



CODE OF CONDUCT

OF THE OUROFINO GROUP



#07/2023

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MESSAGE FROM THE PRESIDENT

Hello #TimeOurofino!

We wake up every day to put into practice our purpose as a company, which is to reimagine animal health. Our Ourofino, since its foundation in 1987, is dedicated to research, development, production, marketing of pharmaceutical products and services aimed at the health and welfare of production animals, in addition to caring for the longevity of our 'pet children'. We challenge conventional thinking by playing as a team and with an owner's head, to lead the evolution and sustainable development of our segment's ecosystem.

The practices of our values and our corporate conduct need to be aligned so that we all provide the same service to internal and external customers, suppliers, public agencies and employees, the press, the environment, and the community. Therefore, reading our Code of Conduct is essential to ensure that our behavior is instructed by the ethical and moral principles that guide the activities of the Ourofino Saúde Animal Group ("Ourofino" or "Ourofino Saúde Animal") since its foundation. Among them are honesty and respect for the law, adopting socially responsible practices aimed at everyone's well-being, protection of the environment, protection of personal data, and respect, above all, for Human Rights principles. This is also taking care of people.

Our Board of Directors, aware of the duty to ensure full compliance with anti-corruption, competition, and data protection legislation, fully supports this Code.

It is up to each one of us, employees, to know and strive to disseminate and comply with this Code.

Only by putting into practice the principles and rules indicated along these pages can our company further fulfill its PURPOSE and effectively live out #OurValuesOurofino.

Sincerely, Kleber.

Kleber Cesar Silveira Gomes
Presidente Executivo/CEO

*For purposes of this Code, the term "Employee" means the administrators, staff, agents and attorneys and Ourofino Saúde Animal Group means the company OUROFINO SAÚDE ANIMAL SAÚDE ANIMAL PARTICIPAÇÕES S.A. and its subsidiaries and affiliates.

01 OUROFINO VALUES AND ETHICAL CONDUCT

Values	Definition	Behavior
I value	Of what I value	How do I express what I value
<p>PLAY TO WIN</p> <ul style="list-style-type: none"> Entrepreneurial attitude Agile Adaptability Efficiency Focus on the long run Continuous improvement Collaboration 	<p>We think like an owner, we are better as a team, and we are only satisfied with superior and sustainable results.</p>	<ul style="list-style-type: none"> I value and trust teamwork. I plan, pursue, and achieve bold, sustainable goals. I pursue new knowledge and effective execution on a daily basis. I evolve every day and adapt quickly to changes.
<p>CARE FOR PEOPLE</p> <ul style="list-style-type: none"> Reliability Engagement Leadership Development Employee Recognition Wellness Diversity 	<p>We are passionate about what we do and go beyond caring for people</p>	<ul style="list-style-type: none"> I build relationships of trust and transparency with employees, customers, and partners I create value through a diverse, inclusive, wellness-generating environment I value and encourage continuous development, recognition, and a feedback culture I take my responsibilities, have the courage and respect to have difficult conversations and solve problems
<p>CONNECT WITH THE WORLD</p> <ul style="list-style-type: none"> Overview Strategic Alliances Innovation Digital Connectivity Continuous Learning 	<p>We operate in connection with the world in an entrepreneurial and digital way to build alliances and innovate.</p>	<ul style="list-style-type: none"> I continuously adopt new technologies for process improvement and learning I develop digital knowledge and extend connectivity to leverage results I anticipate trends and innovate in the creation of processes, products, and services I establish strategic alliances and partnerships to achieve superior results

Without prejudice to the Ourofino's VALUES, already mentioned above, the main ethical conducts protected by this Code are:

- Compliance with laws, rules, and regulations.
- Ethical and honest conduct in personal and professional relationships.
- Respect for diversity and rejection of any form of discrimination.
- Clarity and accuracy in the disclosure of information, always observing the duty of secrecy with respect to confidential information of Ourofino.
- Our role in relation to our employees, partners, and the community in which we operate.
- Building and preserving our institutional image.
- Preservation of the environment and commitment to sustainable growth.
- Respect for the Protection of Personal Data and the Privacy of the data subjects.
- Repudiation of child labor or any other form of compulsory labor by Ourofino, its suppliers, and customers.
- Respect Human Rights and combat any form of exploitation and sexual harassment of children and adolescents throughout the value chain.
- Promoting sustainable development through actions that combat adverse effects on society, such as climate change and social inequalities, thus ensuring better conditions for future generations.
- Support for national and international initiatives that are aligned with the Group's values and address society's main challenges.

