

The logo for Viveo, consisting of the word "viveo" in a lowercase, bold, sans-serif font. The background is a solid teal color with three thin, dark teal curved lines that sweep across the page from top-left to bottom-right.

viveo

**Code of Ethical Conduct
of CM Hospitalar SA
and the Companies that
Comprise Viveo**

MESSAGE FROM THE PRESIDENCY

What makes health happen?

For us, it is a group of factors.

It happens when dedication meets excellence

When information meets intelligence

When the human touch meets technology. And, especially, when people who want to take care of lives come together.

We believe in the power of uniting people who want to strengthen the health sector. That's why we're an ecosystem of healthcare solutions that unites minds and high-performance brands in one place, and opens the door to the healthcare of the future by incubating innovations.

We are a complete and integrated platform to, more than offer services, offer answers with agility, precision and vision of the whole.

We are proud to be part of an ecosystem that thinks about people and that works to simplify the system from the inside, making healthcare access easier for those outside.

An ecosystem that has as standard the customer's vision, proactive attitude and predictive capacity to understand, un-complicate and solve the complex demands of our industry.

An ecosystem that believes that taking care of people is taking care of the entire chain: suppliers, hospitals, clinics, laboratories, healthcare professionals, patients, our employees.

Who cares and who is cared for, who is on the front line, who manufactures and who distributes inputs. It is even taking care of the planet, offering integrated, efficient and more sustainable solutions.

Being together, for us, is a cause. It means joining forces, leading solutions, inspiring the sector and, thus, evolve the entire system.

Simplifying the way for health to reach all people.

All Viveo Employees are responsible for ensuring a safe and healthy work environment. We value ethics and information transparency, preserve our environment and act with social responsibility.

In order to be successful and to create a solid reputation, we constantly act with integrity and we need an excellent synergy of all the people who directly and indirectly participate in this process.

That's exactly why we institute as a value, our way of being and acting, Integrity in the first place and we value the Integrity Program at Viveo: so that we all work in line with the principles and values of the corporate management of our companies, in particular respect for ethics and the terms and legislation relevant to each activity, the integrity of our employees, processes, products and solutions in our portfolio.

The integrity of our conduct is a commitment assumed by us and that must permeate all our relationships.

This Code of Ethical Conduct, together with the Anti-Corruption Policy and other policies instituted by Viveo, contains the compliance rules and the ethical and moral principles that must guide our daily work, ensuring a transparent operation that integrates quality, speed and ethics in meeting the needs of our customers and their patients, healthcare professionals, partners, investors and society in general.

We have the support and dedication of all Viveo Employees, in addition to our business partners, suppliers and third parties who do business on behalf of Viveo, in the unrestricted pursuit of integrity, and we are available to help you in any way possible.

After all, taking care of each life is our reason for existing. That's why we're here. Together. It's as simple as that.

Viveo Presidency

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1. INTRODUCTION

Viveo's Code of Ethical Conduct (" Code of conduct ") is the reference tool that helps all of us act with integrity in the business situations we encounter.

This document also contemplates the most important principles of ethical conduct that should govern Viveo's activities, defining its basic requirements and serving as a basis and guidance as to the behavior expected from its Viveo Employees.

Making ethical decisions goes beyond simply acting in accordance with a set of rules. Thus, the purpose of this Code of Conduct is to ensure that all transactions carried out by Viveo are carried out not only based on its corporate and moral values, but also with respect to ethics and current legislation.

This Code of Conduct applies to all directors, officers, directors, employees, interns, service providers, and any and all individuals and/or legal entities directly or indirectly related to Viveo, regardless of position or function ("Employees of Viveo"), who must strictly comply with all applicable laws, regulations and internal policies, including this Code of Conduct, as well as observe the highest standards of business ethics at all times.

No Viveo Employee has the authority to request any action that violates or exceeds this Code of Conduct, whether due to commercial or competitive demands, industry practices or requirements of any other nature.

Any Viveo Employee who deliberately violates this Code of Conduct, as well as authorizing or permitting its violation by a subordinate, will be subject to disciplinary action, including, but not limited to, termination from the Company and/or its subsidiaries.

2. VIVEO'S CORPORATE CULTURE

Our dream is to be present in all homes and hospitals in Brazil and take care of our consumers at all stages of their lives, from birth to maturity. We want to conquer new markets and expand our operations around the world.

We are a reference brand in the markets in which we operate, recognized for the excellence of our services and products, which contributes to the development of health in Brazil and worldwide.

2.1. COMMITMENTS

- Meet the needs of patients and our consumers, with high quality products and services, striving for family health care and daily hygiene.
- Develop activities with the attitude of someone responsible for success, complying with all current rules and ethical and quality standards.
- Pursuing the highest degree of performance, valuing the quality of the result of each project developed by Viveo to achieve high standards of performance and corporate responsibility.
- Encourage Viveo Employees to constantly seek the implementation of innovative ideas in their work processes and systems, aiming to increase productivity and competitiveness in the market and always ensuring the sustainability of the actions carried out.

2.2. Sustainable Agriculture

Ethics and transparency: Essential value that guides all our transactions. Our commitment includes the utmost respect for the individual rights of our patients and clients, acting in all our business models with the highest ethical standards and transparency. We believe that our success depends on the combination of talent, partnership and the performance of Viveo Employees, and we are committed to strengthening and maintaining an excellent work environment.

Focus on the patient: Our goal is to meet the needs of our patients and customers with high quality products and services. We focus our efforts on developing products and services that help patients live better lives for longer.

Quality and safety of products and services: We are constantly striving for excellence in our products and services, and we strive to achieve high quality standards in

everything we do. We are also committed to complying with all legal and regulatory requirements and adopting internationally recognized good practices.

Commitment to innovation: While working in the healthcare area, we maintain our commitment to research and seek to improve patients' access to healthcare through new business models, launching new products and actions that strengthen healthcare systems.

3. HONEST AND ETHICAL CONDUCT

Viveo trusts its Employees to demonstrate professionalism in all matters and not to participate in any illegal activity or activity that violates the terms of this Code of Conduct and other internal policies and legislation applicable to Viveo.

All relationships with customers, suppliers, competitors, government agencies, employees and government representatives must be guided by compliance with all applicable laws and regulations, including, but not limited to, anti-corruption and competition laws, in addition to laws and regulations relating to exchange controls and anti-money laundering.

3.1. KNOWLEDGE, RESPECT AND COMPLIANCE WITH THE CODE OF CONDUCT

During the exercise of any professional activity, Viveo Employees must always observe and comply with all provisions set forth in the Code of Conduct, in order to ensure strict compliance with all relevant legislation and with Viveo's principles.

3.2. ACTIVE PARTICIPATION

Viveo Employees must always position the Internal Controls and Compliance area when identifying any product, service, information, process or conduct that diverges from the principles and standards that make up the Viveo Integrity Program.

The Internal Controls and Compliance area, in turn, must demonstrate its engagement and commitment to Viveo's Integrity Program, taking initiatives and promoting actions

in line with Viveo's principles, acting with ethics and quality, leading by example, inhibiting and dealing with any and all conduct that disrespects the provisions of this Code of Conduct.

The Internal Controls and *Compliance* has the following responsibilities:

- Ensure compliance with this Code of Conduct;
- Develop and conduct biannual training regarding this Code of Conduct;
- Receive, document and handle internal and external suggestions and complaints;
- Receive and investigate internal and external complaints about irregularities, with the Audit, Risk Management, Compliance and Human Resources Committee ("Audit Committee") applying the appropriate measures; and
- Clarify anyone's doubts about the Code of Conduct.

3.3. CARE FOR THE ENVIRONMENT AND LABOR RELATIONS

The relationship between Viveo Employees must be guided by respect and professionalism, maintaining a balanced, healthy and cordial work environment.

Viveo promotes and values initiatives in favor of diversity and equality in the workplace, prohibiting and repudiating any type of discrimination, or prejudice, explicit or implicit (racial, gender, sexual orientation, religious, cultural, or of any kind), sexual exploitation and abuse, and forced labor conditions.

Viveo does not allow minors to be hired, except as provided for under current legislation, thus inhibiting any form of child labor.

These situations characterize crimes and must be denounced.

In carrying out their activities, Viveo Employees shall:

- Act with courtesy, respect and non-discriminatory behavior, ensuring the uses and customs of other cultures of people inside or outside Viveo.
- Conduct its activities honestly and appropriately, showing professionalism, integrity, and defending Viveo's assets and performance.

- Seek self-development by expanding and updating your knowledge.
- Inform Viveo's Compliance Department of matters and problems that may be contrary to the provisions contained in this Code of Conduct and harmful to Viveo's interests.
- Ensure the correct use of Viveo assets made available to them.
- Use personal protective equipment and respect and comply with work safety standards.

4. USE AND CARRYING OF PROHIBITED SUBSTANCES IN THE WORKPLACE

The preservation of health and physical integrity and safe and healthy working conditions for Viveo Employees are fundamental. Thus, everyone must commit to internal procedures and instructions that guarantee safety and health, as well as strict compliance with legislation.

Viveo does not tolerate any level of impairment of activities due to the misuse of such substances during working hours or while conducting Viveo business.

Except for the exclusive consumption of tobacco products in delimited areas, commonly called smokehouses, or in open areas, the use of drugs and tobacco products (cigarettes, cigarillos, pipes, cigars and derivatives or related products) on Viveo's premises is also expressly prohibited, as well as the permanence of Viveo Employees and/or third parties in any state of intoxication or in a state altered by the use of these substances. In the case of alcoholic beverages and drugs, possession is also prohibited on Viveo's premises.

Except for Viveo Employees who, due to their activities, are authorized to use them, the use of any firearms or other types of firearms is not allowed on Viveo's premises.

5. FREEDOM OF MEMBERSHIP

Viveo supports the right of all Viveo Employees to join trade unions and other organizations of their choice, as well as collective bargaining in support of their interests (the use of Viveo or Viveo resources and assets being prohibited, however, trademarks for these purposes).

Viveo does not discriminate against Viveo Employees who choose to form or join unions or other organizations, nor Viveo Employees who choose not to participate in these initiatives.

6. INSTITUTIONAL COMMUNICATION AND EXPRESSION OF OPINION

Viveo's institutional communication may only be carried out by persons expressly authorized by its officers or persons appointed by the Company's Executive Board, who may represent you and publicly express themselves on behalf of Viveo, and shall, in the exercise of this activity, act with responsibility and in line with Viveo's guidelines, as well as those present in this Code of Conduct.

Viveo Employees are encouraged by Viveo to, in their own name, support the cause and publicize Viveo's actions and activities, observing, therefore, internal policies on the subject.

Any public manifestations made by Viveo Employees that express political, religious and gender opinions, in any form, whether through articles, interviews, conferences or on social media, must make it clear and express that it is a personal manifestation, not related or endorsed by Viveo.

Viveo does not tolerate public manifestations, whether through articles, interviews, conferences or social networks that express opinions of a discriminatory nature, whether under religion, gender, race, sexual orientation, as well as moral and sexual harassment practices.

If there is a possibility of damage to the image of any Viveo company, or discriminatory practices repudiated by the Company, even if the statement is made on a personal

basis, such as in an individual social network of the Viveo Employee, the Audit Committee, after verification of the area of Internal Controls and Compliance, may adopt the appropriate measures, applying the premises established in this Code of Conduct.

7. USE OF VIVEO ASSETS

All Viveo assets, including information, equipment, vehicles, computers, software, resources, funds, facilities, personnel, trademarks, must be used only for legitimate business purposes.

All Viveo Employees must protect assets and ensure that such assets are well managed and efficiently used.

Equipment granted to Viveo Employees must be used exclusively for professional purposes. When requested by Viveo, whether for convenience, necessity or any other reason, the Viveo Employee must return all equipment and work resources granted in adequate conditions, except for the natural wear and tear of use.

8. CONFIDENTIALITY AND RESPONSIBILITY ABOUT PASSWORDS AND ACCESS AUTHORIZATIONS

Both physical access to Viveo facilities and access to systems are granted based on the role performed by each of Viveo's Employees, and are therefore personal and non-transferable.

Only persons who have been explicitly granted username and password access are allowed to roam Viveo's facilities and systems.

The information entered, generated or changed in the systems, as well as the approvals made, are the exclusive responsibility of the electronic user who accessed the system. Therefore, it is the full responsibility of the Viveo Employee to maintain the confidentiality of all passwords and access authorizations to corporate systems and e-mails, and it is prohibited to divulge, assign or share passwords with other people, either temporarily or permanently.

Due to the exposure to the risk that the sharing of an access password may cause, this conduct may subject the Viveo Employee to internal disciplinary sanctions and liability for all consequences and damages arising from unauthorized sharing.

9. E-MAILS, INTERNET AND INFORMATION SYSTEMS

Viveo respects the personal communications of its Collaborators via the internet and other means of communication. In turn, Viveo Employees undertake to make responsible use of the internet and other means of communication, computer systems and, in general, any other means that society makes available to them, always prioritizing development functions to carry out works of interest to Viveo.

The information produced and/or stored in Viveo's computer systems and equipment is its exclusive property. Likewise, corporate email is intended solely for business purposes.

Viveo reserves the right to access and monitor the use of its Collaborators' corporate email at any time, without the need for prior notice, for the purpose of verifying compliance with internal laws and regulations.

Personal e-mail and social networks may only be used in the work environment on an exceptional basis and never to the detriment of the Employees' fulfillment of their role at Viveo. Under no circumstances may personal emails be used to deal with matters related to the company.

Matters related to Viveo should not be treated or commented on social networks, under penalty of liability of the Employee for any damage caused.

The download of music, movies and other digital files for personal use is prohibited by Viveo, as well as the use or permission of software not licensed or not authorized by the institution.

10. USE OF THE VIVEO BRAND

The brand of Viveo companies and its partners may only be used by authorized professionals and always in accordance with Viveo's strategic and marketing objectives.

Improper and unauthorized use will make the Employee liable for all material and moral damages resulting from the action.

11. SUSTAINABILITY

Viveo values the environment and is committed to the best environmental practices, aiming at improving the efficiency of energy consumption, minimizing the production of waste and gas and noise emissions, as well as minimizing other social impacts.

All procedures carried out by Viveo must be preceded by a social and environmental impact analysis, with the aim of maximizing the sustainability of all operations.

Within these precepts, Viveo seeks partners and suppliers who share this concern and have a proactive attitude in managing environmental risks, managing the use of natural resources.

12. COMPLIANCE WITH RULES AND REGULATIONS AND PROFESSIONAL FAIRNESS IN PERFORMANCE OF ACTIVITIES

It is the duty of Viveo Employees to observe and respect the legislation and/or regulations applicable to the activities they develop, which include Viveo's principles and values, the conduct determined in this Code of Conduct and compliance with all laws and regulations applicable to Viveo and your business.

In this sense, Viveo reserves its right of recourse against those who have committed any infraction that causes any type of damage to Viveo.

13. CONFIDENTIALITY OF INFORMATION

Viveo Employees in the performance of their duties at the Company may have access to confidential information about businesses, customers, suppliers, business partners, among others. "Information confidential" include any non-public information of Viveo, including but not limited to financial, business information, documents and information regarding financial models, processes and products, software, hardware, among others.

Viveo Employees must safeguard and maintain confidentiality about all internal information about their activities, especially those relating to financial values, customer information, technological developments, operating strategies, as well as the volume of transactions for products or services.

Transaction information between Viveo and the market is strictly for interested parties. Thus, comments should never be made about Viveo's information in external environments and to third parties, in order to keep the information restricted and exclusively accessible to people who are formally involved in the operation.

Viveo prohibits its Employees from using privileged information that may be obtained in the exercise of their function, that is, using relevant information not yet disclosed to the market, of which they are aware and of which they must maintain secrecy, capable of providing, to themselves or others, undue advantage through the use or negotiation, in their own name or of a third party, with securities or confidential information, projects, systems and strategies of any Viveo company, even if such privileged information concerns a company that is not part of Viveo.

Viveo's confidential information must remain confidential for an indefinite period, and its use outside Viveo's interests and/or transmission to third parties at any time is prohibited.

14. BOOKS, RECORDS AND ACCOUNTING CONTROLS

Viveo's financial statements, books and records must accurately, clearly, completely and with adequate detail represent all of Viveo's businesses and operations.

False, misleading, incomplete, inaccurate or artificial entries in Viveo's books and records are strictly prohibited. All transactions must be recorded and managed in accordance with Viveo's accounting policy, and no funds or assets not recorded in the Company's financial statements may be established or maintained for any purpose.

No Viveo Employee shall engage in falsifying any accounting record or other business record, and shall respond fully and correctly to any inquiries made to them by Viveo's internal or external auditors or by auditors of any regulatory authority.

Viveo Employees who have knowledge of – or information relating to – any unregistered fund or asset or any violation of Viveo policy on financial data and business operations, must report such matter promptly to their supervisor or to the area of Internal Controls and Compliance.

15. CONFLICTS OF INTEREST

Viveo Employees must not engage in any activity or situation that conflicts with or interferes with the performance of their duties to Viveo, that is, Viveo Employees must not compete or allow personal or family interests to exert direct influence or indirect about Viveo's business.

A conflict of interest may arise in any personal relationship that could influence our ability to act in Viveo's best interest, or where our assessment of a circumstance could or appear to be affected by the possibility of a personal benefit.

A conflict may exist when you (or a member of your family): (i) have individual or family participation (first-degree relatives such as parents, siblings, spouses and children) in the business of, or participate in the administration or management of, any supplier, service provider, customer, competitor or any other organization that does business or wishes to do business with Viveo; (ii) making a business decision motivated by a personal interest; (iii) receive a personal benefit from a supplier, service provider, customer or competitor, such as gifts, payment for meals, transportation or lodging, regardless of the amount; and (iv) use Viveo assets or your position for private purposes.

Viveo Employees may not participate in decision-making processes for hiring and/or partnerships with companies and/or organizations in which they participate in the corporate structure or which have, as partners or managers, people with whom they maintain a natural or civil family relationship, except if duly reported to the Audit Committee and authorized by Viveo's Board of Directors.

In any event, it is essential that the interests of Viveo Employees do not conflict with Viveo's interests.

Viveo does not tolerate any type of favoritism, and Viveo Employees are expressly prohibited from:

- Misuse of your position at Viveo to appropriate corporate business opportunities for the benefit of yourself, your family members or third parties;
- Develop parallel and conflicting activities with Viveo's business; and
- Hire a supplier with a particular interest.

A conflict of interest is not necessarily a violation of the Code of Conduct, but not reporting it to the Internal Controls and *Compliance* is thus considered. Viveo Employees who find themselves in an actual or potential conflict of interest situation must immediately notify the Internal Controls and *Compliance*, as well as abstaining from participating in any decision related to the conflict of interest situation.

16.COMMUNICATION CHANNELS

It is the role of all Viveo Employees to act as guardians of this Code of Conduct. Through the available channels, Viveo Employees can easily (i) ask questions about the Code of Conduct and other compliance policies; (ii) report a conflict of interest; (iii) ask questions related to Viveo's Integrity Program; and (iv) file complaints about any

violation of the Code of Conduct, internal policies, regulations and legislation applicable to the Company.

If any Viveo Employee and/or any third party has any concerns or believes that any legislation or internal policy is being violated, Viveo provides the following access channels for questions, queries, anonymous complaints and other communications, which will be received and handled by the Internal Controls area and *Compliance*:

- **Email:** eticaviveo@deloitte.com.br.
- **Telephone:** 0800 721 9152 - service from Monday to Friday, from 7:00 am to 8:00 pm, and, outside these hours, via answering machine.
- Personal contact with members of the Internal Controls and Compliance area.
- **Mailing address:** Avenida Luiz Maggioni, nº 2727, Distrito Empresarial Luiz Roberto Jábali, CEP 14.072-055, Ribeirão Preto/SP (A/C Area of Internal Controls and Compliance).

Complaints made through the reporting channels made available by Viveo are operated by a specialized, external and independent company, ensuring even more confidentiality and security.

In order to guarantee the privacy of Viveo Employees, complaints made through the above channels may be made anonymously or identified, which will be treated, confidentially, by the company hired for this purpose and, subsequently, by the Internal Controls area and *Compliance*, in order to facilitate compliance and effectiveness of this Code of Conduct.

The Audit Committee has the necessary means to receive and process information about non-compliance with the Company's legal and regulatory provisions, especially through the submission of complaints from the Internal Controls and Compliance area.

In the case of sending complaints, for better analysis by the Internal Controls and Compliance area, it is desirable to inform, in addition to what the complainant deems convenient, the date and place of the facts; name of the accused or, at least, surname; and description of the allegedly practiced illegality.

All complaints will be evaluated with confidentiality, impartiality, objectivity, reasonableness, integrity and speed, with the company being contracted for this purpose and, subsequently, the Internal Controls and Compliance area committed to promptly providing a reasoned response to the complaint. In the case of anonymous reporting, the whistleblower may indicate an email and/or telephone so that the Internal Controls and Compliance area can send a response at the end of the investigation.

Viveo reinforces that the participation of Viveo Employees to ensure the effectiveness of this Code of Conduct is essential. Thus, Viveo will provide all the necessary instruments for the full security of the identified whistleblower against any type of retaliation. If the complainant finds any conduct that could be characterized as retaliation, the occurrence must also be reported to the company hired for this purpose, through the channels made available to Viveo by the Company, so that the appropriate measures can be taken.

17. APPLICABLE SANCTIONS

It is the obligation of all Employees to know and understand the content of this Code of Conduct, as well as comply with all the rules and ethical and moral principles set forth herein.

Viveo is committed to faithfully complying with the rules established in this Code of Conduct and will promote constant monitoring of its business activity and any and all employee conduct. No Employee has the authority to request or take any action that violates this Code of Conduct.

Any violation of the rules and/or guidelines of this Code of Conduct and legislation will result in the application of appropriate disciplinary measures, which may even lead to the application of warnings, dismissal of the employee for just cause and/or immediate termination of employment, without prejudice to measures applicable legal provisions, such as communication to the police and inspection bodies, and taking legal and administrative measures to hold the agent responsible and indemnify any and all damage that may be caused.

The decision regarding the definition of the penalty to be applied and the treatment of the specific case will be issued by the Audit Committee, at its sole discretion, taking into account the seriousness of the offense, the extent of the damage caused to Viveo and the professional history and disciplining the Employee.

When the violation involves members of the Executive Board, the Board of Directors, the committees or the Fiscal Council, if installed, the matter must be taken to the Board of Directors for evaluation and deliberation on the application of sanctions.

Any attribution of personal responsibility by the Employee will not restrict the right of return reserved to Viveo in the event of any damage caused to Viveo.

18.FINAL PROVISIONS

This Code of Conduct was approved at a meeting of the Company's Board of Directors held on April 7, 2021.

The Audit Committee will recommend to the Company's Board of Directors the relevant amendments to the Code of Conduct. Changes or insertions of new information must be approved by resolution of the Board of Directors.

Whenever there are changes or insertions of new information, the Company will publish and disclose the new version to Viveo Employees.

The Internal Controls and Compliance area is responsible for disclosing the Code of Conduct to all Viveo Employees, who must use it as a basis for carrying out their work. Disclosure must also be made to all contracted Collaborators.

Facts that do not comply with Viveo's Code of Conduct and Integrity Program must be forwarded to the Committee and will be analyzed by its members, who will decide on any penalties and remedial measures to be adopted.

This Code of Conduct, although seeking to exemplify prohibited conduct, does not present an exhaustive list of actions or omissions of such nature. Therefore, it is recommended that in all situations in which Viveo Employees may be faced with ethical issues, prior consultation with the Committee in case of doubt is recommended.

It is the responsibility of the Audit Committee, with the support of the Internal Controls and Compliance area, to keep the Code of Conduct updated and in line with the needs of the market and current legislation.

TERM OF ADHESION TO THE CODE OF ETHICAL CONDUCT OF CM HOSPITALAR SA AND OF THE COMPANIES THAT MAKE UP VIVEO

Name _____,
registered with the CPF/ME under No. _____,
bearer of identity card RG No. _____,
undersigned, hereby declares, under the penalties of the Law, that he is aware, knows and understands the terms Code of Ethical Conduct of CM Hospitalar SA and the companies that make up Viveo ("Company" and "Code of Conduct", respectively) and all its effects, and that it must observe its content in the exercise of its function, especially that:

- a) It is subject to disciplinary sanctions, without prejudice to civil, administrative and criminal sanctions for non-compliance with the Code of Conduct;
- b) It will conduct its business and functional practices ethically and in full compliance with the applicable legal precepts, with the Company's internal policies and with this Code of Conduct; and
- c) It will denounce any act or omission, of its own authorship or of third parties, verifiable or not, that constitute a violation and/or non-compliance with the Company's Code of Conduct and its ethical and moral principles.

As it is true, I sign this Term of Adhesion.

Place:

Date:

Employee Name: