

The background is a solid teal color. It features three thin, dark teal wavy lines that curve across the page from top-left to bottom-right, creating a sense of movement and depth.

**viveo**

**Policy**  
**Anti-corruption**

## **MESSAGE FROM THE CEO'S OFFICE**

We respectfully address all of our employees, work partners, suppliers and service providers who transact on behalf of the companies that make up Viveo.

We are a traditional brand, a reference in the markets in which we operate, which contributes to the development of health in Brazil and worldwide. We participate in a business chain that has a very special responsibility: taking care of people's health and lives.

With this, our mission is to manufacture, sell and distribute products with the highest quality, aimed at the areas of first aid, surgery, treatment, hygiene and well-being.

In order to be successful, and to create a solid reputation, we constantly act with integrity and we need an excellent synergy of all the people who directly and indirectly participate in this process.

This is exactly why we instituted and valued Viveo's Integrity Program: so that we all work in line with each activity. The integrity of our conduct is a commitment assumed by us and that must permeate all our relationships.

This Anti-Corruption Policy, together with the Code of Conduct and other policies instituted by Viveo, contains the compliance rules and the ethical and moral principles that must guide our daily work, ensuring a transparent operation that integrates quality, speed and ethics in meet the needs of our customers and their patients, healthcare professionals, partners, investors and society in general.

To this end, we have the support and dedication of all Viveo Employees, in addition to our business partners, suppliers and third parties who do business on behalf of Viveo, in the unrestricted pursuit of integrity, as well as being available to help you in whatever is possible.

Presidency of Viveo.

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## 1. INTRODUCTION

The provisions contained in Viveo's Anti-Corruption Policy ("Anti-Corruption Policy"), which are mandatory and must be known, aim to ensure that all Viveo Employees (own or third parties)

understand the guidelines of the Brazilian Anti-Corruption Law and observe its guidelines to prevent and fight situations prone to acts of corruption, bribery and fraud, both in relation to public institutions and private companies.

This Anti-Corruption Policy is complementary to Viveo's other policies and procedures in force and has been prepared in accordance with all applicable laws and regulations against bribery and corruption, including, but not limited to: Brazilian Anti-Corruption Law (Federal Law No. 12,846/13) and its Decree No. 8.420/15; Antitrust Law (Law No. 12,529/11); Administrative Contracts and Bidding Law (Law No. 8,666/93); Administrative Misconduct Law (Law No. 8,249/92) and its regulations, US Foreign Corrupt Practices Act (FCPA); UK Bribery Act (“UKBA”); United Nations Convention against Corruption (“UNCAC”); United Nations Global Compact and other national and international laws relating to bribery and corruption applicable to Viveo.

Viveo prohibits and does not tolerate any practice of corruption, bribery, payment or receipt of bribes, whether with the Public Administration, national or foreign, or with private companies, based on Brazilian and international anti-corruption law.

NON-COMPLIANCE WITH THIS POLICY BY VIVEO'S EMPLOYEES MAY APPLY DISCIPLINARY MEASURES AND/OR APPROPRIATE PENALTIES, BASED ON VIVEO'S POLICIES, LABOR, CIVIL AND CRIMINAL LEGISLATION, INCLUDING ANTI-CORRUPTION LEGISLATION, ANTI-CORRUPTION LEGISLATION FIGHTING CORRUPTION AND MONEY LAUNDERING, AS APPLICABLE.

If Viveo Employees have doubts as to the classification of a situation in relation to this Anti-Corruption Policy, that is, whether or not a certain conduct characterizes a deviation from the precepts established therein, a consultation may be made to the Compliance Committee through the indicated channels in this Policy

THE LAW APPLICABLE TO THE ANTI-CORRUPTION POLICY CAN BE ACCESSED ON THE PAGES FROM THE INTERNET: [www.viveo.com.br](http://www.viveo.com.br)

## **2. INTEGRITY PROGRAM**

### **2.1. WHAT IS THE INTEGRITY PROGRAM?**

Viveo's Integrity Program is a specific compliance program, focused on the adoption of ethical and anti-corruption measures aimed at preventing, detecting and remediating harmful acts provided for in the Anti-Corruption Law and other applicable laws, in addition to the occurrence of bribery and also fraud against the public administration, national and/or foreign.

In other words, Viveo's Integrity Program represents a set of internal mechanisms and procedures for integrity, auditing and encouraging the reporting of irregularities and the effective application of the Anti-Corruption Policy, the Viveo Code of Conduct, in addition to other policies and guidelines, with the objective of detecting and remedying deviations, frauds, irregularities and illegal acts committed against the public administration, national or foreign.

## 2.2. WHAT IS COMPLIANCE?

The term compliance derives from the English verb “to comply”, which means to comply, execute, satisfy, comply with something. Thus, corporate compliance is the adoption of procedures by Viveo in order to comply with and ensure compliance with current legislation and internal and external regulations, by preventing and punishing misconduct or illegal practices.

## 2.3 INTEGRITY PROGRAM OBJECTIVES

The purpose of Viveo's Integrity Program is:

- Observe and enforce the application of all rules and regulations that guide Viveo's activities and relationships;
- Align with best corporate governance practices;
- Ensure greater reliability and security;
- Ensure sustainable growth and business longevity;
- Prevent the occurrence of illegal activities;
- Guide employees on legal and desired practices; and
- Provide greater protection and gain value to Viveo's corporate reputation.

## 2.4 ANTI-CORRUPTION POLICY

Viveo has a zero tolerance policy for acts of corruption. The exercise of professional activities and commercial matters must always respect the laws and regulations in force, as well as the internal norms and policies of Viveo companies.

To guarantee professional honesty in carrying out their activities, Viveo Employees will receive periodic training to prevent the practice of any conduct that does not comply with the guidelines of this Anti-Corruption Policy

personnel, in addition to the sanctions applicable by and related legislation, and non-compliance with Viveo is liable to liability.

### **3. RELATIONSHIP WITH PUBLIC AUTHORITIES**

Viveo reaffirms its integrity and transparency in its relationship with the Government and prohibits any acts of corruption and bribery, directly or indirectly, in its relationship with a Public Agent or a third party related to it, whether national or transnational.

All Viveo Employees who act on behalf of Viveo are prohibited from offering, promising, authorizing or receiving (directly or indirectly) any undue advantage (payments, gifts or the transfer of anything of value) to Public Agents, in order to influence, facilitate or reward any official action or decision on behalf of Viveo or itself.

No Viveo Employee, third party or partner will suffer any retaliation or penalty for delay or loss of business resulting from their refusal to pay or receive a bribe and/or to engage in any illegal or unethical conduct.

### **4. RELATIONSHIP WITH SUPPLIERS, PARTNERS AND THIRD PARTIES**

All suppliers, contractors, intermediary agents and other partners who conduct business with Viveo, whether for Viveo or on behalf of Viveo, must act with the highest level of integrity.

Thus, Viveo reserves the right to carry out a compliance risk assessment through an integrity due diligence procedure, which aims to know and assess the integrity risks to which it may be exposed, in its relationships with third parties, based on the evaluation of the profile, history of involvement in corruption cases, reputation and anti-corruption practices, among other compliance criteria.

Any risk situation identified in the integrity due diligence must be dealt with the support of Viveo's Compliance Committee. Pursuant to the Anti-Corruption Law, Viveo can be held liable for the actions of suppliers, service providers, intermediary agents and other business partners if they participate in acts of bribery or corruption aimed at benefiting Viveo, regardless of the fact that Viveo is aware of the alleged misconduct.

Therefore, Viveo Employees must never ask a third party to engage in or tolerate any conduct that the employee itself is prohibited under, under the terms of this Anti-Corruption Policy.

Viveo also undertakes to compete fairly in the markets, promoting free competition for the benefit of consumers and users, always ensuring compliance with the legal rules in force.

