

# CODE OF ETHICAL CONDUCT

biolab  
PHARMA

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As Biolab partners, we emphasize the importance of the Code of Ethical Conduct as an indispensable guide for behaviour, with rules that must be followed by all employees.

Sustainable success for Biolab depends on how we all conduct ourselves, and management should be lead by example.

Biolab has innovation as part of its DNA, and wishes to expand its business even further, always in an ethical, honest and transparent manner, within a diverse and respectful environment.

Together, we'll build a triumphant future.

We're counting on you.

Cleiton de Castro  
Marques

Dante  
Alario Jr

Paulo de Castro  
Marques

”

**biolab**  
PHARMA

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## **ACTING ETHICALLY IS BUILDING**

the common good  
within our community.

## **BIOLAB'S POSITIVE IMAGE**

is an asset of its partners,  
managers and employees.



# INTRODUCTION

## INTRODUCTION

Biolab understands that behaving ethically means working on the common good within ourselves and in our community. It also means that our actions collectively determine the company's reputation and character.

Biolab's positive image is an asset of our partners, administrators, and employees, resulting directly from this community's behaviour and commitment to the principles of conduct laid out in the code.

All employees and third parties interacting with Biolab must be committed to these principles and values, and are therefore responsible for disseminating and practicing them.

# SCOPE AND REACH

## SCOPE AND REACH

**This code applies to all Biolab employees and is part of the company's management system.**

### Company Management

Biolab's activities affect the lives of many, including employees, patients, doctors, third parties, other private companies, public authorities, and society in general. Building and sustaining trust with all these groups means ensuring that our values are consistently demonstrated through appropriate and consistent behaviours. This code outlines general principles of ethical conduct that must be followed and upheld by Biolab administrators, employees, interns, subsidiaries and companies under its umbrella, as well as in interactions with service providers and partners. It takes precedence over any verbal communications and serves as a guiding framework for all Biolab standards and policies.

Although we encourage all employees to feel comfortable about discussing any matter with their superiors and hope they will do so, there may be situations where an employee might prefer to speak with another party, such as:

- ✓ The next level of leadership;
- ✓ The department head;
- ✓ A human resources representative;
- ✓ A legal department or compliance representative;
- ✓ The ombudsman.



All Biolab employees must be aware of this code and carry out their duties in accordance with it, as well as with all applicable internal policies and procedures. They must also preserve the company's vision, mission, and values in mind and respect our commitments and all relevant laws in the countries where we operate.

Management is responsible for providing necessary support to ensure all teams understand and carry out their duties based on this code, in addition to Biolab's other policies and procedures. It is also management's responsibility to support the ways these policies can and must be implemented, guaranteeing that these matters are appropriately handled by all partners. Management must be ready to determine the correct measures to be taken with discernment and common sense since this code and Biolab internal policies may not cover all everyday situations.

**Biolab's management system:**

- Code of Ethics, which includes:
  - ✓ Vision, Mission, and Values;
  - ✓ Commitments;
  - ✓ Code of Conduct;
  - ✓ Policies and Procedures;
- Code of Commercial Conduct;



VISION, MISSION,  
AND VALUES

## VISION, MISSION, AND VALUES

### Our Vision

To be one of the country's largest and best pharmaceutical companies, and to have the largest share of innovative products in its portfolio.

### Our Mission

Biolab is a pharmaceutical company with a mission to develop, produce, and market products that improve consumer's quality of life. Our products combine quality and superior technological added value, as well as an excellent reputation among the medical community, all at a price that works for both the company itself and the Brazilian consumer.

### Our Values

Commitment means acting in the company's own interests, as well as being responsible, and being determined to achieve and exceed the expected results.

- **Adaptability** is the capacity to adjust to new scenarios with agility, and respect for ethical and legal principles. It means being flexible enough to create a unique and authentic identity and encourage diversity of opinions.
- **Entrepreneurship** is about taking action and devising new methods by applying knowledge and being able to spot opportunities. It involves growing sustainably, based on innovation and creativity while balancing the risks and returns inherent to the business.

- **Valuing people** means behaving with respect and solidarity while encouraging employees to balance their personal and professional lives, keeping health and quality of life in mind.

