



Code of

# Ethics and Compliance

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## 1. About Braile Biomédica

With the need to make cardiac surgery possible for the entire population in mind, Braile Biomédica was founded in 1977 by cardiovascular surgeon Prof. Dr. Domingo Braile. Known for being an advanced medical devices manufacturing hub, the company develops and manufactures products for the lines of Perfusion, Biological, Electromedical, Endovascular, Transcatheter and Oncology, outcomes from the added technology applied to other areas of Medicine, having as its institutional mission to develop innovative technologies that reduce the global cost of health and are accessible to the population, with the major purpose of caring for people.

## 2. Integrated Quality Policy and Mission, Vision and Values

### 2.1 Our Global Goal

To ensure long-term partnerships with our customers by providing world-class solutions in developing countries and reliable services that meet established functional and non-functional requirements.

### 2.2 Our Mission

To develop innovative technologies that reduce the overall cost of healthcare and are accessible to the population with the ultimate goal of caring for people.

### 2.3 Our commitment and goals

We are aware that consistent customer satisfaction is crucial to the survival of the business. Therefore, we persistently work on long-term secure partnerships with each customer and intend to do so with the following goals:

I) To emphasize human value and personal relationships, with great effort in proper communication, transparency and human relationship, where each person can contribute through effective teamwork, as an integral part of our culture.

II) To continuously develop the processes that lead to achieving performance levels in all the organization's activities, to create a productive work environment, having performance based on meritocracy.

III) To ensure that quality standards are met prior to delivery of our products and services through appropriate quality controls, and processes designed appropriately to meet customer requirements.

IV) To strive to continuously improve our processes and performance with respect to ISO and GMP regulatory requirements and process and product management marks.

V) To meet national and international regulations with practices adopted by the Integrated Management System.

## 2.4 Vision

“To be a leader in developing countries, bringing our technology and innovation ensuring access and safety”.

## 2.5 Values

### 2.5.1 Life comes First

Patient’s health is our focus. Since the beginning of the company establishment, Braile Biomédica’s priority has been to bring together new technologies with accessible costs to the patient’s needs.

### 2.5.2 Staying ahead of time

What can be more innovative than leaving a large center after your graduation and coming to the “backlands” to pioneer cardiac surgery? This is and always has been the spirit of Dr. Domingo Braile, founder of the company, who brought this “way of being” to the organization. Innovation is in Braile Biomédica’s DNA and, therefore, is one of the most important values of the company, which seeks to remain in the forefront of medical science.

### 2.5.3 Nothing can resist the work

A quote from Prof. Zerbini, affectionately adopted by Dr. Domingo Braile in the company’s routine, conveys the spirit of the Braile family, which believes that hard work and commitment will always generate good results. Do your best and the result will come.

### 2.5.4 Working with ethics is believing in the future

How can one work for life if the relationships that permeate this work are not ethical? What is the point? Respecting and maintaining transparency and honesty in the relationships with all stakeholders is, and always will be, the relentless struggle of this company. We believe that ethics is the basis for building fairer relationships.



### **2.5.5 Generation of profit and employment in a sustainable way**

Profit is indispensable for any organization, and generating jobs is an honor for our company. However, the balance between profit generation and employment is primordial for the endurance of the business. We value healthy indebtedness and the valorization of talents, so that the maintenance of the corporate structure is guaranteed in a conscious and lasting way.

## **3. Purpose of this document**

To establish policies and procedures that guide personal and professional conduct in the scope of the company's relationships with the different audiences with whom it interacts. This information was designed to ensure compliance with all applicable rules issued by the Ethics Health Institute and the Code of Conduct and Ethics Associated ABIMO (Brazilian Association of Medical Devices Industry).

### **3.1 General considerations on this document**

**3.1.1** Braile Biomédica's Code of Ethics and Compliance covers the following stakeholders: employees, suppliers, customers, environment, community, government and partners.

**3.1.2** A professional conduct, based on lawful, efficient and fair commercial practices, is expected in all contacts with customers, companies, partners and other employees of the company. Braile Biomédica and its Integrity Committee are committed to providing quality products and services, and to act with the highest integrity and ethical standards.

**3.1.3** This document sets as the basic responsibility of Braile Biomédica's professionals to repel any and all potentially unethical and illegal actions/attitudes that may be exposed in the markets, suppliers, customers, competitors and employees.

