



EVOLVING TO A BRIGHTER FUTURE

CODE OF ETHICS AND CONDUCT

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Versão: 01

Comitê de Compliance

1. INTRODUCTION

This Code of Ethics and Conduct ("Code") applies to all employees, executives, directors, managers, consultants, brokers, service providers, interns, or any person who, in any way, acts or collaborates directly or indirectly in SAIL's activities.

This Code contains reasonably necessary standards to promote honest and ethical conduct among all involved, including the ethical treatment of actual or apparent conflicts of interest between personal and professional relationships, as well as encouraging fair trading practices, correct actions, and constant prevention of irregularities.

This Code not only provides a general description of the laws, regulations, and policies we must follow but also reflects our values and culture employed at SAIL.

We must ensure and guarantee that our dealings with employees, directors, clients, suppliers, and public officials are invariably governed by correct, ethical, and legal decisions. We must be familiar with all the policies and procedures applicable to our roles and positions, seeking continuous improvement and evolution.

We must never disobey any applicable law, this Code, or any other company policy.

In short, this Code conveys the following message: we must avoid everything that appears inappropriate or unethical, always acting lawfully and maintaining a professional appearance.

First and foremost, ask yourself: Is it legal? Is it right? Does it comply with SAIL's policies? How could this be perceived by third parties? Do my actions reflect the highest standards of honesty, integrity, and responsibility?

Your cooperation is essential to the solidity of our culture and continuous improvement.

2. PURPOSE

Transform people's lives through science and education by solving our clients' project challenges in a focused and exclusive manner. The experience and care we put into each

project uniquely connect us to their objectives, resulting in innovative proposals that impact the health of individuals in society.

3. COMMITMENT

- Ethics: The highest ethical standards are part of SAIL's routine. Our field of activity is directly related to people. Therefore, it is our commitment and that of everyone who in any way provides services to us to act with integrity, respecting laws, standards, procedures, and regulations in all the countries where we operate.

- Life: Life is the greatest asset in humanity; we value this asset so much that our success is tied to developing, innovating, and contributing to the lives of those who work in this sector, as well as to all who benefit from the results of our work.

- Respect: Respect is one of the most important human values, being the foundation for social interaction. Therefore, we act with courtesy and consideration towards others' actions, opinions, and needs.

Our people are a fundamental part of our success as a company. It is important that we take pride in our workplace, treating our colleagues with respect and actively participating in creating and maintaining a positive and meaningful work environment for society. Thus, we do not permit or tolerate any form of discrimination or harassment in our workplace.

SAIL is committed to employing and cultivating equal opportunities, which means hiring, training, and promoting employees based on merit and competencies, not through illegal means. Therefore, we do not tolerate discrimination based on race, color, sex, nationality, age, religion, citizenship, disability, medical condition, sexual orientation, gender identity or expression, marital status, or any other characteristic protected by law.

We also do not tolerate any form of harassment, i.e., any unwanted conduct that creates an intimidating, hostile, or uncomfortable work environment, whether verbal and/or physical, sexual or not, as harassment will never be accepted in our organization.



EVOLVING TO A BRIGHTER FUTURE

If you feel that you have been a victim or perceive that someone else has been, you have an obligation to report the situation to your immediate supervisor and/or the Compliance Department for appropriate action.

Remember, SAIL's non-retaliation policy/culture prohibits you from being treated negatively by anyone due to your communication or cooperation in investigating a potential violation of the law, this Code, or any other SAIL policy.

No employee who, in good faith, reports suspected violations will suffer any type of persecution, retaliation, or adverse employment consequences – such as dismissal, demotion, suspension, or discrimination.

We emphasize that SAIL upholds the principles set forth in the Universal Declaration of Human Rights and rejects any act against human dignity. We do not condone child labor (except for the hiring of apprentices as per current law), nor do we permit labor relations that could be characterized as slave labor, either within SAIL or with commercial partners.

