
	Anticorruption and Other Wrongful Acts Policy	Issue date 9/30/2020
Prepared by: CEO Legal and Compliance Assessment and Ethics Committee	Approved by: Audit Committee (8/21/2020) Board of Directors (9/30/2020)	6th version

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1. PURPOSE

The Anticorruption and Other Wrongful Acts Policy's purpose is to clarify and restate OdontoPrev Group's commitment in its Code of Ethical Conduct to reject the acts of corruption and other wrongful acts, including frauds.

2. SCOPE

This document applies to OdontoPrev Group's management and employees, starting from its publication at the Corporate Intranet (Between Us). This Policy also applies to third-party suppliers of goods and services, including their management, employees, and agents in Brazil and abroad.

3. CONCEPTS

Public Administration: is the set of State bodies, services, and agents that are part of the direct and indirect Public Administration, assuring the fulfillment of the society's collective needs, such as health, education, culture, well-being, etc. It is the total State control, in all its levels (Federal, State, and Municipal) and branches (Executive, Legislative, and Judiciary) for the provision of public services, management of the public assets, and society's interests as well as its respective representatives. The State bodies with the highest interaction with OdontoPrev Group are the National Supplementary Health Agency (ANS), Securities and Exchange Commission (CVM), and the Brazilian Federal Revenue Office.

OdontoPrev Group's Management: are all the directors, executive officers, and area managers for OdontoPrev Group.

Public Agent: is any person representing the Public Administration, providing a public service, whether a public servant or not, compensated or not, the service being temporary or not. It is anyone performing, whether temporarily or without compensation, by election, appointment, designation, hiring, or any type of investiture or relationship, mandate, position, job, or public role. The Public Agents with the highest interaction with OdontoPrev Group are linked to ANS, CVM, and the Federal Revenue Office.


Treats: items with no commercial value or market value limited in the Company's Code of Ethical Conduct, distributed or received through courtesy, advertisement, or usual disclosure of the OdontoPrev Group's brand or the legal entity granting the treats to the Group's employee.

OdontoPrev Group Employees: are all OdontoPrev Group's employees, including temporary, interns, and apprentices.

Courtesy: any professional conduct in the sense of welcoming, hosting, feeding, and entertaining people. The term includes: entertainment, food, receptions, transportation, accommodation, and similar items that are

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under the regular commercial practices and do not generate the impression, in the counterpart or third parties, of aiming at achieving improper advantages or exerting an improper influence over the counterpart's activities and/or decisions.

Active Corruption: Offering or promising an improper advantage to a public servant to determine them to practice, omit, or delay a trade act.

Passive Corruption: Requesting or receiving an improper advantage for themselves or others, directly or indirectly, even though not on duty or before taking over the role, but due to it, or accepting a promise for such advantage.

Anticorruption Due Diligence: For the purposes of this policy, the information and documents analysis procedures for a specific natural or legal person is considered anti-corruption due diligence, to broadly verify their reputation, negative media, relationship with public bodies and entities, and involvement in wrongful acts or legal processes encompassing the matter.

Donation: It is the act of giving a personal asset to a non-profitable institution, recognized as such by the national or local legislation in force.


Goods and Services Suppliers: the traditional goods and services suppliers, natural and legal persons are included in this category, besides our accredited network (practices and dental surgeons), commercial partners, benefits administrators, brokers, intermediators, commercial representatives, agents, legal advisors, paralegals, consultants, auditors, among others.

Areas Managers: are all OdontoPrev's Group employees that oversee internal and/or external teams, managing areas and approving transactions, payments, reports, processes, and procedures.

Bidding: is the formal and mandatory administrative procedure for contracting services or acquisitions by the Public Administration's entities, regulated by Laws 8.666/93 and 10.520/02.

Sponsorship: Financial support granted to third parties' projects to encourage culture, sports, and social actions, disclosing the actuation, strengthening the positioning, adding value to the brand, increasing the sales, or expanding the Company's relationship and recognition with its target audiences.

Politically Exposed Persons (PEP): Are considered the public agents who perform or performed, in the past five years, in Brazil or countries, foreign territories or facilities, relevant positions, jobs, or public roles, as well as their representatives, family members (the relatives, in a straight line, up to the first degree, the spouse, companion, stepchild), and other people from their close relationship, or a person who exercises or exercised a high-management role in an international organization of any nature (officers, subofficers, council members, or equivalent roles).

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Gifts: tangible items with a commercial value limited in the Company's Code of Ethical Conduct, which does not necessarily carry the institutional brand of a company or institution. It is everything that is offered, free of charge and spontaneously, to another individual, without requesting any type of facility, improper advantage, or exercising improper influence over the counterpart's activity and/or decisions.

Integrity Program: It is a set of internal mechanisms and procedures for integrity, monitoring, and incentive to whistleblowing irregularities, and in the effective application of the Code of Ethical Conduct, policies, and guidelines, to prevent, detect, and resolve misapplication, frauds, irregularities, and wrongful acts practiced especially against national or foreign public administration.


Bribery: Any willful act, direct or indirect, can be characterized as bribery, or through third parties, aiming at promising, offering, or providing anything that can be characterized as an improper advantage to themselves or others.

