

CODE of ETHICAL CONDUCT

GUIDELINES OF PROFESSIONAL CONDUCT



OUR BUSINESS AND OUR CONDUCT

I am proud to present the third version of our Code of Ethical Conduct that reinforces our commitment to ethical conduct, Corporate Governance, and Hypera Pharma's Ethics and Compliance Program.

This Code is to be observed by all our employees and managers, as well as third parties and other business partners, including suppliers and customers.

It lists the main guidelines for our actions and the operation of the Program. This new version has been updated to reflect societal and corporate world changes over the last few years.

The document reinforces our values and culture that guide our entire team's daily actions and conduct and our commitment to maintaining the highest levels of governance aligned with the best market practices. We do business with integrity and transparency, with the involvement of our customers, partners, and the community around us, which will always be at the center of our strategic planning.

We do not tolerate discrimination, violence, or prejudice at all levels and in all relationships with employees, third parties, partners, customers, and stakeholders.

If these Code guidelines are not precise in some respect or do not address a specific issue, we must always ensure that our principles, ethical values, and culture guide us in making decisions with integrity, honesty, and transparency.

Observing the principles outlined here, we follow the path of integrity and compliance to continue bringing health and well-being to the Brazilian population!

Doing the Right Thing Always Works Out Well!

Breno Oliveira
CEO

CODE OF
CONDUCT



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The rules and guidelines addressed by the Code must be applied in conjunction and harmony with laws and external and internal regulations. In case of doubt as to which rule or standard to follow, or even in the absence of a guideline for a specific subject, immediately consult Hypera Pharma's Compliance Department. Complying with the regulations is a must. At the same time, acting with integrity, and doing the right thing in all circumstances and situations, will ensure proper alignment with the Company's expectations of your conduct.

1. INTRODUCTION

1.A. APPLICABILITY

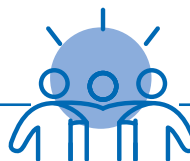
The Code of Ethical Conduct applies to all Hypera Pharma employees (including directors), customers, suppliers, and partners, regardless of hierarchical level, and must be disclosed and complied with in its entirety.

The applicability and scope of the Code of Ethical Conduct must always be linked to and observe three elements of Hypera Pharma's business existence: Vision and Mission, which, allied to our Conduct, translate the competencies necessary for the achievement of our strategy.



OUR MISSION

"To be **the best and most complete** Brazilian pharmaceutical company, participating in people's lives so that **they live longer and better.**"



OUR VISION

"To provide **access to healthcare for the Brazilian population**, offering **high quality and safe products**, continuously investing in **innovation**, growing **sustainably** with **social responsibility.**"

OUR VALUES AND CONDUCT

VALUES

- ✓ Respect / Integrity
- ✓ Excellence
- ✓ Humility
- ✓ Innovation
- ✓ Meritocracy
- ✓ Social Responsibility



CONDUCT

- ✓ Collaborative Spirit
- ✓ Constructive Indignation
- ✓ Creative Thinking
- ✓ Empathy
- ✓ Adaptability
- ✓ Connectivity / Attention to the state of affairs
- ✓ Sense of Urgency



2. OUR APPROACH

Every course of action must be directly related to the concept of "Connecting purposes so that people live longer and better." Thus, the activities practiced by internal agents (employees, executives, board members, and shareholders) or external agents (third parties, suppliers, partners, and customers) must focus on the Company's sustainability strategy.

Our conduct is linked to the Cultura Way and considers Environmental, Social, and Governance (ESG) aspects, guiding our work and decision-making.

The adoption of ESG guidelines by the Company permeates the commitments, obligations, and responsibilities specified in this Code, ensuring harmony between the codes of conduct and practices.

We highlight our competencies based on the principles described above, with values and the expected behaviors of all who interact with Hypera. They form a group of knowledge, skills, and attitudes that, when associated with and applied daily, generate the expected and sustainable results for the teams and the company.



VALUES + CONDUCT = OUR COMPETENCIES



FOCUS ON RESULTS

They demonstrate a **SENSE OF URGENCY** with **INDIGNATION** and non-conformism in a **CONSTRUCTIVE** manner, mobilizing to seek the best results and high standards of **EXCELLENCE**.

They are clear about their responsibilities and seek to exceed delivery and quality expectations. They make the appropriate allocation of financial and non-financial resources, promoting efficiency and effectiveness in delivering results.



TEAMWORK

They work with a **COLLABORATIVE SPIRIT**, showing **EMPATHY**, respect, and recognizing the role of others. They adopt a **HUMBLE** Attitude when identifying barriers and limitations in achieving results, seek support, and establish partnerships with colleagues inside and outside their departments.

They have a systemic vision by showing interest in learning about other departments' activities, difficulties, and challenges, exchanging experiences, resources, and information, and contributing to improving integration.



INNOVATION WITH EXCELLENCE

They demonstrate initiative to identify and implement improvements and **INNOVATION** in processes and activities under their responsibilities and seek better ways to perform tasks.

They have **CREATIVE THINKING** and anticipate opportunities through feedback from internal and external clients, market and competition trends, and movements. They remain **ATTUNED** and have **ATTENTION TO THE STATE OF AFFAIRS** of internal and external environments to promote actions that leverage productivity and **EXCELLENCE**.



READINESS FOR CHANGE

They demonstrate **ADAPTABILITY** to new situations and changes in activities, work environment, and the company. They present flexibility to deal with new scenarios, needs, cultures, and ways to perform tasks. They have a **SENSE OF URGENCY** and act quickly and assertively when making decisions.



HIGH-PERFORMANCE LEADERSHIP

They recognize and value the results achieved by colleagues and subordinates. They are protagonists in their development and in that of others. They reinforce the importance of dedication, effort, and discipline in the performance of activities to reach established objectives, thus stimulating the culture of **MERITOCRACY**.

They disseminate the company's corporate culture and clarify the organization's roles, responsibilities, objectives, and policies.

3. COMMITMENT TO CONDUCT

Hypera Pharma is committed to ethical behavior and attitudes that reinforce the Company's values and culture. With the help of its advisory committees, Hypera Pharma's Board of Directors guides the management of the business, keeps the Company informed on the best Corporate Governance practices, and ensures the monitoring of risk management and the compliance of internal controls.