We believe in coexistence as a vector of social transformation and encourage diversity at SAIL.

4. HEALTH, WELL-BEING, AND WORKPLACE

SAIL supports the health and well-being of all. Therefore, SAIL maintains the policy and culture that all its employees perform their professional activities within their working hours, prioritizing their quality of life and efficiency. Time management should also be a characteristic of the employee and their manager, ensuring smooth and timely delivery.

SAIL is a workplace where the possession and/or use of illegal drugs, alcohol, or other substances is not permitted while working and during working hours.

Additionally, as it is a safe and healthy workplace, it is necessary that we resolve our conflicts peacefully and professionally. We must never tolerate or resort to violence or threats of violence against anyone, including our colleagues or others with whom we interact in the course of our professional activities.

5. QUALITY

SAIL is committed to always operating with the highest quality standards in all services it provides to its clients, a responsibility shared by all of us, regardless of hierarchical level.

Numerous laws, regulations, and other external standards regulate the services provided by SAIL, as well as the documented requirements in agreements, plans, and procedures of our clients and partners. Therefore, SAIL constantly seeks to ensure the provision of services that consistently meet all necessary requirements proactively and transparently, thereby demonstrating SAIL's professionalism and reliability.

6. CONFLICT OF INTEREST

A conflict of interest can be characterized by actions aimed at personal interests to the detriment of the Company's interests. Thus, our employees cannot participate directly or indirectly in companies that compete with SAIL and/or represent SAIL in dealings with companies in which they have a direct or indirect interest that could influence their decisions or harm the company's image.

If a situation is identified where a conflict of interest exists, the employee must immediately report it in writing to their immediate supervisor and/or the Compliance Department.

A conflict of interest occurs when we allow our personal interests to interfere with our responsibility to SAIL. It is essential that we act to benefit our company and avoid situations that could cause such conflicts or be perceived as such by others.

When we allow external activities or relationships to influence our judgment, or interfere with our professional responsibilities, we are not only harming SAIL but also our colleagues, clients, and others who rely on our work.

Although it is not possible to cover all potential conflict of interest situations in our professional routine, below are some common examples:

- Having a family member who holds any equity interest (other than a "nominal" amount of shares in a private or publicly traded company) in any client, supplier, or competitor;
- Any consulting or labor relationship with a client, supplier, or competitor while working for SAIL;
- Competing in any way with our company's business;
- Exchanging gifts or gratuities (other than an occasional article) or excessive entertainment with any company with which we do business – consult our Anti-Corruption Policy for more information on this subject;
- Taking any external employment that interferes with our work and commitment to SAIL;
- Having a personal relationship with our immediate supervisor without the approval of the direct manager;
- Using confidential information obtained in the course of work or employment for personal investment or profit or for third parties;
- Taking advantage of opportunities for personal benefit, which were accessed through the use of property, information, or position at SAIL.

If you have doubts about any activity that may create a conflict of interest, discuss the situation immediately with your direct supervisor or the Compliance Department.

Acting preventively helps us avoid situations that may appear to be conflicts of interest, as well as potential harm to SAIL.

If you suspect you are facing a situation that could give rise to a conflict of interest, or something others might reasonably perceive as a conflict of interest, you must report this situation to your direct supervisor and SAIL's Compliance Department immediately.

SAIL reserves the right to determine when actual or potential conflicts of interest exist and to take any action that, in the company's sole discretion, is necessary to prevent or

mitigate the conflict. Such action may include, but is not limited to, you having to withdraw from the conflict of interest or return any benefit or gain received, redefining your duties and responsibilities, or through disciplinary measures, which, in severe cases, may include terminating your employment relationship with SAIL.