### Our Policies and Procedures

Biolab has internal policies and procedures covering various corporate day-to-day topics. These policies and procedures align with the guidelines in this Code of Conduct. They are part of the Biolab management system. They are mandatory for all employees.

Internal policies and procedures are available on the intranet and are updated periodically.

**Always keep the Vision, Mission and Values in mind. These principles should inspire and guide your conduct every day.**

# PRINCIPLES OF CONDUCT

## PRINCIPLES OF CONDUCT

**This Code of Conduct rests (active voice) on the following principles:**

- Honesty, integrity, coherence, and “*walking the talk*”;
- Commitment to and compliance with applicable laws and internal company policies;
- Sustainable growth and respect for life, the environment, safety and other’s view points;
- Equal treatment, with no distinction based on gender, race, age, or any other legally protected characteristic;
- Professionalism in out conduct and communication, always safeguarding our image and the company’s interests;
- Confidentiality of information;
- Privacy protection;
- Preservation of company property;
- Cooperation with public authorities;
- Commitment to a safe and healthy work environment.



## CHAPTER I

### Conflict of Interests

#### SECTION I

#### Unrelated Activities

1.1 . Each employee is responsible for their activities outside working hours. If an employee has other unrelated professional duties outside of the company that also adhere to legal and ethical standards, they may not negatively affect performance at Biolab or present conflicting interests with the company's business in any way.

1.2 Employees therefore, may not:

- 1.2.1 Use company property, whether facilities or IT resources, during work hours for personal purposes or in unrelated activities that affect work performance at Biolab;
- 1.2.2 Use cell phones during work hours for personal purposes or in unrelated activities that affect work performance or could compromise moral or ethical standards;
- 1.2.3 Operate a business under circumstances detrimental to Biolab or have any direct or indirect shares or any kind of financial interest or involvement in a current or potential competitor or supplier of Biolab.

## SECTION II

### Gifts, Donations, and Related Items

1.3 The encouragement, direct or indirect practice (even through third parties) of offering, receiving or exchanging benefits in the form of *freebies*, gifts, favours or money to healthcare professionals, individuals who work for private or public entities, or even third parties who may somehow influence the normal and ethical flow of any relationship, especially commercial ones (including public bidding), is prohibited.

1.4 Donations must not have any underlying promotional or commercial intent and are defined as acts of charity and goodwill. If approved, both parties must formalize the arrangement through a donation contract/agreement, or equivalent document, signed in accordance with the recommendations of the Legal and Compliance Department.

## SECTION III

### Samples

1.5 Drug samples may only be distributed free of charge and exclusively to healthcare prescribers as a form of advertising.

1.6 Drug samples may not be sold, transferred, marketed, or used as gifts to third parties in violation of internal and regulatory standards.

## SECTION IV

### Personal Relationships and Family Ties

1.7 To avoid conflicts of interest and favouritism the referral and/or hiring of immediate family members or persons with close personal relationships under the same hierarchy or in the same department, or of persons who must in any way work together or depend on one another to perform their work duties is prohibited. Promotions and personnel movements must not result from such circumstances. All employees are responsible for formally communicating with their department heads and the Human Resources Department about their close personal relationships and family ties by updating the Conflict of Interests Form. Close personal relationships include romantic and ones involving great familiarity, frequent interactions, or closeness.

1.8 Immediate family members include children, stepchildren, parents, stepparents, in-laws, spouses, former spouses, siblings, grandchildren, or grandparents.

1.9 To maintain a transparent and favoritism-free environment, all referrals or hiring of professionals who have immediate family members working for competitors, suppliers, clients, and/or belong to the pharmaceutical industry must be communicated and analyzed by Human Resources and approved by the company's Board of Directors.

## SECTION V

### Sponsorship and Events

1.10 Sponsorship of symposiums, congresses, seminars, and other events is permitted the purpose is scientific and educational and involves technical improvement for healthcare professionals.

1.11 Any sponsorship, consultancy or study engagement, provision of gifts, travel or accommodation must be approved by the immediate supervisor, the Commercial and Legal/Compliance Department, as well as the Board of Directors

**To learn more about drug samples, gifts and sponsorship, please see our Code of Commercial Conduct.**

## CHAPTER II Acts of Corruption

2.1 Biolab's core values include conducting the business in a fair, honest, and transparent manner. Our employees and third-party intermediaries must always act professionally and uphold the highest ethical standards.

2.2 Unethical behaviours will not be tolerated, including but not limited to:

2.2.1. Engaging in any form or level of corruption through actions, omissions, or instances or continuation of favouritism

2.2.2. Falsifying or concealing any information stored in books, documents, emails, and statements from Biolab, including financial statements, regulatory requirements, technical-scientific reports and/or clinical research reports and product promotion materials.

2.2.3. Committing any kind of fraud, making false statements, presenting false documents, or in any way altering perception of reality to gain personal benefit or for others.

**While performing their duties, all Biolab employees must keep any relationship with public agents within the limits established by law and always adhere to the ethical principles outlined in this code.**

## CHAPTER III Compliance with Laws and Internal Policies

3.1 Abiding by laws and internal policies is essential for Biolab to operate effectively and harmoniously. We ensure compliance with regulations, keep our work environment safe, and encourage all employees to engage with the company's goals and create an environment of trust and responsibility while contributing to long-term sustainability for the company and the well-being for all concerned.

3.2 Noncompliance with laws and internal policies creates a hostile workplace environment, negatively affects morality, morale, and productivity, and may result in severe consequences, such as disciplinary actions, reprimands, suspensions, or even terminations.

3.3 All policies and procedures must be followed when selecting or hiring suppliers/third-party intermediaries.

3.4 All recruitment and hiring of personnel must receive formal approval for the position and adhere to the selection processes established and conducted by the Human Resources Department. Similarly, promotions and salary increases must be properly reviewed and evaluated by this department, following criteria based on policies that consider qualifications, experience, performance, professional history, and potential for each specific role.

3.5 Every employee must report errors or grave mistakes to their immediate supervisor, whether committed or witnessed, to ensure correction or mitigation of any undesirable consequences.

3.6 All third-party visits to the Research, Development & Innovation (R&D&I) facilities, factories or offices must be supervised and explicitly communicated to the immediate supervisor and the relevant Board(s) of Director(s).



## CHAPTER IV Socioenvironmental Responsibility

4.1 At Biolab, we value life, health, safety, and the environment. This means we are committed to adopting measures that aim to preserve healthy work conditions for all, as well as preventing illness or work-related injuries.

4.2 Biolab does not condone child labour slavery, or any other illegal form of work and will not tolerate such behaviour from any supplier/third-party intermediary, contractors or subcontractors.

## CHAPTER V Respect for People

5.1 Any form of disrespect is prohibited at Biolab, including, but not limited to:

- 5.1.1 **Harassment:** recurring actions, words or gestures to humiliate or embarrass someone at work, amounting to persecution and emotional destabilization of the victim.
- 5.1.2 **Sexual Harassment:** any unwanted sexual behaviour, in any hierarchical position or among colleagues, especially to embarrass another person with comments, insinuations, jokes, propositions, touching and physical advances of a sexual nature, displaying sexually explicit media, as well as any underlying threat of this nature.
- 5.1.3 **Disrespectful Communication:** Engaging in any form of communication whether (verbal, written, gestural, visual, graphical,

or otherwise) that may be perceived as disrespectful, discriminatory, prejudicial, harassing (including moral, sexual or economic harassment), involving abusive nicknames, retaliation, or abuse of authority among employees at any hierarchical level.

- 5.1.4 **Disrespectful Communication Directed at Legal Entities:** Making disparaging or destructive comments about legal entities, whether competitors or not, both within and outside the physical premises of the company, thereby failing to treat other organizations with respect and professionalism.
- 5.1.5 **Discrimination:** Violating an individual's rights by treating them differently and unfairly based on sexual, racial, religious, or other personal differences.
- 5.1.6 **Individualistic Behaviour:** Any behaviour that demonstrates a lack of respect for one's functional responsibilities, through actions that undermine cooperation, harmonious interactions among colleagues, or the moral and material assets of the company.
- 5.1.7 **Carrying Weapons:** Except for professionals legally authorized and with the company's consent, carrying any type of weapon in the workplace is strictly prohibited.