4. INITIAL CONSIDERATIONS

Law 12.846/13 ("Anticorruption Law") establishes the civil and administrative accountability of legal and natural persons for the practice of acts prejudicial to the Public Administration, national or foreign, with the accountability of the legal entity and application of severe penalties to anyone who takes part in acts or omissions defined as a transgression to said Law. Among the prejudicial acts are active and passive corruption, extortion, misconduct in public office, fraud in public bidding and competition relationships, and crimes against the economic and tax orders. These acts prejudicial to the Public Administration are being handled generically herein as corruption acts.

On the other hand, and for the purposes of this Policy, the other wrongful acts are all those described in the OdontoPrev Group's Code of Ethical Conduct, except for the corruption acts already handled in the previous paragraph. Frauds in general, conflicts of interest, bribes, diverse discriminations, and breach of information confidentiality are some of the wrongful acts examples approached in our Code of Ethical Conduct. It is worth highlighting in this Policy the concepts for fraud, conflict of interests, and bribery. Fraud refers to the willful act of omitting or manipulating information or transaction, appropriation of values, and tampering with documents, registries, and accounting statements. Conflict of interests occurs when private interests, including personal, social, family, or financial interests, disagree or might be in disagreement with OdontoPrev Group's interests. In its turn, any direct or indirect willful act can be characterized as bribery, or through third parties, aiming at promising, offering, or providing anything that can be characterized as an improper advantage to themselves or others. No person shall request or receive anything that can be perceived as bribery, directly or indirectly, or through third parties, or perform their work roles in anticipation or consequence of bribery.

Wherefore, OdontoPrev Group established this Policy to prevent its direct or indirect, active or passive, engagement with corruption acts (i.e., acts prejudicial to the Public Administration), and wrongful activities (i.e., other wrongful acts not related to the Public Administration), aiming at

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Protecting its reputation and image before the clients, beneficiaries, shareholders, government and regulatory bodies, press, and other audiences. Hence, this Policy presents OdontoPrev Group's Anticorruption and Other Wrongful Acts Program and expresses the expected conduct from our management, employees, and suppliers of goods and services regarding prevention, tackle, and repression of the practice of acts or omissions characterizing corruption and/or wrongful acts. OdontoPrev Group's Code of Ethical Conduct is an inseparable part of the Program, and it shall be equally observed. We also highlight that the possible omissions in these two documents do not mean OdontoPrev Group's acceptance of the attitudes or practices from their management, employees, and goods and services providers contrary to the Laws and Rules in force, since said legislation is binding and of mandatory observance. Finally, we point out that the Brazilian Legislation supersedes these two documents in all aspects.

In case of questions, the Compliance area can be inquired for case analysis, according to the requirements of this Policy, Laws, and other rules in force.

5. ANTICORRUPTION AND OTHER WRONGFUL ACTS PROGRAM

5.1 Management

OdontoPrev Group's management is the key element of this Anticorruption and Other Wrongful Acts Program. OdontoPrev Group understands that any occurrence of corruption or wrongful act shall be duly prevented or detected since its management performs daily professional activities complying with the Code of Ethical Conduct and this Program, besides the other Company's corporate policies and operational procedures.

OdontoPrev Group's management shall be aware of the content in the Code of Ethical Conduct and this Program. Thus, the management shall always be alert to identify, interrupt, and communicate suspicious attitudes practiced by their subordinates, peers, suppliers of goods and services, or any person acting in the name of the Company.


At last, the management shall be aware that, for any merger and acquisition process, the engagement of the legal area shall be required to verify if the other party is involved in irregularities or wrongful acts as per Law No. 12.846/13, or if their controls and processes have vulnerabilities that can facilitate the breach of the referred Law, besides their traditional analyses.

5.2 Clinical-Operational Area

The Clinical-Operational Area is focused on the management of OdontoPrev Group's accredited network. The area performs countless analyses and reviews of each practice and dental surgeon before the respective accreditations and during the validity of the commercial/professional relationship. The accreditation contracts entered into the practices, and dental surgeons can be immediately terminated, at any time, in the event of

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breach of any of its clauses or the Accredited Manual, a document attached to the referred contract.

The Clinical-Operational Area also monitors the clinical procedures performed by the referred accredited network. Besides guaranteeing that the dental surgeons use the best dental practices for diagnosis, prognosis, and therapy, the monitoring aims to identify irregular conduct cases, which are forwarded to a specific Committee of the area responsible for the final analysis, and related actions are taken.

At last, the Clinical-Operational Area has a group of dental surgeons and administrative assistants specializing in the solution of all types of occurrences related to the accredited network, including suspiciously irregular conduct events. Overall, the occurrences come to the knowledge of this group through the various Company's communication channels, including the Whistleblowing and Ethical Conduct Channel and the Ombudsman. The proved irregular conduct cases are analyzed by the Committee mentioned in the previous paragraph.

5.3 Internal Audit


The Internal Audit area maps and audits the Group's several operational processes, seeking to detect risks unknown by the Administration or assess the controls' effectiveness to mitigate the known risks. Among the risks assessed by the Internal Audit are the "legal" and the "operational," closely connected to the actions by the management, employees, and suppliers of goods and services that can generate corruption and/or wrongful acts. OdontoPrev's Internal Audit answers to the Group's Board of Directors, guaranteeing their works are performed independently.

5.4 Whistleblowing and Ethical Conduct Channel

OdontoPrev Group's unrestrictedly encourages and supports the whistleblowing on any act or omission that might constitute a transgression to our Code of Ethical Conduct and the Legislation in force, including the Brazilian Anticorruption Law and Laws 8.666/93 and 10.520/02 (Bidding).

Whistleblowing on the practice of acts or omissions that, in the judgment and best knowledge of the whistleblower, might constitute a breach of OdontoPrev's Code of Ethical Conduct or the legislation in force shall be preferably performed via the Company's **Whistleblowing and Ethical Conduct Channel**, without excluding any other mean or channel available to the whistleblower if there is an impossibility of accessing the referred Channel.

Aiming at preventing any type of retaliation, the whistleblowing can be made anonymously, and the ones identified shall be handled in absolute secrecy. The assessment or coordination for this whistleblowing is operationalized by the control areas with a report to the Board of Directors, directly or indirectly, through the Audit Committee, and free of liability or

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operational authority on the Organization's activities (Internal Audit or Compliance, according to the internal regulation from the Assessment and Ethics Committee), guaranteeing the whistleblower's anonymity.

OdontoPrev's Group Whistleblowing and Ethical Conduct Channel can be found on the OdontoPrev Portal (<https://www.odontoprev.com.br/home/portugues/fale-com-odontoprev/canal-denuncia.xhtml>). As options, the whistleblower can submit their whistleblowing through e-mail (denuncia@odontoprev.com.br) or letter at the following address:

OdontoPrev Whistleblowing and Ethical Conduct Channel
Av. Doutor Marcos Penteado Ulhôa Rodrigues, 939 - Torre II - 14° andar
ZIP Code: 06460-040 - Alphaville - Barueri - SP - Brazil

It is desirable that any whistleblowing referred to the Whistleblowing and Ethical Conduct Channel have relevant details and are qualified with the names and/or personal information, if any, of all persons that have allegedly participated in the act of disrespect to the Code of Ethical Conduct, the corruption act, or wrongful act. The forwarding of material evidence shall also be very appreciated. Complying with these rules shall contribute to an effective assessment and accountability of the natural persons that practiced or contributed to the accomplishment of the act by omission.

In case of questions about whether an eventual act constitutes or not corruption, wrongful act, or disrespect to OdontoPrev Group's Code of Ethical Conduct, we encourage that the person inquiries their contact at OdontoPrev Group (in the case of suppliers of goods and services), their manager, or a member of the Assessment and Ethics Committee.

The result of the valid whistleblowing assessment is submitted to the Assessment and Ethics Committee, which will evaluate the case, determine the disciplinary actions (regardless of the hierarchical level), and make the recommendations for the enhancement of OdontoPrev Group's internal controls systems, if applicable. Legal penalties might be applicable, besides the notification or collaboration with the competent public authorities, depending on the severity and nature of the whistleblowing.


5.5 CIA and Ombudsman

The Integrated Service Center (CIA) and the Ombudsman are the structures responsible for attending to critical cases from beneficiaries, arising from the many existent channels: Service and Relationship Central, OdontoPrev Portal, social media, corporate clients, Whistleblowing and Ethical Conduct Channel, ANS, consumer protection bodies, press, among others.

Should the CIA or Ombudsman detect corruption or wrongful act, the referred case is passed to the Whistleblowing and Ethical Conduct Channel for assessment. On the other hand, wrongful acts perpetrated by the accredited network are referred to as the Clinical-Operational Area.

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5.6 Commercial and Service Cells

Within this Anticorruption and Other Wrongful Acts Program, the Commercial and Service Cells areas shall only participate in biddings and/or implement the start of the Public Administration's clients relationship after OdontoPrev Group's legal area approval and obtainment of signed contracts/amendments. The Legal shall issue an opinion on the adequacy of the bidding process to Laws No. 8.666/93, 10.520/02, and 12.846/13.

The Commercial area is also in charge of the commercial partners' acceptance process, including benefits administrators, brokers, intermediators, and commercial representatives, preventing the contracting of disreputable companies, suspect of engaging in unlawful activities or with a corporate or administrative structure that might generate a conflict of interests with OdontoPrev Group. The validations and analysis are intensified and furthered in these entities' acceptance, depending on the risk level attributed to each one. The acceptance process also includes formalizing the commercial relationship through a contract signed between the parties and reviewed by the Legal department.

5.7 Purchasing

The Purchasing area coordinates, through a set of rules, procedures, and controls, the approval and registry review processes of the traditional suppliers of goods and services, preventing the contracting of or maintaining disreputable companies in OdontoPrev Group's base suspected of engaging in unlawful activities or with a corporate or administrative structure that might generate a conflict of interests. The validations and analysis of the suppliers are furthered, depending on the risk level attributed to each one.

In addition, the suppliers' payment is only authorized for those duly registered.

5.8 Financial


The financial area, through its controls, seeks to prevent wrong or unlawful payments are made.

