



**SPONSORSHIP AND
DONATION POLICY**



Blau[®]
FARMACÊUTICA

Approved by the Board of Directors at a meeting held on September 30, 2019 GLOSSARY

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

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

Company: Blau Farmacêutica S.A.;

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;

Donation: any contribution, financial or not, to a third party in which no consideration is expected;

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);

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;

Integrity Program: consists of a set of internal mechanisms and procedures, which systematically identifies, treats and manages the risks of violation of the Company's integrity, with the main objective of structuring, reinforcing the culture of institutional integrity, as well as preventing and combating potential acts of fraud and corruption;

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;

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

The Sponsorships and Donations Policy was developed in line with the Code of Ethics and Conduct and the Anti-Corruption Policy, and is part of the Integrity Program instituted by the Company, in order to sign its commitment with the fight against corruption and establish the guidelines necessary for the granting of sponsorships and donations.

Thus, Blau's principles and values must guide and prevail in sponsorships and donations, and must be applied by all involved - managers, employees and third parties of the Company, as well as their beneficiaries.

SPONSORSHIPS

The Company allows sponsorship of legitimate commercial events in line with the activities, strategies and businesses it conducts, as well as sponsorship of sporting, cultural, social and educational events. No sponsorship should be made as a way of obtaining an undue advantage or that could result in a negative image for the Company, its managers and employees.

All sponsorships must be duly formalized and submitted for approval by the Commercial Director and the Chief Executive Officer, who will assess the purpose of the sponsorship, as well as the institution for which it is intended, its reputation, the nature of the activities, among other relevant factors.

The sponsorship formalization instrument must clearly foresee the purpose for which it is intended and counterpart, in addition to containing anti-corruption and protection clauses for the Company's image.

INSTITUTIONAL SUPPORT

Financial support for events organized by public entities must be linked to the Company's institutional purpose or benefit the community in social, cultural, educational or sporting terms.

The Chief Executive Officer of the Company will have the prerogative to approve the support proposal, subject to a favorable opinion from the Compliance Department.

Institutional support must be supported by a written term that contains, at a minimum, the purpose for which it is intended and possible counterparts, in addition to the anti-corruption and protection clauses of the Company.

DONATIONS

Aware of its social responsibility, the Company embraces different social and cultural projects, as it knows the importance of taking care of our society and believes that its support makes a difference.

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

To safeguard the purpose of the donation, as well as the interests of the Company, it must be supported by a term called "Donation Request" (available on the intranet or by the Compliance Department) indicating, at least, the name of the institution; legal nature; address; developed activities; mission, vision and values; adoption or not of an entity's own Code of Ethics; institutional documents or information proving its existence; Bank data; origin of the request; purpose and value.

The request must be submitted for approval by the Compliance Department, which will assess the beneficiary's integrity and verify that the donation does not violate internal laws or regulations, nor does it constitute illegal payment. The Chief Executive Officer of the Company will have the prerogative to approve the donation, subject to a favorable opinion from the Compliance Department.

The beneficiary must issue a supporting receipt and sign the Declaration of Conformity term, in which the institution undertakes to act in accordance with the laws in force, especially the anti-corruption legislation. and Law No. 9.618/1998 Money Laundering Law.

The Accounting Department is responsible for carrying out the donation accounting properly and faithfully.

Donations to public bodies and institutions must follow this same procedure, but will be taken for further approval by the Audit and Ethics Committee.

POLITICAL CONTRIBUTIONS AND DONATIONS

Political contributions and donations of any kind, directly or indirectly, are not allowed, whether for political parties, coalitions, electoral committees and candidates.

Donations made in the employee's own name to the party to which they are linked is their sole responsibility and cannot be linked to the Company.

COMPLIANCE WITH POLICY

Violations of this policy or current legislation must be reported immediately by anyone à Responsible management and/or the Compliance Department (via e-mail etica@blau.com.br or Ethics Line, with due confidentiality guaranteed).

Failure by employees to comply with this standard may result in the application of disciplinary measures, according to the degree of seriousness of the act practiced, in the form of the CLT, which may result, including dismissal.

In the event of non-compliance with this Policy by administrators and/or third parties, the respective contract may be terminated, without prejudice to applicable contractual and non-contractual sanctions, under the terms of the legislation in force.

The occurrence of acts that, in the best knowledge of the Company, may be characterized as illegal must be brought to the attention of the competent authority for proper investigation.

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, helping you with doubts on 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.

Sponsorship and Donation Policy
Audit and Ethics Committee
Compliance Department
Phone: +55 11 4615-9400
Extension 9424
etica@blau.com.br
www.blau.com.br/compliance