

# Code of Ethics





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Term: Indefinite

Version 3

CODE OF ETHICS ALWAYS AVAILABLE



Download the QRC to read and save the  
Code of Ethics on your smartphone or tablet.



## Term of Receipt and Commitment

I do hereby state below, I understood the information contained in the Code of Ethics of the União Química Group that was delivered to me (Version 03/2021).

Therefore, in the performance of my activities, I shall abide by and comply with all the terms, conditions and ethical principles contained in the Code of Ethics of the União Química Group, as amended from time to time.

I do also declare that in case of questions, suggestions or knowledge of violations or incidents related to this Code, I will immediately communicate, alternatively or cumulatively to:

- The employee's immediate superior;
- Phone 0800 601 8689 (União Química Ethics Channel);
- Site [www.contatoseguro.com.br/uniaoquimica](http://www.contatoseguro.com.br/uniaoquimica);
- "Contato Seguro" mobile phone application (Android and iOS);
- Email: [compliance@uniaoquimica.com.br](mailto:compliance@uniaoquimica.com.br).

Name (clearly legible): \_\_\_\_\_

CPF [Individual Taxpayers' Registry] : \_\_\_\_\_

Role or Position: \_\_\_\_\_

Enrollment: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Signature: \_\_\_\_\_

( ) Anovis

( ) Embu-Guaçu

( ) Pouso Alegre  
Logistics Center

( ) Brasília

( ) Sales Force

( ) Pouso Alegre  
Factory

( ) Bthek

( ) Inovat

( ) Pouso Alegre  
Graphic Park

( ) Administrative Center

( ) Laboratil

( ) Other / Specify: \_\_\_\_\_



## Notes

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# Letter from the CEO

Dear Employee of the União Química Group

We work daily to produce, develop and supply quality products, contributing to everyone's well-being and improved health. We have a history of over 80 years based on innovation, excellence, commitment, and respect for people. We are very proud to be one of the largest pharmaceutical industries in Brazil.

So as to remain among the best in the market, we must be always ethical in our actions and relationships. Our success is directly connected to the trust that people to which we are related have on us, such as employees, clients, suppliers, competitors, partners, shareholders and society.

We have reviewed our Code of Ethics so that the document gives us more comprehensive directions to the guidelines we must follow in our daily lives. It is the result of the work we have developed and the relevance we have achieved in the national and international scenario. Having a Code of Ethics means, above all, not forgetting our principles.

May the Code of Ethics be a guide to all our actions and achievements in the União Química Group. You should consult it whenever necessary. We are committed to following these guidelines, acting with transparency and adopting ethical and clear conducts.

We are counting on you on this journey!

***Fernando de Castro Marques***  
CEO





### **Mission:**

Produce, develop and supply quality products that contribute to the well-being and improvement of the health of our society, thus generating opportunities for partners, employees and investors.

### **Vision:**

To be a reference in sustainable growth, extending the product portfolio with added value.

### **Values:**

**Search for Excellence:** search for optimized processes, businesses, and relationships.

**Quality:** ongoing search for the improvement of product quality.

**Entrepreneurship:** commitment to grow based on investments, objectivity and priority.

**Respect for people:** respect for differences, recognition of individual and collective contributions.

**Transparency:** always open to the knowledge and participation of employees, clients, consumers and the society.

**Commitment:** commitment to a history of success built by focusing on meeting consumers' desires.



## 2. The Code of Ethics

The Code of Ethics of the União Química Group gathers ethical principles and standards that must be adopted by all our employees in all the units that are part of the company, guiding their actions and relationships with the public.

Our employees are committed to ensuring compliance with this Code and disseminating it, so that all their co-workers and third parties acknowledge its content and understand and comply with its guidelines.

The leadership has the duty to ensure compliance, impart the content to their teams and serve as an example for the entire organization.

- I. Any suspicion of misconduct or legal violation of the rules established hereunder should be immediately reported to the immediate superior or manager of the area and, if necessary, to the Ethics Channel by calling 0800 609 8689 or at the site [www.contatoseguro.com.br/uniaoquimica](http://www.contatoseguro.com.br/uniaoquimica) or even by the “Contato Seguro” mobile application (Android and iOS) or e-mail [compliance@uniaoquimica.com.br](mailto:compliance@uniaoquimica.com.br);
- II. The reports will be evaluated by the Ethics and Compliance Committee and, if any irregularity is proven, they will result in the corresponding disciplinary actions, in addition to the punishments provided by law.



The Code of Ethics of the União Química Group may not cover every possible situation and problem. Should an employee or any third party come across irregularities in the work environment, before acting, they should ask themselves:

- Is my immediate superior or my management aware of it?
- Is it consistent with the Code of Ethics of the União Química Group?
- Is it in compliance with the law?
- Would I be happy if my coworkers, family and friends knew about it?
- Would I feel comfortable if the details ever came out?

If the answers are “yes” to each of these questions, you are probably acting with integrity. If the answer is “no” to any of these questions, this conduct should not be adopted. Any doubts concerning the appropriate action should be clarified by the immediate superior of the employee involved in the case, the HR, and the Corporate Legal and Compliance department of the União Química Group.

The Code of Ethics is intended to be as comprehensive as possible. Details of the processes, such as limited values for meals for third parties, gifts and hospitalities, are described in the corporate policies of the União Química Group and are complementary to this Code.

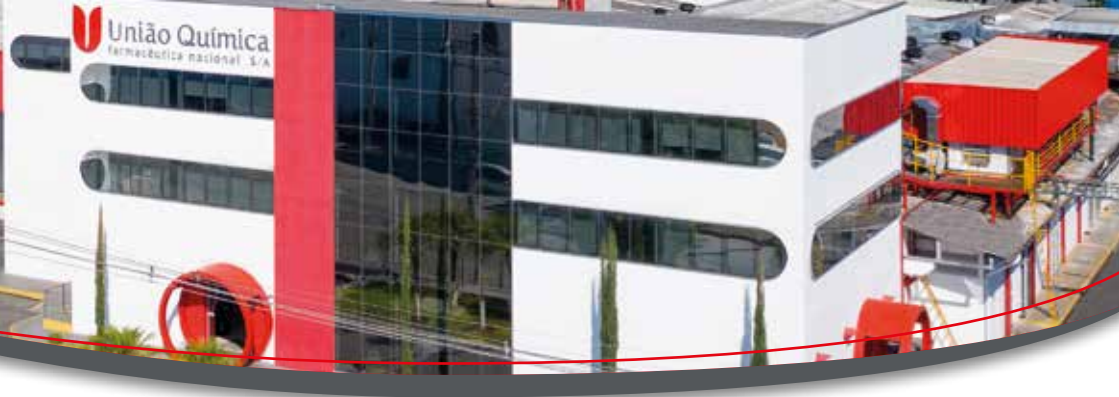
All employees and third parties who receive a printed copy of the Code of Ethics must sign the attached term of receipt, awareness, and commitment. The Code is in force as of the date of its publication and for an indefinite term.



### 3. Compliance with the laws and care for the company's reputation

The União Química Group is committed to the strictest compliance with the applicable laws and regulations in force in the sites where it operates, including international standards, issued by the competent federal, state and local authorities, and it is our duty:

- I. Respect the diversity, privacy, and the rights of all human beings. Therefore, discrimination of any type will not be tolerated, whether related to color, gender, race, ethnicity, religion, creed, nationality, social group, physical or mental disability, political option or sexual orientation. In addition, no moral or sexual harassment, humiliation, duress, insult, threat or violence of any kind is allowed;
- II. Strive to maintain and promote the company's good name;
- III. Act transparently, honestly, in the best interest of the company and the well-being of the society;
- IV. Relate to organizations that represent our employees with ethical principles and respect;
- V. Assume our role as agents of social development and modernization, translated into the generation of jobs, taxes, income and quality of life for the communities where we operate;
- VI. Recognize our responsibility towards sustainability, safety, environmental preservation and social and cultural development.



#### **4. Work environment and professional development**

We are committed to creating and maintaining a respectful work environment that fosters teamwork and our employees' dignity.

So, some requirements are eligible for those in management positions:

- I.** Select your coworkers according to their qualifications and suitability for the job;
- II.** Provide accurate instructions (particularly in compliance with the law);
- III.** Clearly communicate the importance of ethics and integrity and encourage your coworkers to use the Code of Ethics as a reference in their daily activities, and inform that violations of the Code are unacceptable and will result in disciplinary actions, in addition to legal consequences;
- IV.** Set goals that are challenging but, at the same time, achievable;
- V.** Monitor compliance with the company's guidelines, the laws and the requirements of this Code;
- VI.** Evaluate the performance of your coworkers and apply meritocracy;
- VII.** Lead your team with openness, professionalism, politeness, respect and fairness;
- VIII.** Be accessible and willing to engage in open and constructive dialogue.



The União Química Group encourages the education of its employees, promoting specific training, whenever necessary.

Our Units keep ongoing efforts to have a good worksite, offering to the employees a suitable, safe, clean and healthy work environment for their well-being.

In the pursuit of a healthy work environment for everyone, the consumption of alcoholic beverages, the use of illegal drugs, as well as gambling, are prohibited within the company's facilities. Neither is allowed on company premises the marketing of products or the performance of activities unrelated to the employee's scope of work.



## 5. Relationship with clients and competitors

Our ethical conduct directly influences our relationships with the market. Therefore, we are committed to fully satisfying our clients. Our clients are the main sustainability factor of the União Química Group, and we have the utmost interest in satisfying them, being aware that the commitments that we make must be fully complied with.

All employees must:

- I. Ensure fair competition and not engage in activities or business that are harmful to consumers, the public administration or society;
- II. Not engage with competitors aiming at agreements regarding prices, production capacity, market distribution, sales territories or production programs and conducts that eliminate healthy competition;
- III. Not enter into agreements with competitors not to compete, restrict business with suppliers, submit fake proposals in tenders or share clients, markets, territories, or production programs;

The União Química Group permanently seeks market growth and leadership, but above all, it believes that consumers' rights and free competition are the best ways to preserve and achieve its goals. Therefore, it rejects any unfair and deceptive practices that may compromise these principles.

We are effective in presenting our products, always honestly and courageously, but we never slight a competitor's product, or act in such a way that excludes them from the market. Our relationship is based mainly on healthy competition and this is how the União Química Group wants to be recognized in the market.



## 6. Relationship with suppliers and third parties

Our business relationship is composed of a set of activities built before, during and after the entering into a commercial agreement or business.

The União Química Group's employees will assist our suppliers to act as per the principles below:

- I. Comply with all applicable laws;
- II. Prohibit acts of corruption;
- III. Engage in the implementation of mechanisms to fight corruption, fraud, money laundering, cartels and other illegal practices in the public administration;
- IV. Respect employees' human rights;
- V. Prohibit slave-like and child labor;
- VI. Take responsibility for their employees' occupational health and safety;
- VII. Act in accordance with any applicable local and international environmental protection rules;
- VIII. Promote compliance with these requirements in their supply chains.

Third parties are considered any professionals or legal entities that are hired, but which are not effective employees that act on behalf of União Química Group or act, directly or indirectly, in the company's best interest or for its benefit.



The União Química Group requires that its third parties and suppliers act as per the ethical and clear principles detailed in this Code, complying with the laws in force, fighting any acts of corruption, respecting the rights of their employees and disseminating the culture of integrity in their third-party chains.

In addition, prior to the hiring, the employees should assess the qualifications, suitability and reputation of such third parties viewed as business partners. Furthermore, they should ensure that such partners understand and work in alignment with our principles of ethics and integrity.

All our employees must treat third parties with respect and demand the same treatment, always acting in compliance with any applicable laws.

The processes for selecting and hiring third parties will be transparent, impartial and objective.

Hiring third parties, who are relatives of the União Química Group's employees, may only take effect after the approval by the leadership of the hiring area and its board.

No third party should be used by any employee in any way whatsoever to carry out activities that are unlawful or contrary to the guidelines of this Code.





## **7. Relationship with Public Agents**

Public Agents are those who, whether by election, appointment, hiring, or any other form of relationship, exercise, even if temporarily or without remuneration, a term of office, position, job, or role in any federal, state or local public institution.

Employees who act on behalf of the União Química Group in public institutions must know and carefully observe the content of the anti-corruption, money laundering and free competition laws, avoiding involvement in situations that could be characterized as violations of such legal provisions. Thus, the relationship with such Public Agents must strictly follow the legal conduct, in addition to the transparency and integrity expected from our employees.

The União Química Group does not admit any type of payment or favor with the purpose of doing business, influencing decisions or inducing people to grant undue permission on behalf of the company.





## 8. Money laundering and Antitrust

Money laundering consists of a series of operations that basically aim to insert illicit money into a country's financial system, so that it appears to have legal origin. Any payment must have a defined, clear and proven origin. For this reason, cash payments, although lawful, must be assessed and registered in suitable tax documents, always with proof of their origin.

The União Química Group is against any type of agreement among competitors in the same market regarding prices, production quotas, distribution or territory division, aiming to jointly increase prices and profits. Therefore, any actions that limit or have the possibility of limiting free competition are not accepted by the company.

The relationship with competitors should be healthy, and, therefore, it is the duty of all União Química Group's employees to enforce fair competition and not engage in activities or business that are harmful to consumers, the public administration or the society.



## 9. Accounting records

The União Química Group conducts its financial activities under all legal provisions in force, ensuring transparency, periodicity and quality of information to produce reliable records and reports that reflect the reality.

The records must be accurate, complete and comply with all legal requirements and demands. In this sense, all books, records, accounts, and financial statements must be true to the company's approved procedures and accurately reflect its transactions.



## **10. Use of company assets and information processing**

Our employees must make good use of the assets that are available to them, whether tangible or intangible, such as fixed assets, inventories, trademarks and patents, databases, technical information and others.

Information is one of the company's main assets for its performance and must be managed carefully. Thus, the disclosure of company information that is not in the public domain is prohibited, regardless of the existence of a formal confidentiality obligation. The same applies to third-party information that is protected by confidentiality agreements executed by the company. Each employee is therefore a guardian of the company's confidential information and such secrecy must be maintained even after the termination of the employment contract, even if they have not signed a non-disclosure agreement.

The employees are not authorized to make video recordings, audio or photocopies, and photographs of any nature whatsoever relating in any way to the company or its clients.

The disclosure or dissemination of any information of the União Química Group must be avoided, whatever the media, except by employees whose duties involve external communication and are expressly authorized therefor.

Accidental disclosure can be just as damaging to the company as intentional disclosure. All employees should be aware not to discuss confidential matters in public places, take care of confidential documents, protect information and electronic systems from unauthorized access, loss, and misuse. All employees must take care of information security and the responsible use of the data at their disposal, so as not to harm the company's and each person's rights.



Employees who have access to confidential or privileged information are forbidden from using it for their own benefit or that of third parties. This constitutes a conflict of interest with personal consequences for you. The original documents with evidentiary value must be protected, kept on file for the terms defined by law.

It is prohibited to generate or transmit information that encourages racial discrimination, stimulates violence or other criminal or illegal actions, or have sexually offensive content.

It is vital to protect the União Química Group's intellectual property. If any employee sees or suspects that the company's intellectual property has been violated by any individual or legal entity, they must report it immediately to their manager.

All documents produced by the employee in the performance of their duties are proprietary to the União Química Group and may only be copied, disclosed or released to third parties with the express authorization of the Board of Directors.



## **11. Facilitation/extortion payments**

Facilitation payments are payments of any value used to unlawfully speed up processes or obtain some advantage. These payments are not official and are not part of the processes established by the benefited entity or agency.

Extortion is the action of forcing someone to do something under threat or duress to obtain some kind of advantage.

Facilitation and extortion payments are strictly forbidden by law and by the União Química Group, and they are considered a form of corruption.

It is everyone's duty to avoid situations of vulnerability to reduce the possibility of facilitation payments being requested, and, should this occur it should be reported to the immediate superior of the employee involved in the case, the HR, and the Corporate Legal and Compliance department of the União Química Group.



## **12. Conflict of Interest**

The União Química Group respects the privacy of its employees in the conduct of their personal business and affairs. There are situations, however, that might give rise to conflicts between the company's interests and the employees' personal interests.

Conflict of interest occurs when, on their own behalf, an employee may be induced to act against the União Química Group's principles or interests, taking an improper decision or failing to comply with one of their professional responsibilities and obligations. Thus, the conflict of interest may happen when the employee's personal interests conflict, or may come to conflict, with the performance of their activities to serve the União Química Group's interests or when their private activities are incompatible with their obligations to the company.



An employee will not act as director, consultant, manager, agent or employee of any company that competes, does business with or intends to compete with the União Química Group.

Likewise, an employee will not be a debtor of favors to suppliers or companies that have or may have relationships with the União Química Group.

Having a second job is not necessarily prohibited by the União Química Group, but it must not interfere or conflict with the employee's regular duties or reduce their working efficiency.

Employees with family members who act or intend to act in the supply of materials/services to the União Química Group must not personally be involved in the management of these businesses.

Direct subordination is forbidden between siblings, children, parents, grandparents, uncles, cousins, in-laws or spouses, whether by marriage or civil union.

The conflict of interest form must be necessarily filled out by the employee, who has the duty to state the occurrence of any type of conflict of interest or existence of relationship that might configure a conflict of interest, and must be submitted to the appreciation of the immediate manager, HR and the Corporate Legal and Compliance department, which will decide on the appropriate actions for the case.

Any activities that are performed, other than those performed in the União Química Group, must be communicated by the employee to the immediate manager, even if such activities are for non-profit, community, civic or political entities. Any doubts should be cleared up with the immediate superior of the employee involved in the case, HR, and the Corporate Legal and Compliance department of the União Química Group.





### **13. Granting or receiving advantages, benefits, gifts and hospitalities**

The União Química Group does not admit any grant to or receipt of undue advantages from any person or organization, directly or indirectly, whether by employees or third parties.

No offer or receipt of benefits, gifts or hospitality may give rise to a negative perception of the company's image or even of its employees.

Employees are forbidden to take advantage of their position or the name of the company to demand, accept, seek to obtain, or promise any undue advantage.

Any benefit, gift or advantage will only be allowed when it is the result of a commercial relationship that does not generate any type of conflict or possibility of undue advantage, and does not cost more than two hundred Brazilian Reais (R\$ 200.00). Should this occur, it will always be transparently accounted for (or reported, depending on the case) and will faithfully represent the reality.



### **14. Donations, contributions and sponsorships**

A donation will only be allowed if it is transparent, tax-deductible and, if its reason and destination may be justified at any time whatsoever. Donations are prohibited to any institution that poses a risk of misuse of the donated funds.

All contributions as sponsorship must be transparent, formalized in writing, have a legal business purpose and be appropriate to the compensation that is offered. It is not permitted to promise, offer or make contributions aiming at obtaining unjustified competitive benefits, and contributions will not be made to events organized by persons or organizations with purposes that are incompatible with the União Química Group's principles and/or that could damage the company's reputation.



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## 15. Moral and sexual harassment

Harassment, in general, constitutes any invasive approach to individual freedom and dignity, ongoing or repeated harassment, suggestion or intention concerning someone, with the purpose of inducing behavior, obtaining favors, sexual or otherwise, in a non-consensual manner, likewise embarrassment or disturbance based on a discriminating factor.

The União Química Group does not tolerate any kind of discrimination, exclusion or restriction based on race, skin color, gender, descent or origin, sexual orientation or religious option, with the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life.

Abuses of any nature between employees, such as moral or sexual harassment, verbal or physical humiliation, assault, coercion or threat to company members, which creates a hostile work environment, are not tolerated. Employees must understand that if they witness or experience harassment or discrimination, they have an obligation to report such conducts. Any harassment, whether moral or sexual, must be immediately reported to the immediate superior or area manager and, if necessary, to the Ethics Channel at the number 0800 609 8689 or website [www.contatoseguro.com.br/uniaoquimica](http://www.contatoseguro.com.br/uniaoquimica) or even by the “Contato Seguro” mobile application (Android and iOS) or e-mail [compliance@uiaquimica.com.br](mailto:compliance@uiaquimica.com.br), so that the appropriate actions may be taken.



## **16. Environmental protection, occupational health and safety**

The União Química Group is committed to protecting and respecting the environment by minimizing the environmental impacts that may occur during its activities. Thus, complying with the environmental laws in force, prioritizing pollution prevention, proper waste disposal, and the application of ethical and clear standards are common practices in our work.

Child and slave-like labor are activities punishable by Brazilian laws and absolutely contrary to the values of the União Química Group.

Each employee is responsible for creating and maintaining a safe work environment, and also for ensuring the safety of their coworkers. Thus, employees, suppliers and partners alike must pay permanent attention occupational health and safety, whether for their own benefit or with regard to their coworkers.

All employees are encouraged to share their concerns regarding occupational health and safety with their immediate manager. Our employees are trained to be able to identify risks more easily, so that they may find the best ways to control and prevent accidents.

Personal Protective Equipment (PPE) is available for the employees, who are informed about / trained on their correct use. The use of PPE is mandatory for all employees, third parties and visitors in risky areas.





## 17. Violations of the Code of Ethics

Each employee, without exception, is responsible for communicating to their immediate superior whenever they are aware of a possible violation of this Code and/or the laws in force.

Each report will be treated with confidentiality and secrecy, except for those which are mandatory to inform governmental authorities.

Any violation of this Code of Ethics or other policies and procedures of the União Química Group is subject to disciplinary actions and/or penalties based on the applicable laws in force. The degree of the disciplinary actions will result from the assessment of the observed infringement consequences, and may vary, for instance, but not necessarily in this order:

- I. Verbal warning;
- II. Written warning;
- III. Temporary suspension of activities (with or without remuneration);
- IV. Termination of the employment contract (dismissal with or without cause);
- V. Punishment provided by law.

The measures to be applied will be defined by the Ethics Committee of the União Química Group (composed of the HR, Corporate Legal and Compliance, and Internal Audit departments) together with the immediate superior or area manager of the employee involved in the case.



Some features should be considered whenever such measures are applied:

- I. I. Infringement severity or repetition;
- II. Advantage obtained or intended by the offender;
- III. Infringement consummation or not;
- IV. Injury degree or danger;
- V. Negative effect produced by the infringement and
- VI. Cooperation of the offender in the investigation of the offenses, among others.

If any employee, whatever their level, attempts any kind of retaliation, they will be subject to disciplinary measures. Equally, anyone who conceals a known violation, fails to cooperate with an investigation or files a false report in bad faith will be treated as if in violation of this Code of Ethics.

Violations of this Code must be reported by employees, third parties, clients or interested parties, through the appropriate channels, such as:

- I. The employee's immediate superior;
- II. Phone 0800 601 8689 (União Química Ethics Channel);
- III. Site [www.contatoseguro.com.br/uniaoquimica](http://www.contatoseguro.com.br/uniaoquimica);
- IV. "Contato Seguro" mobile application (Android and iOS);
- V. Email: [compliance@uniaoquimica.com.br](mailto:compliance@uniaoquimica.com.br).



The accused of a violation to this Code will be assured full defense and all legal rights during the respective investigation process,.

Employees who have questions about the situations related to the Code of Ethics should consult the Corporate Legal and Compliance department of the União Química Group.

It is important to emphasize that the statements in the União Química Ethics Channel are received by “Contato Seguro”, an outsourced company, thus ensuring independence and confidentiality in the process.

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 **União Química**  
farmacêutica nacional S/A