7. CONFIDENTIALITY

SAIL's confidential information is a valuable asset that deserves the same protection as the company's physical assets. It is very important that you protect SAIL's confidential information and refuse any unauthorized access to such information entrusted to you or any employee for any reason. Examples of confidential information include, but are not limited to, client lists, commercial proposals, financial results, business strategies, documents related to clinical studies, confidential information of clients and partners protected by confidentiality agreements, financial information of the company, etc.

Each of us must preserve and protect such information from any unauthorized disclosure by SAIL or other companies with which our business is associated.

All SAIL employees have a commitment to confidentiality, obligating themselves to protect all confidential information of the company or to which they have access.

If you have doubts about whether information is confidential or not, speak directly with your superior, the Legal Department, or SAIL's Compliance Department.

8. PRIVACY AND INFORMATION RECORDS

We respect each individual's privacy. Any personal information of employees that we collect, store, maintain, or use must be handled responsibly and in accordance with applicable data protection laws in the territories where we have business operations.

Everything from names, contact information, government-issued personal identification numbers, and more must be protected and not shared with anyone inside or outside SAIL who does not have a business need/purpose to use this information.



EVOLVING TO A BRIGHTER FUTURE

The same applies to any information we access from third parties with whom we interact in any sphere of SAIL's operations in the services provided.

If you have doubts, contact our Data Protection Department directly (dpo@sailforhealth.com) or access our Privacy Policy available on our website (www.sailforhealth.com).

SAIL is also committed to maintaining accurate records of our financial performance, being up to date with all legal and tax obligations, payroll, expense reports, all in accordance with accounting rules, laws, and applicable regulations.

Failure to maintain accurate records or keep these records in compliance with our internal management policies may violate our Anti-Corruption Policy and, in some cases, be illegal and punishable.

If you suspect any improper conduct, even if it is a mere suspicion, immediately inform your direct manager and/or SAIL's Compliance Department.

9. RELATIONSHIP WITH THIRD PARTIES

It is essential that relationships with any third party, whether an individual, legal entity, public or private, are always conducted respectfully, following the ethical standards established here, as well as complying with the laws, regulations, and internal policies of SAIL applicable to the specific case.

The entire company is constantly evaluated by its collective performance and the perception of the people with whom it engages in commercial relationships.

a) Anti-Corruption

We adopt a zero-tolerance approach to bribery and corruption. We are committed to complying with anti-corruption laws and implementing systems to prevent bribery and corruption in all our operations, in accordance with our Anti-Corruption Policy.



EVOLVING TO A BRIGHTER FUTURE

As part of this policy, we comply with all global anti-corruption laws, including Brazilian legislation (Law No. 12,846/2013), the FCPA (Foreign Corrupt Practices Act – 1977), and the UK Bribery Act (2010).

Our company's reputation depends on all of us ensuring in our professional routine the highest ethical standards, in compliance with all applicable laws. The Anti-Corruption Policy aims solely to reinforce compliance with applicable anti-corruption and anti-bribery laws, reaffirming concepts, explaining how to act correctly in various practical situations, with relevant examples for our business activities.

It is strictly prohibited for us to engage in or tolerate any acts of corruption or bribery. We cannot make, offer, promise, or authorize any gift, payment, or anything of value on behalf of SAIL to obtain an undue advantage. Additionally, we cannot request, agree to receive, or accept any gift, payment, or anything of value that we know or suspect is offered or given with the expectation that SAIL will provide an undue advantage in return.

SAIL conducts transparent, constructive, and integral work with all public bodies, entities, institutions, and agencies. It is everyone's obligation to provide complete, accurate, and clear information in all public communications and documents sent to public administration bodies.

SAIL recognizes that our industry often requires contact with public officials and healthcare professionals and establishes that negotiations must always be conducted transparently and in compliance with current laws, this Code, and our policies and procedures.

Therefore, we do not tolerate and repudiate any practices considered illegal or immoral. Under no circumstances will we tolerate bribery practices by employees or third parties to public officials aimed at obtaining privileged treatment, influencing decisions, or even concluding any business in favor of the Company.

For more information, please refer to our Anti-Corruption Policy and/or contact the Compliance Department directly.

b) Clients

Our relationship with clients must always be guided by transparency, availability, and honesty. All our actions must be clear and objective, always seeking to preserve the integrity of our Company and our clients, respecting all contractual conditions and not seeking to obtain undue advantages in the contracts signed.

We must always be available, showing willingness and seeking, whenever possible, a satisfactory solution within the highest ethical standards for the problems of our partners and clients.

All confidential client information must be protected and kept confidential, following all applicable regulations and policies.

We repudiate anti-competitive actions or actions contrary to good market practices or that constitute a violation of free competition principles.

c) Research Centers

Clinical Research Centers are fundamental to our business, and we are proud to work with them. The relationship of trust and mutual respect we maintain with them is one of the primary bases for the development of our business activities, and we must always act to preserve it, without violating any regulations or norms.

The relationship of any SAIL employee with any person linked to the Research Center must be guided by ethics, transparency, and compliance with all internal policies and legislation to avoid any type of illegal, corrupt conduct or conflict of interest.

d) Healthcare Professionals

SAIL is committed to conducting business with healthcare professionals (HCPs) ethically and professionally, in accordance with applicable laws, regulations, and industry codes, always observing what is most beneficial for patients.



EVOLVING TO A BRIGHTER FUTURE

An HCP is anyone who administers, purchases, prescribes, supplies, or recommends prescription medications or products. This includes principal investigators at clinical research centers, who are responsible for conducting the clinical study.

The regulations governing interactions and relationships with an HCP can be complex and vary by country. Therefore, SAIL has developed rules on interactions with healthcare professionals to help you comply with these regulations and global laws.

If you have any interaction or relationship with healthcare professionals (public or private) directly or indirectly related to your activities at SAIL, you should consult our Compliance Department for more information.

e) Patient Associations

Interactions with legally constituted Patient Associations are encouraged and allowed, provided they aim to support patients and projects aimed at disseminating information related to health issues, raising public awareness, or technical training.

Such interaction must always preserve the independence of the involved parties and the ethical standards that permeate our services, including transparency. Always ensure that the appearance of this relationship is not considered a conflict of interest.

In case of doubts, always consult the SAIL Compliance Department in advance.

f) Suppliers

We value our suppliers and our professional relationships with them. We treat our suppliers fairly and with the respect we show to each other at SAIL. Therefore, all our purchases are based on price, quality, and service, and we deal with our suppliers fairly, honestly, and openly.

We must avoid any actions during the supplier selection process that may give third parties (or even internally) the impression of favoritism or other undue advantage. Offering an unfair advantage to one supplier over another is not only bad for the market—it is also not in the best interest of our company.

Examples of suppliers for our business activities include brokers, consultants, administrative services, law firms, accountants, IT services, auditing, marketing, among others.

SAIL is firmly committed to validating, qualifying, monitoring, and tracking all our suppliers, always seeking to preserve the quality and reliability of our activities, ensuring that third parties acting on our behalf reproduce our culture and ethics in all their activities.

g) Press

SAIL believes in a free society and recognizes that the media are indispensable elements for this. Therefore, SAIL will always cooperate with the efforts of the Press when requested.

However, only individuals approved by the Shareholders may issue any information or opinion regarding SAIL. These determinations also apply to social and digital media. Any Press requests should be immediately forwarded to SAIL's Communication/Marketing Department.

Our relationship with the Press should always be based on respect and, importantly, urgency, as the speed with which we respond to the media may define our image to society in general.

Never respond to media inquiries on your own initiative. Instead, politely inform the requester about our policy and refer such questions to the appropriate department.

Acting preventively will always be the best way to avoid conflicts, losses, and illegalities.

h) Political Parties

No employee or third party is authorized, on behalf of SAIL, to:

- Issue any political opinion;
- Support or make donations to political candidates or parties;
- Use company resources for political purposes;

- Act or present themselves as a company representative in political activities.

As individuals, we are encouraged to engage in our communities by voting and participating in the political process. However, according to federal law and the laws of some states, SAIL is prohibited from making any political contributions to candidates.

Due to these prohibitions, we cannot use company funds/resources to support any political candidate or party.

This prohibition includes not only direct contributions but also indirect assistance or support to candidates or political parties through ticket purchases for special dinners or other fundraising events and the provision of any other goods, services, or equipment to political parties and committees.

Political contributions or activities for your benefit with your own money and in your free time are, of course, at your discretion. SAIL will not reimburse you directly or indirectly for any political contribution or cost of attending any political event.

In case of doubts, employees or third parties should consult the Compliance Department.

10. ENVIRONMENTAL RESPONSIBILITY

We live and work in various types of communities and environments worldwide. As good citizens, we want our employees to benefit these communities and help maintain our natural environments.

As a company, we comply with all applicable environmental laws and regulations in our business operations at our locations. We also strive to preserve natural resources as much as possible and reasonably during our activities.

11. GIFTS AND PRESENTS

SAIL employees may give or receive gifts as long as the following conditions are met:

- It does not influence the negotiation or conduct of the company's business.

- It is limited to a maximum of two occurrences per year.
- The total value does not exceed one-third of the current minimum wage.
- It is prohibited to give gifts and presents to public officials.
- If they are considered equivalent to public officials, consult the Compliance Committee in advance.

In some countries, it may be customary to offer reasonable gifts, business meals, and entertainment to public officials and business contacts related to business meetings.

Be especially careful when considering giving something of value to a public official (and remember that in many countries where we operate, investigators and others involved in the study are or may be considered public officials). Ensure compliance with the Anti-Corruption Policy and all conditions set forth therein.

We approve, control, and record all relevant gifts and entertainment—given and received—through our gifts and hospitality register. If faced with the situation of giving or receiving a gift or entertainment, consult this Code, the Gifts and Presents Policy, and the Compliance Department.

Excessive entertainment of any kind—involving public officials, clients, or suppliers—is never permitted.

If an employee receives a gift that does not comply with the above conditions, they should courteously return it, informing the existence of this Code and subsequently notifying the Compliance Department.

12. INVITATIONS AND TRAVEL

Invitations or expenses related to travel, such as transportation, accommodation, and meals, may be paid or reimbursed by the Company to third parties as long as they are linked to the professional activity of SAIL, there is a real relationship with the development of activities, and it has been previously agreed upon between the Parties, always following SAIL's internal guidelines on this matter.

Similarly, our employees may have travel expenses paid by suppliers, provided they are for strictly professional purposes, there is no commercial exchange involved, and they are pre-authorized by the Compliance Committee, in compliance with SAIL's internal policies on the subject.

If you have any questions on this subject, consult the SAIL Compliance Department or your direct supervisor.

13. DONATIONS AND SPONSORSHIPS

Any charitable donations by the company in the name of SAIL or events organized by SAIL in support of charitable institutions must be pre-approved in writing by a SAIL leader, the Compliance Department, and a member of the Board.

Any charity we wish to engage with through donations/incentives must not be an entity with whom we are seeking business or as a reward for new business.

Contributions or charitable activities carried out by you personally, with your own money and in your own time, are, of course, at your own discretion. SAIL will not reimburse you, directly or indirectly, for any charitable contributions or costs associated with attending any charitable event.

Our employees should not distribute bulletins or printed materials of any kind, sell merchandise, solicit personal financial contributions, or request contributions for any personal cause during business hours, except when such activity has been pre-approved or sponsored by SAIL.

SAIL believes that events can be very useful in disseminating and promoting knowledge, practices, and interesting discussions in the health chain. Therefore, it may sponsor scientific or educational events related to the health sector through a written contract with the organizing entity, without interfering in its programming, themes, objectives, selection of speakers, and location.

If you have any questions, consult the Compliance Department.

14. USE OF ASSETS AND PROPERTY

SAIL provides all employees with computers, telephones, printers, photocopiers, and other various office equipment for professional purposes, which should be used responsibly, sustainably, and exclusively for professional and legal purposes, with any use contrary to what is described in this Code strictly prohibited.

In view of this, all employees are aware that SAIL monitors the use of company resources to ensure they are being used appropriately and in compliance with our policies, where permitted by local law.

Therefore, it is important that every employee is aware of and follows these guidelines:

- a) Preserve the materials and equipment entrusted to you, avoiding waste, eliminating unnecessary costs, and expenses;
- b) Electronic communication equipment is SAIL's property and is provided as tools to enable employees to better perform their professional tasks for the company;
- c) The available electronic communication resources must be used solely and exclusively for professional purposes, with the transmission/sending of defamatory comments, offensive images or files, or any form of discrimination strictly prohibited;
- d) Access to any internet site through SAIL servers is restricted to the development of your activities in the company;
- e) SAIL reserves the right, without prior notice, to block and/or monitor internet usage on its premises or mobile access devices, emails, and messages. Therefore, inappropriate use of the internet is strictly prohibited.

Theft, loss, or damage to SAIL property directly impacts the Company's financial performance. Employees, executives, and directors are expected to use, transport, or retain Company property with care and for legitimate SAIL business purposes and not for any personal benefit or the benefit of another person.

Any suspected incident of fraud or theft must be immediately reported for investigation through the channels described in this Code.

15. CORPORATE OPPORTUNITIES

No employee, executive, or director of SAIL may use corporate property or information or their position in the company for improper personal gain. You have a duty to prioritize SAIL's legitimate interests when any business opportunity arises, but not for personal purposes.

You must report any corporate opportunity to your immediate superior or the responsible department in the Company to determine if SAIL wishes to take advantage of the opportunity.

16. COMPLIANCE COMMITTEE

Situations may arise that cause doubts about the best course of action and more: how to act when you witness or become aware of situations contrary to the rules and norms of this Code?

With this in mind, we created the Compliance Committee, whose objective is to resolve and direct any doubts, as well as to take necessary and appropriate actions for each situation.

If you have any questions or complaints, report to your manager immediately. If you do not feel comfortable doing so, contact the Whistleblower Channels.

Be honest and based on solid facts. Speak without fear; there will be no retaliation, and your complaint will be completely confidential. We remind you that, by acknowledging this Code, you are also responsible for its execution. It is, therefore, your duty and obligation to report any suspected non-compliance actions.

SAIL's Compliance Committee is obligated to pursue the investigation of all reported cases until a decision is reached.

Contacts:

Email: compliance@sailforhealth.com

Phone: +55 11 3777-0625

17. INVESTIGATION AND SANCTIONS

SAIL, through the Compliance Committee, places great importance on reports and internal processes of possible violations of this Code. Suspicions and complaints relating to any employee and/or issue will be duly investigated, and the results will be disclosed to the Compliance Committee and the complainant if identifiable.

Although investigations are handled discreetly and confidentially, we may disclose the results of investigations to law enforcement authorities or regulatory agencies when necessary/mandatory by a legal obligation.

Evidence of irregularities in complying with the determinations of this Code will be the subject of an internal investigation by the Compliance Officer and, if actual irregularity is found through due process, the responsible party will be subject to penalties (verbal warning, written warning, suspension, dismissal, immediate contract termination, in addition to any other contractual and legal actions applicable).

For legal entities that violate this Code, they may be subject to administrative and judicial sanctions, as well as the payment of fines.

If you discover or suspect any of the prohibited practices described in this Code, you must immediately report it to SAIL's Compliance Officer.

Compliance Committee
SAIL for Health