Our responsibilities

This Code of Conduct is not intended to be exhaustive, nor to replace the laws, rules and other regulations applicable to employees and the business of Ourofino, but it comprises an important tool in maintaining the purpose of the company throughout its trajectory, as well as providing clear and non-negotiable guidelines. All employees must adhere to and meet the requirements of the Code, as well as our partners, and suppliers should be encouraged to adopt similar principles and standards. We expect you to be familiar with and apply not

only the guidelines of the Code, but also the policies and procedures referenced in this document. We also orient our employees to always cooperate in eventual investigations and inspections carried out by public agencies, entities, or agents. In Ourofino, we have as reference the highest standards of integrity, transparency, and reliability. We are always seeking to raise the awareness of our employees and all those with whom we do business. We maintain a governance structure ready to deal with these challenges and we expect our people not to accept living with unethical acts, and if this occurs, we expect you to communicate it to your managers or report it to our Reporting Channel.

02 COMMUNICATION CHANNELS



The ethical conducts mentioned in this Code must be preserved and practiced by all Employees. We act with total transparency and seek to involve the people who make up the markets in which we are located, therefore we value the correct conduct inside and outside our institution. Small mistakes can ruin in a very short time the good reputation and brand built up over decades.

Generally, your manager is in the best position to guide you regarding expected ethical concerns or conduct. Therefore, it is important that you consider reaching out to him first to seek direction.

However, if you feel more comfortable, situations of non-compliance with the standards and policies of this Code may be reported through the Reporting Channel of Ourofino, **available 24 hours, in Portuguese and Spanish, through the toll-free phone 0800 517 0045 (Brazil), or even by the site www.contatoseguro.com.br/ourofinosaudeanimal, by e-mail ourofinosaudeanimal@contatoseguro.com.br or by the application Contato Seguro.** All information received through the Channel of Denunciations of Ourofino will be treated seriously and confidentially, as established in the current legislation.

Prohibition of retaliation

Our entire process of receiving and investigating complaints is confidential and treated with all necessary care. In this way, **we guarantee anonymity and protection for good-faith reporters and do not tolerate any kind of retaliation against people who raise a genuine concern. All allegations of retaliation** will be thoroughly investigated and appropriate action will be taken.

However, **we warn of the disciplinary and legal consequences for cases of false** accusations or providing false information in our Reporting Channel.

Disciplinary Measures

Violations to the Values of this Code, the policies or other regulation of the Company **may result in the application of disciplinary measures** in accordance with the regulations in force, under the **“Policy of Disciplinary Measures”** in force, such as: verbal warning, written warning, suspension, dismissal (with or without cause), among others, and apply to all employees of Ourofino.

Additionally, **illicit conducts** duly verified and **proven will be reported to the competent authorities**, being liable to civil and criminal liability in compliance with the regulations in force, when applicable.

03 COMPLIANCE WITH LAWS AND REGULATIONS

3.1 Competition rules

Employees must comply with **competition protection regulations**, the main objectives of which are to promote the free market, to achieve efficiency, and to contribute to economic growth and development.

The observance of competition rules is important because free competition is fundamental for Ourofino to continue to succeed in a globally competitive economy through its entrepreneurial attitude, present throughout the history of the company.

Another reason to obey such rules is the imposition of severe penalties on those who commit an infraction. Not only the company (legal entity), but also employees (individuals) that fail to comply with the antitrust rules can be punished with fines or other applicable penalties.

(i)

General Principles of Competition Rules

This Code deals with the general principles of the competition legislation and indicates the main practices considered illicit. **If you have any questions, you should seek out your immediate superior to discuss the issue.** If the doubt still persists, contact a member of the Ethics Committee, formed by representatives from the Human Resources, Internal Audit, and Legal areas.

For compliance with the competition rules, **it is essential that Ourofino act independently in determining its strategies** (including commercial and production), as well as in decisions on prices, production levels, methods of distribution, financing, among other matters; **and (b) allow that its competitors, customers, distributors, and suppliers also act independently.**

(ii)

Competing Companies

Agreements with competitors to fix prices, divide markets or customers, or make any strategic decisions are prohibited.

Competing Companies should be understood in the broadest possible sense, covering, in the case of Ourofino, any company that operates in the production and marketing of pharmaceutical products aimed at animal health, as well as their respective employees.

No Employee will participate in any meeting, whether formal or informal, including at trade associations, in which arrangements for market concentration or understandings with competitors are being made for purposes of price fixing, market or customer division, or in which sensitive competitive information is being exchanged or discussed with competitors.

For more information, please see our Competition Rules policy and if necessary our Ethics Committee.

3.2 Anti-corruption rules

We are fully committed to following the **Anti-Corruption Law (Law No 12846/2013)**, which establishes strict guidelines to prevent, detect, and punish acts of corruption in all its forms and spheres. **Our organization strives to maintain a work environment of integrity where bribery, fraud, and any type of corrupt behavior are strictly prohibited.**

Accordingly, we have a **zero tolerance policy for any form of public or private corruption**, including, but not limited to, bribery, embezzlement,

extortion, illegal agreements, and facilitation payments made by our employees or third parties in the conduct of our business.

We conduct our business responsibly, **without resorting to the practice of any illicit conduct or obtaining undue advantages**, contributing to a fair and ethical business environment. Thus, as an employee or third party acting on behalf of Ourofino, you are prohibited from participating in any corrupt activity and from offering, promising, providing, or authorizing, directly or indirectly,

any person to give money or any item of value to a Public Official or any private individual or legal entity with the intention of obtaining or maintaining any improper advantage.

We also have a formal **Compliance Program**, with governance, guidelines, and clear rules about corruption, which includes periodic training, monitoring, and consequence management actions.

For more information, see our Anti-Corruption Policy and if necessary our Ethics Committee.

3.3

Financial information, accounting records and taxes

Ourofino employs total **transparency and smoothness as to the information disclosed to its shareholders and to the organs of control and inspection.**

For this, Ourofino has adopted over the years a series of procedures to ensure the reliability of financial and accounting records of the company, besides being audited by a renowned external audit company according to the international accounting standards (IFRS) published and revised by the International Accounting Standards Board (IASB).

In this sense, it is the Employees' obligation to follow the specific procedures and to zeal for the smoothness of the registers of operations carried out by the company, as a way to ensure the reliability of the information.

3.4

Fraud and illicit acts

Misuse of Ourofino's assets, information and resources is unacceptable and can be considered fraud if any employee intentionally alters, omits, manipulates or falsifies any information or situation, resulting in an unfair and/or illegal advantage or disadvantage of any kind.

Examples of fraud include, but are not limited to:

- Deliberate falsification or tampering with accounting books and records, as well as other documents;
- Signing documents without authorization or power of attorney;
- Personal use of Ourofino's financial resources;
- Presentation of bills, receipts, or vouchers that do not correspond to the services rendered or contracted;
- Providing false information about hours worked in order to receive additional compensation;
- Presentation of false medical certificates.



04 EXTERNAL RELATIONSHIP

4.1 Relationship with third parties and suppliers

We seek to establish partnerships with third parties who share our values and commitments to ethics, integrity, responsible sourcing, quality, environmental and social responsibility, and sustainable supply chain management.

In all interactions with third parties, it is essential to ensure compliance with the Anti-Corruption Law No. 12846/2013 and applicable regulations.

We do not tolerate bribery, illicit payments, or any form of corruption. We expect all third parties with whom we engage to follow the same principles and standards of conduct, and we reserve the right to terminate any relationship that violates these guidelines.

In addition, **we value partners who adopt sustainable and responsible environmental practices, taking into consideration the environmental impacts of their operations.** We also expect our suppliers to follow strict environmental standards, minimize their carbon footprint, properly manage waste, and adopt natural resource conservation practices.

We also value the commitment to ESG criteria (environmental, social, and governance), seeking partners that demonstrate respect for human rights, promote diversity and inclusion, ensure safe and fair working conditions, and practice transparent and responsible corporate governance.

See item "4. Competition Rules" for other important information about relationships with suppliers.



4.2 Relationship with public agents

Ourofino is committed to conducting its business without resorting to the practice of any illicit conduct or obtaining undue advantages.

Our code of conduct reinforces the importance of an ethical and transparent relationship with public agents. We recognize that interaction with government officials requires special diligence to ensure compliance with applicable laws and regulations. Thus, and in line with our Anti-corruption and Anti-bribery Policy, **all relevant interactions with agents or public authorities must be formally declared** and evaluated by the GRC area and the Ethics Committee.

In the relationship of our employees with the government and public agents, Ourofino **does not tolerate and does not condone any practice that may configure or appear to be an act of corruption**. Therefore, it is fundamental that our employees follow good practices when interacting with public authorities, for example:

Legal compliance:

- Comply fully with all applicable laws, regulations, and norms when interacting with public agents.
- Know and respect anti-corruption laws, such as local and international legislation criminalizing bribery, active and passive corruption.

Transparency:

- Avoid any form of payment, gift, or benefit intended to influence or obtain undue preferential treatment from public agents.
- Keep accurate and transparent records of all interactions with public officials, including meetings, communications, and any benefits provided.

Contracting and bidding:

- Participate in bidding and contracting processes in a fair, transparent, and competitive manner, in compliance with policies and legal requirements.
- Do not offer or accept bribes, kickbacks, or favors in order to obtain undue advantages in contracting or bidding processes.

Reporting irregularities:

To encourage the reporting of any suspected inappropriate behavior or irregularities related to the relationship with public agents.

Illegal or improper payments and benefits are those made with the intention of obtaining some government action in favor of Ourofino. Money, gifts, trips, job offers, invitations to events, free products are some examples of improper benefits given to public officials, and that can be perceived with the aim of influencing the recipient.

For more information, see our Anti-Corruption Policy, Conflicts of Interest Policy, and if necessary our Ethics Committee.

4.3 Responsible marketing

All Marketing work is executed with responsibility, free of prejudice, and discrimination, with respect for the consumer, the citizen, and the environment. It includes mechanisms to prevent the dissemination of misleading or abusive information or advertising communication and, in particular, that incites violence, exploits fear or superstition, takes advantage of the poor judgment of vulnerable groups, disregards environmental values, or is capable of inducing the public to behave in a manner that is harmful or dangerous to their health or safety.

4.4

Gifts, entertainment, and hospitalities

Ourofino recognizes that in maintaining business relationships it is common to offer small gifts to partners and third parties, and that not accepting a gift can sometimes seem impolite on our part. However, such gifts cannot create the feeling that a commitment or favor has been made to either the giver or the receiver of the gift. Inappropriate gifts and entertainment can negatively influence business relationships. The gifts, entertainment and hospitality acceptable to Ourofino and which do not require approval to be accepted or offered are:

- Gifts worth no more than R\$100 per beneficiary and that are offered as a gesture of friendship, kindness, or to commemorate a special occasion;

- Business meals of acceptable, non-extravagant values that do not include a spouse or other guests.

- Gifts of a corporate and promotional nature (such as diaries, calendars, and other similar gifts), provided they are non-exclusive and have no commercial value.

Invitations to entertainment events (e.g. theater plays, concerts, sporting events, etc.) tend not to have a direct relationship with Ourofino's business. So before accepting or offering any entertainment invitation, the Ethics Committee should be consulted.

It is essential that all employees understand and comply with these guidelines. We must exercise good judgment, discretion, and always act in compliance with anti-corruption legislation and other applicable internal rules. Failure to comply with these guidelines may result in disciplinary action, in accordance with the company's policies and procedures.

If the employee has doubts in determining whether the item offered is appropriate or not, or if it does not meet the above requirements, the employee should seek guidance from his or her manager or the Ethics Committee.

For more information, see our Anti-Corruption Policy and if necessary our Ethics Committee.

4.5 Press & social media

Employees should be aware that **everything that is shared can be accessed by a wide audience and remain online even after deletion.** By following these guidelines, we promote a respectful online environment and protect the company's reputation. Each employee is responsible for his or her behavior and should be aware that their online actions can reflect directly on the organization and may be subject to disciplinary action.

Press

All professional contact with any press agency must, necessarily, be previously authorized by the Ourofino's Communication Sector.

It is not allowed to any employee, in relation to Ourofino, to give any kind of interview or consent to take his image or his workplace, whether in video, photography or any other form of record, without prior authorization from the Communication Sector of the company.

Mídias Sociais

We believe that social networks represent an important and fundamental channel for relationships and for strengthening our brand. Accordingly, we **encourage the responsible and ethical use of social networks** by our employee, in compliance with current regulations, and recommend considering the following guidelines to ensure the protection of our corporate image, privacy, and respect for the rights of third parties:

- You must act responsibly and not make any statements that are defamatory, discriminatory, obscene, or that could damage the company's reputation.
- We recommend that before sharing information, you verify the veracity and reliability of the source. Avoid spreading false information, rumors, or unconfirmed news, as this can cause damage to the company's reputation and damage the credibility of social media.
- It is prohibited to disclose confidential information, trade secrets, intellectual property, or any company's copyrighted content.
- When sharing content related to third parties, always get proper permission.

4.6 Relationship with the community

Aligned to our value of Caring for People, we understand that our business must promote a **positive transformation** in society. Accordingly, we are permitted and encouraged to make donations, social investments, and sponsorships aimed at cultural, social, or environmental development, provided that **they strictly comply with applicable laws and regulations**, are in line with our Donations and Social Investment Policy, and are **not used as a way to improperly influence decisions**.

The identity of the recipient and the intended use of the donation must be clearly defined, and the reason and purpose of the donation must be justified and documented. Monetary donations should always be made in the name of the institutions and never to the individuals representing them.

Additionally, every donation process must go through a Due Diligence process of the potential final beneficiaries, to evaluate the eventual risks of association with the referred institutions.

Ourofino also seeks to invest in partnerships with

government agencies, groups, or social programs in order to develop these communities, providing job opportunities and greater social participation.

When participating in activities aimed at the development of communities in which they are inserted, employees must respect the values that guide the activity of Ourofino.

Unless approved by its Board of Directors, Ourofino does not support or encourage requests for donations of any nature to suppliers and/or service providers, in order to provide financial or material resources for the realization of promotions, events, campaigns or actions of social nature to third parties.

Ourofino does not make donations or provide support for representatives or political activists, except under the exact terms of the electoral legislation in force, and giving transparency to these donations.

For more information, please see our Donations and Social Investment Policy and if necessary our Ethics Committee.

4.7 Relationship with the environment and sustainability

Ourofino has as one of its pillars to create ideas and solutions integrated to the needs of the world, developing new ways to produce with **more efficiency and less impact**, so it develops its activities always in accordance with environmental legislation, establishing internal policies that reflect its actions in favor of environmental preservation and sustainability. For this, Ourofino is based on the following principles:

- Act in accordance with the environmental legislation and standards in force, including, among others, the due obtainment of all environmental licenses and certifications for the exercise of its activities, the correct final disposal of residues and the conservation of Permanent Preservation Areas ("APP") and other protected areas.
- Improve processes and incorporate new technologies aiming at the continuous improvement of the environmental performance.
- Encourage practices, actions, and programs for the preservation of environmental resources (water, air, soil, and vegetation).
- Identify, assess, monitor and mitigate the socio-environmental risk present in the activities of Ourofino, especially for activities with greater environmental impact.
- Previously evaluate the social and environmental impacts of new modalities of products and services, including in relation to possible image and reputation risks.
- Promote the environmental education of its employees, encompassing society in a systemic way.
- Perform the integrated and comprehensive management of its residues, in a synergetic way with the links in the chain (suppliers, society, consumer).
- Attending, in its main aspects, to the most relevant international certification standards.
- Establish as a parameter and guidance for decision-making processes at higher hierarchical levels, the evaluation and choice for more sustainable and low-impact practices, ensuring that the theme of climate change is always in vogue in the main guidelines of Ourofino Saúde Animal.

05 INTERNAL RELATIONSHIP

5.1 Professional attitude

The personal relationships in Ourofino must always be guided by **ethics, transparency, and respect**. Thus, we guide our employees to follow the following guidelines:

Mutual respect: Cultivate a work environment based on mutual respect, treating all colleagues with courtesy, consideration, and dignity, regardless of position, hierarchy, religion, personal taste, sexual orientation, or any other personal characteristic. Avoid discriminatory, offensive, or hurtful behavior.

Clear and effective communication: Promote open, honest, and constructive communication. Listen actively to colleagues, avoid interruptions, and use clear and respectful language. Don't gossip or spread false information.

Collaboration and teamwork: Encourage collaboration and teamwork by valuing individual contributions and recognizing collective efforts. Respect divergent ideas and opinions, seeking solutions through dialogue and consensus.

Inclusive environment: Promote diversity and inclusion in the workplace, respecting differences in gender, ethnicity, religion, sexual orientation, and origin.

Compliance with internal policies and standards: Be familiar with the company's internal policies and standards and adhere to them strictly. This includes information security policies, proper use of company resources, work schedules, and other properly disclosed policies.

5.2 Diversity and inclusion

Our code of conduct reinforces our commitment to diversity and inclusion, recognizing that fostering a respectful and inclusive work environment is essential to our collective success.

Ourofino believes in the diversity of people from different origins, creeds, races, genders, age, sexual orientation, cultural background, expectations and any other singularity in order to commit ourselves to the mission of maintaining our internal environments with integrity, health and safety. **We respect all differences, whatever they may be.**

5.3 Prejudice and discrimination

Ourofino values a non-discriminatory and equitable work environment, in which everyone should be treated with **respect, education and equal opportunities.**

Our recruitment, development, and promotion processes are transparent and defined on the basis of each employee's performance, ability, and potential in relation to the job requirements.

We expect you to treat everyone with respect and promote diversity in our work environment.

No discrimination, humiliation, intimidation, bullying, hostility, and embarrassment of any kind in our work environment, whether based on race, social status, national origin, religion, age, retirement, disability, gender, marital status, sexual orientation, health condition, pregnancy, union membership, political affiliation, working conditions considered inhumane or degrading, or any violation of fundamental rights, such as child, slave, or forced labor, will not be accepted under any circumstances and are subject to appropriate disciplinary action.

5.4

Moral and sexual harassment

Our organization is committed to maintaining a work environment that is safe, respectful, and free of bullying and sexual harassment.

We value the dignity and well-being of all employees and do not tolerate any form of harassment or inappropriate behavior.

Our code of conduct and internal policies are aligned to the requirements pointed out in **MPT Directive 4219/202**, defining information to prevent and combat sexual harassment and other forms of violence in the workplace.

Seemingly innocent actions can create a hostile environment and we must be aware of our own behavior and the effect it may have on others.

Our goal is to provide a work environment where everyone is treated with dignity, equality, and respect at all times. As such, we will **not tolerate** any employee, supplier, visitor, customer or any other person in our workplace being subjected to or threatened by any type of: (i) physical punishment or abuse, (ii) bullying or harassment, including but not limited to sexual, physical and verbal harassment, (iii) intimidation, humiliation or degradation, or (iv) unjustifiable behavior by any individual or group that creates a risk to the health and safety of another worker, whether intentional or not.

We offer regular training to promote awareness of bullying and sexual harassment and encourage the reporting of incidents of this nature. To this end, we provide

confidential channels for reports and complaints, ensuring that all reports are treated with respect, **confidentiality**, and are properly investigated. Proven cases of bullying or sexual harassment will be treated with the utmost seriousness and may result in disciplinary action, including warnings, suspensions, dismissals, and, where applicable, legal action.

We reinforce the importance of all employees knowing and respecting these guidelines. It is everyone's responsibility to create and maintain a safe, inclusive, and respectful work environment. The prevention and eradication of bullying and sexual harassment are fundamental to our success and to the preservation of our corporate culture and maintenance of our values.

5.5

Conflicts of interest

A Conflict of Interest is an **actual, potential or apparent conflict** that may arise when your personal, family, social, or political activities and relationships interfere or have the potential to interfere with your responsibilities and duties to Ourofino.

Family relationships or affectionate relationships between employees, suppliers, and clients, in certain circumstances, can generate a conflict of interest. In situations like this, look for your manager to find ways to deal with the conflict.

You **must avoid** any Conflict of Interest (actual, potential, or apparent) between your personal interests and the interests of Ourofino and **must not use** your position to obtain undue advantages or benefits, directly or indirectly, for yourself, any other business or person related to you or any other third party.

By adopting these guidelines, we are committed to ensuring transparency, fairness, and ethical decision-making in all our activities. By identifying and managing conflicts of interest appropriately, we protect the reputation of and trust in our organization. Each employee is responsible for understanding, complying with, and reporting any potential conflict of interest, ensuring integrity and excellence in our work environment.

For more information, see our Conflict of Interest Prevention Policy and, if necessary, our Ethics Committee.

Common examples of conflicts of interest may include:

- Employees with **any degree of kinship or affective relationship** acting in a direct subordination relationship or in sectors with intervening activities that may generate conflict or result in function segregation problems.

- Employees who serve as a member of the Board of Directors of some other company.

- Employees who have family member(s) who act as employee(s) of a company in the same line of business as Ourofino or that, in some way, can be considered a competitor of Ourofino.

- Employees who have **activities or second jobs** with third parties that are competitors of Ourofino, that is in the same line of business or that maintains a relationship with Ourofino.

- Employees who have family member(s) who are employees or hold equity interest in companies with business or contracts signed with Ourofino.

- Employees who have family member(s) with power of decision in public agencies or if it is a public agent with some relationship with the operations of Ourofino.

5.6 Political participation of employees

We recognize the fundamental right of our employees to engage in political activities outside the work environment. However, it is important to establish clear guidelines to ensure that political participation is carried out in an ethical manner and does not compromise the impartiality, reputation, or neutrality of our organization:

- We respect the individual rights and freedoms of our employees, including their participation in political activities, as long as they are carried out on their personal time, in accordance with the legislation in force and do not conflict with their professional obligations.

- All Employees are free to associate or collectively negotiate their interests through unions or associations, as long as it is exercised with ethical responsibility and within legal limits.

- Our work environment should be **neutral and free of any partisan involvement or political activities** that could create division, conflict, or negatively influence employee relations.

We stress the importance of clearly separating personal political activities from professional duties and maintaining a harmonious and neutral work environment. **Our organization values diversity of opinion and respects the individual rights of employees,** provided that these rights are **exercised responsibly** and within the limits established in this code of conduct.

06 OCCUPATIONAL HEALTH AND SAFETY

Ourofino is committed to ensuring an appropriate working environment for its employees, especially regarding health and physical integrity. Thus, it is essential that Employees and Service Providers follow the standards and procedures for work safety and occupational health adopted by Ourofino and provided in the legislation in force.

As this is a priority for the company, periodic training will be held with all employees of Ourofino, in order to ensure that everyone knows and is committed to the dissemination and compliance of this Code.

It is the **responsibility of all employees**, regardless of position or function, **to comply with the health and safety policies** and procedures established by the company, as well as **to promptly report** any accidents, incidents, or unsafe conditions that might endanger the health and safety of employees.

07

RESEARCH AND **ANIMAL WELFARE ETHICS**

Ourofino Saúde Animal has a policy of animal welfare that aims to establish the guidelines and commitments related to the practices of animal welfare in research activities.

We are committed to ensuring ethical and responsible conduct with all the animals that are part of our herd, recognizing that the practice of animal welfare is essential to the sustainable development of the business. **We also require a commitment from all involved** that animals will only be used in situations where it is not possible to obtain the necessary answers through alternative methods or when their use is indispensable to meet regulatory requirements.

Ourofino Saúde Animal has employees exclusively dedicated to the practices with animals for research, and these are constantly undergoing training and requires that the activities developed internally or in partner institutions are conducted in accordance with the criteria and ethical and legal precepts that safeguard the welfare of animals in any circumstance of their use.

However, we adhere to the requirements set forth in **Law No. 11794 (Arouca Law) and CONCEA's Normative Resolutions** regarding the physical structure and care of animals for research purposes and the adoption of the **3Rs principle (Replacement, Reduction and Refinement)**, established by Russell and Burch in 1959.

For more information, please see our Good Welfare Practices in Animals Used in Clinical Research Policy.

08 INFORMATION AND OTHER ASSETS

8.1 Confidentiality and secrecy

Information is a precious asset for Ourofino. So we should **limit the type and amount of confidential information we share** with others or in public places. The disclosure of improper information may put us at a disadvantage, cause financial loss, or damage our image. **Confidential information is that which may cause damage to Ourofino if improperly disclosed. Some examples are:**

- **Pricing;**
- **Investment and expansion plans;**
- **Personal information of employees, clients, and third parties;**
- **Registration of new trademarks or patents;**
- **Production data;**
- **Research and development efforts.**

If you do not know whether certain information is confidential or may be disclosed to a third party, then do not disclose it. Don't leave materials on tables or copiers. At the end of the workday, put the documents or files in the appropriate place.

Employees must protect the secrecy of passwords to access the Company's systems and facilities. It is the obligation of each one to ensure that the information owned by Ourofino is properly protected and cannot be accessed by unauthorized persons.

For more information, see our Privacy Policy and if necessary our Ethics Committee.

8.2 Intellectual property

The documents created or used by the Employee in the exercise of its activities (such as, for example, contracts, projects, market research, financial and accounting records, reports of any nature, commercial and marketing plans and programs for management of information) **are owned by Ourofino and may not be used outside**

the company or disclosed to third parties, except when there is express authorization of the respective Management for such.

All programs, plans and projects developed or created by Employees during their time of activity in the company are owned by Ourofino, as provided by law.

It is the obligation of the Employees to ensure that the information owned by Ourofino are properly protected and cannot be accessed by unauthorized persons. Don't leave confidential materials on desks, fax machines, or copiers. At the end of the workday, put the documents in drawers or files.



8.3

Information security

As an employee, you are responsible for **complying with the policies and procedures of Information Security** of Ourofino and ensure that third parties contracted by you also comply when processing, copying, collecting, transferring, sharing and working with data, including personal information or confidential information.

This rule covers information written or stored on our electronic systems and any other associated media (such as flash drive, external disk, virtual storage, CD/DVD and others). Besides, information is a valuable asset. In case of improper disclosure of information, the reputation of Ourofino can be put at risk and we may be implicated in a violation of the duties of trust and confidentiality committed by us or our suppliers, which may subject us to administrative, civil and criminal penalties.

A non-exhaustive list of rules and behaviors that contribute to keeping Ourofino information secure includes:

- Do not use any electronic system to share confidential information of Ourofino that has not been approved by our area of information security;
- **Do not insert strategic or confidential data of Ourofino in tools of artificial intelligence, such as chat and portals available on the Internet.**
- Do not, under any circumstances, provide anyone with improper access to information, tools or resources under your control or responsibility.
- Do not, except with prior written consent to do so, share access to your individual professional e-mail box with any other employee or third party.
- Do not use the credentials (e.g., logins, passwords, or ID badges) of your colleagues. This data is personal and/or confidential and non-transferable and, as a result, each employee is responsible for its custody, confidentiality and maintenance.
- Lock your computer whenever you leave your workstation, so that others cannot access information on your computer;
- Beware of dubious content received via instant messaging, e-mail, or websites. If in doubt, do not open it.
- Practice the clean table policy. Don't leave notes (e.g., post-it notes, notes, and so on) containing passwords and sensitive information visible at your workstation.
- Report to the manager and the Information Security team, suspicious or malicious activities (in physical or digital media), which may cause an information security incident.

8.4 Personal data protection

The **General Law on Personal Data Protection (Lei Geral de Proteção de Dados Pessoais - LGPD - Law 13709/2019)** aims to ensure that the processing of personal data does not violate the dignity and fundamental rights of natural persons in relation to freedom, equality, and privacy, describing how personal data should be handled by companies.

Ourofino believes that the

holders of personal data are the individuals themselves and that these individuals have the freedom to determine their personal information. We foster a culture that values privacy and the protection of personal data through awareness.

In addition, **Ourofino is committed to responsible and transparent management in the treatment of personal data** and reinforces

that all areas, led by the Top Management, are truly engaged in compliance, implementation and consolidation of a program of governance in privacy.

In order to ensure compliance with the LGPD, Ourofino, focusing on continuous improvement, has been constantly investing in improving the controls of information security, whether in physical or digital format, as well as its policies,

standards and procedures related to the treatment of personal data.

Thus, any activity that performs the processing of personal data that are under the responsibility of Ourofino and its employees, whether from customers, partners or suppliers, or from the employees themselves, requires strong commitment in the application and monitoring of the defined security controls.

In this context, employees and representatives of Ourofino must always observe the following rules of conduct:

- The collection and processing of personal data may only occur when there is an appropriate legal basis, such as consent of the data subject or compliance with legal obligations.
- Personal data should be collected and used only for legitimate and specific purposes and kept secure and confidential. The privacy of the holder of personal data must be respected at all times when carrying out its activities or creating a new product or service;
- We must ensure that the parties involved in the processing of personal data (other areas, partners, suppliers, etc.) perform their activities properly, observing the Policies, Standards, and Procedures of Ourofino aimed at protecting personal data, and that they clearly understand what are the objectives of the treatment.

Because of this, and by the respect that Ourofino has on the rights of the holders, compliance with the policies of information security and governance of personal data is mandatory. It is extremely important to understand and take responsibility for the risks related to information security and the protection of personal data.

For more information, see our Privacy Policy and if necessary our Ethics Committee.

8.5

Assets and resources (equity)

Employees are responsible for the use, maintenance and protection of the assets of Ourofino, as well as its premises and equipment.

Managers are responsible for establishing and communicating to their employees the policies and procedures necessary for the proper preservation of the material and financial resources of Ourofino.

The assets and resources of Ourofino may not be appropriated by employees for the purpose of use for their own benefit or for any other personal interest or that of third parties. The unauthorized removal or use of material, assets or equipment belonging to Ourofino is prohibited and is subject to sanctions.

The resources and equipment for electronic communication are assets of Ourofino and

for its exclusive use in the performance of activities of interest to the Group.

Ourofino reserves the right to control and monitor access to the Internet, e-mail, and all applications for communication such as Teams, among others, of all equipment interconnected to its system of information technology, under the law.

Under no circumstances will internet access, e-mail, and communication applications , among others, be used to send, receive, or access discriminatory, offensive, pornographic, or obscene content.

The Employee also may not install software without the approval of the Information Technology department or that does not respect the copyright and economic rights of its creator.

09

ETHICS AND CONDUCT MANAGEMENT



9.1

Ethics committee

The Ethics Committee is a body established by the Code of Conduct of Ourofino with the purpose of **resolving issues and questions** involving the practice and compliance with the **ethical values and standards of conduct of Ourofino**.

The deliberations of the Committee will have an orientative character regarding to the doubts of the employees of Ourofino in that which is the competence of the Committee and will be taken by the majority of the members present at the meetings.

The Committee will have the following duties and responsibilities, in addition to others assigned to it by the Ourofino's Code of Conduct:

- Receive questions related to the practices and compliance with the ethical values, standards, and conduct of Ourofino.
- Act as an body for answering questions from management about questions of an ethical nature related to the conduct of employees and third parties;
- Analyze and recommend actions on policies, structures, and practices related to the conduct expected from the Company's employees, in light of the best practices adopted by national and international companies, as well as of the strategies, opportunities and risks the Company is exposed to in this regard.
- Formulate recommendations and monitor the implementation of policies, strategies, and actions related to aspects of ethical conduct in the internal and external environments of the Company.
- Contribute to updating the Code of Conduct of the Ourofino Group.
- Act with confidentiality, regardless of the subject discussed or received for evaluation.

9.2 Reporting channel

It is the responsibility of the Employee to be aware of the policies and practices expressed in this Code. **Any violation of the standards or guidelines set forth therein will result in appropriate disciplinary action according to the seriousness of the conduct.** Among the disciplinary measures applicable are the warning, temporary suspension, and the dismissal of the Ourofino's employee, including for fair cause.

All employees have a duty to report any violation or suspected violation of this Code immediately, under penalty of disciplinary action. Failure to act in the face of possible violations will also be considered unethical conduct and may result in sanctions for the offender.

When identified the commission of irregularity, Ourofino will take all

appropriate measures for its immediate interruption.

Confidentiality: All information regarding possible ethical violations or illegal activities involving employees will be received and treated **confidentially**. Ourofino undertakes to maintain confidentiality about the identity of those who report or participate in the investigation on violation of this Code.

Our entire process of receiving and investigating complaints is confidential and treated with all necessary care. In this way, we guarantee anonymity and protection for good-faith reporters and do not tolerate any kind of retaliation against people who raise a genuine concern. All allegations of retaliation will be thoroughly investigated and appropriate action will be taken.

However, we warn of the disciplinary and legal consequences for cases of untrue accusations or providing false information in our Reporting Channel.

As mentioned above, in situations of doubt as to the policies and practices of this Code, the employee must contact his or her immediate superior. If, nevertheless, his doubt persists, he should seek a member of the Ethics Committee, formed by representatives from the Human Resources, Internal Audit, and Legal areas. Situations of non-compliance with the rules and policies of this Code should be reported through Ourofino's **Reporting Channel**, available 24 hours, in Portuguese and Spanish, through the toll-free phone **0800 517 0045 (Brazil)**, through the website: **www.contatoseguro.com.br/ourofinosaudeanimal**, by email **ourofinosaudeanimal@contatoseguro.com.br** or by the Safe Contact application.

ADHERENCE TO THE CODE OF CONDUCT OF THE OUROFINO SAÚDE ANIMAL GROUP

I declare that I have received a copy, have read carefully, understand and undertake to fully comply with the Code of Conduct of Ourofino Saúde Animal Group.

Name

Date