Viveo's Employees will not carry out misleading advertising of their business activities and will avoid any conduct that constitutes or may constitute an abuse or unlawful restriction of competition (price agreement, formation of a cartel, restriction of competition, etc), and any anti-competitive practice is prohibited provided for in Law No. 12.529/11.

If any third party conduct represents a suspicion of corruption and/or the practice of any other illegal act, whether of any kind, the Viveo Employee involved must incisively and immediately reject the proposal, reporting the occurrence to their leadership and/or the Compliance Committee, so that the appropriate measures are adopted, including in the criminal sphere.

#### O QUE FAZER? - PRACTICAL EXAMPLE

In a meeting with the presence of representatives of several competitors, one of the participants starts a dialogue seeking to establish a minimum fee to be charged for the provision of a certain service. You, as a Viveo Employee, must:

- a) Seek to establish a price that is interesting for the company;
- b) Do not speak up, as you know that the topic dealt with is confidential and it would be imprudent to reveal information regarding the fees charged by your company;
- c) Inform participants that it will leave the meeting, requesting that its withdrawal be recorded in the minutes, and will immediately report the incident to Viveo's Compliance Committee.

Right answer

## **5. UNDUE ADVANTAGE OF FACILITATION PAYMENT**

Viveo Employees are strictly prohibited from directly or indirectly promising, offering or giving an Undue Advantage, regardless of the amount, to a Public Agent or third parties related to it.

Likewise, Viveo Employees are strictly prohibited from directly or indirectly requesting, soliciting, agreeing to receive or accepting bribes, kickbacks, payment of illegal influences or any kind of favor or special treatment.

Viveo prohibits and does not tolerate the offer or payment of facilitation to accelerate or favor the analysis and obtaining of licenses, authorizations and permissions to be carried out by its employees, suppliers or intermediary agents.

## **6. CONFLICT OF INTERESTS**

All Viveo Employees must act in order to prevent and remedy situations that may cause or suggest a conflict of interest in the relationships between employees, suppliers, competitors and public bodies and which, if not disclosed, could undermine the trust and credibility of the employees and Viveo, as established in the Code of Conduct.

## **7. BIDDING AND PUBLIC CONTRACTS**

All Viveo assets, including information, equipment, vehicles, computers, software, resources, funds, facilities, personnel, trademarks, must be used only for legitimate business purposes.

All Viveo Employees must protect assets and ensure that such assets are well managed and efficiently used.

Equipment granted to Viveo Employees must be used exclusively for professional purposes. When requested by Viveo, whether for convenience, necessity or any other reason, the Viveo Employee must return all equipment and work resources granted in adequate conditions, except for the natural wear and tear of use.

### **7.1 INFORMATION AND DOCUMENTS**

It is expressly prohibited to have any manipulation or adulteration of documents, authorizations, filling of commitments, purchase orders, or any other documents used for participation in bids and other procurement systems of public authorities.

In order to curb eventual vices and illegalities, any discrepancies in information identified during the validation of the documents necessary to formalize Viveo's participation in a bid must be reported to the Committee of Compliance .

#### O QUE FAZER? - PRACTICAL EXAMPLE

About to take place, you notice that, before entering the public session, bidders are talking about prices and other public tenders yet to be held. What action should be taken?

- a) Participate in dialogues only to maintain a good relationship with companies in the field, but always pay attention to the information you are sharing, so that you do not provide any confidential data about your company;
- b) Ignore competitors and immediately enter the site of the session, guaranteeing their honest participation in the bidding, without any knowledge about the other companies participating in the event;
- c) Immediately report to the Committee of Compliance , informing, in writing and by protocol, the entity responsible for the bidding about what happened, which is why it will not participate in the process. Right answer

## **8. FRAUD OR DIVERSION OF FINANCIAL VALUES AND ASSETS**

Fraud is any misleading, bad-faith conduct with the intent of causing damage, deceiving someone or failing to fulfill a duty. These are fraudulent and, therefore, criminal activities: forgery, embezzlement, misappropriation, theft, active and passive corruption, payments and receipts of dubious origin, among others.

In this sense, Viveo Employees undertake to respect all the provisions contained in the various internal regulations of Viveo, such as, for example, rules on the use of corporate debit and credit cards, use of vehicles, reimbursement of expenses, approval of contracts and any other rules presented to them.

Cases identified as fraudulent will be considered very serious faults and those responsible will be subject to the penalties provided for in this Anti-Corruption Policy and referral to the competent authorities. Upon becoming aware of cases of fraud or any illegality, Viveo Employees must immediately notify the Committee of Compliance about what happened.

## 9. GIFTS, FREEBIES, ENTERTAINMENT, MEALS AND TRAVEL EXPENSES

It is forbidden for Viveo Employees to offer, request or accept, from people who trade and/or seek to do business with Viveo, Gifts, Giveaways and Entertainment, which includes, but is not limited to, discounts, loans, cash, vouchers, vouchers , guarantees, favors, advantages, sponsorships, travel, meals, expenses or other commercial courtesies, in excess of BRL 150.00 (one hundred and fifty reais), for the benefit of oneself and/or third parties and/or in situations that may result in a feeling or expectation of obligation to Viveo Employees in relation to the formalization of said business, with the exception of the item below.

Subject to the conditions listed below, they will only be authorized by the Committee of Compliance the offering of Gifts, Giveaways and Entertainment to public bodies or agents that:

- They are intended for legitimate and appropriate purposes, linked to Viveo's core activities.
- They are not bound by any intended retribution or consideration bound to Viveo;
- Are limited and reasonable in value, type and quantity, such as pens, diaries, calendars and institutional gifts;
- Permitted by the internal rules of the receiving party's organization;
- Be delivered openly to the recipient (and not in a hidden way)
- Do not embarrass Viveo if publicly disclosed;
- Are not made available to a single person repeatedly, thus understood as a maximum of twice a year;
- Do not contravene or violate the Anti-Corruption Law and other rules and procedures established in this Anti-Corruption Policy

Wherever possible, Viveo Gifts should be engraved with your name and/or logo and no Gifts, Gifts or Entertainment should be given in cash or cash equivalents.

Gifts and Giveaways offered to Viveo that exceed the value of R\$150.00 (one hundred and fifty reais) must be immediately communicated to the Committee of Compliance so that the appropriate measures are taken in relation to acceptance or refusal (if it fits the hypothesis provided for in the item above).

Likewise, Viveo's Employees are prohibited from offering, on behalf of Viveo, Gifts and Giveaways in excess of R\$150.00 (one hundred and fifty reais) to third parties with whom Viveo maintains a relationship, in any sphere , and even within this amount, the prior approval of the Committee of Compliance .

It is also forbidden for Viveo Employees to offer a Public Agent, their relatives or family members, and also to third parties, money, advance payments, gifts, facilitations, improper payments, gifts and/or travel in order to influence their decision . Improper payments include anything other than a token amount given to any person to obtain treatment aimed at obtaining an advantage by Viveo or Viveo's Employees.

Exceptions to the rules imposed herein will be analyzed by the Committee of Compliance . In all of the above situations, it is necessary to ensure that records of expenses associated with meals, travel, favors, Gifts, Giveaways and Entertainment received and offered by Viveo Employees are accurate and that they clearly reflect the reason for the expenses, and documentary records must be maintained and corresponding accounting.

Reimbursements of these expenses will only be made after proof of compliance with the rules of this Anti-Corruption Policy and confirmation of the correlation of expenses with the information presented.

## 9.1 ENTERTAINMENT

Events are a legitimate means for Viveo to promote and give visibility to its businesses and brands, whether by holding its own events or by sponsoring third-party events. In this context, Viveo may offer Entertainment, such as tickets to events held or sponsored by the company, to promote and give visibility to its practices and its business to third parties.

Notwithstanding the above, Viveo Employees are prohibited from promising, offering or giving any entertainment to a Public Agency or Agent without the prior approval of the Committee of Compliance .

Entertainment may only be offered or given to a Public Agent if the provisions above are observed, and when the Public Agent is to exercise institutional representation in said event, it being advisable that at least one Viveo Employee is present in any entertainment offered by Viveo.

The provision of Entertainment by Viveo to companions or guests of a Public Agent is not allowed, and the provision of entertainment will not be approved if there is a potential negative exposure to Viveo.

Any exception to the rules established herein must be previously approved by the Committee of Compliance .

## 9.2 MEALS

In the context of business accomplishments, meals with third parties related to Viveo's activities may occur.

Meals can only be offered or paid to Public Agents when the matter to be dealt with is related to the institutional functions of said Public Agent, and at least one Viveo Employee is present.

The maximum value of the meal to be offered to Public Agents will be determined by the Committee of Compliance , and cannot involve items considered luxury (such as drinks and excessively expensive food). It is not allowed payment of meals, by Viveo, for companions or guests of Public Agents.

Meals that exceed the limit determined by the Committee of Compliance must be previously authorized by the Committee of Compliance , even if the amount actually spent on the meal is updated later.

Any exception to the rules established herein must be previously approved by the Committee of Compliance.

## 9.3 TRAVEL EXPENSES

Viveo Employees are prohibited from promising, offering or paying any travel expenses for or on behalf of a Public Agent, including transportation, food and lodging, without prior approval of the Travel Committee. Compliance .

Payments for travel expenses for Public Agents will be approved if the event that gave rise to the trip, such as seminars, conferences, visits and technical meetings, is directly related to the promotion of Viveo products and/or initiatives, and provided that such event has correlation with the attributions of the position, employment or function of the Public Agent.

The invitation to participate in the events dealt with here must be forwarded to the highest authority of the body or entity, or to another instance or authority designated by it, which will indicate, in case of acceptance, the appropriate representative, in view of the nature and matters to be addressed at the event.

TRAVEL EXPENSES WILL BE PAID ONLY IF:

- The trip has a legitimate business purpose;
- The cost is reasonable and in accordance with Viveo's policies;
- No guest and/or family member of the Public Agent is traveling at Viveo's expense;
- The trip is in accordance with the rules to which the Public Agent is subject; and
- There are no planned stops that are not directly linked to the commercial purpose of the trip, unless the additional expenses resulting from this stop are borne by the Public Agent and not by Viveo.

Expenses in excess of what would be considered reasonably necessary for the business purpose, including extravagant accommodations or expenses related to companionship, or that are not in accordance with Viveo's internal policies, will not be approved.

Payment of daily expenses (defined as fixed payments to an individual to cover expenses on a given day, regardless of the nature and extent of expenses actually incurred on that day) is prohibited, unless required by applicable law or agreed in advance and by written with the Public Agent's organization. Payment of remuneration to the Public Agent for participating in the event is prohibited.

To avoid the risk of deviations, whenever possible, expenses must be paid directly by Viveo (for example, the air ticket must be directly to the travel agency or airline)

Any exception to the rules established herein must be previously approved by the Committee of Compliance .

## **10. DONATIONS TO NON-PROFIT INSTITUTIONS**

Contributions from donations and sponsorships will be made with the highest standard of transparency, impersonality, integrity and legality.

Donations to non-profit institutions or associations must be previously approved by the Committee of Compliance , and the institution receiving the donation must expressly agree to comply with this Anti-Corruption Policy.

Donations are prohibited from being offered, promised or granted for the purpose of obtaining an inadequate advantage or influencing the action of any person, whether public agent, supplier, third party, among others, regardless of the suitability of the organization to be favored.

Donation requests made by a Public Agent will not be accepted.

If the Public Agent promises any benefit or makes any threat regarding the donation request, the request must be denied.

It is up to Viveo Employees to monitor donations. Such monitoring may involve requests for audited financial statements or confirmation from the recipient that funds donated by Viveo have been used properly.

All expenses must have their supporting documentation (receipts, invoices, etc) duly filed and registered in Viveo's financial statements.

Any exceptions, doubts and/or clarifications regarding the application of this Anti-Corruption Policy may be reported to the direct superior, area manager or to the Committee of Compliance .

## **11. CONTRIBUTIONS TO POLITICAL PARTIES AND ELECTORAL CAMPAIGNS**

Viveo does not engage in partisan political activities and does not make political contributions, whether to candidates, political parties, representatives of parties or similar campaigns, and donations to electoral campaigns, by Viveo or by individuals on behalf of Viveo, directly or indirectly, are prohibited. indirectly, including monetary contributions, sponsorships, payment for fundraising events or the like, either before or after the close of such campaigns.

Viveo respects the participation of Viveo Employees in political activities, provided that donations and/or contributions to political parties and electoral campaigns are always made in a strict personal nature, outside working hours and in compliance with the guidelines of the Code of Conduct, it is certain that the party and political support of Viveo Employees does not reflect Viveo's choice.

If a Viveo Employee engages in any type of political activity, he/she must do so independently, without requesting help, support, participation, funding or any type of involvement from Viveo and other Viveo Employees

## 12. Accounting Records.

Viveo Employees must always act to ensure that Viveo's financial statements, books and records accurately, clearly, completely and in appropriate detail represent all of Viveo's businesses and operations.

All transactions must be recorded and managed in accordance with Viveo's accounting policy, including those related to the budget, as follows:

- Clearly and accurately reflect Viveo's operations;
- Be recorded in a way that allows the preparation of Financial statements in accordance with applicable accounting standards;
- Comply with applicable tax legislation; and
- Maintain accountability of assets.

All supporting documentation must be maintained in compliance with applicable record retention requirements (i.e. invoices, receipts, expense vouchers, etc.).

No funds or assets not recorded in Viveo's financial statements may be established or maintained for any purpose.

No Viveo Employee shall engage in falsifying any accounting record or other record of business, and all Viveo Employees shall respond fully and correctly to any inquiries made to them by internal or external group auditors or regulatory authority auditors.

## 13. COMPLIANCE COMMITTEE

Viveo maintains an active Committee of Compliance , which is responsible for identifying, controlling, informing, instructing and mitigating, through appropriate procedures, the risks that Viveo may suffer from non-compliance with laws, regulations, internal guidelines and/or this Anti-Corruption Policy, in addition to inspect and punish any and all violations of its terms.

Viveo and all Viveo Collaborators must act in the sense of always assisting the actions of the Committee of Compliance and ensure its autonomy, independence, impartiality, material, human and financial resources necessary for the full functioning of the body.

The Committee of Compliance It is made up of members internal and external to Viveo, with technical knowledge in the area, elected under the terms of Viveo's Internal Regulations.

It is the responsibility of the Committee of Compliance ensure the effectiveness of Viveo's policies, keep them updated and in line with market needs and current legislation.

Whenever there are changes or insertions of new information, the Committee of Compliance will publish and disseminate the new version to Viveo employees.

## **14. COMMUNICATION AND WHISTLEBLOWING CHANNELS**

It is essential that anyone immediately reports any acts or suspicions of non-compliance with this Anti-Corruption Policy, preventing acts of corruption and preserving Viveo's image in the market and in front of its stakeholders .

Viveo provides the following access channels for queries, queries, anonymous complaints and other communications, which will be received and dealt with by the Committee of Compliance :

PHONE - 0800 721 9152

Service from Monday to Friday, from 7:00 am to 8:00 pm, and, outside these hours, via answering machine.

COMPLIANCE HELPLINE - <https://ethicsdeloitte.com.br/viveo>

EMAIL - [eticaviveo@deloitte.com](mailto:eticaviveo@deloitte.com)

In order to ensure the privacy of Viveo Employees, and in order to facilitate compliance and effectiveness of this Anti-Corruption Policy, the complaints made through the above channels may be made anonymously or identified, which will be operated and treated, confidentially , by the company hired for this purpose and, subsequently, by the Committee of Compliance , ensuring even more confidentiality and security.