To enhance controls and ensure the adoption of all requirements and rules included in the Company's Payment Policy, besides the total fulfillment of the current legislation, the Financial Department (Accounts Payable area) and Compliance established a monthly monitoring process for payments considered suspicious or that, due to their characteristics, present a sign of irregular payment.

This monitoring is one of the Money Laundering Prevention Program pillars, fulfilling ANS's Normative Resolution (RN 117/15) and Law No. 9.613/1998 (Money Laundering Prevention Law). The monitoring should identify not only misappropriation, but payments that might represent any risk, suspect of money laundering, or acts prejudicial to the public administration.

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5.9 Legal

OdontoPrev Group's Legal is responsible for analyzing the participations of the OdontoPrev Group's companies in public bidding processes for the operation of dental plans along with the Public Administration bodies to guarantee that the provision of dental services to the beneficiaries linked to the referred entities are according to the internal rules of the Group and the bidding and anti-corruption laws in place. For such, the area issues a formal opinion for the processes considered in line with Laws No. 8.666/93, 10.520/02, and 12.846/13. As mentioned in topic 5.6 above, no client from the Public Administration is activated without the Legal's favorable opinion.

Besides the activity previously mentioned, Legal is a key player in this Program since it is also responsible for preparing and/or reviewing the contracts with the goods and services suppliers. As of the initial validity herein, all contracts with suppliers include the mandatory clauses of observance to the premises of ethics, anti-corruption, information security, and data privacy, where applicable. Legal shall only accept contracts without such mandatory clauses after the Compliance's analysis and agreement for the clauses regarding ethics and anti-corruption and from the Data Protection Officer (DPO) for the information security and data privacy clauses.

Another Legal's relevant role is the technical legal support in the merger and acquisition processes and the arrangements required to handle the occurrences, suspected or proven, of corruption and wrongful acts.

5.10 Compliance


One of the pillars of OdontoPrev Group's Compliance Program is the Integrity Program, defined according to the efficacy criteria provided in art. 41 of Decree No. 8.420/2015, and criteria of Law 12.846/13 ("Anticorruption Law"). This Anticorruption and Other Wrongful Acts Policy is one of the Integrity Program's pillars. Its premise is preventing the Company's and its controlled companies' structures from being used in corruption and other wrongful acts, including the financing of drug trafficking and terrorism.

The Compliance area has a key role in complying with the Guidelines included herein to prevent, detect, report, and interrupt the occurrence of irregularities, frauds, corruption, and other misappropriations. For an effective Compliance Program, all management and employees, from every hierarchical level with no exception, shall comply with and enforce the Company's Code of Ethical Conduct and the Anticorruption and Other Wrongful Acts Policy.

Also, as one of the Compliance Program pillars, the Compliance area is responsible for the required training arising herein, with the operational support from the Human Resources area. The training aim at disseminating and furthering the knowledge of the requirements and legal and regulatory responsibilities, as well as the anti-corruption and other wrongful acts' corporate guidelines.

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The Compliance area answers to OdontoPrev's Board of Directors, with immediate and periodic reports to the Audit Committee, assuring its works are performed independently.

At last, Compliance is liable for dealing with possible questions regarding this Policy's content and its application.

5.11 Information Security and Data Privacy

OdontoPrev Group has an Information Security Corporate Policy, which shall be followed by the management, all employees, and suppliers of goods and services. Its main goal is to establish an effective Information Security management and governance program to protect information assets and be the grounds for other information security-related policies and procedures.

Two distinct and separated teams form the corporate security's organizational structure. The Information Security and Data Privacy area, control area, manages and governs the information assets, preserving confidentiality, integrity, availability, authenticity, and legality. The Cyber Security area, operational area, is in charge of implementing and maintaining the technological controls over the processing, storage, and transmission of information through the local network or the Internet.

OdontoPrev Group's management and employees, as well as suppliers of goods and services, including their management, employees, and agents, in Brazil and abroad, shall also observe the determinations included in Law 13.709/18, known as LGPD ("General Data Protection Law"). OdontoPrev's Group shall prevent situations in disagreement with the referred law, identify, interrupt, and inform incidents and suspicious attitudes practiced by its management, managers, employees, suppliers of goods and services, or any person acting in the name of the Company. Information security and privacy measurements shall be adopted to protect personal data from unauthorized access and accidental or unlawful (incidents) situations, respecting the LGPD determinations.


Situations conflicting with the Information Security Corporate Policy or data leakage or leakage risk shall be immediately reported to the Data Officer (DPO - Data Protection Officer) and the Information Security and Data Privacy team.

5.12 Marketing

Under the scope of OdontoPrev Group's Anticorruption and Other Wrongful Acts Program, the Marketing area is in charge of presenting to the Assessment and Ethics Committee all promotional or institutional treats, gifts, courtesies, and benefits, with a unit value higher than the established by the Code of Ethical Conduct, offered to clients and suppliers of goods and services.

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5.13 Treats, gifts, and courtesies

The act of sending treats, offering gifts, or courtesies can be appropriate in building or maintaining relationships or commercial partnerships. However, gifts and treats are troublesome if they create a real or perceived conflict of interests or if they seem to influence a business decision. In this sense, facilitation payment is not allowed, regardless of existing local laws allowing this practice.

Offering and receiving treats is allowed, as long as it is limited to the limit value included in the Company's Code of Ethical Conduct, also observing, regarding the public agents or PEP, the regulations, policies, or codes of conduct of the respective public bodies and entities to which they belong and authorize such receipt. These treats can be single and exclusively offered as a courtesy to events, meetings, formal and institutional commitments for the advertisement and promotion of the OdontoPrev brand.

No employee, administrator, or manager of the OdontoPrev Group is allowed to deliver or receive gifts that cannot be characterized as treats, within the limits and criteria previously expressed, cash in-kind, or equivalent, from public agents or PEP, in their name or the name of the Group.

Should there be costs or expenses with public agents or PEP (e.g., food, accommodation, training/lectures, displacements, visits, etc.,) there shall be a provision of accounts informing the name of the Public Agent, PEP, body, or entity represented, and justification.

5.14 Sponsorships

The OdontoPrev Group has an Institutional Sponsorships Policy to provide transparency and formalize the guidelines and rules in these sponsorship's selection and management. OdontoPrev provides the opportunity for any entity or company to request sponsorship, as long as the rules established in the referred policy are followed.


The choice of the institutions to which we will direct efforts and resources shall also be guided by the criteria established in the Sustainability Policy.

5.15 Donations

The donations shall be granted only to non-profitable organizations admitted by the legislation in force.

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All donations shall be transparent and duly registered in the books and accounting registries, received or accompanied by a recognition letter from the charity institution to ensure the donations get the proper fiscal treatment. Besides, the donations shall comply with the local laws, regulations, or local internal policies.

Donations of a different nature shall be evaluated and previously approved by OdontoPrev Group's management. The donations to politicians and political parties were addressed on the item "Conduct with Public Agents."

5.16 Information and Registries Maintenance and Safekeeping

The information and registries of the operations and services are maintained in their original format or electronic files, according to the terms established by the legislation in force and responsibilities defined in its own corporate policy.

5.17 Prevention and Tackling Internal Fraud, Including Accounting


The OdontoPrev Group adopts specific measures to prevent the occurrences of fraud encompassing its management, employees, and other relationship audiences, through control procedures for the prevention and detection of irregular activities. Some of these procedures are mentioned in this Program (e.g., Internal Audit; Compliance; Whistleblowing and Ethical Conduct Channel; Financial; etc.).

On the other hand, all transactions and accounting and/or financial operations shall be documented, approved, and properly sorted to reflect the established in the base documents, accounting principles, and rules in force correctly and accurately in the financial statements. OdontoPrev Group prevents and tackles accounting frauds in these transactions, operations, and financial statements through internal controls performed by the Controllershship area, besides the actuation of the Internal and Independent Audits, and the supervision from the Audit Committee, Board of Directors, and Fiscal Council.

5.18 Human Resources

The Human Resources area has a set of procedures adopted in selecting the employees, aiming to prevent contracting people not aligned to the Company's Code of Ethical Conduct and this policy.

The Human Resources area has the key role of providing operational assistance and guaranteeing the adhesion and participation of the training regarding this Program, under the liability of the Compliance area, for the management, employees, and, where applicable, the selected suppliers of goods and services.

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5.19 Relationships with Investors

Besides its primary mission of clearly and transparently conveying information and results from OdontoPrev Group to the financial community, the Relationships with Investors area is the guardian of the Group's Code of Ethical Conduct section regarding privileged information and relevant facts. Adopting the necessary measurements, the area seeks to disclose important information and relevant facts absolutely symmetrically, without creating privileges, besides disseminating to the management and employees how they should handle privileged information and how they should negotiate with the Company's roles.


5.20 Conduct with Public Agents (ANS, CVM, Federal Revenue Office, etc.) or PEP

OdontoPrev Group does not adopt, encourage, or allow its management, employees, and suppliers of goods and services to practice any conduct constituting or resulting in acts prejudicial to the Public Administration, national or foreign, as provided in the Anticorruption Law, such as:

- Promising, offering, or giving, directly or indirectly, an improper advantage to a public agent or PEP, or to a third person related to them (e.g., family members, friends, etc.), to obtain an advantage in a business, investigation, or inspection of Public Administration bodies.
- Manipulating or defrauding the economic-financial balance of the contracts entered into with the Public Administration;
- Preventing or defrauding, upon adjustment, combination, or any other manner, the competitive character of a public bidding procedure or a contract arising from it;
- Obtaining or offering improper advantage or benefit fraudulently for modifications or extensions of contracts entered into with the Public Administration, with no authorization under the law, in an act calling the public bidding or in the respective contractual instruments;
- Hampering the investigation or inspection activity from bodies, entities, public agents, or PEP, or intervening in their actuation, including within the ANS and CVM scope.

In addition, aiming at the donation of transparent conduct, the management and any employee of the OdontoPrev Group follows the following guidelines in the interaction with public agents or PEP:

- Every contact (via telephone, in-person, or mail) with public agents or PEP is preferably performed by at least two administrators and/or employees from OdontoPrev. In the rare event that the contact was not made under this condition, a minute (via e-mail) is prepared to formalize the contact. Such document is referred to the manager or hierarchical superior of the administrator or employee who made or received the contact.
- Every phone contact with public agents or PEP is made via a piece of equipment provided by OdontoPrev, landline, or cellphone.

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- Every in-person meeting with public agents or PEP is held in OdontoPrev's facilities or the public body's official facilities.
- If there is any deviation of conduct from the public agent or PEP during the reunion, meeting, or event, immediately terminate the meeting and then report the fact to your manager or the Whistleblower and Ethical Conduct Channel as provided in item 5.4 herein.
- All electronic correspondence (e-mail) for public agents or PEP has the manager or hierarchical superior of the administrator or employee in copy. In addition, should the public agent or PEP forwards an e-mail to an OdontoPrev administrator or employee, the latter shall retransmit such e-mail to their manager or hierarchical superior.

At last, as established by Federal Law 13.165, dated September 29, 2015, OdontoPrev Group's companies will not make financial contributions/donations to political parties or candidates to positions in the Executive or Legislative Branches.

5.21 Training


The periodical and mandatory training regarding the provided herein is under the Compliance area's liability and encompasses all people indicated in item 2.

6. RESPONSIBILITIES

General Responsibilities	<p>It is the duty of the management and employees of the OdontoPrev Group, within this policy context, its daily activities, and decisions:</p> <ul style="list-style-type: none"> ■ To comply with this policy's provisions and other specific ones, more restrictive, that might be instituted over the terms included herein. ■ To observe the values and principles provided in OdontoPrev Code of Ethical Conduct. ■ To refrain from engaging in unlawful situations, such as acts of corruption and bribery. ■ To be transparent in the actions, mitigating improper interpretations by any interested party. ■ To act in compliance with the legislation and regulation in force on the subject matter. ■ To report to the Whistleblowing Channel situations highlighting or causing suspects of being directly or indirectly related to the practice of corruption or bribery, consumed or not.
Board of Directors	<ul style="list-style-type: none"> ■ To determine the institutional guidelines over the matter and support the Integrity Program for its effective application in the entire OdontoPrev Group, having as base the values and principles established in OdontoPrev's Code of Ethical Conduct.

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	<ul style="list-style-type: none"> ■ To evaluate the corruption or other wrongful acts reported by the Executive Board and/or Audit Committee. ■ To decide on these occurrences (corruption/wrongful) notifications to the competent public authorities.
Audit Committee	<ul style="list-style-type: none"> ■ To report to the Board of Directors any act of corruption or other significant wrongful acts that they might become aware of. ■ In the name of the Board of Directors, supervise OdontoPrev Group's Anticorruption and Other Wrongful Acts Program.
Executive Board	<ul style="list-style-type: none"> ■ To observe and fully follow the Code of Ethical Conduct and all OdontoPrev Group's corporate policies, besides the laws and rules in place and applicable to the activities of the areas under its responsibility. ■ To supervise its teams to act according to the precepts of the Code of Ethical Conduct and the other OdontoPrev corporate policies. ■ Through its daily attributions, it seeks to detect corruption and other wrongful acts, taking the appropriate corrective actions. ■ To assure the Legal's engagement in mergers and acquisitions. ■ To report to the Board of Directors any act of corruption or other significant wrongful acts that they might become aware of. In addition, to assure that the Internal Audit and Legal become aware of the referred cases.
Assessment and Ethics Committee	<ul style="list-style-type: none"> ■ To analyze the assessment results from the valid whistleblowing received by the several communication channels, especially the Whistleblowing and Ethical Conduct Channel, determine the corrective actions, disciplinary actions, and recommendations for legal actions and enhance the internal controls system, if applicable. ■ To analyze the matters of conflict of interests in disagreement with the Code of Ethical Conduct. ■ To assure that the infractions and breaches are followed by applicable disciplinary actions, regardless of the hierarchical level, without prejudice to the applicable legal penalties. ■ To inform the Executive Board and/or Audit Committee of the acts of corruption or other significant wrongful acts.
Area Managers	<ul style="list-style-type: none"> ■ To observe and fully follow the Code of Ethical Conduct and all OdontoPrev Group's corporate policies, besides the laws and rules in place and applicable to the activities of the areas under its responsibility. ■ To supervise its teams to act according to the precepts of the Code of Ethical Conduct and the other OdontoPrev corporate policies. ■ To maintain procedures and controls in operation to prevent and identify corruption and wrongful acts, including financial and accounting frauds. ■ To maintain procedures and controls in operation over the registries of operations and services provided, including accounting and fiscal, maintaining them accurately and registered within the terms established by the legislation in force. ■ To ensure all OdontoPrev Group's participation in public biddings

