




Anti-bribery Policy

Viveo's Anti-bribery Policy is the tool that directs and guides everyone to act with ethics, morality, integrity and transparency regarding business situations, day-to-day activities and the behavior expected by employees, third-party providers or Viveo business partners, in order to prevent and combat situations prone to acts of corruption, bribery and fraud, both in relation to public institutions and private companies. Along with a commitment to complying with the anti-bribery management system, Viveo aims to be an ecosystem of products and services for the healthcare sector, with companies specialized in each link in the chain, from manufacturing to delivery to the patient, with the mission to simplify the market with agile, reliable and innovative solutions, and the purpose of taking care of each life, from the patient to the healthcare professional, from the employee to the supplier.

- This policy is complementary to Viveo's other policies and procedures and is consistent with applicable laws and regulations against bribery practices;
- Viveo prohibits and does not tolerate any practice of corruption, bribery, payment or receipt of bribes with any business partner, whether with the Public Administration, national or foreign, or with private companies, based on Brazilian and international anti-corruption law;
- Viveo has a policy of zero tolerance for acts of corruption and the exercise of professional activities and commercial matters must always respect the laws and regulations in force, as well as the internal rules and policies of Viveo which prohibits and does not tolerate the offer or payment of facilitation to speed up or favor the analysis and obtaining of licenses, authorizations, permits, etc. to be performed by its employees or business partners;
- To establish, analyze and achieve the anti-bribery objectives, Viveo has the Compliance, Internal Controls, Internal Committee, External Statutory Audit, Risks and Compliance Committee and the Board of Directors;
- Viveo's Compliance and Internal Controls sectors have authority and independence in the exercise of their activities and represent the anti-bribery compliance function that reports directly to the CEO and to the Risk and Compliance Committee, composed of external members and members of the Board of Directors;
- Viveo encourages the raising of concerns based on good faith or a reasonable conviction and provides the Viveo Ethics Channel, where complaints are received by an external, specialized and independent company. Viveo warrants that no Employee or business partner will suffer any kind of retaliation or penalty due to delay or loss of business resulting from their refusal to pay or receive a bribe and/or to engage in any illegal or unethical conduct;
- Any violation of this and other Viveo policies and/or the Viveo Integrity Program and related legislation will result in the application of appropriate disciplinary and legal action;
- Viveo is committed to satisfying the requirements and to the continuous improvement of the Anti-bribery Management System (SGAS), through the monitoring of performance indicators and critical analysis;
- Complaints must be made through the ethics channels below, which may be anonymous or identified and are treated confidentially.

 CALL CENTER 0800 721 9152	 E-MAIL Send as an email etlcaviveo@deloitte.com	 ACCESS OUR SITE COMPLIANCE HELPLINE www.ethicsdeloitte.com.br/viveo/
---	---	--

Elaboration	Revision	Approval
Quality, Compliance and Internal Controls	Version 1.0 September, 2021	Audit, Risk Management, Compliance and Human Resources Committee; and Board of Directors