**3.1.4** The practice or involvement in the practice of corporate fraud, or any other form of fraud, or any other illicit act by its employees and partners will not be tolerated, with the company reserving the right to investigate the facts and apply the appropriate administrative penalties, in addition to civil and criminal liability of the scammer.

**3.1.5** The company will carry out its negotiations in the marketplace with customers, competitors, suppliers and partners in ways that are fair and that protect the ethical and moral integrity of customers and the freedom of free competition.

**3.1.6** The commercial aspects must have as a basic element the awareness to the regulatory guidelines.

**3.1.7** The company complies with the current legislation therefore it expressly forbids the use of any illegal practices such as bribery, administrative malfeasance, concussion or extortion, questionable payments or receipts, bribe-paying or bribe-taking, fraud in public tenders, bribery and “slush funds” to obtain commercial advantages, and for this reason, it prohibits the creation of parallel accounting or secret accounts.

**3.1.8** If illicit actions are proven on the part of any professional linked to the company, the company reserves the right to dismiss the professional involved, with just cause, under the terms of the current legislation, with recourse action for damages caused to the company or stakeholders, such as suppliers, government, domestic or foreign public administration, customers, communities, among others. In this case, the relationship will be discontinued and, depending on the severity of the fact, the respective charge will be made to the competent authorities, according to the legislation in force.

**3.1.9** Braile Biomédica has the commitment and transparency regarding the veracity of the information provided to all interested parties, such as financial institutions (billing, financial statements and number of employees), Government (registration data, wages, taxes, social security, unemployment insurance and PIS) and suppliers (balance sheet and articles of organization).

**3.1.10** The company pays all federal, state and municipal taxes in the exact manner prescribed by law.

**3.1.11** Braile Biomédica uses internal audits periodically, randomly and by sampling, in order to certify compliance with the rules and processes instituted by the top management, as well as the effectiveness of internal controls by the method adopted and indicated for companies in the form of a limited-liability company.

### 3.2 Channel for whistleblowing or reporting irregularities

**3.2.1** Braile Biomédica encourages the reporting of irregularities. The main communication channels with the company are:

- Email [codigoetica@braile.com.br](mailto:codigoetica@braile.com.br)
- Managers
- People Management (for internal affairs)
- Channel for Whistleblowing of the Instituto Ética Saúde [Ethics-Health Institute] (for market issues and others): Braile Biomédica requests that reports be registered with the Channel for Whistleblowing of the Instituto Ética Saúde, through the link available on the homepage of Braile's website: <https://braile.com.br/>

**3.2.2** In order to ensure a more effective management and maintain transparency, Braile Biomédica is a member of the Instituto Ética Saúde, an independent non-profit civil association that brings together companies and institutions with the proposal to create and follow, voluntarily, rules for the prevention of bribery and corruption in the health sector, and therefore, all the instructions included in its normative rules, especially with regard to "Compliance Policies" must be effectively exercised.

### 3.3 Braile Biomédica's Integrity Committee

**3.3.1** Braile Biomédica has an Integrity Committee which is composed of:

- Maria Cecília Patricia Braga Braile Verdi – President;
- Rosângela Miranda – Advisor to the President;
- Glauca G. Basso Frazzato – Research Coordination;
- Sandro De Felipe Ottoboni – RD [Management Representative] / Quality and Regulatory Affairs Manager
- Enio Shiota – Lawyer
- Caroline Bianchini – Communication Coordinator

**3.3.2** The main attributions of this Committee are:

- I) To set forth the content of the company's Code of Ethics and Compliance, as well as ensure its dissemination and update it when necessary;
- II) To set forth training programs to keep all employees aware of the company's compliance rules;

III) To set forth and implement effective communication channels, including for anonymous reporting;

IV) To take prompt action when problems are detected, complaints are made, and define relevant corrective actions and/or disciplinary sanctions;

V) To analyze and to answer the consultations made to the Integrity Committee. The consultations are made by the email [compliance@braile.com.br](mailto:compliance@braile.com.br), and must be answered within a maximum period of 5 working days;

VI) To identify the risks, as far as possible, and classify according to their degree - probability of occurrence vs. impact, in order to guide the risk management strategy (accept, control, mitigate or transfer the risk);

VII) To perform periodic Compliance audits in order to verify compliance with the manual, ensure the effectiveness and efficiency of the systems and internal controls, risk management, and the observance of the legal framework and infra-legal regulations.

**3.3.3** The Integrity Committee members shall observe, practice, preserve and defend the following principles:

- a) Integrity;
- b) Legitimacy;
- c) Transparency;
- d) Justice;
- e) Impartiality in judgments and speed in the examination of procedures;
- f) Secrecy and confidentiality.

**3.3.4** The Integrity Committee shall meet at least quarterly and whenever there is a special need.

**3.3.5** The meetings will be recorded in the Minutes of the meeting and should be aimed at putting into practice all the above-mentioned tasks.

## **4. Social and Environmental Responsibility**

### **4.1 Community**

The community in which Braile Biomédica is inserted is honored and informed about the business activities, the work environment, in order to provide social interaction.



## 4.2 Environment

Braile Biomédica is aware of and develops actions to prevent the main environmental impacts that may be caused by its activity. The company develops programs aimed at protecting the environment, such as: solid waste management, recycling program, treatment of industrial effluents, control of gas emissions and rational use of water and energy, among other prevention measures.

## 5. Internal Audience

### 5.1 Discrimination

Braile Biomédica is against discrimination in the workplace of any nature (ethnicity, gender, age, sexual orientation, religion, marital status, physical or mental disability, sociocultural condition or nationality). And, aiming to provide a diverse environment, free of prejudice and discrimination and safe for all workers, it has the Diversity and Inclusion Program entitled "Your voice, our voice".

### 5.2 Harassment

**5.2.1** Any kind of moral harassment, that is, any exposure of employees to humiliating and embarrassing, repetitive and prolonged situations during the working day and in the performance of their duties is forbidden.

**5.2.2** Attitudes such as repeated verbal, gestural, or physical sexual advances or insinuations are prohibited and considered sexual harassment conducts.

**5.2.3** Professionals who witness or experience any kind of harassment or discrimination within the company should immediately inform their managers, the People Management department, or report it through the available reporting channels.

### 5.3 Family relationship

**5.3.1** Nominations of relatives for selection processes are welcome and encouraged, however, first degree relatives who may hold positions under direct leadership or in any position under their influence are prohibited.

**5.3.2** The candidates nominated by Braile professionals shall participate in the company's standard selection process and will be admitted according to their capacity and performance in the process, free of any protection, advantage or privileges.

**5.3.3** For the cases of permitted family relationship, where there is no subordination or direct influence (conflict of interests), Braile Biomédica advises that the parties should relate within the company as co-workers, using absolutely professional ways of treatment.

#### **5.4 Internal Commercialization**

Sales of products between professionals are not allowed within the company's premises and during working hours, in accordance with article 482 of the CLT (Consolidation of Labor Laws).

#### **5.5 Donations, gifts and bonuses**

**5.5.1** Gifts from suppliers and customers cannot be requested under any circumstances by the Braile Biomédica professional.

**5.5.2** All donations, presents and gifts must be forwarded to People Management, which will verify their destination with the President. In cases of authorization for a raffle of donations to employees, these must have the supplier's name disclosed.

**5.5.3** Braile Biomédica's professionals may only request donations and or gifts from suppliers if authorized by the President.

**5.5.4** No in-kind donations to/from political parties should be accepted.

#### **5.6 Conflict of Interests**

All professionals should avoid situations in which personal-interests conflict, or appear to conflict, with Braile Biomédica's interests.

**5.6.1** Professionals may not use the information obtained during their work at the company as business opportunities to their advantage.

**5.6.2** Any parallel activity outside Braile Biomédica, with or without remuneration, must not impair the activities developed within the company and there can be no overlapping of hours or time deviation from the performance of duties.

**5.6.3** The tools and goods made available by the company are restricted to use during working hours and for the benefit of the organization.

## **5.7 Information Technology**

Braile Biomédica provides its employees with goods and work tools necessary for the proper performance of their activities, and these tools and goods, including software and Internet access, must be used conscientiously and responsibly in the performance of their work obligations.

**5.7.1** The internet, email and other available communication tools should be used only for work-related matters. It is forbidden to use them to access and/or disseminate messages with illegal, pornographic, racist, religious or political content, as well as for private matters.

**5.7.2** It is expressly forbidden to

**I)** Use cell phones without moderation for private purposes during work hours. This use must be in moderation, whether to make or receive calls and messages, always prioritizing brevity and exceptionality (try to do this during rest breaks);

**II)** Use personal equipment in the company and for the company (cell phone, camera, pen drive, printer, computer and any similar equipment) without formal authorization from the immediate superior;

**III)** Photograph and film the company, whether the spaces, products, people or documents, without the previous authorization of the board of directors;

**IV)** Retain company files and photos on their private equipment, as well as sending them by means of personal applications;

**V)** Expose name, photos, reports and any company data in social media and/or any means of communication.

### 5.7.3 About the use of the software

Every computer program or software comes with a license agreement to which the company is subject and responsible for applying it. At Braile Biomédica, the IT Department is responsible for the installation, therefore:

- a) It is forbidden to use software without a license from the manufacturer, except those of free use;
- b) Only the IT Department is allowed to install software;
- c) No employee may copy, or duplicate purchased software packages or use them on another processing unit (CPU) than the location originally installed by the IT department;
- d) Software registrations or instructions must not be changed;
- e) In case of need to reinstall a program, request its execution to the IT Department.

## 5.8 Admission, Compensation, Benefits, Internal Allocation, Promotion and Dismissal Policy

Braile Biomédica has a policy for admission, compensation, benefits, allocation, promotion and dismissal that meets the internal rules and current legislation.

**5.8.1** The privacy of the information obtained from its professionals is guaranteed: physical, emotional health, personal information (telephone numbers, address, documents etc.) obtained and maintained under the responsibility of People Management, according to the provisions of the General Law of Data Protection - LGPD (Lei nº 13.709/2018).

**5.8.2** At the admission stage, exams are performed by entities and regulated professionals, who issue the ASO (Occupational Health Certificate) of the candidates, indicating whether they are suitable or not for the function in which they will be hired.

**5.8.3** Documents such as criminal records and tests that denote discrimination such as HIV or other tests that are not pertinent to the position hired will not be requested.

**5.8.4** We will check the existence of professionals with the necessary skills to perform new functions before opening external vacancies, prioritizing internal recruitment.

**5.8.5** Internal training demands are mapped out and through the PAT (Annual Training Plan), training programs are scheduled to train the company's professionals. External courses and/or training will be paid according to the company's needs and the decision of the Board of Directors / Executive Board.



**5.8.6** The professional who receives the benefit and investment from the company, in full or in part, through payment for courses/training for their professional qualification, undertakes to apply its content within the company or return the investment according to the Scholarship Policy.

**5.8.7** All professionals in leadership positions or in specialized positions should train internal professionals for their succession.

## **5.9 Secrecy and Confidentiality**

Confidential information is understood as all data to which the company's professionals have access due to the execution of the services, such as technical information, commercial plans, projects, among others.

**5.9.1** Regarding this information, Braile Biomédica's professionals should follow the following rule:

**I)** Keep confidential information strictly confidential and use it in Braile Biomédica's exclusive interest;

**II)** Provide no services, in any form or under any condition, by themselves or by third parties, to a company engaged in the medical products business;

**III)** Have no equity interests, directly or indirectly, as a partner, shareholder or interested party, in a company competing with Braile Biomédica, or establish themselves on their own the exploitation of the same activity exercised by the company;

**IV)** Have no equity interests, directly or indirectly, as a partner, shareholder or interested party, in a company that provides services to Braile Biomédica;

**V)** Not disclose or reveal to any unauthorized person, individual or legal entity, any of the confidential information of which they may have knowledge as a result of their functions at Braile Biomédica;

**VI)** Use no confidential information, outside or beyond what is strictly necessary in function of their activities in the company;

**VII)** Take not for himself/herself or for others any material containing Braile Biomédica's confidential information;

**VIII)** Make no photographic record, share on applications, film or even record the confidential information without the prior written authorization of at least one director of Braile Biomédica;

**IX)** Not disclose on websites or any other means of communication, photos or recordings of the company's premises, including equipment, machines, materials, facilities or products.

#### **5.10 Outsourced Professionals**

In the event of Outsourced Professionals, it is required in the contract that the legislation is complied with and that their conduct is aligned with the values and principles determined herein.

#### **5.11 Relations with Trade Unions**

Braile Biomédica keeps consolidated communication with the trade unions, providing necessary and timely information in order to subsidize and influence the discussions, whether they are for improvement actions for the professionals or for collective bargaining.

#### **5.12 Commitment to the future of children and adolescents**

The hiring of children under 16 is forbidden, except as apprentices, as stated in the Apprenticeship Law, according to the MTE - Ministry of Labor and Employment.

### **6. Relationship with competitors**

**6.1** Braile Biomédica's relationship with its segment competitors is based on ethical standards, following the pricing and competition practices common to the market, complying with the legislation and with a loyal positioning in relation to the best ranked companies in the health devices segment.

**6.2** Braile Biomédica's professionals are not authorized to provide any information about the company to competitors or people outside the organization without prior authorization from the president.

**6.3** The professional who is related to professionals of direct competitors must communicate this fact to the People Management.

## 7. Suppliers

### 7.1 Relationship

Braile Biomédica relates with suppliers based on legal, efficient and fair commercial practices, addressing to them with respect and transparency, not using its size to obtain undue advantages, nor submitting itself to eventual inappropriate impositions from suppliers of great commercial strength.

**7.1.1** The suppliers hired must guide their behavior by the ethical conduct guidelines contained in this manual, keeping themselves aligned with Braile Biomédica's ethical principles.

### 7.2 Choice

The selection of a supplier must be based on objective criteria, such as ethical principles, suitability, quality, price and delivery.

**7.2.1** It is not desirable to maintain direct negotiations with suppliers who in any way have personal links with the negotiating professional, which can cause interest in the transaction.

**7.2.2** Transactions with any company in which professionals or relatives have any kind of connection or interest must be evaluated by the management department of the area.

## 8. Relations with customers and partners

Customers are the reason for Braile Biomédica's success. Therefore, efforts should be made to understand their needs and expectations, and actions that can meet them through products and services should be implemented, aiming at gaining their trust and preference.

**8.1** All professionals must honor the commitments made to customers and ensure agility in responses and complete resolution of any complaints and claims.

**8.2** The customer has access to anyone in the organization, regardless of area or hierarchical level, however, whenever possible, the service should be done by the usual relationship professional.

**8.3** Customer information should be forwarded to the area responsible for the customer service. The customers' privacy must be ensured, and their personal information protected.

- I) It is forbidden to use the patient's name. We recommend using initials, if necessary.
- II) It is forbidden to expose pictures of patients (even after recovery).
- III) It is forbidden to expose photos of the surgical center on WhatsApp and social media.
- IV) It is forbidden to generate company materials with patient names.
- V) Make pertinent comments, with care and caution.

**8.4** The promptness and agility of response to the customer are fundamental to build the company's credibility. This does not necessarily mean that all their expectations have to be met, but all doubts and questions must be explained with transparency and respect.

### **8.5 Bids and contracts**

Braile Biomédica's professionals responsible for participating in biddings for Public Agencies must follow the current legislation in the country on anti-corruption, Law 12.846/13, plus the ethical principles of this manual where, under no circumstances, may they ever promise, offer or give, directly or indirectly, an improper advantage to a public servant or related person; and obtain an improper advantage or benefit, fraudulently or irregularly.

**8.5.1** In bidding contracts, a careful analysis of the required documentation and the follow-up of the entire process must be performed.

**8.5.2** It is forbidden to make any kind of:

- I) Payment or other form of benefit, direct or indirect, to a public servant in order to obtain any advantage, such as, for example, specification in a bidding notice targeting a brand or a specific product of a certain company;
- II) Fixing prices between bidders;
- III) Fraud, such as opening a new CNPJ [Corporate Taxpayer ID] to make use of preference as an EPP - small-sized company;
- IV) Sham or cover bidding.



**8.5.3** A sham or cover bidding is understood to involve at least one of the following behaviors, in which a competitor:

- I) Agrees to submit a higher bid than the successful candidate;
- II) Submits a proposal that they already know in advance is too high to be accepted;
- III) Submits an offer that contains specific conditions that they know in advance will be unacceptable to the buyer;
- IV) Submits proposals that are designed to give the appearance of genuine competition among bidders.

**8.5.4** The company should consider taking appropriate administrative action in case of:

- I) Suspicion of irregularity in the bid notice or in the purchase process of the public agency or entity and, furthermore, irregularity in the performance of the contract;
- II) Suggestion by any public servant of payment or offer of any kind of benefit in exchange for an improper advantage.

## **8.6 Contracts for Services with Healthcare Professionals**

**8.6.1** The company engages healthcare professionals to provide a wide variety of consulting services through different types of scopes of work, such as:

- I) Advisor: a professional who works with Research and Development Projects as a specialized technical/scientific consultant;
- II) Opinion Leader Evaluation: a professional who assists Braile's technical team in evaluating complex cases to suggest the best endovascular treatment;
- III) Proctor: a professional who works as an instructor of specific surgical techniques, according to the company's Proctor Program;
- IV) Speaker: a professional who gives lectures and presentations about the company's products and projects/studies;
- V) Perfusionist: an expert professional, with the ability and technical knowledge to prepare, handle and monitor cardiopulmonary bypass equipment during surgical procedures.

**8.6.2** The company is responsible for maintaining proof of performance of services provided by consultants, such as the results of clinical studies and reports of activities performed.

**8.6.3** The Company may provide research grants to support medical research with scientific merit. Such activities must have well-defined objectives and milestones, and may not be tied directly or indirectly to the purchase of medical supplies and equipment.

**8.6.4** The hiring of professional services must observe the following rules:

- a) Selection, evaluation and hiring must be done by sectors distinct from the Commercial area;
- b) Selection and evaluation criteria must be established based on education and science;
- c) Fees should be decided based on a methodology that contemplates fair market value.
- d) Ways to prove the evidence of the activities performed under the contract;
- e) Existence of a legitimate technical or scientific interest;
- f) Disclosure through all available means and through notification of the respective Regional Medical Council and the plenary of the agreement, of the health professional's relationship with the company.

**8.6.5** Payment made to an advisor should be consistent with fair market value under normal market conditions for the service provided and should not be based on the volume or value of the advisor's past, present or anticipated business. Compensation paid to the advisor may only be made after the service has been rendered. Payment must be made by wire transfer or check.

**8.6.6** The contracts shall provide for anti-corruption clauses and the obligation to comply with the Codes of Ethics and/or Conduct.

**8.6.7** The contracts must comply with:

- a) Work plan;
- b) Detail of the workload employed between contractor and contracting party;
- c) Detail of the limits to be paid for each activity;
- d) Report of activities performed;
- e) Receipt or invoice for the service;
- f) Payment exclusively through suitable means, such as the advisor's current account in Brazil;
- g) Other rules that are detailed in the company's internal policy (Policy for Hiring Health Professional Services).

## 8.7 Educational and Scientific Sponsorships of Third-Party Events

8.7.1 Sponsorships are limited to:

- a) Infrastructure;
- b) Promotional stand;
- c) Food during the event for all participants;
- d) Rental of rooms for workshop realization;
- e) Disclosure of the event (related materials);
- f) Expenses for travel, accommodation and meals for speakers (indirect sponsorship);
- g) Loan or donation of products for demonstration at workshops, and the brand disclosure should be limited to the identification on the donated or borrowed products;
- h) The payment of expenses related directly or indirectly to the participation of health professionals in the event, as well as their families and/or other accompanying persons, is prohibited.

8.7.2 The company may support conferences that are authentic, independent, educational, scientific, and standards-setting, that promote scientific knowledge, medical advancement, and efficient healthcare.

8.7.3 Payment of expenses related directly or indirectly to the participation of Health Care Professionals is prohibited. Contributions to conferences may be offered when the purpose of the meeting is to promote objective activities and dialogues on science and education and the training institution, or the conference organizer chooses the health professionals who are under training.

8.7.4 Contributions should be paid only to organizations that have a genuine educational function and may be used only to reimburse legitimate expenses for legitimate educational activities as well.

8.7.5 The Company may provide funding for the provision of meals and snacks for conference attendees to the conference sponsor. It may also provide meals and snacks for the Health Care Professionals attending the conference.

**8.7.6** Meals and snacks should be provided to all Health Care Professionals attending the conference. Any meals and/or snacks provided should be modest in value, limited to the time, focus, and purpose of the conference, and clearly separate from the continuing education portion of the conference.

**8.7.7** The Company may make contributions available to conference sponsors for reasonable fees, travel expenses, lodging, and modest meals for healthcare professionals who are legitimate faculty members.

**8.7.8** The company has the possibility to purchase advertising material and lease company space to exhibit displays at the Conferences.

**8.7.9** The Company may make grants to conference organizers for fair fees, travel, hotels, and quality meals compatible with the activity for healthcare professionals who are trained instructors.

**8.7.10** The company may purchase advertisements and lease booths for its displays at the conferences. This support should not be conditional on the company's past or future purchases from the institution.

## **8.8 Prohibition on Entertainment and Recreation Events**

Payment and/or provision of any entertainment or recreational event and/or activity for any healthcare professional is prohibited.

## **8.9 Prohibition of Incentives**

Personal incentives to induce health professionals to prescribe or purchase products and services are prohibited.

## **8.10 Expenses for Participation of Healthcare Professionals in Training Events on Company Own Products**

**8.10.1** It is allowed to fund the participation of health professionals in training events on the company's products.



**8.10.2** Events and conferences should be held in venues suitable for the efficient transmission of information. Such venues may include clinical or educational facilities, conference halls or other settings, as well as hotels and commercially available facilities.

**8.10.3** The programs that eventually evolve interactive training shall be held in facilities that allow such interactivity, such as medical institutions, hospitals, and laboratories. The training team must be qualified to perform the proposed training.

**8.10.4** The companies may provide the participants of the event with meals and snacks of quality compatible with the activity, which must be related to the respective programs.

**8.10.5** Any meals and snacks, in quality compatible with the activity, should be made available according to the time and focus intended by the training and/or the educational purposes of the meeting.

## **8.11 Business Meals**

**8.11.1** Meals provided for Health Care Professionals should be for business purposes, modest, infrequent, with moderate consumption of alcoholic beverages, held in a place appropriate for the exchange of scientific, educational or commercial information.

**8.11.2** Business interactions between the Company and Health Care Professionals should involve the presentation of scientific, educational or commercial information.

**8.11.3** Commercial interactions accompanied with meals of quality compatible with the activity may be provided as a commercial courtesy.

**8.11.4** Contributions should be paid only to organizations that have a genuine educational function and may be used only to reimburse legitimate expenses for legitimate educational activities.

**8.11.5** The meal shall be secondary to the legitimate presentation of scientific, educational, or commercial information and provided in a manner conducive to the presentation of that information. The meal must not be part of an entertainment or recreational event.

**8.11.6** Meals should be held in a setting conducive to legitimate scientific, educational, or business discussions. They may take place at the Health Care Professional's place of business.

**8.11.7** Meals may be offered at a location other than the location where the healthcare professional work, when:

- I) State-of-the-art medical technology cannot be easily transported to the healthcare professional's place of business;
- II) It is necessary to discuss product development or improvement information confidentially;
- III) A private space cannot be obtained on site.

**8.11.8** The Company can only provide meals for the health professionals who actually participate in the meeting and provided that their representative is present.

**8.11.9** Meals will be provided for the entire site team only when all members attend the meeting.

**8.11.10** It is prohibited to pay meals for healthcare professionals or anyone else who does not have a legitimate professional interest in the information being shared at the meeting.

**8.11.11** The values of Business Meals shall follow those stipulated in PLT-FIN-0001 - Company Travel Policy.

## **8.12 Supply of giveaways**

**8.12.1** Giveaways may occasionally be provided to Health Care Professionals, provided that they are modest and permitted by applicable local laws and regulations, and subject to:

- a) The giveaways must have genuine educational and/or scientific value, benefit the patients and be relevant to the professional's medical practice;
- b) Giveaways may not be offered in the form of cash or cash equivalents. They must be offered in connection with a legitimate business purpose and in good faith, not motivated by a desire to exert improper influence or an expectation of reciprocity;

c) Giveaways must be accurately recorded in the company's accounting books and records;

d) With the exception of medical textbooks or anatomical models used for educational purposes, any other item must have a value equal to or less than BRL100.00.

### 8.13 Donation of Products

**8.13.1** Any Donation of Products for commercial benefit to hospitals and health care professionals for the purpose of obtaining an advantage or influencing the decision about purchasing products is prohibited.

**8.13.2** Donation of Products is allowed for handling, manipulation and training purposes only, as well as for bench testing by clinical engineering departments. For such situations, the item must be identified with a 'SAMPLE' label and its use for clinical use is prohibited.

**8.13.3** It is also legal the practice of Donation of Products destined to clinical trials, performed through protocols in compliance with the norms and resolutions of clinical research. In this case, the product must be identified with a label of 'CLINICAL RESEARCH'.

### 8.14 Items for Demonstration

**8.14.1** Products in demonstration, loans and consigned in repair, can be used in the promotion and temporary replacement of products.

**8.14.2** There must be a formal control over the inventory of products made available for demonstration purposes, in terms of quantity and time.

### 8.15 Provision of Specialist

**8.15.1** A specialist, if provided by the company, to assist in a surgical procedure shall:

- a) Have specific training to meet the needs of the procedure in question;
- b) Comply with all requirements of the medical organization they are serving, follow all regulatory policies, and obtain all necessary authorizations to perform their work;

c) Participate in the surgical procedure only if they meet all the standard requirements;

d) Limit himself/herself to guide, handle or calibrate exclusively the company's products, being forbidden to handle or help in the performance of any procedures on the patient.

### **8.16 Accounting Transparency**

It is the company's obligation to keep books, records and accounts that reflect, in a detailed, accurate and correct manner, all transactions of the organization. To combat corruption, it is important that transactions are transparent, fully documented, and coded to accounts that accurately reflect their nature, as follows:

a) The expenses with health professionals must be recorded in a proper accounting identification, in order to allow the transparency of the commercial relations occurred;

b) It must be ensured that all assets are properly controlled, including appropriate levels of asset approval and review;

c) All payments and transactions must be accurately recorded and reported in the company's books, accounts and records;

d) Payments made in such a way that it is not possible to record and/or check them later in the company's accounting books and other pertinent documents are prohibited.

### **8.17 Financial discounts granted by medical suppliers to health services**

**8.17.1** The company must establish a documented procedure on how to handle the granting of discounts or any financial advantages to public or private healthcare entities that represent a compliance risk.

**8.17.2** Those discounts, among others, that imply incentives for medical interventions, directly or indirectly, practiced in the interest or benefit of the associate, involving physicians and organizations for the provision of medical services that hide or conceal commissions, commercialization fees or any other denomination, of which demand is capable of causing commercial distortion or in decision criteria of medical practice constitute risk discounts.

**8.17.3** For the purposes of this paper, discounts are considered to be:

l) Promoted by manufacturers, importers or distributors of medical products;



II) Received by public, private or philanthropic health service providers, or by professionals of these entities;

III) Incidents on direct billings to health services, where diagnostic and therapeutic procedures or surgical interventions are performed.

### **8.18 Relations with Hospitals and Paying Sources (Public or Private)**

**8.18.1** Any form of commission linked to the use of devices or surgical procedures is prohibited, either as a systematic financial discount or payment to the hospital staff.

**8.18.2** Every borrowing of material or equipment should be regulated by a loan for use contract, in which the responsibility of safekeeping, use, conservation and cleaning is foreseen.

**8.18.3** Ensure that, after performing the surgical procedure, the hospital immediately checks the consumption in the legal terms.

### **8.19 Funding and Donations to Political Parties and Campaigns Are Prohibited**

## **9. Statute**

**9.1** This Code of Ethics of Compliance takes effect upon its disclosure to the company's professionals, and the company is responsible for promoting its wide disclosure.

**9.2** Braile Biomédica motivates and encourages the initiative to confess, state or report any attitudes that go against the ethical principles described herein.

**9.3** Your attitude and statement will be taken into consideration in the event you are an author or co-author of the action.

**9.4** The omission before the knowledge of possible violations by third parties will also be considered a conniving conduct to the act, being co-responsible for actions that dishonor or negatively influence this company.

**9.5** The company undertakes to keep confidential the identity of those who report.

**9.6** The statements and breaches of this regulation will be examined by the Management Team, Legal Department, Board of Directors and Executive Board and the resolutions will be taken following the current legislation and by consensus of the members present. Employees who disrespect the regulation will be subject to verbal warning, written warning, suspension and dismissal.

**9.7** In case of questions, complaints, suggestions, criticism or praise, look for your manager, People Management, or any other channel for whistleblowing or communication of irregularities, informed in the item 3.2.1 in this document.