



**ANTI-CORRUPTION
POLICY**



Blau[®]
FARMACÊUTICA

THE MANAGEMENT

Blau Farmacêutica has always conducted its business on a foundation based on transparency, equity, trust and quality.

In this context, the Anti-Corruption Policy, together with the Code of Ethics and Conduct, was specially developed to guide our directors, employees and third parties about the current anti-corruption legislation, as well as to guide them on the expected behavior in the most varied situations faced in the day-to-day business.

We know that we are not always faced with easy and clear situations, but it is our duty to act with ethics, integrity and transparency, as we all have the responsibility to act correctly, not to share corruption in its most varied forms.

So, in case of doubt or if you have any concerns, share it with your department manager, with the Compliance Department or access our Ethics Line.

This is Blau: an innovative company, which seeks to be better every day, to ensure that as many people as possible can have access to the most valuable asset that exists: a healthy life.

GLOSSARY

Public Administration: comprises any and all bodies, autonomous agencies, companies or controlled entities directly and/or indirectly by the Federal Government, States, Federal District and Municipalities, including entities with legal personality under private law under control the public authorities and the foundations established or maintained by them, or any entity that depends on public resources for their maintenance, even if not exclusively;

Foreign public administration: for the purposes of Law No. 12.846/2013, comprises the state bodies and entities or foreign country diplomatic representations, of any level or sphere of government, as well as controlled legal entities, directly or indirectly, by the government of a foreign country. International public organizations and those maintained, albeit partially by resources from foreign countries, which are necessary for it to be able to carry out its objectives, are equated with foreign public administration.

Administrators: members of the Board of Directors, members of the instituted Committees and Directors of the Company;

Public servant: for the purposes of Law No. 12.846/2013, it is the person who, temporarily or without remuneration, exercises office, employment or public function in bodies, state entities or in diplomatic representations of a foreign country, as well as in legal entities controlled, directly or indirectly, by the public power of a foreign country or in international public organizations;

Gift: promotional object of communication, with no commercial value, with specific distribution purpose free to the consumer or end user and reinforcement of the corporate image;

Employees: permanent and temporary employees, interns and young apprentices of the Company;

Company: Blau Farmacêutica S.A.;

Board of Directors: deliberative body, whose competence is to examine and resolve on any subject of interest to Blau, with powers established in the Brazilian Corporation Law and the Articles of Incorporation;

Corruption: to promise, offer or pay to an authority, government official, public servant or professional of the private sector any amount of money or any other favors with the objective of obtaining an undue advantage that may interest their own or third parties. Law No. 12.846/2013 (Anticorruption Law) provides for the objective, administrative and civil liability of legal entities for the practice of acts of corruption against national and foreign public administration, including fraud in public tenders and public contracts;

Courtesy: any benefit offered free of charge or below market value to a public or private agent, received by a Blau employee, by suppliers or third parties. Example: presents, gifts, job offers, travel, meals, entertainment (tickets, invitations) etc .;

Fraud: can be defined as:

- a. Deliberately deceiving or covering up a reality against the Company or any other interested party (such as client, investors), in order to guarantee a personal benefit and/or unfair or illegal gain;
- b. False accounting, incorrect and intentional application of accounting principles and omission, falsification or alteration of accounting records, books, reports, tax records, indicator results, other documentation or authorizations;
- c. Theft, robbery, improper or incorrect use of the Company's resources, working hours or assets (as an example, but not limited to: buildings, equipment, vehicles, computers, money, documents, information, assets, stock, shares, *software* and intellectual property).

Managers: employees responsible for planning and directing the work of a group of individuals, monitoring the work and taking corrective measures when necessary. Managers are supervisors, coordinators, administrators and members of the Company's Management.

Hospitality: travel expenses (land, air, sea), accommodation, food;

Money laundering: illicit act used to mask the origin of illegal resources. Law No. 9.613/1998 provides for the crimes of laundering or concealment of assets, rights and values, as well as the prevention of the use of the financial system for illicit activities provided for in this law;

Anti-corruption legislation: any legislation, national or foreign, regarding anti-corruption practices, including Law No. 12.846/2013 (Brazilian Anti-Corruption Law), Decree No. 8.420/2015 (regulation) Law No. 12.846/2013), *Foreign Corrupt Practices Act* - FCPA (American anti-corruption law) and UK *Bribery Act* - UKBA (British anti-corruption law);

Bidding: administrative process conducted by a public entity to choose a supplier, with the objective of ensuring the constitutional principle of isonomy. Law No. 8.666/1993 establishes general rules on public tenders and contracts related to works, services, purchases, disposals and leases within the scope of the Powers of the Federal Government, States, Federal District and Municipalities;