In the case of sending complaints, for better analysis by the company hired for this purpose, it is desirable to inform, in addition to what the complainant deems convenient, the date and place of the facts; name of the accused or, at least, surname; and description of the allegedly practiced illegality.

All complaints will be evaluated with confidentiality, impartiality, objectivity, reasonableness, integrity and speed, with the company being contracted for this purpose and, subsequently, the Committee of Compliance committed to promptly submit a reasoned response to the complaint. In the case of anonymous reporting, the complainant may indicate email and/or telephone so that the company hired for this purpose can send a response at the end of the calculation.

Viveo reinforces that the participation of Viveo Employees to ensure the effectiveness of this Anti-Corruption Policy is essential. Thus, Viveo will provide all the necessary instruments for the full security of the identified whistleblower against any type of retaliation. If the complainant finds any conduct that could be characterized as retaliation, the occurrence must also be reported to the company hired for this purpose, through the channels provided by Viveo, so that the appropriate measures can be taken.

## **15. VIOLATIONS AND PENALTIES**

It is the obligation of all Viveo Employees to know and understand the content of this Anti-Corruption Policy, as well as comply with all the rules set forth herein.

Viveo is committed to faithfully complying with the rules established in this Anti-Corruption Policy and will promote constant monitoring of its business activity and any and all conduct of Viveo Employees. No Viveo Employee has the authority to request or take any action that violates this Anti-Corruption Policy.

Any violation of the rules and/or guidelines of this Anti-Corruption Policy and the legislation will result in the application of appropriate disciplinary measures, and may even lead to the application of warnings, dismissal of the employee for just cause and/or immediate termination of employment, without prejudice to legal measures applicable, such as communication to the police and inspection bodies, and taking judicial and administrative measures to hold the agent responsible and indemnify any and all damage that may be caused.

The decision regarding the definition of the penalty to be applied and the treatment of the specific case will be issued by the Committee of Compliance, at its sole discretion, taking into account the seriousness of the fault, the extent of the damage caused to Viveo and the employee's professional and disciplinary history.

Any attribution of personal responsibility by the employee will not restrict the right of return that Viveo reserves in case of any damage caused to the company.

## 16. FINAL DISPOSITIONS

All Viveo Employees are responsible for applying the precepts contained in this Anti-Corruption Policy in all professional relationships. Therefore, everyone must formally adhere to the Anti-Corruption Policy and renew it when a new edition is published.

Viveo Employees must act as guardians of the Anti-Corruption Policy, reporting through the available channels any and all situations that may indicate non-compliance with the precepts defined herein.

This Anti-Corruption Policy, although seeking to exemplify prohibited conduct, does not present an exhaustive list of actions or omissions of such nature. Therefore, it is recommended that in all situations in which Viveo Employees may be faced with ethical issues, prior consultation with the Committee of Compliance in case of doubt.

This Anti-Corruption Policy enters into force on the date of publication in Viveo’s media and revokes any rules and procedures to the contrary.

## 17. APPROVALS

Elaboration	Revision	Approval
Compliance, Internal Controls, Legal, Information Technology	March 15, 2021	Audit, Risk Management, Compliance and Human Resources  Board of Directors

## GLOSSARY

### PUBLIC ADMINISTRATION

Set of agencies, services, autarchies and State agents, as well as other public legal persons, at the Federal, State and Municipal levels and Executive, Legislative and Judiciary powers for the provision of public services, for the management of public assets and interests community, including departments of education and public universities.

### PUBLIC AGENT

Any person representing the public power, national or foreign, who is providing public service, even if temporarily or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, employment or public function. The equivalent of a public agent is someone who works for a company providing a service contracted or associated with the execution of a typical activity of the Public Administration.

### PROMO GIFT

Item that has no commercial value distributed as a courtesy, advertisement or usual disclosure; that contains the logo of the legal entity that granted the gift; and that it is of a general character and, therefore, is not intended to bestow exclusively on a particular person.

**VIVEO EMPLOYEES** every individual, in Brazil or abroad, who has an employment or statutory relationship with Viveo, even if on a temporary basis; and (ii) every natural or legal person, in Brazil or abroad, that provides services under a contract signed with an intermediary company (outsourced service provider).

#### CONFLICT OF INTEREST

Any situation in which someone is not neutral regarding the matter under discussion and, therefore, may influence or make decisions motivated by interests that conflict with Viveo's interests.

#### CONFLICT OF INTEREST

Any situation in which someone is not neutral regarding the matter under discussion and, therefore, may influence or make decisions motivated by interests that conflict with Viveo's interests.

#### ENTERTAINMENT

These are activities or events whose main purpose is to provide leisure to your participants, such as parties, shows , sporting events or commemorative meals.

#### FACILITATION PAYMENTS

"Facilitation payments" are known as payments made to Agents in both the public and private sectors, as a personal benefit, to guarantee or expedite the execution of routine acts to which the company is entitled.

#### PUBLIC AUTHORITIES

Any and all government agency, authority or entity.

#### GIFTS

Anything that does not fall within the definition of Gifts, including, but not limited to, other types of GIFTS, FREEBIES, prizes, monetary values or any other benefits of any nature, which are not related to the image of Viveo, with the identification of trademark and logos, or rights exploited by them.

#### BRIBE OR KICKBACK

It is the means by which corruption is practiced, consisting in the act of promising, offering or paying an authority, government official, public agent or private party any

amount of money or any other advantages so that the person in question ceases to behave ethically with your professional duties.

### THIRD PARTIES

Service providers, including individuals or legal entities, personified or not, regardless of the form of organization or corporate model adopted, as well as any foundations, associations of entities or persons, or foreign companies, with headquarters, branch or representation in Brazilian territory, constituted in fact or in law, even if temporarily, contracted or subcontractors, suppliers in general and consultants contracted by formal contract, or not, acting on behalf of Viveo or associated companies for any purpose, including those providing services and interact with the government or others on behalf of Viveo to pursue the contracted business.

### IMPROPER ADVANTAGE

It consists of any benefit, even if not economic, such as GIFTS, FREEBIES, travel, meals, lodging, entertainment and work opportunities.

## **TERM OF ACCEPTANCE AND ADHESION TO THE POLICY**

### **VIVEO ANTI-CORRUPTION**

\_\_\_\_\_, enrolled with the CPF under no. \_\_\_\_\_, bearer of ID no. \_\_\_\_\_. The undersigned declares, in this act, under the penalties of the Law, that it is aware, knows and understands the terms of Law no. 12,846/2013 (Anti-Corruption Law) and all its effects, as well as Viveo's Anti-Corruption Policy, and which must observe its content in the exercise of its function, in particular that:

- a) IS SUBJECT TO DISCIPLINARY SANCTIONS, WITHOUT LIMITING CIVIL, ADMINISTRATIVE AND CRIMINAL SANCTIONS FOR BREACH OF THE CODE OF CONDUCT AND POLICY VIVEO'S ANTI-CORRUPTION;
- b) It will conduct its commercial and functional practices, especially those inherent to the object of the contracts maintained with Viveo for its function, in an ethical manner and in full compliance with the

applicable legal precepts and the Anti-Corruption Law, in addition to Viveo’s Code of Conduct and Anti-Corruption Policy;

- c) It shall not practice and/or restrain, at all levels and spheres, bodies of the Direct and Indirect Public Administration, national or foreign, any act or activity that constitutes or may be understood as an act harmful to the interests of the National or Foreign Public Administration and/or transgression of the Anti-Corruption Law, Viveo’s Code of Conduct and Anti-Corruption Policy, including, but not limited to, directly or indirectly promising, offering or giving undue advantage to a Public Agent or third party related to it, for the purpose of influencing any act or decision of the agent, government or public entities, or to secure any undue advantage, or direct business in favor of Viveo and/or any person; and
- d) It will report any act or omission, verifiable or not, that constitute a violation of the Anti-Corruption Law and/or Code of Conduct and Viveo’s Anti-Corruption Policy.

As it is true, I sign this adhesion term.

Place:

Date:

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Name: