud or offering advantages of any type;
  - iv. Violate the proceedings of public bidding processes or the contract resulting from it;
  - v. Handle or violate the economic-financial balance of contracts celebrated with the public administration.

Additional instructions about this topic are provided by the Anticorruption and Money Laundering Policy.

## 5.16 Disciplinary Measures

Violations to the Code of Ethics and Conduct and its policies will be investigated based on the applicable laws and interests of Grupo Oncoclínicas, so that the applicable measures can be taken.

Failure to comply with the provisions herein stated may subject the offender to civil, labor and administrative penalties, which include oral and/or written warnings, suspension, termination of employment contract, suspension or termination of the contract with the Third-Party Provider, without the prejudice of any other legal actions related to claiming damages.



## 5.17 Compliance Channel and Duty to Report

Actions that are not in compliance with the principles defined by the present code, Grupo Oncoclínicas policies or the applicable legislation and regulations should be reported through the Compliance Channels, which may be anonymous. It encourages the report of any suspicions. The Compliance Area will investigate all reports and adopt the necessary measures required to manage the reports brought to them, following the principle that everyone is innocent until otherwise proved (counting on the support of other areas, such as the Compliance Group, Internal Audit, Legal, Human Resources, among others, and/or external assistance, whenever applicable, or recommend hiring independent investigation).

All Employees and Third-Party Providers have the duty to report suspected violations.

Compliance Channels are maintained by an independent company and the contact should be made through the website <https://www.canaldeintegridade.com.br/oncoclinicas>, by phone 0800 591 8829 and email [oncoclinicas@canaldeintegridade.com.br](mailto:oncoclinicas@canaldeintegridade.com.br). Reports are confidential and may be anonymous. The participants in the investigation of violations to the Code of Ethics and Conduct have their identification maintained confidential, within the legal limitations. Grupo Oncoclínicas does not tolerate retaliations against anyone who has in good faith reported a possible violation to the Code of Ethics and Conduct, instructed someone to report or contributed to an investigation. Any forms of retaliation against good faith reporting people are subject to the disciplinary measures provided by this document.

Reports made through the Compliance Channels should be received by the specialized company, which will make the initial screening of information. Next, the reports will be primarily directed to the Compliance Area, observing the applicable restrictions in case of involvement of its own members.



After receiving the report, the Compliance Area will assess whether the circumstances of the report support a reasonable suspicion of violation of the present Code and the other integrity policies, as well as the applicable legislation. If reasonable suspicion is confirmed, the Compliance Area will investigate the case. When finished, the Compliance Area will prepare a written report with the summary of the facts, submitted to the Compliance Group. The Compliance Group will then decide whether the report is grounded, and depending on the case, will apply the disciplinary measures.

If there is evidence of involvement of members of the Compliance Area or Compliance Group or members of the reporting chain in facts object to the report, the Audit Committee will directly hold the investigation, without the involvement of the Compliance Area or the involved subjects. In such cases, the Audit Committee will decide about applying the disciplinary measures.

If there are members of the Audit Committee or the top management of the company (such as CEO or Executive Officers) involved in the reported fact, the case will be referred to the Board of Directors for investigation. In such case, the Board of Director will decide about the application of disciplinary measures.

If there are signs of the involvement of members of the Board of Directors, the report will be referred to the Board, which will review impartially and autonomously the report and define the measures to ensure the appropriateness of the investigation (such as contracting specialized external consultants), excluding any acts or deliberations of the allegedly involved member.

Under no circumstances will the offending person take part in the deliberations about the imposition of disciplinary measures.

The Audit Committee will be periodically informed about the investigation activities of irregularities conducted by the Compliance Area and the Compliance Group.



## 6. Responsibilities

### Employees:

- Harmonize behaviors with the Code of Ethics and Conduct and the policies related to it;
- Ensure that the business partners whose management is under their responsibility are aware of the values expressed by the Code of Ethics and Conduct and its related policies, and that they conduct their activities in accordance with them;
- Report suspicions of violations through the Compliance Channels, collaborating for the continuous improvement of Grupo Oncoclínicas;
- Take part in required trainings on Compliance. New Employees should undergo training within 30 (thirty) days from joining the company and then, at least once a year, all Employees must participate in a refresher session. Delay and/ or refuse to participate in trainings will subject the Employees to the applicable disciplinary measures.

### Leaders:

- Reinforce through communication the values expressed in the present Code of Ethics and Conduct and its related policies;
- Ensure that the teams comply with the guidelines presented here and the other internal rules of Grupo Oncoclínicas;
- Ensure that the teams take part in the required training sessions on the Code of Ethics and Conduct and its related policies.

### Compliance Group:

- Responsible for promoting broad dissemination of the Compliance Channels to internal team (employees) and external players (clients, suppliers, partners and stakeholders); determining the sanctions and remediation plans to be adopted in case of violation of the Code of Ethics and Conduct;



Propose changes to the Code of Ethics and Conduct and its related policies for approval by the Board of Directors; among other functions included in the regulations or determined by the Compliance Committee, Audit Committee and other agents or roles of Grupo Oncoclínicas, such as Risk Management Area and Internal Audit. It is formed by member of the Executive team of the company, holding monthly meetings.

