	<b>Policy</b>	<b>Code: Pol.001</b>
	<b>Anti-Corruption and Money Laundering</b>	<b>Type: Public</b>
		<b>Version: 00</b>
		<b>Date: 02/05/2020</b>

## 1. Purpose

This Policy seeks to define the guidelines for business and personal relations to prevent acts of corruption and money laundering.

## 2. Guidelines

Fundmed has always been guided by ethics and honesty in its activities and contracts. In decision-making, operational processes and contracting, Fundmed's values are present in order to achieve savings, assertiveness, and quality services. Through this Policy, actions are taken to prevent and repel any possibility of Fundmed's involvement in illegal acts, especially those characterized as acts of corruption with government agents or individuals, and money laundering.

### 2.1 Anti-Corruption and Money Laundering Laws.

Fundmed operates under Brazilian law and has contractual relationships with sponsors of medical research that may be of public or private origin, of national or foreign origin


Legislation:

- Law 12.846, on August 1, 2013, which provides for administrative and civil liability of legal entities for the practice of acts against the public administration, both domestic or foreign.
- International laws that require statements and information regarding Fundmed's internal controls when playing an administrative role in a contractual relationship.

### 2.2 Relationships

Relationships In professional or even personal relationships such as kinship and close friendship, in which one or more people are linked to Fundmed, it is necessary to keep Fundmed's interests above personal interests. It is prohibited, under any circumstances, to accept or offer benefits that may be understood as an attempt to induce or influence decision making at Fundmed that is not based on objective criteria and on the integrity of professional relationships, especially quality, trust, and transparency. Decision making will be based on technical, professional and ethical criteria in line with Fundmed's general guidelines.

Decision-making regarding the provision of services must be conducted through an objective and previously established process, such as quality measures or price quotations, in order to ensure the best cost-benefit ratio for Fundmed. Any choice or decision making based on personal advantage for members of the Boards, Executive Management, employees or

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anyone who has an influence on Fundmed's operational and strategic processes is unacceptable.

Relationships must strive for transparency, observing the appropriate administrative, legal, and financial purposes, as well as compliance with laws and contracts.

Fundmed uses the “Statement of Politically Exposed Person and Conflicts of Interest” form to record what each member of the Board of Trustees, Audit Committee, Executive Management, Executive Manager and Fundmed area Coordinators must declare regarding personal relations they have that may cause a conflict of interest. The form is renewed for each change in Management, position or function, and it is the responsibility of the aforementioned to update the form extraordinarily when the condition changes.

### 2.3 Conflicts of Interest and Conflicting Activities

A conflict of interest arises when a person or an organization can receive an advantage in a decision, thereby affecting the criteria of objectivity, independence and commitments to the principles of honesty, ethics and integrity and the values of the business.


Fundmed ensures transparency, professionalism and integrity in any decision-making process as well as the absence of any personal or professional conflicts of interest.

Fundmed respects privacy and personal choices, but nothing at work or in personal life should be done if it conflicts with responsibilities with the Institution or interferes with the quality or performance of work, ones professional commitment, or their decision-making ability, including the sale and exchange of private goods or from family and friends on Fundmed's premises.

The exercise of professional activities on behalf of Fundmed must preserve good relationships with the different segments of society as well as with public agents. Any participation in festivities and events must take place with respect for the principles and guidelines of Fundmed's Compliance Program, Internal Policies and Procedures. When in doubt, the immediate supervisor or the Compliance Officer should be consulted.

The Boards, Executive Management, Employees, and Researchers must refuse to participate in any decision-making in which they may have interests that influence or may be seen as influencing their ability to make an objective decision or to fulfill their responsibilities with Fundmed.

The Boards, Executive Management, Employees and Researchers must inform the Compliance Officer, in writing, regarding any activities, financial interests or external relationships that may involve them, directly or indirectly, in a conflict of interest, using the Fundmed conflict of interest form for this purpose.

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Any possible conflict of interest will be properly analyzed, which includes considering whether it is appropriate to resume discussions or activities involving the conflict. When in doubt, the leaders or the Compliance Officer should be consulted in search of a joint solution, or if possible, to reduce potential losses resulting from it.

#### 2.4 Gifts, Presents and Entertainment.

It is inappropriate to give or receive gifts if these actions are not strictly in accordance with the principles and guidelines of Fundmed’s Integrity Program, Internal Policies and Procedures.

You must not give or receive gifts or entertainment benefits that are not in accordance with the policy adopted by Fundmed or that may raise questions about the personal and professional integrity and independence of Fundmed.

Gifts, presents, entertainment benefits and work meals may be offered and accepted when considered simple courtesies consistent with usual practices of respect and cordiality and that exclude any influence on Fundmed decision making. This possibility also applies to gifts, meals or entertainment during events or conferences.

Even when exchanged for reasons of personal friendship or professional relationship, gifts or entertainment benefits can be perceived as an undue advantage. Always act with transparency and Management’s knowledge to avoid that type of situation.


Fundmed acts in such a way that any third party does not feel obligated to make a donation or to give personal favors in exchange for an advantage with Fundmed. Boards, Executive Management, and Employees must take extreme care when receiving proposals for donations that are not in line with the purpose and objective of Fundmed activities. When in doubt, the leaders or the Compliance Officer should be consulted. Ignorance of the rules does not justify any non-conformities, even if in good faith.

In the relationship with public agents, especially with regard to receiving or offering gifts and donations, anti-corruption guidelines and legislation must also be observed.

#### 2.5 Code of Ethics and Conduct

Fundmed's Code of Ethics and Conduct defines the ethical behavior guidelines that guide all people who are linked to Fundmed's activities and services. This Code defines the inappropriate conduct that can generate conflicts of interest, materialization of operational risks and illegal conduct that can harm the community and Fundmed itself.

Training and promotion of the guidelines are held periodically, maintaining the culture and stating appropriate behavioral for those who are subject to the Fundmed Code of Ethics and Conduct.

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## 2.6 Reporting Channel

Fundmed makes a Communication Channel available to the general public for complaints and reports of misconduct. The Channel is also available for the public to ask questions and request support in matters related to conduct, behavior and illegal acts. The reporters have the option of anonymity when reporting, and Fundmed promises to evaluate, treat and, if applicable, investigate all registered reports of the Communication Channel.

## 2.7 Investigation and Internal Control

Reported cases are dealt with and investigated internally, looking for evidence and proof to corroborate any situation that does not comply with the Law or the Fundmed Code of Ethics and Conduct.

In cases considered corruption and money laundering, Fundmed will report it to the competent authorities so that the proper due diligence can be done, providing documentation and full cooperation and support with public agents to ascertain the extent of the infraction and any liability.

Fundmed maintains accounting and financial records in accordance with Brazilian law, maintaining and improving good internal control practices to mitigate the risks of error and fraud.

## 2.8 Anti-retaliation of Complaints and Consequences

The FUNDMED Anti-Retaliation and Consequences Guideline is intended to ensure protection from identification or retaliation for reporting non-compliant situations with the FUNDMED Code of Ethics and Conduct, also defining the consequences for the verified and proven cases of breach of conduct. Anti-retaliation measures and consequences are determined by pre-defined criteria and issued by the Compliance Committee.

## 2.9 Compliance Committee

The Fundmed Compliance Committee is responsible for spreading a culture of Compliance at Fundmed, ascertaining responsibilities for misconduct or violation of the Fundmed Code of Ethics and Conduct through supporting documentation and reports, defining a consequence, i.e., a measure disciplinary or remedial action to maintain the integrity of Fundmed and its staff.

## 3. **Temporality**

This Policy is valid for each FUNDMED Presidential term and should be reevaluated with each new term.

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<b>Developed by:</b>	<b>Revised by:</b>	<b>Approved by:</b>
Mariel Elizeire <b>Aid   Compliance</b>	Betina Bria <b>Executive Manager</b>	Fernando Grilo <b>President</b>

<b>Min Policy Alterations</b>		
<b>Date</b>	<b>Version</b>	<b>Alteration Made</b>
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## Attachments

### 1. Statement of Politically Exposed Person and Conflicts of Interest - FUNDMED

#### STATEMENT OF POLITICALLY EXPOSED PERSON AND CONFLICTS OF INTEREST - FUNDMED

This Statement will be valid as long as the issuer maintains their current relationship with Fundmed. Changes in the condition of a Politically Exposed Person or with a conflict of interest must be immediately registered in a new statement with the Fundmed Compliance Officer.

Characterization of a politically exposed person or with conflicts of interest:

I. An issuer who performs or has performed, or whose representatives, family members and other persons of close relationship, perform or have performed, in the last 5 (five) years, relevant positions, jobs or functions such as :


- I - Holders of elective terms from the Executive and Legislative Powers of the Federal, State or municipal government;
- II - Occupants of office, in the Executive Branch of the Federal, State or Municipal Government;
- III - Occupants of position in a non-governmental health agency, either Brazilian or international;
- IV - Occupants of positions on Committees, Councils, Governing Bodies or on the staff of private pharmaceutical and/or health research companies.

Examples of close relationships are considered situations such as: constitution of a politically exposed person as a proxy or agent; habitual movement of financial resources from or to a politically exposed person not justified by economic events, such as the acquisition of goods or provision of services.

I declare, in accordance with Fundmed's Anti-Corruption and Money Laundering Policy, my condition in relation to qualifying as a politically exposed person or with a conflict of interest:

- Yes, I qualify as a politically exposed person or with a conflict of interest.
- I do not qualify as a politically exposed person or with a conflict of interest.

If Yes, complete the table below:

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Name	Situation*	Position / Job / Public Position	Period	
			From	Until

\*Such as: proponent, wife of proponent, attorney of proponent.

Place and date:

Full name:

ID Card No.:

CPF (Individual taxpayer registration number):

\_\_\_\_\_

Signature