

ANTI-CORRUPTION AND ANTI-BRIBERY CODE OF ETHICS

1. Propose

1.1. To set rules aimed to clarify both Interested Parties and employees that Prozyn does not agree in any way with practices that may be considered corruption and/or bribery, and to establish potential punishments for employees, suppliers, distributors, agents, representatives, service providers and others who may violate this Code.

2. Responsibilities

2.1. All employees: comply with the requirements of this procedure and report any deviation that may impact the violation of this Code.

2.2. Interested parties: To respect and enforce the requirements of this procedure, acting in a professional and ethical manner, without offering benefits or compensations whatsoever that violate this Code.

3. Coverage

3.1. This Code covers all employees (including temporary workers), regardless of hierarchical level and/or position, its founding partner, suppliers, agents, representatives, distributors, and service providers (either with or without a formalized contract).

4. Requirements

4.1. Employees shall not commit acts of corruption and bribery, nor shall they use intermediaries, such as agents, consultants, distributors, or any other business partners for this purpose.

4.1.1. Prozyn does not tolerate any act or activity of corruption and bribery, regardless of the recipient's position.

4.1.2. Prozyn's accounting, tax and financial statements are annually audited by an independent auditing firm and are available for consultation upon request.

4.2. Guidelines

4.2.1. Internal Employees are not allowed to:

4.2.1.1. Promise, offer or give, directly or indirectly, undue advantages to any person or entity having a business relationship, either directly or indirectly, with Prozyn and its Employees;

4.2.1.2. Finance, fund, sponsor or, in any way, subsidize the practice of illicit acts;

4.2.1.3. Use another natural person or legal entity hide or disguise their real interests or the identity of the beneficiaries of the acts performed;

4.2.1.4. Hinder the investigation or inspection activity of public bodies, entities, or agents, or intervene in their performance, even within the scope of regulatory agencies and supervisory entities of the national financial system.

4.3. Other Anti-Corruption and Anti-Bribery Guidelines

4.3.1. Prozyn understands that it is market practice, usage and custom that business meetings may extend to meals, happy-hours, or social events. Therefore, Prozyn does not consider that such events lead to an advantage for any of the parties involved as practice of bribery and/or corruption. Thus, proof of expenses or even consumption of food or beverages considered abusive by Prozyn's Financial Department will be considered as practices not accepted by this Code and perpetrators will be subject to legal penalties and those set forth in this Code.

4.4. Code Acceptance

4.4.1. Agreements celebrated between Employees and Prozyn contain clauses referring to this Code, and employees undertake to respect it.

4.5. Decisions, complaints, and FAQs

4.5.1. Can be addressed to the following email: ouvidoria@prozyn.com.br or to the following telephone +55 11-3732-0476. Prozyn's Committee undertakes to effectively take actions in all cases.

4.5.1.1. The Committee is made up of:

- a) A member of the Board
- b) A member of the DHO area
- c) A member of the Financial Department

4.5.2. The Committee is independent and autonomous and has decision-making power.

4.6. Penalties

4.6.1. All employees who violate this Code are subject to disciplinary, legal, and contractual measures.

4.6.2. The Committee analyzes all acts and activities, allegedly carried out by employees and/or interested parties, considered bribery or corruption, and it is responsible for applying the penalties according to the seriousness of the misconduct.

4.6.3. All infractions will be considered from the perspective of the Anti-Corruption Laws, CLT (Labor Laws) and other applicable laws.

5. References

5.1. The Anti-Corruption and Anti-Bribery Code of Ethics herein complies with Law 12.846/13 (Anti-Corruption Law).

6. Definitions

6.1. Internal Employees: all employees (including temporary employees) regardless of hierarchical level and/or position, and their founding partner.

6.2. Interested Parties: suppliers, agents, representatives, distributors, and service providers (with or without a formal contract).

6.3. Employees: All Internal Employees and Interested Parties.

6.4. DHO: Human and Organizational Development.

6.5. Corruption: Action or effect of corrupting, dishonest, fraudulent, or illegal behavior involving the exchange of money, assets, favors or services for one's own benefit and the alteration of the state or original characteristics of something.

6.6. Bribery: Means paying, offering, promising, or receiving an improper benefit to influence someone's behavior to obtain or retain some type of commercial advantage.

6.7. Unlawful Acts: means going against ethical principles to obtain any advantage, whether financial or not. It is an act prohibited by laws or rules.

Nota: Should you have any doubts as to whether an act or activity or behavior fits any of the above three concepts, do not hesitate to contact Prozyn's Finance Department before performing or accepting it.