### **Compliance Area:**

- The Compliance Area is responsible for executing the guidelines defined by the Compliance Group and coordinating the meetings of the group, which includes submission of presentations for editing, review and interpretation of the Code of Ethics and Conduct and its policies, management of the Compliance Channels; support the investigation of suspicions of deviation. The team will also work in the performance of other activities related to the compliance program, including the performance of background checks, production and dissemination of reports, coordination of annual compliance training and communication programs.

### **Compliance Committee:**

- The Compliance Committee is an independent agent, of consultive and permanent nature, which supports the Board of Director. The purpose of this committee is to safeguard compliance with the Code of Ethics and Conduct and the Compliance Policies of Oncoclínicas and it supports the development of the company compliance program. It is the top management level related to compliance. It is formed by members of the Board of Directors and it holds meetings every 4 months or whenever necessary.



## **7. Training**

Grupo Oncoclínicas has required training offered to all Employees and applicable to some Third-Party Providers to qualify and build awareness about the conducts, principles, concepts and procedures included in the present Code. These training programs will be offered at least every year.







## 8. Final Considerations

Employees, upon receiving this Code of Ethics and Conduct, will sign a Document of Knowledge and Commitment (Annex II). Through this document, they acknowledge and confirm their knowledge and agreement with the related dispositions and policies.

Even though the purpose of this code is to encompass most of the situations involving ethics and conduct in our activities, new situations may emerge. The Compliance Area or the Compliance Group should be contacted in case of questions concerning the Compliance program or situations that require additional instructions to ensure that the values expressed by the present Code of Ethics and Conduct are maintained.

All contracts signed between Grupo Oncoclínicas and third parties should include clauses that ensure compliance with the applicable laws and the adoption of values consistent with those expressed in the Code of Ethics and Conduct and its related policies.

The Compliance Group is responsible for minimizing conflicts between the content of this Code of Ethics and Conduct and the remaining internal rules of Grupo Oncoclínicas.

The enforcement, review and update of the Code of Ethics and Conduct and its related policies are performed by the Compliance Area and the Compliance Group and will follow the internal rules and levels of approval defined by the document of Rules for Standardization of Documents for Policies, Guidelines, Instructions, Regulation of Clinical Commissions, Programs, Plans, Protocols and SOPs.

Review and/or update of the Code of Ethics and Conduct and the related policies are submitted to the approval of the Board of Directors.



# ANNEX I

Statement of Transparency



In accordance with our commitment with integrity, our values and culture, as well as following the best compliance practices in the market, we request that ALL employees answer the questionnaire below. It is important to emphasize that any positive response to this questionnaire requires a justification.

We request special attention to compliance with the rules and policies of Grupo Oncoclínicas and the provision of complete and genuine information in this questionnaire.

We recommend that you read the Policy of Conflict of Interest of Grupo Oncoclínicas before completing this document.

Our Compliance Group is available to provide any support in completing the present questionnaire by e-mail [compliance@oncoclinicas.com](mailto:compliance@oncoclinicas.com).

### Questionnaire

Complete Name:	
CPF:	Position:
Unit	Area / Department:

Questions	Yes	No
Do you or some of your relatives hold positions as Public Officials?		
Do you have relatives who are Employees and/or suppliers of Grupo Oncoclínicas?		
Are you romantically involved with another Employee and/or supplier of Grupo Oncoclínicas?		
Do you have relatives that work in competitors of Grupo Oncoclínicas?		
Do you or some of your relatives hold corporate participation, capable of influencing the corporate decisions, in companies with businesses or contracts signed with Grupo Oncoclínicas (partners, third party, representatives, subcontractors, suppliers, consultants, service providers in general)?		
Do you or some of your relatives hold corporate participation, capable of influencing the corporate decisions, in companies that are competitors of Grupo Oncoclínicas?		
Do you have close friends who are suppliers and/or or work in strategic positions of the Top Management/ Senior Management of Grupo Oncoclínicas?		

Questions	Yes	No
Are you aware of other relationships, agreements, transactions that could create or seem to create a conflict of interest?		
[Board Members and Executive] Do you have a position as Board Member (Administrative or Consultive)//Executive Officer in other companies?		
If you have answered YES to any of the questions above, please explain below:		
<p>Acting in accordance with our Code of Ethics and Conduct and the policies of Grupo Oncoclínicas, the Employee should commit with reporting the occurrences described above and whenever there is a potential conflict of interest different from those reported here.</p> <p>Personal data obtained from the completion of this questionnaire will be subject to restricted access and considered confidential, as provided by the personal data protection regulations.</p>		
Place and date.		
Signature:		



# ANNEX II



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Complete Name:

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I herein state that I have received the Code of Ethics and Conduct do Grupo Oncoclínicas and the policies listed below:

- Anticorruption and Money Laundering Policy;
- Policy of Conflict of Interest;
- Policy on Competition.

I herein commit to follow the guidelines of the code and the performance policies applicable to my professional activities and report any suspicion of violation or questions to the Compliance Group through the Compliance Channels:

Email: [oncoclinicas@canaldeintegridade.com.br](mailto:oncoclinicas@canaldeintegridade.com.br)

Site: <https://www.canaldeintegridade.com.br/oncoclinicas/>

Phone: 0800 591 8829

Place and date.

Signature:



