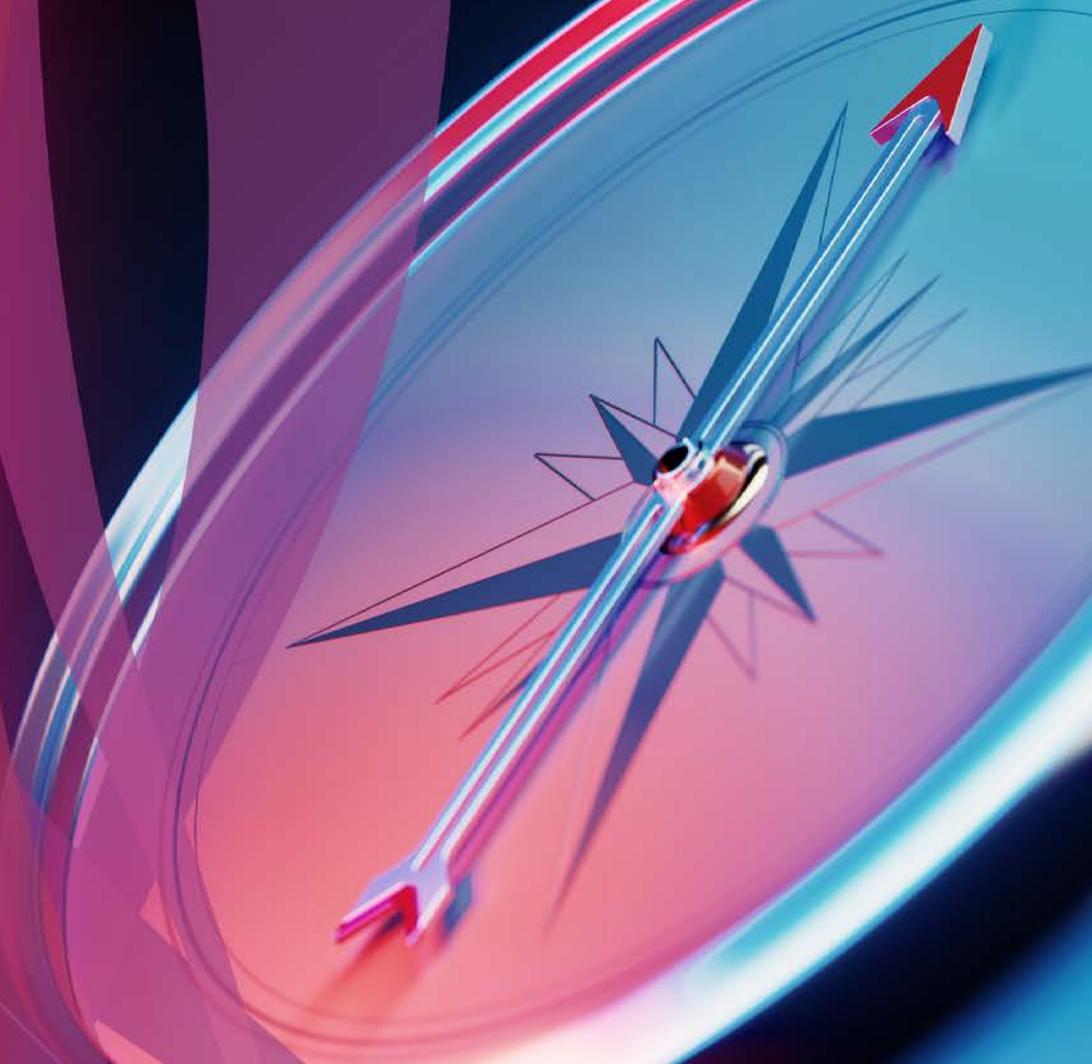


# Code of Conduct

**achē**  
better living for you



# Table of Contents

<b>Message from the Presidency</b>	<b>3</b>
<b>Our Purpose</b>	<b>4</b>
<b>Way of Being Aché</b>	<b>5</b>
<b>Way of Doing Aché</b>	<b>6</b>
<b>General Guidelines</b>	<b>7</b>
<b>Pillars of the Code of Conduct</b>	<b>11</b>
<b>Corporate Governance</b>	<b>12</b>
<b>Social</b>	<b>22</b>
<b>Environmental</b>	<b>31</b>
<b>Suppliers and Service Providers and Business Partners</b>	<b>32</b>

# Message from Presidency

We are passionate about life and this feeling guides us in everything we do. Throughout our history, we have evolved our **way of being and doing**, attentive to the impact of our presence on people's lives, on nature, and on the sustainability of our business.