As a signatory to the United Nations Global Compact (UNGC), Hypera Pharma periodically updates its operations and strategies, putting into action the ten universal principles of Human Rights, Labor, Environment, and Anti-Corruption practices. Following these principles and the 2030 Agenda, which proposes the attainment of the 17 Sustainable Development Goals (SDGs), an initiative of the United Nations (UN), Hypera Pharma prioritizes the SDGs most relevant to the Company, according to its stakeholders. This information is available in its Annual Report at the address:

[\(https://ri.hypera.com.br/hypera-pharma/sustentabilidade/\)](https://ri.hypera.com.br/hypera-pharma/sustentabilidade/)

Accordingly, this Code clarifies and guides employees, suppliers, customers, partners, shareholders, investors, public agents, and other third parties (stakeholders) that have interaction with the Company about the expected and sought attitudes in all established relationships, and it is everyone's duty:

- Safeguard the Company's solid and reliable image, acting in the market in a fair, transparent, and ethical manner, and practicing clean and honest competition;
- Comply with the current and applicable national or

foreign legislation;

- Respect human relations based on principles of equality, individuality, and dignity, with relationships free of prejudice in all forms, whether by origin or social condition, religion, gender, color, ethnicity, age, sexual orientation, political preferences, hierarchical level, physical condition, or any other form of discrimination or harassment.

To enforce this Code, Hypera Pharma has structured its Ethics and Compliance Program, which aligns the Company's strategy with the best market practices related to ethics and integrity. The Statutory Audit Committee supervises the program's activities, and the Ethics Committee monitors its work plan.

Aligned with the Company's Values and Culture, this Code becomes a valuable instrument for strengthening HyperaPharma's Vision and Mission.

3.A. Integrity and Compliance in Conduct

The Company understands that it is essential to adopt conduct focused on Integrity and Compliance, which are based on Transparency.

Integrity is understood as acting in a correct, honest, ethical, fair, human, empathic, and responsible manner, always respecting human dignity, the safety of all people, and the certainty that one is doing the right thing.

Compliance is fulfilling applicable rules, whether external, such as laws and regulations, or internal, such as policies and procedures.

Transparency is the ability to openly explain to anyone entitled to know the 'how' and 'why' of a specific action without concealing or distorting any information. Transparency does not mean giving unrestricted access to information, activities, or decisions to anyone but only those with the legitimate right and authority to receive it.

Based on these parameters, the following are the expected conduct of those who relate to or act on behalf of Hypera Pharma. In case of doubt, always seek the support of the management or the Compliance Department.

4. HUMAN RELATIONSHIPS

4.A. RESPECT FOR PEOPLE

Respect and appreciation for people, including everyone related to the Company, is one of the priorities expected of everyone.

We are committed to promoting respect for human rights in our relationships with employees, customers, shareholders, suppliers, and society.

We are guided by the three pillars of the Guiding Principles on Business and Human Rights, "protect, respect and remedy," presented in John Ruggie's Final Report, approved by the United Nations Human Rights Council on June 16, 2011.

The Company follows the principles of the Universal Declaration of Human Rights principles and values the right to life, freedom of expression, and security as the basis for justice, freedom, and peace. We respect migrant workers, including refugees, regardless of their country of origin. In addition, we value diversity and are against discrimination of any kind.

We repudiate any intimidation or sexual, moral, religious, economic, political, or organizational harassment, nor do we tolerate physical and verbal aggression, disrespect, embarrassment, or humiliation.

Our commitment to Human Rights is based on the United Nations Declaration of Human Rights, the conventions of the International Labor Organization (ILO), the United Nations Global Compact principles, and the Sustainable Development Goals (SDGs).



4.A.1. Approach to the Employees

Hypera Pharma promotes equal opportunities and diversity in the selection processes for internal promotions and hiring new employees, seeking the inclusion of race, gender, LGBTQIA+, and people with disabilities at all hierarchical levels, ensuring selection processes guided by affirmative action.

The Company values a dignified, responsible, and fair work environment, understanding that it is fundamental for its collaborators to carry out their activities properly and achieve professional and personal development.

The collaborators must perform their activities professionally and with the necessary skills to adequately perform their functions. At the same time, the leadership must provide suitable conditions for their development and support.

Employees must have personal and professional attitudes based on the Company's Values so that:

:

- Act according to Hypera Pharma's guidelines and directives;
- Accept mistakes honestly and transparently;
- Notify their manager of errors and mistakes as soon as possible so that

the problems do not worsen and the effects can be stanchd;

- Question and report to the Company any orientations contrary to its principles and Values.

4.A.2. Prevention and Struggle Against Discrimination and Prejudice

Any prejudiced or discriminatory behavior in the work environment or in any work activity related to race, color, ethnicity, religion, nationality, gender, marital status, sexual orientation, politics, age, physical disability, or any other condition that differentiates individuals is prohibited and considered unacceptable at all hierarchical levels. Employees are also expected to adopt the same attitude outside the workplace and in electronic or digital media.

The Company's commitment begins with the nomination process for the composition of the Board of Directors, which seeks to give opportunities to professionals prepared in various areas of knowledge, considering criteria such as gender, age, ethnicity, nationality, and educational background.

4.A.3. Prevention and Combating of Moral Harassment

The Company expects all its employees to fight against any form of moral harassment (gestures, words, writings,

behavior, or attitudes) against any person in the exercise of their functions, inside or outside our facilities, by any professional or hierarchical level.

Moral harassment is considered conduct that offends the dignity and physical or psychological integrity of any person, with repeated and frequent actions aiming at humiliating or constraining someone during the workday or, due to it, destabilizing the professional's relationship with the work environment and with the Company.

Furthermore, bullying is prohibited on the Company's premises or in any face-to-face or electronic relationship connected with the activities performed on behalf of the Company.

Bullying is deemed any hostile, discriminatory, offensive, persecutory or offensive treatment between employees or third parties. Bullying, as well as moral harassment, can occur with employees of the same or different hierarchical levels.

Every such situation must be reported to the immediate management, who will forward the matter to the People & Management Department.

Likewise, the case can be taken directly to People & Management or Compliance departments to be assessed, investigated, and defined and to apply disciplinary measures.

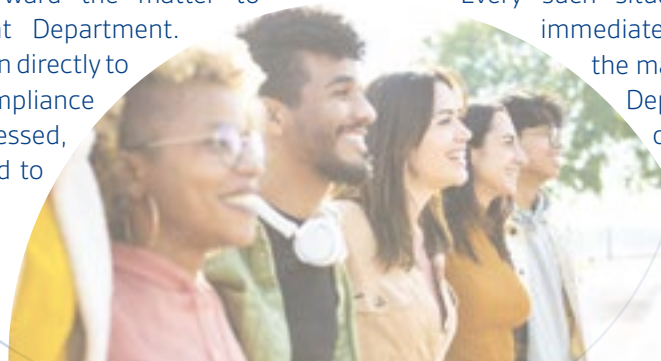
4.A.4. Prevention and Combating of Sexual Harassment and Sex Trafficking

Sexual harassment occurs when someone embarrasses other person with the intent to gain sexual advantage or favor.

Inappropriate postures (gestures, words, writings, behavior or attitudes) that cause embarrassment with the intention of obtaining any sexual advantage or favor inside or outside the work environment, in a professional activity or in an act arising from the work are prohibited.

Sexual Harassment is a crime, as provided for in the Brazilian Penal Code, and may generate, in addition to, corrective and punitive measures within the Company, public investigative proceedings, and other applicable legal actions. Likewise, Hypera Pharma is against any trafficking, including, but not limited to, sexual trafficking. Thus, the Company expects its partners, customers, and suppliers to engage in the same commitment.

Every such situation must be reported to the immediate management, who will forward the matter to the People & Management Department. Likewise, the case can be taken directly to People & Management or Compliance departments to be evaluated, investigated, defined, and to apply disciplinary measures.



4.A.5. Respect for the Fundamental Rights of Children and Adolescents

Hypera Pharma is committed to the rights of children and adolescents. The Company is against any form of discrimination, cruelty, negligence, violence, sexual exploitation, and pornography in its activities, in the use of its products, and its value chain.

Hypera Pharma repudiates child labor and any situations involving adolescents' irregular work under the age of 16 (except when in the condition of young apprentices, as of the age of 14).

Any supplier, service provider, or partner directly or indirectly involved with the above situations will be disqualified or have the contract terminated and may be reported to the competent authorities.

4.B. CONFLICT OF INTERESTS

Conflicts of interest arise when the individual interests of employees or third parties clash with Hypera Pharma's interests, generating a potential or practical favoring of one or several people other than the Company. It is present in companies' day-to-day activities, whether in their relations with suppliers, customers, partners, government agencies,

or even among employees. Therefore, it is necessary to deal with these conflicts honestly and transparently so that the Company's interests are always preserved.

All conflicts of interest, as soon as they are identified by the Company's employees or partners, must be reported to the immediate managers, who must forward the matter directly to the People & Management or Compliance departments so that they can be formally registered through the **Conflict of Interest Form**, available on the Company's intranet.

4.B.1. Kinship

Some rules prevent conflicts of interest arising from kinship in relationships:

- Prior information and approval by the People & Management Department is required when the hiring of employees who are related to other employees working for the Company is being considered; *
- The candidate must meet the requirements for the position without privileges of any kind;
- The performance of relatives in direct



Hypera Pharma understands that family kinship that might result in conflicts of interest are those between parents, spouses, partners, children, stepchildren, brothers, grandchildren, grandparents, brothers-in-law, uncles, cousins, and first-degree nephews and nieces, fathers-in-law, mothers-in-law, sons-in-law, and daughters-in-law.

subordination conditions is forbidden, considering the same management or reporting line;

- The Company does not recommend that relatives act as peers and answer to the same manager. Hiring, internal promotions, and transfers that generate this type of situation should be previously validated with the Compliance and People & Management departments that, when necessary, will submit them to the Ethics Committee.

The Company does not recommend that employees under these conditions act as peers and report to the same manager. All situations must be validated and handled by the People & Management and Compliance departments promptly.

4.B.3. Parallel Activities

Parallel activities are those that employees perform outside their working hours, whether paid or unpaid. Such actions are permitted as long as they do not hurt the employee's performance or the Company's image and do not constitute an act of potential competition with Hypera Pharma.

Main practical guidelines on this subject:

Commercial relations with suppliers, partners, and clients related to Hypera Pharma's collaborator must be informed to the Compliance Department through the **Conflicts of Interest Form**, available on the Company's intranet.

The hiring and contract management of suppliers, customers, and partners should not be carried out by an employee with a family relationship with the other external party.

4.B.2. Affective Relationships between Collaborators

Hypera Pharma has no restrictions regarding relationships between employees as long as there is no direct subordination relationship between those involved, considering the same management or reporting line.

- No parallel activities may be performed during working hours or on Company premises;
- The use of the Company's assets or resources for such activities, including its intellectual property rights, is forbidden;
- Employees are not allowed to take part in the management or boards of directors of companies competing with Hypera Pharma, nor are they allowed to develop external activities that could

characterize any conflict of interest with the Company's business;

- To ensure transparency in our business, any invitations to take on board roles in any Company or even in institutions, as well as equity participation in Companies in any field, must be previously validated by the respective Executive Director or CEO, who may, if necessary, consult the Compliance Department, which may trigger the Ethics Committee if necessary;
- Invitations to give lectures, workshops, and occasional classes, as well as the use of information for these purposes, must be previously authorized in writing by the respective Executive Officer and validated by the Corporate Communication department;
- It is forbidden to carry out any commercial advertisement related to similar activities within the Company's premises.

- It is forbidden to use Hypera Pharma's image or any of its products and brands for political campaigns or religious preaching, and any practices that may link the Company to such movements are also forbidden;
- The position held by the employee may not be used to support a candidate or political party, nor a religious institution;
- Political and religious activities must not be carried out on the Company's premises or Company business, such as, for example, leafleting inside or in front of the work unit;
- The exercise of political and religious activities must not cause any favoritism or harm to the employee's professional performance;
- Hypera Pharma also undertakes not to contribute to political campaigns, political parties, candidates for public office, or any other type of organization engaged in political activity.

4.B.4. Political or Religious Activities

The Company respects the political and religious activities and opinions practiced by its employees, as long as its name or brands are not linked to the employee's profile, observing the following conditions:

It is essential to point out that the Company only expresses itself through its official channels, and any comments or opinions of its employees have no connection whatsoever with Hypera Pharma's position, regardless of their position.

5. BUSINESS RELATIONSHIPS

5.A. GIFTS, HOSPITALITY, AND INVITATIONS TO EVENTS

The offering or receiving of gifts, hospitality, and invitations to entertainment must not be made to influence any decision of the Company, our customers, partners, or suppliers.

It is forbidden to offer, give or receive money as a token or gift.

The offering of gifts:

Only persons previously authorized by the Board of Directors may offer gifts, presents, or invitations to events to third parties, and the respective Executive Officer must once allow what and when will be offered.

Entertainment trips offered to customers, and third parties must be aligned with the strategies defined by the Company and formally approved by the respective Executive Officer. In addition, the supplier, customer, or partner must be made aware that they may not transfer any gift, present, invitation, or a trip to any third party.

In case of conflict between the Codes of the two Companies involved, donor and recipient, the most restrictive rule shall prevail.

The receiving of gifts:

Gifts such as notebooks, notepads, pens, self-adhesive pads, calendars, etc., may be accepted as long as their market value does not exceed 1/3 of the current minimum wage and, preferably, they must bear the logo of the Company or the event offering them.

The gifts that do not meet the above specifications, as well as invitations to entertainment events and other non-professional hospitality, must be delivered

to the respective Executive Director, who will decide on the appropriate destination, and may be raffled among the team members.

The Compliance Department shall be called upon at any time to assist in evaluating and treating appropriately.

Public Administration

It is forbidden to offer, promise, or receive, directly or indirectly, advantages to public administration agents, including - but not limited to - gifts, hospitalities, and entertainment of any value.

Any situation contrary to the observed must be reported to the Compliance Department immediately to be investigated and resolved.

5.B. EVENTS SPONSORED BY THIRD PARTIES

Only employees previously authorized by the respective Executive Board or CEO may participate in events sponsored by third parties, other professionals such as service providers, or relatives are prohibited.

If the invitation is not intended for a specific position, the department's Executive Director must define which employee will participate in the event. If the invitation is for a particular job, the Executive Director will determine whether the employee will participate in the event.

Hypera Pharma will preferably bear the costs and expenses of the collaborator's travel, accommodation, and meals, following the Company's Travel Expenses Reimbursement Policy.

Situations not mentioned above must be previously evaluated by the respective Executive Officer, who may, at any time, contact the Compliance Department in case of doubts.

5.C. BUSINESS MEALS

Only persons previously authorized by the respective Executive Board may hold or attend business meals.

The higher-ranking employee must always pay for the meal of all employees present and seek reimbursement following the Internal Travel Expense Reimbursement Policy.

In the case of meals with current or potential suppliers, customers, or other partners, each party must bear its expenses, and these should not generate an obligation of retribution. Finally, unnecessary costs during meals must be avoided, and the other guidelines on this subject in the Internal Policy on Reimbursement of Travel Expenses must be observed.

In case of doubt, the Compliance Department must be consulted in advance so that the situation can be properly assessed and investigated.

6. OUR ASSETS

6.A. ASSETS AND RESOURCES

Hypera Pharma's assets and resources are understood as the tangible and intangible assets owned or used by the Company, such as facilities, property, equipment, vehicles, software, systems, brands, patents, industrial secrets (for example, the list of partners, the formulation and manufacturing method of our products), telephony, office materials, among others.

When you receive or access Company assets and resources, you must:

- Use them properly and carefully, seeking to avoid unnecessary wear and tear, ensuring cost containment, and performing preventive maintenance whenever necessary;
- Observe and follow the legislation in effect and use only approved applications and software;
- Do not use them to practice illegal or improper acts, obtain a personal advantage, access or disclose offensive or immoral content, interfere in third-party systems, participate in virtual discussions, etc.;
- Communicate to your immediate superior any situation that indicates the possibility of loss, misuse, or theft of assets;
- Do not remove them from the Company's premises unless you have prior and formalized authorization. Notebooks, cell phones, Ipads, and other equipment made available by the Company to employees must be used as provided for in their respective policies;
- Return them in a proper state of conservation and use at the moment of eventual dismissal.

The unauthorized consumption of any products, inputs or other assets or resources of the Company during the stay in its facilities is prohibited unless formally authorized by the Corporate Health Department.

According to the Information Security Policy, Hypera Pharma has the right to control and monitor the means of communication, the access to the Internet, and the equipment connected to its information technology system, as well as having free access to the files stored in this equipment and the corporate network.

The use of equipment must be responsible and sharing access to software and systems made available to perform your work is forbidden.

Finally, it is forbidden to send or store inappropriate, offensive, obscene, or illegal content in addition to participating in chain letters and pyramids. Employees must always consider the rules defined in the Corporate Information Security Policy.

6.B. INTELLECTUAL PROPERTY

Intellectual property is understood as the protection of literary, artistic, and scientific works; inventions in all fields of human activity; scientific discoveries; industrial designs and models; industrial, commercial, and service marks; protection against unfair competition; and all other rights

inherent to intellectual activity in the industrial, scientific, literary, and artistic fields.

Examples of such protection are patents, trademarks, and know-how, which is the Company's ability and capacity to perform an activity.

The Company is the owner of all information acquired due to the professional activities performed by employees. Thus, it is not permitted to copy, transmit or distribute its information externally, nor to use internal materials and content for personal purposes.

Before disclosing any information about Hypera Pharma's processes, formulas, or products, consult the respective Executive Director and the Legal Department, specifically the intellectual property team.

Due to their activities, departments that have an occasional need to share strategic or confidential information, such as but not limited to Research & Development, New Business (BD), Innovation, Intellectual Property, and Communication, should formalize confidentiality agreements with their partners before sending the information. These agreements should be made with the guidance of the legal department.

Finally, the Company commits not to patent protect product-related technologies for diseases such as, but not limited to, those described in the scope of the 2021 ATMI*. Especially



in countries classified as Least Developed Countries (LDCs), Low-Income Countries (LICs), or Middle-Income Countries (MICs) as defined by the United Nations and the World Bank.

6.C. PROTECTION AND CONFIDENTIALITY OF INFORMATION

Keep the confidentiality of passwords for computers, e-mail, systems, and electronic devices, and never share user data and passwords, as this is prohibited.

Do not disclose information that influences Hypera Pharma's image and results. Only the CEO, the Press Office, and the Investor Relations Office are authorized.

Hypera Pharma's strategic and confidential information should not be disclosed in any way to employees or third parties who do not necessarily need it to perform their duties.

Be discreet when speaking about Company matters in public places, especially if the information is confidential, and always consider whether the time and place are appropriate.

Always report personal data breaches or information security incidents of which you become aware to Compliance via **Hyperaescuta**, to the Data Protection Officer via e-mail at dpo@hypera.com.br or to IT & Digital at seguranca.informacao@hypera.com.br.

The confidentiality of Hypera Pharma's information must be maintained by everyone, even after they leave the Company since this is a legal obligation.

Hypera Pharma requires third parties to be committed to the confidentiality of information. The companies subject to this Code must not disclose Hypera Pharma's confidential information for their benefit or that of third parties.

Confidential information is considered to be information whose disclosure impacts the Company's operations, tactical or strategic objectives, or places the Company's business at risk.

6.D. SOCIAL MEDIA

Information about Hypera Pharma and its brands, including quotes, must only be posted on social media by authorized persons or on channels approved by the Company.

Use of Social Media for personal purposes should not feature:

- Any kind of relationship with the Company;
- Issuing value judgments or opinions

about other employees, partners, clients, consumers or competitors;

- Content with internal text or image of the work environment without prior authorization;
- Information that is not in the public domain, that is, that has not yet been disclosed in the media, by the Company itself;
- The disclosure of products presented in conventions or internal meetings, which have not yet been officially to the market. In the case of products that have already been officially launched, sharing the content is only allowed through the communication channels maintained by the Company.

The Company advises that all communication, whether among employees or in contact with third parties, suppliers, customers, health professionals, and other business partners, be carried out only employing the corporate tools made available for this purpose.

7. LEGAL COMPLIANCE

Some specific laws require closer observance and compliance. In the following items are those that the Company would like to highlight, but without departing from the obligation to comply with all the laws in force in the locations where we do business.

7.A. GENERAL DATA PROTECTION LAW

Hypera Pharma maintains its commitment to observing the applicable legislation on privacy and protection of personal data, especially the General Law on Data Protection or LGPD (Federal Law No. 13,709/2018).

Thus, it is the duty of all employees, third parties, suppliers, and business partners to ensure the protection of personal data processed due to the relationship maintained with the Company, respecting the Internal Policy on Personal Data Protection guidelines.

In this way, always:

- Observe the rules established by the Company for the use of personal data;
- Participate in training and dynamics to raise awareness about privacy and protection of personal data; and
- Adopt a proactive attitude to clarify doubts about the use of personal data or report any non-compliance with the Company's guidelines for handling personal data.

Any requests or questions on this subject should be addressed to the Data Processing at dpo@hypera.com.br.

7.B. COMBATING CORRUPTION, MONEY LAUNDERING, AND TERRORIST FINANCING

Hypera Pharma repudiates any act of bribery or corruption, as well as those that may enable Money Laundering or Financing of Terrorism (MLTF), providing all its collaborators and partners with clear guidelines on this subject in its Anti-Corruption and Government Relations policies.

As also provided in Federal Law 12,846/2013, known as the Anti-Corruption Law, it is prohibited to offer, promise or give, directly or indirectly, bribe or any improper advantage to a public or private agency as a result of their job, function, or position.

Hypera Pharma's employees must not, under any circumstances, solicit or accept any benefit that can be equated to bribery, especially as regards obtaining any advantage to which they would not be entitled.

Employees receiving such an

offer must immediately inform the Executive Board and the Compliance Department.

During the relationship with partners, suppliers, customers, and third parties, the respective Executive Board and Compliance Department must be immediately informed for evaluation and treatment if any involvement with corrupt practices or illicit activities is identified.

Further information is available in the Anti-corruption Policy and must be followed.

7.C. ANTITRUST AND COMPETITION LAWS

Hypera Pharma is committed to ethical marketing, advertising, and sales practices and providing accurate and balanced product information.

The Company is guided by antitrust and competition laws protecting the free market. As such, they prohibit agreements between Hypera Pharma, competitors, and other market players that may affect prices, terms or conditions of sale, fair competition, and the free market.



8. QUALITY, HEALTH, SAFETY, AND ENVIRONMENT

8.A. QUALITY OF PRODUCTS

Hypera Pharma follows the best manufacturing practices following the premises of the Brazilian governmental agencies National Agency for Sanitary Surveillance (ANVISA) and the Health Surveillance Agency (VISA) for each category in its portfolio. It continuously invests in innovation, offering high-quality, safe, and efficacy products, emphasizing our customers' health.

The concern with health goes from the care taken with the development of its drugs through clinical studies conducted by the company, which are approved by Research Ethics Committees (CEP), which, in turn, are accredited by the National Research Ethics Commission (CONEP). Likewise, the quality of the post-sales products is guaranteed by the Pharmacovigilance system, which continuously performs risk assessment, periodically reporting the analysed data to ANVISA. Finally, it is essential to emphasize that Hypera Pharma does not carry out tests on animals.

8.B. HEALTH AND SAFETY

A safe and healthy environment is provided for all employees, suppliers, consultants, clients, and society related to the Company.

Everyone is obligated to ensure that working conditions meet safety requirements for their protection and that of their colleagues, collaborators, and third parties who frequent the Company's units and facilities.

Suppose you identify any situation that puts your physical integrity or someone else's at risk. In that case, you must communicate such a fact to your immediate manager (at least your manager) and the departments of Labor Safety, Health Management, or the responsible department. Similarly, if you understand that a situation risks your health and safety, you must

exercise your right of refusal and immediately inform the departments mentioned.

The necessary measures must always be taken to ensure that the following Occupational Health and Safety objectives are met:

- Provide and maintain safe and healthy workplaces;
- Provide and maintain a suitable work environment;
- Develop a safety culture among employees;
- Participate in safety training activities;
- Continuously improve Quality, Health, and Safety performance in the Company;
- Comply with the standards and principles of health and safety and the rules of thumb available in our units.

The consumption of illicit drugs and alcohol is prohibited on Company premises and during the execution of activities, even when working remotely or in external activities. In case of events promoted by the Company in which alcoholic beverages are offered, they must be consumed conscientiously and moderately.

