

Ethics and Conduct Manual

INDEX**GRANBIO'S CODE
OF ETHICS AND
CONDUCT**

PRESENTATION	4
1. PREAMBLE	5
2. PRINCIPLES OF CONDUCT	6
3. COMPLIANCE WITH GRANBIO'S LAWS, REGULATIONS & INTERNAL RULES	7
4. PROHIBITION OF CORRUPTION PRACTICES	8
5. ETHICS AND CONDUCT COMMITTEE	10
6. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY	11
6.1. QUALITY, HEALTH, SAFETY AND ENVIRONMENT (QSSMA)	11
6.2. BIOSECURITY	13
7. CONFLICT OF INTERESTS	14
7.1. GRANBIO'S CONFLICT OF INTERESTS X PERSONAL INTERESTS	14
7.2. CONFLICT OF INTEREST PUBLIC x PRIVATE	16
7.3. ACTIVITIES OUTSIDE GRANBIO	18
8. ENTERTAINMENT, GIFTS, DONATIONS AND SPONSORSHIPS	19
9. RELATIONSHIPS	21
9.1. WITH CUSTOMERS	21
9.2. WITH SUPPLIERS	22
9.3. WITH THE PUBLIC AUTHORITY	23
9.4. WITH UNIONS	26
9.5. WITH BUSINESS PARTNERS AND COMPETITORS	27
9.6. WITH THE PRESS AND THE ADVERTISING MARKET	28

10. INFORMATION	29
10.1. CONFIDENTIAL	29
10.2. PRIVILEGED (INSIDER TRADING)	30
10.3. ON SOCIAL NETWORKS	30
10.4. COMMUNICATION CHANNELS AND COMPLAINTS	31
10.5. RULES AND PRINCIPLES TO THIRD PARTIES	32
11. INTELLECTUAL PROPERTY	33
12. POLITICAL ACTIVITIES	34
13. USE OF ASSETS	35
14. EXPLOITATION OF ADULT AND CHILD LABOR	37
15. DISCRIMINATION AND MORAL OR SEXUAL HARASSMENT	38
16. USE OF DRUGS AND ALCOHOL AND CARRYING WEAPONS	39
17. VIOLATIONS	40
18. GENERAL PROVISIONS	41
ANNEX I. GRANBIO'S ETHICAL AND CONDUCT GUIDELINES	42

CODE OF ETHICS AND CONDUCT OF GRANBIO INVESTIMENTOS S.A. AND SUBSIDIARIES

PRESENTATION

Dear members,

On the next pages, you will have the opportunity to learn about GranBio's Code of Ethics and Conduct. It clearly and precisely translates our commitment to ethics and integrity. It is not just a declaration of principles, but also a description of the values and commitments that must guide our daily conduct in internal and external relationships.

It is important to always remember that we will be recognized for our attitudes and for the level of confidence and seriousness that we manage to pass on to the people with whom we interact.

I therefore expect from all GranBio members, without exception, respect and faithful compliance with the guidelines of the Code of Ethics and Conduct. Our permanent challenge is to grow consistently, transparently and sustainably, which implies never giving up ethics and integrity.

Bernardo Gradin – Founder, GranBio

01

PREAMBLE

This Code of Ethics and Conduct (“Code”) is intended for all members, including employees, managers, directors and shareholders (jointly, “Members”) of GranBio Investimentos S.A. and the companies controlled by it (“GranBio”), and aims to provide for the ethical principles and standards of conduct that should guide internal and external relations, in order to encourage an ethical, honest, transparent, healthy work environment free of any prejudice or injustice.

The guidelines in this Code make it possible to assess most situations and minimize the subjectivity of personal interpretations of moral and ethical principles, but they do not necessarily detail all situations that may arise on a day-to-day basis. Therefore, *in case of questions in the application of the rules set forth herein, the Member must consult with the Leader of his area or GranBio's compliance area (compliance@granbio.com.br).*

02

PRINCIPLES OF CONDUCT

Without prejudice to the other provisions of this Code, GranBio guides its activities and businesses by observing the following principles of conduct:

- Trust and respect for people
- Ethical, honest and transparent conduct
- Productive and relevant innovation for the common good
- Recognition of merit
- Lead by example
- It matters what is right, not who is right
- Passion for what you do



03

COMPLIANCE WITH GRANBIO'S LAWS, REGULATIONS AND INTERNAL RULES

It is the obligation of GranBio and its Members to comply with the specific legislation of each country in which it operates and any other rules that may be applicable. Respect for standards is not limited to complying with the law, but also observing the guidelines provided for in this Code, in the Environmental Compliance and Biosafety Manual, in GranBio's specific corporate governance policies, among other policies adopted by GranBio.