5.2 We value a positive image at Biolab, and attire must be appropriate and convey professionalism based on local habits. For example, wearing shorts, sweaters, clothing with ideological slogans, or high heels in the factory or distribution center is considered improper. Employees must always respect work safety rules and guidelines.

## **CHAPTER VI**

### **Use of Alcohol and/or Illicit Drugs**

6.1 Biolab expressly forbids the use or sale of illicit drugs and/or alcohol in company premises or even outside during work hours, especially when such usage might interfere with work performance or risk causing damage to Biolab's or an employee's reputation.

6.2 Biolab expressly forbids the use or sale of illicit drugs and/or alcohol in company's premises, or even outside during work hours, especially when such use might interfere with work performance or risk damaging Biolab's or other employee's reputation

## **CHAPTER VII**

### **Asset Protection**

7.1 Employees must use the company's physical assets (such as materials, merchandise, equipment and money), and intangible assets (such as those related to intellectual property, information, time, and talent) safely and responsibly when performing their duties and avoiding waste, damage, loss, theft, or premature wear and tear.

7.2 Biolab does not tolerate misuse of company resources, including cellphones, email and electronic devices for personal purposes without proper authorization.

7.3 Company systems are not authorized to transmit or receive (whether self-initiated or requested) images or text of any nature that might be considered embarrassing, offensive or discriminatory, including pornography.

7.4 Employees must protect Biolab's electronic systems, communication networks and IT resources to safeguard confidentiality and property with such assets. Copying or installing copyright-protected software, or those developed for Biolab without authorization, is also prohibited.

7.5 Employees must use social media responsibly and respect privacy, copyrights and information security. The use of these tools must not involve inappropriate content or cause embarrassing situations or privacy concerns through circulated images/texts, disclose strategic or confidential information, cause financial or reputational damage to the company, its partners, customers, employees, suppliers, or third parties, nor issue any statement on behalf of Biolab, including those of a political, religious or sports-related nature.

7.6 Creation of institutional profiles with Biolab or its brand logo and/or name or those referring to Biolab areas or programs with no authorization from the Communications Department is prohibited. Similarly, the use of corporate emails to create personal social media profiles is not permitted.

7.7 Any use of social media must comply with our Code of Conduct and Good Practices in the Digital and Social Media Environment, available on the intranet.

7.8 Use of Artificial Intelligence (AI) consciously, ethically and transparently. Any use of AI for discriminatory purposes, or data leaks is strictly prohibited and will not be tolerated. Do not enter confidential Biolab information into AI systems for any purposes unless previously authorized by the department head

**The company reserves the right to monitor employees and use tools to detect or prevent access to unauthorized websites and messages. Biolab may also monitor messaging apps, audio and video communication over the internet, or other electronic work tools used during corporate activities.**

## **CHAPTER VIII**

### **Confidential Information**

8.1 Confidential information refers to information not available to the public, that may be beneficial to competitors or even harmful to Biolab if disclosed. We do not use or share insider information that could be used to make business decisions, such as product information, research, partnerships, mergers, or corporate changes that have not yet been announced to the public.

8.2 Employees must respect and protect confidentiality with all strategy-related material, including plans, products, processes, financial or market information, technical-scientific data, and any content associated with Biolab's intellectual and/or physical property, or those of third parties entrusted to Biolab, regardless of the position held.

8.3 Employees must exercise caution when using phones, emails, or other electronic media that store, receive and send messages/information. They should be cautious in public settings, especially when discussing company-related topics, administrators or employees. The rules on confidentiality and professional secrecy also apply to the digital environment.

8.4 Employees are prohibited from forwarding confidential or proprietary information to email accounts outside of the company or those of partners without signed confidentiality agreements approved by the head of the area.

8.5 Employees are prohibited from disclosing, without authorization, confidential information related to employees, applicants, open positions, clinical trial subjects, researchers, results and protocols, or any other information on healthcare professionals, doctors and consumers conveyed by the Customer Relations Service and/or the Pharmacovigilance Department, as well as any information related to suppliers or resellers.

8.6 Employees must use confidential information ethically and must avoid any behaviour that suggests undue privilege in possessing such information.

8.7 Engaging in industrial espionage, whether internal or external, or misappropriating confidential information from other companies, institutions, or individuals is strictly prohibited.



## CHAPTER IX

### Data Protection

9.1 Biolab treats personal data from employees, suppliers, customers and third parties per the Brazilian General Data Protection Law (LGPD) and other applicable laws and regulations while carrying out its activities.

9.2 For this reason, employees must acknowledge and comply with data protection rules while performing their duties, ensuring that the collection, use, storage or even disposal of personal data is done appropriately, responsibly and securely.

9.3 Any information relating to an individual that permits identification, such as name, CPF, address, email address, race or ethnicity, health-related data, consumer information must be protected.

9.4 All employees must respect the following rules on personal data:

- 9.4.1 Collect personal data only if it is essential to meet a legitimate purpose and use it for that purpose only;
- 9.4.2 Be clear and transparent about the way personal data will be used;
- 9.4.3 Keep personal data protected, whether physically or digitally, by adopting security measures against unauthorized accesses or data leaks;
- 9.4.4 Dispose of all personal data once the purpose of the processing has been fulfilled, retaining only the necessary data to meet legal obligations;

9.4.5 Maintain appropriate controls for personal data processing, including privacy and collection consent from data owners, when applicable;

9.4.6 Report any data breach to [privacidade@bioabfarma.com.br](mailto:privacidade@bioabfarma.com.br).

9.5 Any violation of these rules, as well as of the Brazilian General Data Protection Law may result in disciplinary measures for employees.

### Managing the Biolab Code of Conduct: A Shared Responsibility

The Compliance program aims to promote the adoption of ethical principles in conducting Biolab's businesses focusing its sustainability. Ensuring compliance with the rules outlined in the Code of Conduct is a commitment and responsibility shared by all employees.

Management is responsible for fostering a healthy work environment, free from harassing, discriminatory, or abusive practices while consistently promoting respect and engagement among all employees.

### MANAGEMENT, STAY ALERT!

**Managers should lead by example and create an honest, transparent, just and coherent work environment for the team.**

All employees, business partners, and suppliers commit to act according to the precepts set forth in this code, and are subject to the company's rules and internal regulations, where applicable to their activities.

This code does not cover every unacceptable behaviour or action at Biolab. Therefore, any situation not specifically addressed in this document should be reported with leadership, Human Resources, Compliance and/or the Ombudsman.

This Code of Conduct may be periodically reviewed by Biolab.

## Ombudsman

Biolab's ombudsman may be contacted to deal with complaints, criticisms, grievances, and suggestions related to violations of this code, local laws, and company policies or procedures and processes, including but not limited to:

- ✓ Corrupt actions;
- ✓ Fraud;
- ✓ Theft or misappropriation of Biolab assets for any purpose;
- ✓ Disrespect, harassment, discrimination, prejudice, coercion or abuse;
- Other reprehensible conduct

The ombudsman is represented by a reputable independent contractor who provides services impartially confidentially and structured manner. This ensures that all information is properly analyzed and forwarded to the appropriate departments for investigations.

Individuals who file complaints in good faith are protected from retaliation and it is assured that the facts will be investigated with professionalism, impartiality, and confidentiality in line with the commitment to this document.

All complaints will be investigated impartially and in detail to assess the veracity of the allegations, and supporting documentation will be collected when necessary.

Do not overlook anything and remember that anonymity is guaranteed to anyone who requests it.

**If you have any questions, do not hesitate to ask.**

**Ombudsman:**

**Website:** [www.contatoseguro.com.br/biolab](http://www.contatoseguro.com.br/biolab)

**Phone:** 0800 810 8512

Code created in 2013.

Updated on: September/2018; October/2020; September/2024.

## Appendix I – Code of Conduct Receipt and Acknowledgement

I, \_\_\_\_\_,  
with ID No. \_\_\_\_\_  
hereby confirm that I have received, read and understood this Code  
of Conduct. I agree with and commit to comply with it and the ethical  
standards it represents, as well as to comply with the law, regulations  
and company's norms, values, and principles.

I hereby declare that the above is true.

Signature \_\_\_\_\_

Occupation \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_

Date        /        /



[illegible]

EXPERIENCE EVOLUTION

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