We present our updated **Code of Conduct**, reinforcing our commitments to patients, doctors, customers, business partners, shareholders, employees and all those who relate to Aché. In this update, in addition to bringing an orientation guide of what is expected of each one of us, we also present our ESG – Environment, Social and Governance look integrated to the company's processes and decision-making to achieve better results in economic, social and environmental aspects.

We are committed to ensure a good working environment for all our employees and ensuring excellence and transparency in everything we do, so that together we can achieve our purpose of bringing more life to people. Always looking out of your reputation, because it is unmerchtable.

Use this Code of Conduct as a guide and use it whenever necessary. In case of questions, please refer to the channels indicated in this code.

The responsibility to do right lies with all of us.

Enjoy your reading!

**José Vicente Marino**  
**CEO**



# Our Purpose



Our Purpose is the reason why we work every day

For pain, we bring relief.  
For the mind, tranquility.  
For the skin, beauty.  
For the pharmaceutical market, we bring innovation.  
For health care professionals, information.  
For clients, solutions.  
For forests, we bring trees.  
For the community, inclusion.  
For our employees, opportunities.  
For the society, more culture, education and sports.  
More possibilities for your treatment.

More efficacy for caregivers.  
More respect for the environment.  
More future for the next generations.  
More well-being for the whole family.  
Our vocation is to bring health and longevity to people.  
And our mission is to bring more life to you.



## We are Magenta

- » We are passionate about life;
- » We innovate to always be one step ahead;
- » We take care of our customers;
- » We inspire through talent and diversity;
- » We look after our reputation, it is non-negotiable.



**That we do:**



Deliver high performance;

We can be proactive with autonomy and responsibility;

Collaborate and build together;

Teach and learn;

Act with simplicity and agility.



# General Guidelines

## Why does Aché have a Code of Conduct?

This Code directs Aché's way of acting and makes public our commitment to always act ethically, transparently, responsibly and with respect.

It is a guide of behavior and rules that must be followed by its shareholders, advisers, employees, interns, apprentices and all those who work in or for Aché ("employees").

The principles of this code also apply to suppliers, service providers, business partners and other public slates that relate to with Aché.

## Code Governance

To the Managers of Aché, it is worth leading by example, support and contribute to their teams fully understanding and comply with this Code of Conduct.

As a condition of belonging to and/or maintaining relations with Aché, everyone must read this Code of Conduct and individually sign a term of commitment that proves that it is in accordance with all the principles and rules described herein.

This Code of Conduct is public and is available on the website: **[www.ache.com.br](http://www.ache.com.br)**



## It will be considered as nonconformity with the Code of Conduct:

- » Any violation of the guidelines set forth in this document, corporate policies and procedures, as well as legal requirements;
- » Failure to report any violation of this Code of Conduct to the communication channels
- » Manipulate or omit information that may harm investigations or hide actions that violate the Code of Conduct
- » Not following confidentiality rules and/or retaliating against anyone who, in good faith, reports actions or behavior that violate the guidelines of this Code of Conduct



## How to report a breach of the Code?

Complaints must be sent through the communication channels mentioned in this Code. They are received through an external ombudsman channel and are always treated confidentially.

Complaints may be made in an identified or anonymous manner, at the discretion of the person reporting. However, complaints must be made in detail, precisely and, whenever possible, accompanying evidence (documents, witnesses, etc.) and the identification of the offender in order to make possible an investigation.

Complaints that do not identify the infringer or that have no evidence may be filed for lack of evidence. On the other hand, the evidenced complaints will be investigated by representatives of the Ethics Committee or third-party specialists and the investigation report will be sent to the Committee itself for deliberation of eventual disciplinary measure whenever a violation of this Code is detected.