Sponsorship: contribution of funds granted by the Company with the objective of supporting the promotion of projects, actions or events of initiative of third parties with a social, cultural, sporting, educational nature, among others, to obtain as a counterpart the disclosure to generate recognition of Blau's performance, adding value to the brand;

Objective liability: liability of the legal entity for an act that is harmful to the public administration, involved in its interest or benefit (exclusive or not) by its employees or third party acting on its behalf, regardless of the guilt or intention of the company legal person to practice the act. Accountability does not exclude the individual responsibility of the person who committed the wrongdoing (the latter will respond to the extent of their guilt for the act performed) or any other individual, author, co-author or participant in the wrongful act;

Retaliation: negative consequence imposed on a whistleblower after they made a complaint, questioned or expressed concern through the available channels or participated in an internal investigation;

Bribery: a form of corruption that consists of promising, offering, requesting, authorizing, providing, giving, receiving or accepting an advantage, payment or improper favor, directly or indirectly, to or from a person who occupies a public function or office, to practice or refrain from doing an act, in order to obtain or maintain business;

Third party: any person, whether an individual or legal entity, who acts in the name, interest or for the benefit of the Company, rendering services or supplying goods, as well as business partners, including, but not limited to, distributors, agents, brokers, intermediaries, resellers, consultants, etc.

INTRODUCTION

Blau Farmacêutica has always conducted its business with honesty, integrity and transparency. For this reason and in order to maintain its reputational image as a reputable company, the public commitment to zero tolerance for corruption and fraud is fundamental.

As we know, corruption harms democratic institutions, curbs economic development and contributes to political instability, thus causing a damaging effect on the economy and society, resulting in a breach of confidence in the market.

In this context, the Anti-Corruption Policy was developed to provide instructions and establish an effective management structure to identify critical situations and mitigate risks related to corruption, weaknesses and undue payments, giving clear responsibilities to administrators, employees and third parties, as well as addressing prevention, detection and response strategies.

Together with the Code of Ethics and Conduct, the Anti-Corruption Policy is also part of the Integrity Program instituted by the Company, in order to establish its commitment to fight corruption and to promote the values and principles of Blau Farmacêutica towards its employees, third parties, customers and society in general.

The engagement of all of us in the fight against corruption promotes Blau's reputational image, attracting business partners and the best talents with the same values, in addition to captivating customers and better business opportunities.

POLICY APPLICATION

This Anti-Corruption Policy is applicable to everyone who is part of Blau, including administrators, employees, interns, apprentices, as well as third parties, in Brazil and in our subsidiaries abroad.

We all have a responsibility to carry out our daily activities in an ethical and complete manner, within the law, safeguarding the Company's assets and reputation. It is also our responsibility to promptly report actions and suspicions of unlawful acts to the Compliance Department or Blau's communication channel - the Ethics Line -, which will provide serious and appropriate treatment.

The knowledge and commitment to the rigorous application of this policy and the anti-corruption legislation by our employees is a fundamental condition for them to be part of our team.

Directors, administrators and managers are expected to adopt model behaviors, so that their actions and behavior are reflected in other employees and third parties, and proactive actions are required to prevent and identify possible frauds, bribes and other illegal acts.

CONTEXT

Blau Farmacêutica is subject to the application of national anti-corruption legislation and the countries in which its subsidiaries are based - Argentina, Chile, Colombia, Peru and Uruguay.

In Brazil, Law No. 12.846/2013 known nationally as the Anti-Corruption Law and internationally as *Brazilian Clean Companies Act (BCCA)*, provides for strict liability (that is, regardless of the demonstration of guilt or intention to perform the act) of legal entities in the administrative and civil spheres, for harmful acts practiced against the national or foreign public patrimony, against principles of public administration or against the international commitments assumed by Brazil.

The law is applicable to business companies and simple companies, personified or not, regardless of the form of organization or corporate model adopted, as well as any foundations, associations of entities or persons, or foreign companies, which have their headquarters, subsidiary or representation in Brazilian territory, constituted in fact or by law, even if temporarily.

According to article 5 of this law, harmful acts can be described as:

- I - Promising, offering or giving, directly or indirectly, undue advantage to a public servant, or the third person related to it;
- II - Proven to finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for by law;
- III - Proven to use an intermediary, whether an individual or legal entity, to conceal or disguise their real interests or the identity of the beneficiaries of the acts performed;
- IV - With regard to bidding and contracts:
- a) Fail or defraud, through adjustment, combination or any other communication, the competitive nature of any public bidding procedure;
 - b) Prevent, disrupt or defraud the performance of any act of public bidding procedure;
 - c) Rule out or seek to rule out a bidder, through fraud or offering of an advantage of any kind;
 - d) Defraud public bidding or contract resulting from it;
 - e) Create, fraudulently or irregularly, legal entity to participate in public bidding or enter into an administrative contract;
 - f) Obtain undue advantages or benefits of modifications or extensions of contracts entered into with the public administration, without authorization in law, in the notice of public bidding or in the respective contractual instruments; or
 - g) Manipulate or defraud the economic-financial balance of the contracts entered into with the public administration;
- V - Hinder the investigation or inspection activity of public bodies, entities or agents, or intervene in their performance, including within the scope of the regulatory agencies and inspection bodies of the national financial system.

Although the anti-corruption law considers that the harmful acts are those practiced against the public administration, the Company prohibits these practices against any entities, be they public servants, private legal entities or individuals, and regardless of the amount comprised.

GIFTS, PRESENTS, HOSPITALITIES AND ENTERTAINMENT

The Company prohibits any payment, receipt, offering, donation or even promise, directly or indirectly, of undue advantage, in cash or benefits, with the objective of influencing business between Blau or its contracted third parties and Brazilian, foreign or third parties related thereof.

É the receiving of gifts, presents, hospitality, entertainment and courtesies by Blau employees is authorized, as long as it does not exceed the amount of R\$ 150.00 (one hundred and fifty reais) and provided that:

- It is not illegal;
- It does not set up an attempt at bribery or improper payment to exert influence;
- It does not cause embarrassment to the employee or to the Company if disclosed to the market;
- It does not violate this Policy, the Code of Ethics and Conduct or the Company's values.

It is not allowed to receive cash, whatever the amount, even when it is intended to defray hospitality expenses. Acceptance of a gift voucher or gift certificate is also not permitted.

The receipt of any object or kindness must be reported to the Compliance Department for control and valuation of what was received. In case of doubts about acceptance, contact your manager or the Compliance Department.

Receipt of courtesies above the allowed value

If you receive anything that exceeds the amount stipulated by this Policy, after due reporting to the Compliance Department, the gift must be returned to the sender, with an explanatory message about the terms of the Anti-Corruption Policy.

The following example is a suggestion of a thank you message, with due refusal:

Dear partner,

On behalf of Blau Farmacêutica, we thank you for your courtesy.

To comply with our Anti-Corruption Policy, I inform you that we cannot receive the courtesy offered.

Thank you for your understanding.

Invitations to events, lectures or workshops

Invitations to events, lectures or *workshops* free of charge with expenses paid by the supplier or customer, can be accepted as long as the expenses do not exceed the amount of R\$ 150.00 (one hundred and fifty reais).

The Company allows the acceptance of an invitation to participate in these events when carried out by a government agency or public servant, however the cost of expenses must be refused by our employees.

In both cases, the invitation can only be accepted as long as the event does not aim to influence business or any other situation that may constitute a conflict of interest.

Offering courtesies to third parties and customers

Blau admits the offering of presents, gifts, hospitality, courtesies and benefits to third parties (other than public servants), as long as it is not part of a contracting process, does not have the objective of obtaining an undue advantage and also meets the following requirements :

- It is not illegal;
- It does not set up an attempt at bribery or improper payment to exert influence;
- It does not cause embarrassment to the employee or to the Company if disclosed to the market;
- It does not violate this Policy, the Code of Ethics and Conduct or the Company's values.

If necessary the payment of expenses with travel or meals to third parties, in professional situations between the parties, such payments will only be allowed in specific situations, without extravagance and in accordance with the Travel Expenses Policy in force. The Company is not allowed to pay for expenses other than those mentioned.

Offering courtesies to public servants

Public servants are only allowed to offer institutional gifts, which have a promotional character and have no commercial value, duly identified with the Blau brand. If the product does not meet one of these criteria or if you have doubts about the nature of the object, do not offer it.

SPONSORSHIPS

The Company sponsors legitimate commercial events, in line with the business activities developed by Blau and also sponsors sporting and cultural events, as provided in the Sponsorship and Donation Policy.

To ensure that the sponsorship is not intended to mask illicit activities, such as money laundering, all requests must be duly formalized by means of a specific document (for more details on the procedure, refer to Sponsorship and Donation Policy) and submitted to the approval by the Commercial Director and the Chief Executive Officer, who will assess the purpose of the sponsorship, the institution it is intended for, its reputation, the nature of its activities, among other relevant factors.