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	<p>Are previously analyzed by the Company's Legal.</p> <ul style="list-style-type: none"> ■ Only authorize payments of fees or expenses reimbursements for brokers, lawyers, agents, intermediators, consultants, etc., that are NOT related to corruption or other wrongful acts. ■ To follow this Policy when contracting suppliers of goods and services, besides the dental surgeons and practices accreditation processes; suppliers approval and commercial partners acceptance, benefits administrators, brokers, intermediators, and commercial representatives. ■ To assure that the contracts with their suppliers of goods and services include the mandatory clauses on the Code of Ethical Conduct, this Policy, and the Information Security Corporate Policy. To also assure the proper custody of contracts with its suppliers of goods and services. ■ To guarantee that its suppliers of goods and services receive a copy of the Code of Ethical Conduct, this Policy, and the Information Security Corporate Policy, when applicable, and become aware of their content. To also assure the proper custody of the documents proving such action. ■ To participate and assure that its teams and selected suppliers participate in the training on anti-corruption and wrongful acts. ■ To inform all situations, operations, or proposals suspected of being a corruption or other wrongful act to the area's executive officer, member of the Assessment and Ethics Committee, or Whistleblowing and Ethical Conduct Committee. ■ To submit to the Assessment and Ethics Committee the cases of conflict of interest described in the Code of Ethical Conduct (e.g., affective relationships; kinship; activities outside the OdontoPrev Group; gifts receipt; etc.), besides the cases of acquisitions of promotional/institutional treats, and expenses on meals whose unit or per person values are above the limit defined in the Code of Ethical Conduct.
Employees	<ul style="list-style-type: none"> ■ To observe and fully follow the Code of Ethical Conduct and all OdontoPrev Group's corporate policies, besides the laws and rules in place and applicable to the activities performed by the employee. It is worth highlighting that the absence of written policies and procedures does not exempt the employee from complying with the guidelines informed by OdontoPrev Group's management, laws and rules in place, and good management practices. ■ To participate in training offered on ethics, anti-corruption, and wrongful acts. ■ To inform all situations, operations, or proposals suspicious of corruption, wrongful act, or disrespect to the Code of Ethical Conduct and the Company's corporate policies to the immediate manager or the Whistleblowing and Ethical Conduct Channel.
Suppliers of Goods and Services	<ul style="list-style-type: none"> ■ Our suppliers of goods and services, including their management and employees, shall not violate the Code of Ethical Conduct from the OdontoPrev Group, available at the OdontoPrev Portal. ■ If not forbidden by contract, our suppliers' management shall

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	<p>Assure that the third parties they contracted to perform services to OdontoPrev Group are aware of our Code of Ethical Conduct and follow its principles and guidelines.</p>
Clinical-Operational Area	<ul style="list-style-type: none"> ■ To assure that only reputable dental surgeons and practices with an active registry at the CRO are accredited. ■ To permanently monitor the clinical procedures performed by the accredited network. To take the relevant actions in the identified cases of irregular conduct, including those connected to wrongful acts. ■ To assess all occurrences received by the several communication channels of the Company, identified or anonymous, against dental surgeons and practices. To take the relevant actions to the identified cases of irregular conduct, including those connected to wrongful acts. ■ Should acts of corruption or other significant wrongful acts be identified, inform them to OdontoPrev Group's Internal Audit or Executive Board.
Internal Audit	<ul style="list-style-type: none"> ■ To perform periodic audit tests to assure that the controls adopted by the Company, aiming at tackling corruption and other wrongful acts, are operating properly. To immediately inform the Assessment and Ethics Committee, Executive Board, and/or Audit Committee, all acts of corruption and other significant wrongful acts identified. ■ To support the Management in enhancing the processes and controls to prevent or detect corruption and other wrongful acts. ■ To assure that any whistleblowing received by the Whistleblowing Channel is duly assessed; analyzed by the Assessment and Ethics Committee; informed to the Audit Committee (significant), and properly addressed by the executive officers and managers in charge.
Compliance	<ul style="list-style-type: none"> ■ To clarify questions as to the application of this policy. ■ To periodically review and update the Anticorruption and Other Wrongful Acts Policy to keep it up-to-date, reflecting in its content any alterations in the direction of the OdontoPrev Group; ■ To encourage the compliance of the guidelines established herein; ■ To prepare, provide, and/or give periodical training on this Policy's content to the management, employees, and service providers, monitoring the adhesion of the target audiences; ■ To assure that any whistleblowing received by the Whistleblowing Channel is duly assessed; analyzed by the Assessment and Ethics Committee; informed to the Audit Committee (significant), and properly addressed by the executive officers and managers in charge. ■ To analyze the payments referred by the Financial Department considered suspicious or that, due to their characteristics, present a sign of irregular payment. ■ To develop and/or enhance monitoring tools aiming at identifying

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	<p>Signs of corruption and bribery.</p> <ul style="list-style-type: none"> ■ To accompany the legislations and regulations handling prevention and tackling corruption and other wrongful acts. ■ To analyze possible proposals for amendment of the anti-corruption clause's content with the Legal Department, possible specific adjustments proposed in its writing.
Information Security and Data Privacy	<ul style="list-style-type: none"> ■ To encourage the adhesion to the provision of the Information Security Policy. ■ To guarantee effective segregation of roles, separating the authorization, approval, and execution roles, and preventing the individual fraudulent actuation, disagreeing with this policy. ■ To guarantee that logical and physical accesses are aligned to the corporate policies and duly monitored, reducing the risk of unauthorized access. ■ To assure that the technological controls applied to the infrastructure are aligned to the information security program and compliant with the data privacy legislation in force. ■ To prepare, provide, and/or give periodical training on Information Security and Data Privacy to the management, employees, and service providers, monitoring the adhesion of the target audience;
CIA and Ombudsman	<ul style="list-style-type: none"> ■ To inform about any act of corruption or other wrongful acts identified to the Whistleblowing Channel.
Commercial and Service Cells	<ul style="list-style-type: none"> ■ To only start a relationship with clients from the Public Administration upon the Legal's opinion on the adequacy of the bidding process to Laws 8.666/93, 10.520/02, and 12.846/13. ■ To only start a commercial relationship with Public Administration entities (clients), commercial partners, benefits administrators, brokers, intermediators, and commercial representatives supported by a contract reviewed by Legal. ■ To assure that the contracts with clients, commercial partners, benefits administrators, brokers, intermediators, and commercial representatives include the mandatory clauses on the Code of Ethical Conduct, this Policy, and the Information Security Corporate Policy. ■ To obtain the minimum documentation and execute the acceptance process for the commercial partners, benefits administrators, brokers, intermediators, and commercial representatives before registering in the company's systems.
Controllership	<ul style="list-style-type: none"> ■ To ensure that its internal controls are effectively in place to detect errors or frauds in accounting operations or transactions and the preparation of financial statements.
Purchasing	<ul style="list-style-type: none"> ■ To assure that the Suppliers Management Policy is aligned to the Code of Ethical Conduct and this Policy. ■ To assure that the suppliers of goods and services' approval and registry review.

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	<p>Processes are being performed according to the Suppliers Management Policy, and that the process is performed before contracting.</p> <ul style="list-style-type: none"> ■ To assure that all requirements for products and services negotiated by the Purchasing Department are supported by all documentation required, as provided in the Supplier Management Policy. ■ To assure that the approval process for new Suppliers (natural or legal person) encompasses reputation surveys or that deter the contracting.
Financial	<ul style="list-style-type: none"> ■ To prevent improper or unlawful payments. ■ To perform monthly monitoring of payments considered suspicious or that, by their characteristics, present a sign of irregular payment and might represent a risk or suspicious of money laundering or acts prejudicial to the public administration.
Legal	<ul style="list-style-type: none"> ■ To issue an opinion on the adequacy of Laws 8.666/93, 10.520/02, and 12.846/13 for all public bidding processes for the continued dental assistance provision, presented by OdontoPrev Group's business areas. ■ When reviewing the contracts with their suppliers of goods and services, ensure that they include the mandatory clauses on the Code of Ethical Conduct, this Policy, and the Information Security Corporate Policy. ■ To support the Management in the merger and acquisition processes and the provisions required to handle the suspicious or proven occurrences of corruption acts and other wrongful acts.
Marketing	<ul style="list-style-type: none"> ■ To assure that any offer of treat, gift, courtesy, or benefit of a unit value higher than the limit defined in the Code of Ethical Conduct is supported by approval from the Assessment and Ethics Committee.
Human Resources	<ul style="list-style-type: none"> ■ To assure, in the employees' selection process, before the actual hiring, that the candidates are in line with the precepts included in the Code of Ethical Conduct and the Recruitment and Selection rules. ■ To enable anti-corruption training programs regarding this policy, under the Compliance area's liability, ensure that the management and all employees are duly guided and updated on their obligations and responsibilities.
Relationships with Investors	<ul style="list-style-type: none"> ■ To assure that all important information and the relevant fact of the OdontoPrev Group is disclosed to the market absolutely symmetrical. ■ To disseminate to the management and employees how they should handle privileged information and how they should perform negotiations with the Company's roles.

7. SANCTIONS

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The management and employees' failure to comply with this Policy, including negligence or voluntary failure, is subject to disciplinary actions, regardless of the hierarchical level, without prejudice to the applicable legal penalties. Members of the high management engaged in prejudicial acts shall be removed from their activities.

Besides the applicable legal penalties for the suppliers of goods and services, they can have their contracts terminated and answer for possible compensation for damages undertaken by the OdontoPrev Group due to the acts practiced.

In both cases, if the act is linked to the failure to comply with a law or regulation, OdontoPrev Group shall fully collaborate with the competent public authorities for the complete and correct assessment of the facts and accountability of the people who performed it.

The sanctions provided herein shall be applied considering the severity of the acts practiced and the consistency of the evidence obtained.

8. FINAL PROVISIONS

Considering that it is unlikely that the Code of Ethical Conduct and other policies, including this one, address all situations found in practice, we believe in everyone's sense of judgment, encouraging them to consult their immediate superior, Compliance area, or the Assessment and Ethics Committee in case of questions.

All OdontoPrev Group's employees are responsible for assuring they are familiar with the Anticorruption and Other Wrongful Acts Policy. The Compliance area provides periodic training to ensure the total adhesion and understanding of the document.

Situations conflicting with this Policy can arise unexpectedly in our daily lives; each of us is responsible for positioning ourselves concerning it, remembering that the legislation supersedes this Policy in all aspects.

The breaches to the Anticorruption and Other Wrongful Acts Policy shall be whistleblowed as per item 5.4. (Whistleblowing and Conduct Channel).

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