## Communication Channels

To report any nonconformity with this Code, please look for the channels below:

- Internet: [contatoseguro.com.br/ache](http://contatoseguro.com.br/ache)
- Call Center: 0800 155 0003
- Intranet: [portal.iache.ind.br/ouvidoria/canais de acesso/](http://portal.iache.ind.br/ouvidoria/canais%20de%20acesso/)

Reports can be identified or anonymous, and confidentiality is guaranteed to the complainant. In case of doubt, talk to your manager or send an email to: [compliance@ache.com.br](mailto:compliance@ache.com.br)



# Pillars of Code of Conduct

Aché has a public commitment to sustainable development throughout its value chain and operations based on the protection of the environment, social development and the adoption of best practices in corporate governance.

These practices are reflected in these three pillars:

- » **Corporate Governance:** More vitality for business;
- » **Social:** More vitality for people;
- » **Environmental:** More vitality for Nature.



## Integrity

Integrity is a unmerchtable value for Aché because we recognize that acting with transparency and ethics is what guarantees establishing lasting and trusting relationships with all our audiences. All employees represent Aché and are responsible for the company's reputation, and everyone is expected to work ethically, correctly and fairly.

## Financial Statements

Accurate accounting and financial records are essential. All financial transactions must be correctly recorded and employees must cooperate with internal and external auditors in a transparent manner, without omissions or manipulations.

All employees, suppliers and service providers must correctly follow the legislation applicable to financial records, including the Brazilian Anti-Corruption Law and the General Data Protection Law.



## Conflict of interests

The particular interests of employees cannot conflict with the interests of Aché. Employees must not use their positions or business information from Aché and/or its clients to influence decisions that may favor their own interests or those of third parties.

## Contracting of Suppliers and Service Providers

All Aché employees must comply the procurement policy when choosing and hiring suppliers and / or service providers, thus ensuring transparency in competition processes that must be based on technical, professional and ethical criteria.

The obligation to read, know and comply with the purchasing policy is the obligation of each employee, including the duty to maintain the confidentiality of the information of the competitive process.



## Attention to possible situations of conflict of interest:

- » Corporate participation in companies that may be suppliers, competitors or customers of Aché (examples: pharmaceuticals, pharmacies, drug and cosmetic distributors, online or physical retail);
- » Family members working in a supplier or competing company (parents, children, grandchildren, grandparents, siblings, cousins, in-laws, spouses, brothers-in-law, stepchildren);
- » Affective relationship or bond of kinship between employees, interns, apprentices and/ or third parties. (Suppliers, Service providers, Business Partners, Customers, people assigned to services within the Aché office and others) who in any way relate to Aché
- » If the Employee is in a situation of possible conflict of interest, they must immediately and compulsorily communicate with their manager, as well as the Human Resources and Compliance areas. Possible conflicts identified within Aché that cannot be resolved (e.g. through the relocation of an Employee in another area or other management) or unreported conflicts, the Employee will be in disagreement with the Code of Conduct and will be subject to sanction, including your dismissal from the company for non-compliance with this Code.



## Parallel activities

Employees are not allowed to:

- » conduct other professional activities, paid or unpaid that constitute competition to Aché's activities;
- » work or be remunerated by Aché's competitors, suppliers or service providers;
- » do activities during their journey that compromise their responsibilities in Aché;
- » trade products, services, raffle, among others, during working hours and/or in the premises of Aché.

Employees must request prior authorization from their respective Directors to participate in lectures, on executive offices, classes, articles or on behalf of Aché or with association with the position held in Aché. If the activity is approved, employees remain bound by the obligation of confidentiality with Aché and should not use any business information without prior authorization from Aché's communication area.



## Gifts and Presents

Employees may not accept, request or offer, directly or indirectly, favors or gifts of any value to suppliers, service providers and/or business partners



**Situations not allowed:** cash or equivalent amounts, gifts of any value or kind, travel, meals, tickets to sporting events, concerts, cultural shows and any kind of favors.

Business trips that are not intended to influence any business decision (such as invitation to congresses) must be submitted for approval by the Ethics Committee.



**Situations allowed:** Promotional items of the supplier and/or service provider of no commercial value and containing the company's logo. Example: pens, notebooks, calendars. Customer relationship events must be approved by the responsible Board



## Confidentiality of Our Information

Employees are prohibited from publishing, sharing or disclosing confidential and/or property information from Aché. Information related to patents, trademarks, knowledge, technical data, process and market information, among others, is considered strategic and needs to be kept confidential. All employees and third parties must ensure the correct access and protection of confidential information. The storage of documents, classification of information and care with sensitive data must follow the policies and procedures of the area of Information Security and it is the responsibility of each employee to know them

## Press Interviews

Aché has a guide of spokespersons authorized to give press interviews and to speak on behalf of the Company. Upon receiving any interview request, refer it to the Institutional Communication Management, responsible for conducting the process with the Press Office.

## Political Demonstrations and Financing of Election Campaigns

Aché maintains absolute political neutrality and makes no contributions, in any form, to political parties or organizations or candidates for elective office. None of the collaborators is authorized to make or offer, directly or indirectly, contributions to political parties or candidates for public office on behalf of Aché.



## Use of Resources

All employees are responsible for the protection and conscious use of the infrastructure and resources made available by Aché (equipment, technology, meeting room, corporate e-mail, among others). It is expected that, during the execution of its activities, these resources will be used for the benefit of Aché and are not used for improper purpose or for the sharing of illegal or inappropriate content.

Use facilities, equipment and materials in a correct and responsible manner, avoiding unnecessary losses and expenses.

Is expected that all employers include the “ESG Look” into their processes, always seeking to reduce waste, produce more with less and correctly dispose of their waste.

## Social Media

All employees must be careful when photographing Company spaces or events. It is not allowed to post on social medias or in other digital environments photos of the factory, production, innovation laboratories or any spaces and events that may reveal information or explanations of the Company.



## Related Parties Policy

Employees must read and comply the related party policy that aims to establish rules to ensure that transactions between Aché and Related Parties (entities, individuals or companies that have relevance in Aché's management organization) are concluded in Aché's interest, in a transparent manner, without conflict of interest and in accordance with best governance practices.

## Antitrust and Competition Protection Laws

Aché complies with fair competition laws, foreign trade and customs laws. Aché promotes free competition in all places where it has operation and therefore does not compact with unfair practices to obtain any commercial advantage, repudiates and seeks to curb any anti-competitive conduct and abusive practices that may constitute economic violations and/or unfair competition. All employees, suppliers and service providers are expected to comply with the legislation and act in line with the principles described herein.



## Anti-Corruption Policy and Anti-Bribery Policy

Aché's policy reflects **zero tolerance** to the practice of any act that constitutes or may constitute a business offense or harmful act provided for in the Brazilian Anti-Corruption Law (Law No. 12.846/2013) including the American Foreign Anti-Corruption Practices Act (FCPA), the UK Bribery Act of the United Kingdom or any other legislation applicable to Aché, or even that poses a risk to its integrity or image, being expressly forbidden to any Collaborator or third parties on behalf of Aché:

- » the offer or promise, direct or indirect, of undue advantage, gifts, favors and the like to a public official, or a third person related to him;
- » the financing, costing or sponsorship of unlawful acts with the involvement of a natural or legal person;
- » active or passive corruption, as well as extortion, bribery, money laundering, bribery, or any other unlawful conduct;
- » preferential or privileged treatment to any supplier, business partner, entity or company;
- » compact with maneuvers or agreements that aim to circumvent or direct any bidding or direct contracting procedures, as well as requests for favors by public agents, including those responsible for inspections of any nature.



## Data Protection Policy

Aché adopts actions to ensure transparency in the processing of personal data, online and/or offline, in accordance with the General Data Protection Law-LGPD.

Such actions seek to ensure that the data are used only for the legitimate and specific purposes for which they were collected, sharing only with those who have access permission, preserving them in accordance with security policies and keeping them only for the necessary time, proceeding with their disposal after use.

Employees or third parties acting on Aché's behalf who need to access or handle personal or Legal Entity Data must act in strict accordance with the laws and regulations related to data protection and in accordance with the applicable security standards and Aché's normative data sharing policy.



## Relationship with Society

Aché is committed to generating and sharing value with society, patients, customers, employees, the medical community, suppliers, service providers, business partners, shareholders, regulatory bodies and other stakeholders.



Message from the CEO

Our Purpose

Way of Being and Doing Achē

General Guidelines

Pillars of Code of Conduct

Corporate Governance

Social

Environmental

Suppliers and Service Providers and Business Partners



## Diversity and Inclusion

Aché believes in the value of inclusion and diversity, valuing and respecting the different skills, experiences, thoughts, beliefs, ethnicities, ages, genders, cultures and knowledge that are added up. It is a commitment of Aché to respect and promote human rights and to act in accordance with national and international conventions for the protection of persons. All employees are responsible for ensuring an inclusive and diverse environment, and any act of prejudice and/or disrespect is prohibited.



## Relationship with Various Publics

### Shareholders

It is with the investment of shareholders that Aché realizes its growth plans. Therefore, Aché is committed to providing a fair return to shareholders and ensuring the appreciation of the company's assets. Aché ensures accurate and transparent reporting of its activities and its economic and financial performance, periodically, or whenever requested.

### Employees

Aché observes the rights of employees and treats everyone equally, from recruitment to the termination of the employment contract.

In the constant pursuit of employee satisfaction, Aché has communication channels that ensure an active dialog of all employees with the leadership and reinforces the importance of a respectful and truthful relationship between employees.

Aché is committed to promoting a safe and healthy work environment for employees and third parties. All employees and third parties must strictly follow the rules of Aché's Occupational Safety, Health and Environment Policy.



Aché does not tolerate any kind of harassment or situations that configure violence, pressures, intimidation or threats in the relationship between employees, regardless of their hierarchical level. Employees who consider themselves in a situation of disrespect, discrimination, prejudice, pressures or abusive practices or witness a situation with third parties, must immediately report the fact to the Compliance area or the Ombudsman channels.

**Moral Harassment\*** is the exposure of people to humiliating and embarrassing situations in the workplace, in a repetitive and prolonged manner, in the course of their activities. It is conduct that brings damage to the dignity and integrity of the individual, putting health at risk and damaging the work environment, manifested by behavior, words, acts, gestures or writings that may bring harm to the personality, dignity or physical and psychological integrity of a person, endangering their employment or degrading the work environment.

**Sexual Harassment\*** is any unwanted conduct of a sexual nature that restricts the sexual freedom of the victim. The reiteration of the conduct is not essential for the characterization of Sexual Harassment. A single act can be serious enough to damage the honor, dignity and morals of the victim.

Both moral and sexual harassment can occur regardless of the position, for example, from the manager to the subordinate, from the subordinate to the manager and among employees of the same level.

Source: \*TST Tribunal Superior do Trabalho (\*TST Superior Labor Court)



## Community

Aché fulfills its commitment with development and social inclusion. For this reason, in addition to producing excellent products for people's health and well-being, it continues to invest in programs and projects that seek the social, environmental and economic development of communities.

## Consumers

Aché works to generate more life for its patients and seeks to meet all their present and future needs, respecting their rights, ensuring their safety and the protection of their data, and providing relationship channels so that they can make suggestions, criticisms and remarks about products and services, whenever they wish

## Customers

Aché considers as customers all distributors, pharmacy chains, independent pharmacies, hospitals, oncology clinics, and public entities focused on the dispensation of medicines. Aché's relationship with this audience is based on business partnerships aimed at exceeding their expectations, with mutual respect and productive results for both parties.



## Relationship with the Medical Community

All national or international events intended for or with the participation of health professionals must follow the guidelines of regulatory agencies.

It is allowed to sponsor symposiums, congresses, seminars, and other events of scientific or educational nature that aim at providing training to health professionals or to the Medical-Scientific Community, discussion or exchange of scientific information as long as this support or sponsorship is not conditioned to the prescription, dispensing, advertising, or publicity of drugs by health professionals or in disagreement with the regulation in force.

The expenses with transport, meals and lodging must observe the period of the event and be directed to the invited professionals, not being allowed the inclusion of expenses of family members, companions or people invited by the professionals.

The invited professionals may not receive any kind of remuneration, direct or indirect, for participation in the event, except when such participation corresponds to services provided by the same, for example, as a speaker.



## Visit to the Health Professional

Aché's relationship with doctors and health professionals is based on trust. Aché has deep respect for medical-scientific knowledge and constantly seeks to understand the expectations of these professionals regarding the benefits to be achieved for their patients and for society.

Aché is committed to promoting its products ethically and in accordance with applicable laws and regulations, providing information that assists in the development of medical and pharmaceutical care.

Aché's representatives must transmit accurate and complete information about the products to Healthcare Professionals, always limited to the information and characteristics of the product registered with ANVISA.

Aché representatives are prohibited from offering financial incentives, gifts of any kind to Health Professionals in return for prescription, indication, influence on the decision to purchase or administer products, including the offer of any items intended to facilitate the prescription.

It is allowed to pay for meals to Health Professionals, when carried out with the purpose of sharing scientific or educational information, not being extensible to companions.



## Competition

Aché believes in fair competition, based on the quality, competence, and reliability of each company. With this, it maintains a cordial and respectful relationship with its competitors and relies on cooperation to achieve common objectives.

Aché employees must avoid destructive comments in relation to competitors, treating them with respect and professionalism. Positive image building of a company requires years of serious and exemplary attitudes towards everyone and can be destroyed by rumors, pranks and deceit.

## Press

Aché's relationship with the press is guided by transparency and truth, with the commitment and responsibility to serve it with promptness and clarity, providing institutional information and about its products. Aché evaluates agendas with a high level of criticality in order to bring information that adds value to society through the press.



## Government and Public Administration

Aché maintains a transparent and professional relationship with the public sector, especially with the National Health Surveillance Agency (ANVISA), which regulates the activities of the pharmaceutical industry. Aché and its employees are committed to the full observance of industry legislations, marking sure none of them are breached.

Critical remarks about acts or attitudes of public officials or comments of a political nature should not be expressed within Aché, since we are in a non-partisan environment.



## Environment

Aché's purpose to bring more life to people is directly related to conducting its business responsibly and creating more life for the planet.

Aché is committed to implementing the best solutions to avoid or mitigate the negative environmental impacts of its activities and continuously improve its performance, conducting initiatives to enhance Brazilian biodiversity, adequate waste management, efficient use of electricity and water, among other initiatives aimed at Environmental Conservation.

All employees must act with focus on the conscious use of Natural Resources and the correct disposal of waste generated, with the aim of protecting the environment. During the performance of activities, employees must observe and comply with all environmental laws and regulations applicable to Aché, as well as internal environmental policies and related instructions.



## Chapter for **Suppliers, Service Providers and Business Partners**



Message  
from the CEO

Our  
Purpose

Way of Being  
and Doing  
Achē

General  
Guidelines

Pillars of Code of  
Conduct

Corporate  
Governance

Social

Environmental

Suppliers and Service  
Providers and Business  
Partners



# Suppliers, Service providers and Business partners



## Principles and rules

Aché Suppliers, Service Providers and Business Partners must comply with the legislation applicable to their business, the Brazilian Anti-Corruption Law, the General Data Protection Law – LGPD, labor and safety legislation, environmental and health regulations, as well as its products and services provided must meet the quality and safety standards established by laws, rules and regulations, in addition to the obligations contracted by Aché.

## Labor practices

In addition to full compliance with all labor and human resources laws, Aché expects its suppliers service providers and business partners to be committed to the defense of workers' human rights and treat them with dignity and respect, as well as comply with valid collective bargaining, collect taxes due and respect the right of workers' free association.



# Suppliers, Service providers and Business partners



## Forced labor and analogous to slavery

Aché does not tolerate and expects its suppliers and service providers to prohibit all forms of forced or slave labor. Every employment relationship must be spontaneous and all workers must be free to terminate their employment contract at any time.

## Child labor

All suppliers and service providers must comply with the child and adolescent statute. Under no circumstances does Aché tolerate the use of child labor by its partners.

