

	MAN-ADM-002.01	APPROVED ON: 03/04/2024
	<b>Code of Conduct, Anti-Corruption and Anti-Bribery Policy</b>	

## 1. Objective

Establish clear rules to inform stakeholders and employees that Prozyn does not tolerate, in any form, practices that may be considered corruption and/or bribery. Define potential penalties for employees, suppliers, distributors, agents, representatives, service providers, and similar parties who violate this Code.

## 2. Scope

This Code applies to all employees (including temporary ones), regardless of hierarchical level and/or position, the founding partner, suppliers, agents, representatives, distributors, and service providers (with or without a formal contract).

## 3. Requirement

All employees must comply with the requirements of this procedure and report any deviation that could result in the violation of this Code.

Stakeholders must respect and enforce the requirements of this procedure, acting professionally and ethically, without offering benefits or compensations that violate this Code.

Employees must not commit acts of corruption or bribery, nor use intermediaries such as agents, consultants, distributors, or any other business partners for such purposes.

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

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

### 3.1. Guidelines

Internal Employees are prohibited from:

- Promising, offering, or giving, directly or indirectly, any undue advantage to any person or entity with a commercial relationship, directly or indirectly, with Prozyn and its Employees.
- Financing, subsidizing, sponsoring, or in any way supporting the practice of illegal acts.
- Using another individual or legal entity to conceal or disguise their real interests or the identity of the beneficiaries of the acts performed.
- Obstructing investigations or inspections by public agencies, entities, or agents, or interfering with their actions, including in regulatory agencies and financial oversight bodies.

### **3.2. Additional Anti-Corruption and Anti-Bribery Guidelines**

Prozyn recognizes that in business culture, meetings may extend to meals, "happy hours," or social events. Therefore, such events are not considered bribery or corruption unless they offer undue advantages to any party. Any excessive expenses or consumption deemed inappropriate by Prozyn's Finance Department will be considered violations of this Code and subject to penalties under law and this policy.

Gifts, souvenirs, or low-value items are also acceptable under the following conditions:

The total value does not exceed USD 100.00.

The gift is offered in the presence of a third party.

If the gift bears the Prozyn logo, it may be valued up to USD 200.00.

### **3.3. Money Laundering**

Money laundering is a serious financial crime involving the process of making illegally obtained funds appear legitimate. In the corporate environment, anti-money laundering practices are essential to ensure the integrity of the financial system and prevent companies from being used for illicit purposes.

Prozyn implements the following actions to mitigate such risks:

**Low-Risk Customer Identification Policy:** Objective criteria are applied to classify low-risk customers, allowing compliance resources to be focused on higher-risk profiles.

**Address and Contact Information Verification:** Validating a customer's address and contact details complements identity verification and strengthens the reliability of transactions.

**Transaction Limits and Automated Alerts:** Financial thresholds are defined for transactions, and automatic alerts are triggered in case of unusual activity, supporting the detection of suspicious behavior.

**Monitoring of Inactive Accounts:** Periodic review of inactive accounts helps prevent their potential misuse for illicit activities.

**Contract and Commercial Document Audits:** Careful examination of contracts and documents related to business transactions is conducted to detect inconsistencies or anomalies that may indicate attempts to conceal the origin of funds.

Cash Payment Restriction Policy: Implementing a policy that prohibits the acceptance of cash payments above a predefined threshold is an effective measure to prevent the introduction of illicit funds into the company's financial system.

### 3.4. Acceptance of the Code

Employment contracts with Prozyn include clauses mandating compliance with this Code.

### 3.5. Decisions, Reports, and Inquiries

May be submitted via email ([ouvidoria@prozyn.com.br](mailto:ouvidoria@prozyn.com.br)) or phone (+55 11 3732-0476). Prozyn commits to handling all reports through its Committee, which consists of:

- One member from the board
- One member from Human and Organizational Development (DHO)
- One member from Finance

The Committee is independent, with full autonomy and decision-making authority.

### 3.6. Penalties

All employees violating this Code are subject to disciplinary, legal, and contractual actions.

The Committee will assess all suspected acts of bribery or corruption and apply penalties based on the severity of the violation. All infractions will be considered under the Anti-Corruption Law, Labor Law (CLT), and other applicable regulations.

## 4. References

This Code complies with Brazilian Law No. 12.846/2013 (Anti-Corruption Law) and Law No. 9.613/1998 (Anti-Money Laundering Law).

## 5. Definitions

**Internal Employees:** All staff (including temporary), regardless of rank or role, and the founding partner.

**Stakeholders:** Suppliers, agents, representatives, distributors, and service providers (with or without a formal contract).

**Employees:** Includes both Internal Employees and Stakeholders.

**DHO:** Human and Organizational Development.

**Corruption:** Dishonest, fraudulent, or illegal behavior involving the exchange of favors or money for personal gain.

**Bribery:** Offering, giving, or receiving improper benefits to influence someone's behavior for commercial advantage.

**Unlawful Acts:** Actions that violate ethical principles to gain advantages, financial or otherwise.

**Suborno:** Significa pagar, oferecer, prometer ou receber um benefício impróprio com o intuito de influenciar o comportamento de alguém para obter ou reter algum tipo de vantagem comercial.

**Atos Ilícitos:** significam contrariar princípios éticos a fim de obter qualquer vantagem, seja ela financeira ou não. É um ato proibido por leis ou regras.

**Note:** When in doubt whether an act falls under the above definitions, contact Prozyn's Finance Department before proceeding.

## 6. Review

Date	Number	Review
08/15/2022	00	Initial issue of replacement document RHU-POP-008
03/04/2024	01	Revisão da máscara do documento

## 7. Aprovação

---

Prepared/Reviewed by: Jaqueline Santos – Human and Organizational Development Coordinator

---

Verified by: Thiago Salustri – Quality Coordinator

---

Approved by: Aauto Junior – Director