Smoking is forbidden on Hypera Pharma's premises except in a designated area.

It would be best if you informed the Health Management department or your manager (minimum manager) whenever you are undergoing medical treatment with medication that interferes with your reflexes or could compromise your safety or that of your co-workers.

Employees are not allowed to carry weapons on Company premises or when performing activities related to their work, even outside the Company. Professionals who use weapons as a work tool must prove that they are technically qualified and adequately identified. The possession of the weapons must be in order and be previously authorized by Hypera Pharma.

8.C. ENVIRONMENT

Aware of the need to manage natural resources, Hypera Pharma is committed to preserving the environment, improving continuously, and adopting the best practices and technologies to manage its environmental aspects safely.

In addition to being a signatory to the UN Global Compact, Hypera Pharma is committed to maintaining Brazilian biodiversity. This commitment is based on the Biodiversity Law (Law No. 13,123 of May 20, 2015), which provides for access to genetic heritage, protection of and access to associated traditional knowledge, and sharing of benefits for the conservation and sustainable use of biodiversity.

This commitment goes beyond the operations and extends to the supply chain to avoid operational activities near sites containing globally or nationally important biodiversity.

In addition, the company dedicates efforts to mitigating

the impacts resulting from climate change, and every year it diagnoses atmospheric emissions through the Greenhouse Gas Emissions Inventory. The inventory enables the identification of risks and opportunities arising from climate change to managing the issue at Hypera Pharma.





9. RELATIONSHIP WITH THE EXTERNAL CUSTOMERS

Hypera Pharma requires respecting and promoting Human Rights in its activities, establishing business relationships with Companies that share the same principles and values, and repudiating labor analogous to slavery or child labor (UN and ESG).

9.A. CLIENTS

Clients are all those who mediate relations between the Company and its consumers, that is, retailers, distributors, supermarkets, pharmacies and drugstores, and wholesalers, among others.

Hypera Pharma always seeks a respectful and ethical relationship with its clients, aiming at achieving the best results for both parties responsibly and fairly. Furthermore, it does not interfere with the commercial policies of its clients and distributors, especially concerning sales to the Public Administration.

These are Hypera Pharma's attitudes toward its clients:

- Courtesy and agility in solving problems;
- Confidentiality of strategic and confidential information; and
- Respect for the Codes of Ethical Conduct and client policies.

Hypera Pharma seeks relationships with clients who commit themselves to:

- Maintain the secrecy and confidentiality of their strategic information;
- To act following this Code and other company policies;
- Comply with the Brazilian legislation in force and other applicable foreign laws.

9.B. CONSUMERS

Hypera Pharma's focus is on its consumers; therefore, the Company seeks to understand their needs and identify opportunities and ways to exceed their expectations.

Thus, Hypera Pharma and all its collaborators must focus on the following:

- Using materials and processes accepted by the country's official regulatory agencies;
- Respecting the health of each individual and the population;
- Not carrying out misleading advertising;
- Complying with the country's current legislation.

Focusing on customer satisfaction means respecting people and their values, and this is part of the mission of every Hypera Pharma employee.

9.C. SUPPLIERS AND SERVICE PROVIDERS

The process of analysis and contracting of Hypera Pharma's suppliers occurs based on the internal policies in force and applicable legislation, without any privilege.

The Company practices free competition, transparency, impartiality in the contracting process, and strict compliance with contracts. The Company also encourages adopting good practices that address sustainability, diversity, and corporate

and social responsibility. The relationship with suppliers should be determined by respect for the rules of this Code.

The Company expects its service providers and suppliers to comply with applicable laws and prohibit forced or compulsory labor, child labor, pedophilia, intimidation, or harassment based on gender, gender identity, disability, origin, religion, race, ethnicity, sexual orientation, marital status, age, health condition, social condition or any other form of prejudice in economic, political or organizational spheres.

Hypera Pharma emphasizes the importance that its suppliers and service providers carry out sustainable management of their supply chain and that they identify critical suppliers from an economic, social, and environmental point of view.

The presentation or indication of suppliers will not imply favoritism and must follow what is established in this Code, in the item "Kinship." This also applies to suppliers or service providers with Hypera Pharma employees or shareholders as partners or shareholders without privileges of any kind.

Suppliers must comply with Hypera Pharma's Code of Ethical Conduct, just as the Company undertakes to comply with its Code of Conduct.

Hypera Pharma's suppliers must also respect the measures outlined in the Anti-Corruption Policy and the other policies.

The Company understands that non-compliance with the legislation or unethical conduct characterizes a breach of trust. Therefore, infringements of this Code and Hypera Pharma will analyse the legislation and the suppliers and will

be subject to applicable sanctions, including termination of the contract.

9.D. PARTNERS

Hypera Pharma understands that the partnership relationships established should be distinguished by responsibility, respect and ethics. Thus, these are attitudes desired from both parties in partnership relationships:

- Maintaining confidentiality about the other party's strategic information;
- Ethical behavior in relation to shared technologies;
- Respect for the provisions of the Anti-corruption Policy and other policies and codes of both parties, with the most restrictive guidelines always prevailing.

9.E. SHAREHOLDERS AND INVESTORS

Hypera Pharma and its collaborators are committed to complying with the legislation in force and the

determinations of the Securities and Exchange Commission concerning the trading of the Company's shares and to following the guidelines of the Investor Relations Office.

The Company's relationship with its shareholders and investors is based on transparency and the pursuit of the best Corporate Governance practices.

The Company, observing the best Governance guidelines, undertakes to:

- Disclose true and accurate financial information and statements;
- Cooperate with internal and external audits, providing pertinent information;
- Do not disclose unofficial information that may generate financial or image damage or favoritism to others.

Employees and other stakeholders who interact with the Company are forbidden to use insider information for their benefit or for the benefit of third parties of which they are aware.

Furthermore, the Company's employees must respect the Quiet Period and the Period of Prohibition on Trading Hypera Pharma's shares*.



Quiet Period - An interval that precedes the release of the Company's quarterly or annual results, during which its representatives are prohibited from publicly discussing information regarding the Company's performance in a given quarter or year.

Period of Prohibition on Trading Company Shares - The period during which it is forbidden for managers and employees to trade shares or other securities issued by the Company. It may be the period preceding the disclosure of quarterly or annual results or periods preceding the disclosure of Material Facts by the Company. In the latter case, the Investor Relations Office determines the trading restriction interval and which persons are subject to the restriction. In the first case, all employees and shareholders should refrain from trading.

For more information, please access the Policy on Disclosure of Relevant Act or Fact and Confidentiality and the Policy on Trading Securities Issued by the Company available on the Company's website.

9.F. COMPETITORS

Competitors are those operating in the same market or market segment as Hypera Pharma.

Accordingly, the Company, all employees, and other persons who have a relationship with Hypera must:

- Seek healthy competition with competitors, maintaining an ethical, cordial and respectful relationship;
- Not admit comments that may affect or harm the image of competitors or contribute to the spreading of rumors about them;
- Not contract and not to compact with industrial espionage actions, illegal obtaining and use of competitors' strategic and/or confidential information.

9.G. PUBLIC ADMINISTRATION, PUBLIC AGENTS, AND REGULATORY AGENCIES

All institutional relationships with Public Agents must follow the Anti-corruption Policy, this Code of Ethical Conduct, the Company's additional internal guidelines, and the Legislation.

Hypera Pharma vetoes the promise, offer, or donation, directly or indirectly, of an undue advantage to a public agent, Brazilian or foreign, or a third party related to them in Brazil or abroad.

As a response to this prohibition, Hypera Pharma expects

that no person or Company related to it, directly or indirectly make, offer or promise payment or any undue advantage to any public agent or third party related, whether national or foreign nor shall it authorize or allow them to do so.

All employees must promptly deny any proposal by a public official that violates this Code or the Anti-Corruption Policy and report it immediately to the Compliance Department. Thus:

- The Company does not perform and does not condone corruption practices and bribe payments;
- Relations with the Public Administration shall follow the Code of Ethics of the public body in question, and in case of conflict with other codes, the most restrictive shall prevail.

Only persons previously authorized by the respective Executive Director or CEO may carry out any active communication with the Public Administration.

Should a representative of the Public Administration approach a Company employee, the latter must, whenever possible, direct them to a department authorized by this contact or seek guidance from their respective manager.

Additionally, participation in bidding processes, public or private, must occur following the principles of correctness, transparency, and good faith, in addition to total respect

for the guidelines established by the Business Units, the Company's other policies, and current and applicable legislation at all stages.

In case of doubt, the Compliance Department must be consulted in advance to evaluate and deal with the situation appropriately.

9.H. UNIONS, ASSOCIATIONS, AND CLASS ENTITIES

Hypera Pharma respects free association, recognizes the trade unions as legal representatives of the employees, and seeks constant dialogue for the construction of positive initiatives or when there is the need for a solution to conflicts of a labor or union nature.

The union relationship must be respectful, harmonious, and focused on the expected results.

We recognize the role of legally constituted trade associations and entities, following their initiatives and practices, and are always willing to talk to them about any situation that involves the Company's business, always seeking opportunities and solutions that suit both parties.

Please see the Internal Policy on Associations and Trade Unions for more details. In case of doubt, the Compliance Department must be consulted in advance to evaluate and deal with the situation appropriately.

9.I. PRESS

Hypera Pharma's relationship with the press is based on truthful information. To avoid the dissemination of incorrect information or inappropriate situations, only the Corporate Communications department or persons indicated and guided by it are authorized to speak on behalf of the Company.

Suppose an employee or person related to the Company's activities is sought out or questioned by any press representative. In that case, they should not make any statement or pronouncement but rather transfer or refer the contact to the Corporate Communication department or the Press Office.

9.J. COMMUNITY

The relationship with the community is based on transparency, mutual respect, and compliance with the legislation in force.

Our commitment to Social Responsibility demands everyone attention towards the community, mainly in the identification, evaluation, and prevention of any impact that may affect it negatively, as well as risks of Human Rights violations. Thus, the Company makes available and ensures external access to the Confidential Channel ([Hyperescuta](#)) for any communication with the external public in this regard.

9.K. HEALTH PROFESSIONALS

In its direct or indirect interaction with healthcare professionals, the Company undertakes its operations in accordance with the principles of integrity, transparency and high moral values, also observing the current and applicable laws and regulations.

In case of doubt about actions of interaction with these professionals, the Compliance, Legal, and Regulatory departments shall be contacted for evaluation of possible conflicts and support in decision making.



10. SOCIAL RELATIONS (ESG)

10.A. DONATIONS

The donation process must enhance Hypera Pharma's image, benefit the community, and be aligned with the Company's commercial and institutional interests, with particular attention to its social role.

All donations must comply with the policies on the subject and go through the necessary approvals. Besides, they cannot generate a need for retribution or seek advantages, and their recipients must respect the legislation in force.

It is the Company's duty to guarantee

- Forms of traceability of donations for eventual verification or proof of the real purpose given to the donated items;
- Observe that the recipients of the donations have sustainability mechanisms to ensure their existence, independent of the Company's donations.

Finally, it is forbidden for the Company to make donations for political purposes.



In addition to establishing ethical behavior guidelines, Hypera Pharma recognizes the importance of maintaining and reinforcing ethics within the Company by employing the instruments listed below.

11.A. COMPLIANCE DEPARTMENT AND ETHICS COMMITTEE

The responsibility for the Management of Ethics in Hypera Pharma lies in the Compliance Department. Compliance Department, which, when necessary, must activate the Ethics Committee.

This Committee is formed by directors and employees elected by the Company's Board of Directors, acting as a support body to the CEO, the Statutory Audit Committee, and the Company's Board of Directors, with the following responsibilities:

11. MANAGEMENT OF ETHICAL CONDUCT

- Managing and analysing, with impartiality, serenity, and guarantee of equal treatment and non-retaliation, the issues referring to the Company's Code of Ethical Conduct or any other pertinent matters when brought to the attention of the Code of Ethical Conduct;
- Monitoring the annual work plan of the Compliance Department;
- To analyse and define how to deal with situations that may not be foreseen in the Code of Ethical Conduct;
- To clarify doubts and guide how to act when faced with possible ethical dilemmas;
- To monitor, using reports issued by the Compliance Department, the indicators from the communication channels of the Company's Ethics Management structure;
- Reviewing and recommending, periodically, eventual

changes in the Company's Code of Ethical Conduct and updating it at any time, whenever necessary.

11.B. STATUTORY AUDIT COMMITTEE (CAE)

The CAE is an advisory body to the Board of Directors, whose purpose is to supervise the integrity of the financial reports, the adherence to standards, the adequacy of the processes related to the Compliance Department, and the activities of the internal and independent auditors.

To seek the independence of all bodies, situations that disagree with this Code involving the Company's CEO will be taken to the CAE for analysis

11.C. CONFIDENTIAL CHANNEL

Hyperescuta is an exclusive channel available to all to report violations or noncompliance with Hypera Pharma's Code of Ethical Conduct, its policies, standards, and legislation in force, in an identified or anonymous manner, as defined by the reporter. The Channel can also be used to clarify any doubts regarding the Code of Ethical Conduct, ethical dilemmas, suggestions, and criticisms regarding the Management of Ethics at Hypera Pharma.

This Channel is operated by an outsourced company

specialized in receiving and analysing reports, which are then forwarded to the Compliance Department for due verification. The Compliance Department, in turn, may trigger the Ethics Committee and the Statutory Audit Committee to assist with the issue.

When filing a report, the claimant must include as much information and details as possible about the reported situation (what, when, who, how, how much, where and why). The claimant is responsible for the veracity of the information reported, and it is essential to use it in a correct and conscientious manner.

It is important to note that after the report has been registered, the claimant will receive a protocol number with which it will be possible to follow the progress of the investigation and, in some cases, to verify the existence of doubts or questions on the part of those responsible for the investigation.

If they prefer, Hypera Pharma's employees can contact their managers or the departments of People & Management or Compliance to clarify doubts or report any situations. If sought out, it is the managers' role to immediately refer the matter to the People & Management or Compliance departments without prior investigation.

Confidentiality and non-retaliation are guaranteed to claimants.

Access:**Website:** <http://www.hyperescuta.com.br>**Telephone:** 0800 772 0891**11.D. NO RETALIATION**

Hypera Pharma values transparency and confidentiality during assessing and verifying recorded situations, reinforcing the whistleblower.

- In good faith, report what they believe to be a violation of the Code, laws, policies, and internal procedures;
- Cooperate by providing truthful information;
- Raise questions about the content of the Code, conduct, or decisions;
- Make suggestions, compliments, or other contributions.

Retaliation is a violation of the Code of Ethical Conduct and must also be reported to the Confidential Channel.

11.E. ENGAGEMENT

Hypera Pharma requires formal awareness of the Code of Ethical Conduct from all employees when hired. In addition, training is provided in the New Employee Integration Program (PINC), which explains the main points of this Code and practical situations in day-to-day professional life. Finally, annual mandatory training on this Code is also made available to employees in digital format (e-learning).

In addition, Hypera carries out periodic communications via corporate e-mails and messages on the televisions provided on company premises to reinforce the ethical principles contained in this document for all its employees, third parties, and partners in general.

11.F. VIOLATIONS OF THIS CODE

Violations of the Code of Ethical Conduct will be analyzed and investigated by the Compliance Department and, when necessary, will be submitted to the Ethics Committee and the Statutory Audit Committee. The appropriate disciplinary and contractual measures will be indicated for each case according to the internal procedures and the legislation in force, as well as the seriousness of the violation, which may vary as follows: (i) formal orientation, (ii) verbal warning, (iii) formal warning, (iv) suspension, (v) dismissal or (vi) dismissal for cause.

All employees and third parties must immediately report any violation of this Code, the other internal policies and procedures, and the laws in force. Failure to do so will also be considered a breach of the Code and, therefore, subject to sanctions.

11.G. APPROVAL OF THIS CODE

The Company's Board of Directors is responsible for approving the content of this Code, which takes effect immediately and for an indefinite period. It can be updated at any time, whenever the Compliance Department identifies the need. Specifically, the content is re-evaluated every two years and, if necessary, updated and approved.



12. FINAL CONSIDERATIONS

All employees and other people dealing with the Company are responsible for looking after Hypera Pharma's image and reputation. Ethics and behavior with integrity are expected of everyone, without exception.

Therefore, it is everyone's responsibility, especially the collaborators, to know and apply the rules of this Code of Ethical Conduct and other internal controls to ensure an environment and relationships based on high standards of ethical conduct and the Company's values.

The role of leadership is fundamental in the Company's Ethics Management, and it is considered an important communication channel for guidance and clarification of questions from employees. Always use the management to find the first level of support you need regarding ethics, integrity, and compliance issues. Likewise, employees or people related to Hypera Pharma may seek help directly from the departments People & Management and Compliance.



13. KNOWLEDGE WORTHY OF CONTEMPLATION

Building a good reputation, personal and professional, takes many years, if not decades. However, it can disappear in minutes or seconds.

With this in mind, we highlight below some knowledge worthy of contemplation to guide the day-to-day activities and decision-making of all those who, directly or indirectly, have a relationship with Hypera Pharma:

- Empathy has invaded people's lives, so it is always important to assess whether your behavior is in line with the treatment you would like to receive;
- When in doubt about whether or not to perform a particular task, think about, "Is it something I would proudly tell my children and family about?"
- Before you make an important decision, stop and think: Do I want to? Can I? Should I? If in doubt, always seek help from your manager, the People & Management and Compliance departments, or directly from the Confidential Channel;
- We live in an interconnected world, where an action that takes place in one place can trigger millions of shares, the facts can go viral and cause a positive or negative impact on your image, as well as on the Company;
- There will always be someone with a smartphone nearby, so think carefully before making a comment, giving a public opinion, posting on a social network, acting, or omitting something, because you may be being watched, filmed, or recorded.

If in doubt about how to proceed in a given situation, it is advised to stop and ask for help. The Compliance Department is open to listening and assisting.



Have courage and responsibility! When you notice something inappropriate with a colleague, with the Company, or even with yourself, it is advisable to make an anonymous or identified report in the channels:



www.hyperescuta.com.br

Telephone: 0800 772 0891 and

e-mail: compliance@hypera.com.br

If you happen to be unsure, contact your manager or Compliance Department and remember that:

DOING THE RIGHT THING ALWAYS WORKS OUT WELL!