The request for sponsorship involving public entities must follow this same procedure, but it will be further evaluated and approved by the Audit and Ethics Committee.

DONATIONS

Aware of its social responsibility, the Company embraces different social and cultural projects and believes that its support makes a difference, especially in the local community.

In this way, Blau allows and encourages donations to charities, with the most varied objectives, such as nursing homes, care for people with disabilities, projects related to education and health care, among others.

To ensure that the donation is not intended to mask illicit activity, such as money laundering, all requests must be duly formalized by means of a specific document (for more details on the procedure, see Sponsorship and Donation Policy) and submitted for approval. Department of Compliance and the Chief Executive Officer, who will assess the purpose of the donation, the institution it is intended for, its reputation, the nature of its activities, among other relevant factors.

The beneficiary must issue a supporting receipt and sign the Declaration of Conformity term, made available by the Compliance Department. The payment must be correctly and properly classified and accounted for by the Controlling Department.

Blau monitors the materialization of the project for which the donation was intended, in order to verify the fulfillment of the commitment assumed by the institution/entity and, otherwise, the Company communicates the competent bodies.

Institutional support granted to public bodies must follow this same procedure, but will be further analyzed and approved by the Audit and Ethics Committee.

POLITICAL CONTRIBUTIONS AND DONATIONS

The Company respects the different political aspects of the countries in which it operates, but does not allow political contributions and donations of any kind to be made (to political parties, coalitions, electoral committees and candidates), carried out directly by Blau or indirectly through third parties.

ACCOUNTING RECORDS

The Company is committed to establishing adequate internal controls to ensure that the accounting records comply with the accounting practices and principles, the tax legislation in force and the internal rules, valuing that the accounting and financial transactions are complete and faithful, duly approved, supported by the necessary documentation.

Blau does not tolerate any changes or adulterations in accounting and financial transactions and documents, management reports, performance indicators and does not accept the adulteration of any documents, whether they are medical certificates, invoices, receipts, etc.

Both the presentation and the conscious acceptance of false records, debt notes, receipts and/or invoices is strictly prohibited and will be subject to applicable disciplinary measures and legal sanctions.

RELATIONSHIP WITH THIRD PARTIES

In order to make assertive hiring, we carry out transparent tenders for the selection of our third parties, based on technical, objective criteria and in accordance with the Purchasing Policy. All contracts signed between the Company and third parties must have anti-corruption and agreement clauses in accordance with the precepts established in the Code of Ethics and Conduct.

To ratify the provisions of the Code, which is of fundamental importance to the Company and its team in conducting its business, we require that our third parties also strictly comply with the provisions contained in the anti-corruption legislation, taking care that their processes have the necessary controls to mitigate any risk of illegal activities and that its employees are trained to identify and report any suspicious activities.

Thus, we rely on the integrity and ethics of our third parties, especially our business partners, who are so important to our operations. We condemn any attitude to the contrary, which may have a negative impact on Blau's image and reputation.

Our third parties are committed to maintaining professional conduct, ethics and essential requirements for the provision of services or supply of goods. The loss of one of the requirements will result in your disqualification.

RELATIONSHIP WITH PUBLIC SERVANTS

The contact with public servants, including interactions resulting from inspections, bidding processes, obtaining licenses and permits, or for any other reason that leads to the development of ordinary business activities, must be carried out by a professional duly authorized and trained to do so. For more details, refer to the Public Servant Relationship Policy.

Contact with public servants should preferably be made through the department's electronic e-mail address or telephone contact provided with a recording whenever possible. All communication maintained with a public servant be filed through secure systems and immune to defrauding, in order to safeguard the interests of the Company in the event of a lawsuit.

Contact with public servants through e-mails, cell phones and/or other private technological communication tools is not permitted.

PARTICIPATION IN BIDDING

All Blau employees involved in bidding processes must ensure that legislation must be fully observed, in order to prevent any unlawful acts, including corruption, or situations that may lead to the impression of undue or unlawful influence, even if not.

Bidding information must necessarily be obtained through transparent and reputable practices. Such information must be received by third parties responsible for capturing the notices in all federal units or by public calls issued by the bidding agency itself.

The Company disapproves any information about bidding that may be obtained illegally or that provides privileges to the company, even if it does not cause losses to other competitors.

The presentation of price quotations practiced by the Company is not allowed without being requested by the public administration by official means, with the due identification of the administrative process, whether in the internal or external phase, including characterization of the object to be auctioned.

HOW TO AVOID ILLEGAL ACTS

It is of utmost importance the understanding of this Policy, which, in line with the precepts of the Code of Ethics and Conduct, aims to instruct everyone on the practices authorized and prohibited by the Company, in order to protect Blau and other interested parties, such as managers, employees, third parties and customers.

In order to prevent any kind of situation from being characterized as corruption, we must take certain precautions, such as:

- Avoiding any conduct that may seem improper;
- Never receiving, giving or promising money, presents, gifts, hospitality and other courtesies, the purpose of which is to provide an improper advantage, reward for any business done or imply an obligation;
- Never offering, giving or promising money, presents, gifts, hospitality and other courtesies to a public servant, whether national or foreign and regardless of the desired purpose, with the exception of institutional gifts;
- Never relating to people who have been convicted of corruption or administrative misconduct;
- Redoubling the attention when involving operations in countries known for corrupt practices;
- Analyzing inappropriately documented payments or expenses with special attention;
- Being suspicious of payments offered, requested or made in cash, especially when dealing with large amounts.

You can be investigated even if you participate directly or indirectly, regardless of fault, in the following situations:

- Approving payment of bribes;
- Providing or accepting false invoice;
- Relaying instructions for paying bribes;
- Covering up payment of bribes;
- Cooperating consciously with the payment of the bribe.

DISSEMINATION AND AWARENESS

For the practical application of the Anti-Corruption Policy, adequate internal and external disclosure is essential, covering not only Blau's managers and employees, but also their third parties. In this context, our managers constantly receive guidance from the Compliance Department.

To this end, the Compliance Department is responsible for carrying out a communication plan involving different communication vehicles, such as corporate social network, corporate e-mail, TVs in cafeterias, among other means.

Training will be provided annually to all managers and employees, to be carried out according to the schedule and procedures defined by the Compliance Department in conjunction with the Audit and Ethics Committee.

COMPLIANCE WITH POLICY

Compliance with anti-corruption legislation and this Anti-Corruption Policy is the duty and responsibility of all managers, employees and third parties of Blau.

In case of disobedience to the anti-corruption legislation, the Company can be held liable objectively, in the administrative and civil spheres, for harmful acts practiced in its benefit or interest, exclusive or not. Such accountability does not exclude the individual responsibility of its administrators and employees, whether they are authors, co-authors or participants in the illegal act.

The Anticorruption Law provides for the following administrative and judicial punishments, which can be applied separately or cumulatively, whatever they may be:

Administrative Sanctions

- Administrative fine of up to 20% (twenty percent) of the gross revenue of the legal entity;
- Publication of the condemnatory decision, causing reputational damage;
- Comprehensive repair of the damage caused.

Judicial Sanctions

- Loss of assets, rights or values that represent an advantage or profit directly or indirectly obtained from the infraction;
- Suspension or partial interdiction of its activities;
- Compulsory dissolution of the legal entity;
- Prohibition of receiving incentives, subsidies, allowances, donations or loans from public administration (including public or government-controlled financial institutions) for up to 5 (five) years.

The disrespect to any of the matters dealt with here must be duly reported, through the channels made available by the Company, so that the Compliance Department and the Audit and Ethics Committee can initiate an internal investigation to verify the facts.

After the investigation is completed and the illegal act is found, disciplinary measures will be duly taken, regardless of the hierarchical level, technical knowledge and degree of friendship. Among the measures that can be applied to employees, according to the degree of severity of the act performed, are:

- Warning;
- Temporary suspension (while the internal or external investigation lasts), with or without payment of the salary;
- Dismissal.

In case of non-compliance with this Policy by administrators and suppliers, the contract will be terminated, without prejudice to the applicable contractual sanctions.

Any unlawful acts known to the Company will be duly reported to the competent public authority and the offender, whether an individual or a legal entity, will be subject to civil and/or criminal liability.

EXPRESSES YOUR CONCERNS

If there is a situation in which you do not know how to proceed or are unsure which way to go, you are not alone! Blau has an Ethics Line that can help you, understanding the situation in as much detail as possible and assisting you with questions about how to move forward.

Ethics Line

Phone: 0800 892 5055

www.blau.com.br/compliance

Blau Ethics Line is a secure channel, maintained by an external company, where you can remain anonymous if you wish. The channel works 24 hours a day, 7 days a week, by phone, email or link on the Blau website.

No retaliation will be permitted against whistleblowers in good faith or for participating in an internal investigation. For more details, refer to the Whistleblower Policy.

Anti-Corruption Policy

Audit and Ethics Committee

Compliance Department

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