## Work conditions

Suppliers, service providers and business partners must provide a safe workplace free from harassment, intimidation, discrimination and promoting gender equality, in order to achieve a discrimination-free and equal-opportunity environment.. Aché does not tolerate any type of discrimination based on race/ethnicity, gender identity, age, disability, sexual orientation or nationality.



# Suppliers, Service providers and Business partners



## Business Integrity and Environmental Protection

Aché expects its suppliers, service providers and business partners to follow the highest standards of ethical conduct and not engage in corrupt practices. It is expected They maintain accurate, organized and reliable accounting and personnel controls, keeping adequate records, not generating liabilities in relation to their business conduct and in relation to their employees.

Aché suppliers, service providers and business partners must comply with all applicable environmental laws and regulations, care for the protection of the environment, maintaining all necessary licenses to operate.

Suppliers, service providers and commercial partners are expected to act proactively, adopting initiatives that promote greater environmental responsibility. In carrying out their activities, Aché's suppliers, service providers and business partners must act to reduce or eliminate waste of all kinds, working to reduce the consumption of resources, including water, energy and inputs. The generation of waste and effluents must be also minimized, eliminated at source and/or ensured proper disposal in accordance with current legislation.



Term of Commitment  
**Aché Code of Conduct**  
Collaborator and Third Resident

I \_\_\_\_\_, Position: \_\_\_\_\_,

CPF: \_\_\_\_\_, I hereby agree and certify that I have read and understood Aché's Code of Conduct, and undertake to observe and comply with the standards of behavior and guidelines explained in the document, always acting in an ethical and transparent manner. I assume the commitment to report to the competent channels any behavior or situation which is or appears to be in disagreement with the guidelines and recommendations of this Code. I reiterate my commitment to observe and comply with all the rules provided in this Code and in my Employment Contrata, as well as the commitment to report to the competent channels, any behavior or situation that involves me directly or that involves third parties that is in disagreement with the guidelines and recommendations of this Code.

I declare, any conflicting situation with this Code of Conduct: \_\_\_\_\_

*Examples of possible conflict situations: family members working in a supplier or competitor company; corporate interest in companies that are or may be suppliers, competitors or customers (examples: pharmaceutical companies, pharmacies, medicine and cosmetics distributors, online or physical retail); parallel activities during working day that compromise your responsibilities at Aché or work for competitors, suppliers, service providers; sell products, services, raffles, among others, during working hours and/or on Aché premises. The examples described here are not meant to be exhaustive, other situations may be considered conflicting.*

*The Compliance to this Code of Conduct and the signing of this term of commitment includes authorization to use your image in photos or videos, for exclusively institutional use (not advertising or commercial).*

I declare that in this moment I am not currently in any situation that violates this Code of Conduct.

Employees

Third Resident

\_\_\_\_\_  
Signature

\_\_\_\_\_, \_\_\_\_/\_\_\_\_/\_\_\_\_  
Place and Date

Term of Commitment  
**Aché Code of Conduct**  
Supplier and/or Service Provider



I hereby declare that I have received and understood Aché's Code of Conduct, and I undertake to transmit to all our employees/subcontractors the contents of the Code of Conduct and we will take steps to ensure that they also comply with its provisions.

We are willing to report to Aché any suspected violation of this Code through the official channels and keep confidential all information received or exchanged with Aché.

This document regulates the relationship between Aché and the publics mentioned herein, and nonconformity with its terms is subject to sanctions, such as contract termination, among others.

I declare that, at this moment, the company that I represent is not in any situation that violates this Code of Conduct.

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

CNPJ: \_\_\_\_\_

Name of authorized signatory: \_\_\_\_\_

Position of the authorized signatory: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_, \_\_\_\_/\_\_\_\_/\_\_\_\_\_  
Place and Date

Credits:

CÓDIGO DE CONDUTA ACHÉ

7th Edition - September 2022

REALIZATION

Aché Laboratórios Farmacêuticos S.A.

GENERAL COORDINATION AND CONTENT

Legal, Compliance and Sustainability Board

Risk Management and Compliance

SUPERVISION

Institutional Communication Management

GRAPHIC DESIGN AND EDITING OF ART

Phoenix Integrated Communication

[www.editoraphoenix.com.br](http://www.editoraphoenix.com.br)

**achē**  
better living for you