GranBio must provide regulatory, self-regulatory and supervisory authorities with all necessary collaboration, promptly responding, whenever appropriate, to requests made to it and not adopting any behavior that could impede the regular exercise of supervision by the competent authorities.

04

PROHIBITION OF CORRUPTION PRACTICES

Any practice of corruption, in all its active and passive forms, whether through acts or omissions, or through the creation and/or maintenance of situations of irregularity, favoritism or fraud, is prohibited. GranBio and its Members will neither pay nor receive bribes or bribes, including cross-border ones. GranBio does not tolerate the practice of harmful acts against the Public Administration, national or foreign.



GranBio does not accept or support any initiative related to “money laundering”, which is understood as a process carried out to hide or legitimize illicit financial resources. It is important that everyone stay tuned for the following events:

- Unusual forms or complex payment patterns;
- Unusual transfers to/from countries unrelated to the transaction;
- Customers and/or suppliers with operations that appear to have little integrity;
- Customers and/or suppliers who are anxious to avoid record keeping requirements; and
- Transactions involving locations previously associated with “money laundering” or tax evasion. Financial transactions involving, directly or indirectly, top-notch banks headquartered in a tax haven must be analyzed and approved by GranBio's legal department.

Any indication of the occurrence of the events mentioned above must be communicated to your Leader or to GranBio's compliance area (e-mail: compliance@granbio.com.br), noting that any and all acts of corruption and impropriety will also be forwarded to public authorities.

05

ETHICS AND CONDUCT COMMITTEE

GranBio has an Ethics and Conduct Committee, whose installation occurs ordinarily every quarter and extraordinarily when requested by one of its members.

The Ethics and Conduct Committee has autonomy and independence to investigate and judge cases of violation of this Code and impose appropriate disciplinary sanctions.

It is also incumbent upon the members of the Ethics and Conduct Committee to disseminate, resolve doubts and provide guidance on compliance with this Code, as well as to prioritize the attributions of this Committee to the detriment of any other of their respective responsibilities.

The list of members of GranBio's Ethics and Conduct Committee is available on the website: www.granbio.com.br

06

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

6.1. QUALITY, HEALTH, SAFETY AND ENVIRONMENT (QSSMA)

GranBio's activities are permeated by sustainable actions based on socio-environmental responsibility. All GranBio's activities comply with the quality, health, safety and environmental legislation applicable to GranBio. The risks involved in GranBio's activities are identified, analyzed and managed, with a view to maintaining the health and integrity of its Members and preserving the environment.



GranBio will continuously conduct training with all Members to learn about routines and responsibilities related to its activities.

Members must know the health, safety and environment policies, procedures and practices and strictly comply with them.

A preventive posture must be adopted by all Members in their work environment, by identifying possible risk situations and immediately communicating them to the Leader of their area so that immediate actions can be taken. Service providers contracted by GranBio must comply with all legal requirements and health, safety and environmental procedures applicable to their activities.

In emergency situations, such as accidents, whether environmental, process or work-related, those involved must follow the procedures provided for each situation and quickly report the facts to the Leader of their respective area. Only officially appointed spokespersons will be able to give interviews or make announcements to authorities and the community. Accidents, due to their unexpected nature, can cause damage, directly or indirectly, to the environment, health and life.

6.2. BIOSECURITY

Biotechnology is one of GranBio's scientific pillars. It is compulsory for the company and its Members to observe good laboratory practices, as well as the responsible use of natural genetic resources.

All GranBio Members directly involved in working with genetically modified organisms (GMOs) are duly trained and equipped for such activity, which in turn is subject to periodic internal audits.

GranBio has an Internal Biosafety Commission (CIBio), which is responsible for faithful compliance with biosafety standards and inspection mechanisms provided for in the applicable legislation on cultivation, production, handling, transport, transfer, import, export, storage, research, commercialization, consumption, release into the environment and disposal of GMOs and their derivatives.

07

CONFLICT OF INTERESTS

GranBio Members must act to prevent and, if applicable, remedy situations of conflict of interest that may occur both in relation to GranBio and its Members and in relation to GranBio and the public authorities.

7.1. GRANBIO'S CONFLICT OF INTERESTS X PERSONAL INTERESTS

In this case, there is a conflict when the personal interests of any of the Members compete with the interests of GranBio. In these situations, it is possible that decisions do not take GranBio's interests into account, and may even cause damage to GranBio's image and reputation.

The Member may not perform external activities, such as providing consultancy or holding a position, in organizations with conflicting interests or that do business with GranBio, except upon prior analysis and approval by the legal area, the compliance area or, eventually, the Ethics Committee and Conduct.

Corporate ties, whether own or through a spouse or family members, with suppliers or competitors of GranBio, are also not accepted if the position held by the Member gives him or her the power to influence transactions or allow access to privileged information.

Members who occupy positions in external entities or have a spouse or family members who also work at GranBio, at competitors, at suppliers or at clients, must notify the fact in writing, as soon as possible, to their Leader or the compliance area (e-mail: compliance@granbio.com.br / phone: +55 11 2739-0506), which will assess any conflicts of interest and competition with working hours. "Family members" are considered to be family members up to the third degree: father, mother, child, brother, grandfather, great-grandfather, grandson, great-grandson, uncle and nephew. For the purposes of this Code, relatives by affinity are also considered, namely: spouse, partner, son-in-law, daughter-in-law, father-in-law, stepfather, stepmother, stepson and brother-in-law.

Situations of conflict of interest should be avoided whenever possible, noting that, in this case, the Member must report immediately to their Leader, to any GranBio Vice-President or to GranBio's compliance area who may, in turn, submit the fact to GranBio's Ethics and Conduct Committee for the purpose of resolve the conflict in a fair and transparent manner. Members will inform their impediment in the face of any commercial transactions with participating companies whose owners, partners and/or representatives have a personal relationship with the Member himself or with his family nucleus.

7.2. CONFLICT OF INTEREST PUBLIC x PRIVATE

In addition to the situations described above, other precautions must be adopted in order to prevent conflicts of interest between private and public activities. In this case, a conflict of interests is considered to be the situation generated by the confrontation between public and private interests, which may compromise the collective interest or improperly influence the performance of the public function.

The following behaviors are prohibited:

- maintenance of business or contracting by GranBio of companies in which a public agent, his spouse, partner or relatives, consanguineous or similar, in a direct or collateral line, up to the third degree, with the aim of influencing his management acts;
- offer of gifts to public agents in whose decisions GranBio has an interest, with the exception of gifts, whose value is less than BRL 100.00;
- hiring, even indirectly or as a consultant, of a public agent while in office or within a period of six months after leaving office, except in cases where the law authorizes hiring;

- use of privileged information received from a public agent who had an obligation to keep it confidential; and
- acting with or in partnership with public servants who are family members of the Members and who have decision-making power in the scope of GranBio's businesses and operations.

Complementary rules on the prevention of conflict of interests may be adopted by the Ethics and Conduct Committee.

7.3. ACTIVITIES OUTSIDE GRANBIO

Without prejudice to the provisions of the items immediately above, Members undertake not to engage in any external professional activity that interferes with the performance of their duties at GranBio and not to develop private professional activities during the working day, except upon prior analysis and approval by the legal area, the compliance area or, eventually, the Ethics and Conduct Committee.



08

ENTERTAINMENT, GIFTS, DONATIONS AND SPONSORSHIPS

Offers of gifts (including travel, accommodation and any other benefits or advantages), entertainment, donations and sponsorships must not influence GranBio's decisions at any time, nor be used as a form of reward for any decision.

Expenses with gifts and entertainment given to public agents or received from people who are involved in GranBio's business must not exceed the value of BRL 100 (one hundred reais) and are only acceptable if they are not understood as a form of influence, bribery or corruption.



Offering gifts of any value to public agents who have the power to influence decisions in which GranBio has an interest is prohibited.

In the event that the value of a gift to be received by a GranBio Member exceeds the stipulated maximum limit, the Member must refuse the gift and inform about GranBio's policies. If refusal is not justifiably feasible, the legal and compliance areas must be informed, in order for the gift to be formally donated to any charity selected by GranBio.

Donations and sponsorships up to the amount of BRL 1,000,000.00 (one million reais) must be approved by the Chief Executive Officer with the monitoring of GranBio's legal and compliance areas, observing that any donations and sponsorships that exceed this amount must be approved by GranBio's Board of Directors.

Violation of the provisions of this item leads to dismissal for just cause of the offending Member, at the sole discretion of GranBio's Ethics and Conduct Committee, without prejudice to applicable civil, administrative and criminal sanctions.

09

RELATION -SHIPS

9.1. WITH CUSTOMERS

It is GranBio's commitment to contribute to its customers' value creation process by meeting their expectations and developing innovative solutions.

GranBio does not discriminate against customers, whether by origin, economic size or location. However, it reserves the right to terminate any commercial relationship whenever its interests are not being met or, even, when the relationship is not in line with this Code, represents a legal, social or environmental risk.

Information about our products and services must always be clear and true. Technical data, in particular safety, health and environment requirements, will be obligatorily communicated to customers.

Each product must strictly follow the legal requirements of the market for which it is intended.

It is prohibited to make improper payments to anyone in order to facilitate the sale of our products or services, even if we lose business opportunities.

Members are responsible for maintaining the confidentiality of confidential information passed on to them by their clients and partners.

9.2. WITH SUPPLIERS

GranBio only deals with suppliers that comply with the country's labor and environmental legislation, that are not included in the National Register of Companies Declared Disreputable and Suspension (CEIS), that do not directly or indirectly exploit child or slave labor, that respect the anti-corruption legislation of the countries where they operate and, preferably, with those who are committed to social responsibility practices in their production chain.

GranBio undertakes to select and hire its suppliers based on technical, professional and ethical criteria, conducted through predetermined processes that make it impossible to decide to favor personal interests, friends or relatives, ensuring GranBio and its customers the best cost-effectiveness.

In addition, contracts to be entered into with suppliers should preferably contain rules prohibiting fraud and corruption practices, as well as the respective penalties to be applied in case of infringement. GranBio may terminate a business relationship whenever a supplier disrespects the provisions of this Code, there is damage to its interests or disregard of legal, ethical, tax, environmental and occupational health and safety issues.

9.3. WITH THE PUBLIC AUTHORITY

It is strictly forbidden to promise, offer or give, directly or indirectly, an undue advantage to a public agent, or a third person related to him, with a view to obtaining favoritism.

With regard to public tenders and contracts, including concessions and public-private partnerships, any conduct tending to:

- frustrate or defraud, through adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- prevent, disturb or defraud the performance of any act of public bidding procedure;
- remove or seek to remove bidders, through fraud or offering of advantage of any kind;
- to defraud a public bidding process or the resulting contract;
- create, fraudulently or irregularly, a legal entity to participate in a public bidding process or enter into an administrative contract;
- fraudulently obtain an undue advantage or benefit from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the public bidding act or in the respective contractual instruments; or
- manipulate or defraud the economic-financial balance of contracts entered into with the public administration.

The payment or offering of undue advantages to a public agent with a view to accelerating or favoring the analysis of an administrative procedure, including with a view to obtaining licenses, authorizations, permissions or any other measures of a regulatory or inspection nature, will also not be accepted.

It is also prohibited to hire intermediaries or brokers to act on behalf of GranBio with public bodies, except in the cases expressly provided for in Law or Regulation.

GranBio's Members are committed not to involve it in partisan or political matters of any kind.

In this sense, GranBio's Members will not make monetary or other contributions to political parties on behalf of GranBio, anywhere in the world.



The provision of information to all spheres of government, including municipal, state and federal public bodies, must always be done in writing, through a protocol and with due guidance from the legal area and the compliance area.

Whenever a demand is presented by a government representative, including an inspection representative, the Member must submit it to the legal area and the compliance area before forwarding it. If a court order is presented to any Member, the Member must cooperate, but immediately contact the legal area and the compliance area for assistance and prior guidance on how to proceed.

GranBio reserves the right to publicly comment on government policies and decisions that may affect the progress of business and the relationship with Members or customers. This act, however, can only be exercised or authorized to the Member by the Chief Executive Officer of GranBio.

Members must not use GranBio's name in dealing with personal matters of any nature in their relationship with the government.

In addition, in the event of meetings with any public agent, the Member representing GranBio must (i) request the inclusion of the hearing in the public agenda of said authority; and (ii) obligatorily appear accompanied by another Member.

9.4. WITH UNIONS

GranBio respects free association, recognizes trade unions as legal representatives of its Members and seeks constant dialogue.

Negotiations and dialogue with these partners, on behalf of GranBio, must only be carried out by formally authorized persons.



9.5. WITH BUSINESS PARTNERS AND COMPETITORS

GranBio is guided by the principle of free competition.

All market and competitor information, legitimate and necessary for the business, must be obtained through transparent and reputable practices, not admitting its obtaining by illicit means. Here, illicit means are illegal and morally unacceptable ways of accessing confidential information.

Members are prohibited from adopting any attitude that tarnishes the image of competitors or commercial partners of GranBio.

GranBio's businesses must be guided by compliance with the Laws, GranBio's values and this Code, and all Members are responsible for ensuring compliance.

Arrangements with competitors for the purpose of abuse of economic power, arbitrary or anti-competitive commercial practices, such as agreements on prices, sales conditions or division of customers or sharing of competitively sensitive information, must not be promoted with competitors.

9.6. WITH THE PRESS AND THE ADVERTISING MARKET

GranBio adopts an objective and clear position in disclosing information and seeks to satisfy the interests of the parties involved.

Contacts with the press will be promoted exclusively by the communication area. Therefore, unauthorized persons are prohibited from contacting the press on behalf of GranBio. Members must not promote the disclosure of confidential or untrue information in the press.

Contact with media professionals should under no circumstances be treated as a commercial relationship. In this way, it does not involve favors or payment of any kind.

The relationship with the press should prioritize the disclosure of relevant facts and the promotion of GranBio's businesses. The highlight should be, whenever possible, directed to GranBio's activities. GranBio's Communication Manual establishes the guidelines for correct contact with the press.

All advertising by GranBio must be truthful, only involve public information and avoid exaggeration; arrogance, arrogance or prejudice is not tolerated. GranBio's institutional advertising must follow guidance from the communication area and must be previously approved by the legal area and the compliance area.

GranBio condemns misleading advertising. GranBio's product and business marketing initiatives are characterized by respecting current legislation, ethics and local and international reference standards.

10

INFORMATION

10.1. CONFIDENTIAL

Information that has not been made public by GranBio's institutional area (such as, for example, acquisitions or sales, industrial secrets and investments) must be kept confidential, unless disclosure is authorized by any of its Vice-Presidents. In the event that confidential information is entrusted to GranBio by professionally involved third parties, GranBio and its Members undertake to protect such information so that it is not disclosed improperly.

This obligation remains in force even after the Member leaves GranBio. The use of confidential information for personal use or for third parties is a crime and may be subject to labor and criminal sanctions, in addition to dismissal for just cause, at the discretion of GranBio's Ethics and Conduct Committee.

In lectures and participation in seminars and other public events, the secrecy of confidential information about GranBio and its business must be strictly respected.

Both participation as an exhibitor at events and the topics to be exposed must be previously approved by the Leader of the Member involved, as well as by the communication and compliance areas.

10.2. PRIVILEGED (INSIDER TRADING)

The purchase and sale of shares or securities of companies based on privileged information that has not been disclosed to the public and that may have an impact on the value of negotiations is prohibited.

Members are subject to GranBio's Securities Trading Policy.

Disclosure of such information to third parties and trading in securities based on insider information are civilly and criminally punishable.

10.3. ON SOCIAL NETWORKS

GranBio expects from its members a professional conduct permeated by the company's ethics with regard to the dissemination of information about the day-to-day work at GranBio on social networks such as Facebook, LinkedIn, X, Instagram, and others. Information that may tarnish the image of GranBio or other Members or that is covered with confidentiality, if posted on social networks, may subject the person who has done so to sanctions provided for in item 17 of this Code.

10.4. COMMUNICATION CHANNELS AND COMPLAINTS

A Member who becomes aware of a violation of any aspect of this Code, by any person, cannot omit himself and must communicate this fact: (i) the compliance area (e-mail: compliance@granbio.com.br) or the Leader of your area; or (ii) through the reporting channel available on GranBio's website (www.granbio.com), under the condition of total anonymity.

The compliance area will be responsible for receiving these complaints (which may be anonymous, at the whistleblower's discretion), investigating them and submitting them for consideration, as applicable, to the Ethics and Conduct Committee.

Any retaliation against a member who, in good faith, reports illegal conduct or contrary to the guidelines established in this Code will not be allowed and tolerated.

Suggestions, criticisms, compliments and requests for clarification regarding ethical issues and the application of this Code may also be sent through the reporting channels.

10.5. RULES AND PRINCIPLES TO THIRD PARTIES

GranBio's members undertake to inform their partners, customers, suppliers and employees ("Third Parties") about the ethical rules and principles contained herein so that they are effectively practiced throughout their value chain.

Such information can be easily accessed on the GranBio website, without prejudice to the availability of material on the subject to the Third Party in question, under the terms of Annex I to this Code, which must be included in our agreements and dealings with Third Parties.



11

INTELLECTUAL PROPERTY

Intellectual property is a strategic asset for GranBio. It includes patents, trademarks, business secrets, know-how, technical data and process and market information, among other items that would benefit a competitor if they were known.

The result of work of an intellectual nature and strategic information generated at GranBio is the exclusive property of GranBio.

Members are responsible for handling confidentially the information on intellectual property they have access to as a result of their work, using them carefully. Disclosure of this information is not permitted without the express authorization of GranBio's Vice-Presidency.

Confidential information in response to legitimate requests from government authorities may only be provided after considering that they will be treated confidentially and after adequate measures have been taken to protect their confidentiality, subject to prior consultation with GranBio's legal and compliance areas.

12

POLITICAL ACTIVITIES

GranBio is not involved in partisan political activities. If any Member wishes to engage in any type of political activity, they must do so independently, without requesting help, support, participation, funding or any kind of involvement from GranBio and other Members. All political activity must be carried out outside the work environment and office hours, without any resources from GranBio, and any form of broadcasting of political propaganda on the premises or any property of GranBio is prohibited.



13

USE OF ASSETS

The use of GranBio's assets must be done in a responsible and conscious manner and in accordance with GranBio's business purposes, and must be restricted to the professional activity of the Member in question. The use of these assets must not generate unnecessary costs for GranBio and cannot be used to transmit information of a discriminatory, illegal nature or that is not in line with the principles of conduct and ethics presented in this Code.

Electronic systems and information technology resources are available to Members for the proper performance of their duties. Its use for personal matters is permitted as long as it does not go against internal rules and guidelines or jeopardize the progress of the work. The exchange, redemption, storage or use of obscene, pornographic, violent, discriminatory, racist, defamatory content that disrespects any individual or entity and is contrary to GranBio's policies and interests is prohibited. Games and chain messages are also not allowed.

The access password to the systems is for exclusive personal use, not being allowed to be granted to third parties, even to a co-worker.

Any type of software and programs must not be copied or installed on GranBio's computers without prior authorization from GranBio's Information Technology department.

Members acknowledge that all data produced as a result of their professional practice are the exclusive property of GranBio. The company can access any information recorded or transmitted in its system at any time, and the Member has nothing to complain about in this regard.

Assets include: tools, equipment and machines, computers and technologies, electronic information systems, mobile phones, automobiles, office supplies, information, including privileged and sensitive information.



14

EXPLOITATION OF ADULT AND CHILD LABOR

GranBio does not use slave or child labor. Likewise, GranBio does not do business with entities that use slave labor or child labor, requiring a declaration by the contractor that it does not use slave labor or child labor in the provision of its services.



15

DISCRIMINATION AND MORAL OR SEXUAL HARASSMENT

GranBio considers human rights to be fundamental and universal principles and seeks to consolidate its practice based on this recognition. In addition, GranBio is committed to developing and maintaining a healthy work environment that values respect for its members, ensuring the right to working conditions that respect individual dignity and the regulations in force.

In this sense, GranBio is committed to promoting an environment free of any type of harassment, verbal or physical (or situations that constitute disrespect, intimidation or threat), or discrimination, whether based on gender, race, sexual orientation, religion, age, nationality, origin, union membership or any type of disability, under penalty of dismissal for just cause of the Member who violates this rule, at the sole discretion of GranBio's Ethics and Conduct Committee, without prejudice to applicable civil and criminal sanctions.

It is characterized as harassment when someone in a privileged position uses this advantage to humiliate, disrespect or embarrass a subordinate or co-worker. Moral harassment occurs when someone is exposed to humiliating situations during the workday. Sexual harassment is aimed at obtaining sexual advantage or favor.

In the recruitment, selection and promotion processes, candidates must be assessed solely and exclusively on their ability to meet and adapt to the expectations of the position and GranBio's ethics.

16

USE OF DRUGS AND ALCOHOL AND CARRYING WEAPONS

GranBio promotes a work environment free of illicit drugs and alcohol during working hours. In this sense, it is the obligation of all Group Members to report to work free from the effects of illegal drugs or alcoholic beverages. Possession, use, sale, distribution or any type of exchange of illicit substances in the work environment is prohibited, under penalty of dismissal for just cause of the Members involved, at the sole discretion of GranBio's Ethics and Conduct Committee, without prejudice to applicable civil and criminal sanctions.

On commemorative occasions or at promotional events, such as dinners with clients or partners, moderate use of alcohol may be tolerated.

Furthermore, weapons of any kind are not allowed on GranBio's premises, except for professionals expressly authorized to do so.

17

VIOLATIONS

Unless otherwise provided herein, noncompliance with any of the provisions of this Code will subject the violating Member to the following disciplinary sanctions, without prejudice to other applicable sanctions in accordance with the legislation in force: (i) verbal warning; (ii) written warning; (iii) suspension; and (iv) dismissal for just cause.

In the processing and judgment of situations of violation, the alleged offender will be given the opportunity of full defense. Sanctions will be applied and graded in a transparent, reasonable and proportionate manner, as follows:

(i) the seriousness of the breach; (ii) possible recurrence; and (iii) damages caused to GranBio, including with regard to compromising the work environment and its image before third parties.



18

GENERAL PROVISIONS

This Code will be in force for an indefinite period, and must be reviewed at a meeting of GranBio's Board of Directors with a minimum frequency of 2 (two) years.

The conduct guidelines contained in this Code will be made known to all GranBio Members through training, posters and other informational materials, and will also be available on the website: www.granbio.com.br or directly with the compliance area.

It is up to Leaders, at all levels, to ensure that their subordinates and contractors know and apply the precepts of this Code, which must be an example of conduct to be followed by all Members.

ANNEX I**GRANBIO'S
ETHICAL AND
CONDUCT
GUIDELINES**

- GranBio, the companies controlled by it and their members (“GranBio”) base all their business activities on respect for ethics and integrity.
- GranBio does not pay or accept to receive any type of advantage that could be understood as a form of payment of bribes or corruption.
- Gifts given to or received from third parties cannot exceed the value of BRL 100.00 (one hundred reais) and they are not offered or accepted by GranBio in any circumstances where there is a possible suspicion of improper influence in decision-making by public or private agents, including its own members or those of partners, suppliers or customers.
- GranBio is not involved in partisan political activities.
- GranBio does not receive or process financial transactions derived from or used for any criminal activities. All financial operations carried out by GranBio are duly registered in its accounting and kept in its files, remaining available to the competent authorities.
- Information that has not been made public by GranBio's institutional area must be kept confidential.

- GranBio only deals with suppliers and third parties that comply with the country's labor and environmental legislation, that are not included in the National Register of Companies Declared Unsuitable and Suspension (CEIS), that do not directly or indirectly exploit child or slave labor, or compromise with acts of corruption and, preferably, with those who are committed to social responsibility practices in their production chain.
- GranBio expressly prohibits: (i) promise, offer or donation, direct or indirect, of undue advantage to a public agent, or a third person related to him, with a view to obtaining favoritism; and (ii) the contracting of intermediaries or brokers to act on behalf of GranBio with public bodies, except in cases expressly provided for by Law or Regulation.





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