

**CODE OF CONDUCT AND ETHICS OF
BLAU FARMACÊUTICA S.A.
(Free Translation)**

**Approved at Meetings of the Company's Board of Directors
held on October 23, 2017, January 5, 2018 and
January 12, 2018**

OUR WAY – FROM VALUES TO ACTIONS

This Code aims to define the principles and values of ethical conduct with which we commit ourselves and which we believe are fundamental to the profile of a Company whose activities are focused on human health.

Ethics is based on pillars that help in identifying who we are, how we act and what we want to be.

The development pillars of our Code of Conduct and Ethics are grounded in our past, vision and values.

Respecting the origins of formation of Blau Farmacêutica S.A. means applying the principles set forth in our Code of Conduct and Ethics in daily actions.

Our mission: "To provide, in the broadest possible way, medicines that provide a better quality of life and greater longevity".

Our vision: "To be the leading pharmaceutical company in Latin America with the patient first."

Our values are:

Integrity;

Quality;

Efficiency;

Team Spirit;

Daring.

Innovation is a characteristic constantly present in Blau Farmacêutica. We believe that the actions practiced now influence the fate of a company that values health.

We innovate when looking for new products and treatments, face challenges and explore new paths and ideas, always aiming at improving the quality of life and longevity.

Besides Innovation, safety is essential in our operations. It reflects the need to provide the medication user with a set of measures aimed at quality and efficacy in the treatment of diseases.

The implementation of state-of-the-art technology and good manufacturing practices of our plants will allow the introduction of new drugs and consequently will allow the development of new treatments with proven efficacy.

We respect shareholders, internal collaborators, business partners, the scientific community, customers and consumers, the environment, as well as any environment where we carry out any type of activity.

We are passionate about what we do. Health is our daily inspiration, with the responsibility of being in an ethical manner, respecting the laws and regulations in force and applicable to our activities to regulate, protect and value health.

All of this would not be possible without our people, our team of collaborators, suppliers and partners, who build our routine together with us.

It is a team of excellence, composed of professionals who are reliable, qualified, dedicated and tireless in the pursuit of the excellence of their work, imbued with doing better every day, in harmony with our mission, vision, values and principles, in search of dreams and goals intended by the Company.

THE CODE OF CONDUCT AND ETHICS

Our Code of Conduct and Ethics aims to translate and reflect our mission, vision, values and principles, and should be used as a reference, a daily consultation guide that will guide the actions of each of our collaborators and partners, in the most various areas and operations of Blau Farmacêutica in Brazil and subsidiaries abroad. It is the responsibility of everyone to know and fully apply this Code of Conduct and Ethics.

Given this concept, we have created a unique and branched family in which, in any Blau Pharmaceutical operation, there will be a perfect synergy of ethical procedures that will result in the same reliable behavior towards consumers, customers, suppliers, government, community and the environment.

The commitment of Blau Farmacêutica is to conduct its business while maintaining constant standards of management, based on ethics, integrity, trust and professionalism. We want to be recognized as leaders and example of good practices of ethical and management practices.

The minimum ethical stance we seek is to comply with all applicable laws and

regulations applicable to our operations. But the Company's yearnings go beyond this. We seek best practices in business behavior and management from our stakeholders in all countries where we operate. This principle is essential and unquestionable.

Implementing a Code of Conduct and Ethics is not an easy task, but the dedication of each cell of Blau Farmacêutica will make the goals achieved. For this, they will have an Ombudsman prepared to answer the doubts that have arisen during their development, in order to clarify eventual questions arising from this process.

REGISTRATION AND TRANSPARENCY IN FINANCIAL INFORMATION

Among our values we find the word "TRANSPARENCY"

Among our commitments, we highlight the adoption of the highest degree of transparency in relation to financial information and all transactions involving Blau Farmacêutica:

- **We keep the Company's documents secure and strictly organized.** We record our operations correctly, within the best accounting and financial practices, so that they accurately and transparently reflect our activities.
- **We disclose our information to the public clearly.** Our commitment is to produce accurate, complete and reliable reports in accordance with best practices for disclosure of financial data, following all applicable rules and regulations. All information disclosed by the Company to the market and internal employees is accurate and with the same level of detail, and made available to all stakeholders at the same time, which contributes to decision making.

These measures result in the increasing confidence of all those involved in the business, but especially in the financial market in particular, this have been earned as a result of great dedication, hard work and ethics of the Blau Farmacêutica family in the dissemination of clear information and accurate.

RELATIONSHIP WITH GOVERNMENTS

The profits generated by the Company are treated in accordance with the local tax legislation, since its operations occur in several countries and federative entities, making it essential to meet the information requirements and payment of taxes.

- **Accurate company's documents.** All our business operations and transactions are properly documented so that taxes can be collected in a timely and correct manner according to the place where our operations occur. This tax collection is part of our contribution to society.

RELATIONSHIP WITH THE REGULATED SECTOR

Our operations and the final product offered to the consumer are aimed at preserving human life and health.

All activities follow the guidelines of the World Health Organization and, specifically, in the countries where we operate, are bound by the laws, regulations and guidelines of competent health surveillance authorities.

We are committed to following the regulations in the different localities where Blau Farmacêutica S.A. operates. For this purpose, we promote the constant refreshing of our professionals, investing in knowledge.

The employee involved in the refreshing process and their knowledge is committed to disseminating ideas and procedures aimed at guaranteeing the safety, quality and effectiveness of internal procedures and the final product, offering the best product for the final consumer within the sanitary standards applicable.

WORKING AT BLAU

We at Blau Farmacêutica are committed to stimulating, encouraging and motivating our employees, with a unique culture to grow, to have innovative spirit and daring, in order to find new paths, always.

We are a company where employees are treated equally and with trust, respect and justice. A company committed to offering its employees equal opportunities, a good, healthy, safe working environment, and that prohibits conduct that could harm personal dignity.

Thus:

- **We compensate our employees** for the work performed, based on their skills, performance and market conditions and provide good working conditions. We

observe the rights of all our employees, as set out in laws and agreements, and remunerate them based on their skills, performance and market conditions.

- **We are committed to provide a workplace** that is healthy, safe and immune to agents that can compromise or endanger health and well-being. For this purpose, we use and implement all the necessary tools to achieve this goal.
- **We are against the practice of threats and violence** in the workplace. We do not tolerate any form of prejudice, whether or not related to belief, race, origin or customs and any form of abuse, including sexual, physical or moral. We do not tolerate any form of persecution under any circumstances.
- **Equal employment opportunities for all** are applied generally and uniformly, encouraging diversity, development and personal and professional improvement without any prejudice or bias. We believe that our strength emerges from the differences between us, which enrich our way of thinking, influencing our way of being.
- **We are committed to meritocracy.** That is why we hire, compensate and promote our employees according to their abilities, performance, development and capacity to perform their job to the best, without any kind of inequality.
- **We promote and respect** the certain diversity that the distinctive identity of our employees is essential to the success of a global business.
- **Personal and professional development is a usual investment tool** to enrich skills and competencies in order to prepare the employee for the workplace as well as for new experiences.

We also believe that every employee represent the Company in its values and serve as multipliers and examples so that our culture of ethics and collaboration is disseminated through all levels of our organization, thus:

- **We are ethical in relationships between people** – At Blau, we are open, transparent and work in harmony with respect and mutual cooperation.
- **We abstain from / avoid conflicts of interest and the exploration of business opportunities for personal purposes** – In our work, we act exclusively for the benefit of the Company, not allowing our judgment to be influenced by personal decisions.

We refrain from exploring any business opportunities offered to us because of our work or position in the Company. We use these opportunities solely and exclusively to achieve the Company's objectives.

- **We expect that our employees will not offer or accept, directly or indirectly, in the performance of their duties any kind of gifts, services, money or any**

other type of benefit that may be understood as a sign or indication of corruption.

- **All employees must adhere to the Blau Farmacêutica Anticorruption Policy, which details all related procedures.**
- **We do not take advantage of insider information and refrain from disseminating information** – we do not use confidential information for the purpose of personal gain or for the benefit of others. We do not disclose inside information about Blau, about its activities or plans.
- **We use the assets of the company appropriately** – We have responsibility in the use of Blau assets, which must be used responsibly, exclusively for the benefit of the Company.
- **We do not allow child labor, nor any forced labor** – we do not accept any form of labor that is not in full compliance with the laws, especially with regard to child labor, slave labor or comparable to slavery. This principle is also applied to suppliers, customers and subcontractors.

CONFIDENTIAL INFORMATION AND TECHNOLOGY:

Because we are a pharmaceutical industry, the protection of our intellectual property and technology is fundamental to the long-term sustainability of our business.

- As an essential obligation to the performance of our activities, we must **respect, make good use of information and protect our knowledge / Know How.**
- **We take special care with confidential information.** The information we have access to during our work, market data, product prices, production details, results of clinical studies, among others, are the exclusive property of the company, and should not be disclosed under any circumstances.

OUR CONSUMERS / FINAL USERS:

Our consumers are the source of our strength. We work to improve the quality and extend the life of people according to the following principles:

- **We produce safe and high quality products** – We consider the safety of our products and our consumers as an unquestionable point. We are committed to providing only safe products, always.
We are committed to meeting the highest levels of quality standards, and we do not measure efforts to maintain a process of continuous improvement of

our quality - Blau's Total Quality.

- **We communicate clearly and reliably about our products** – We are committed to meeting all requirements/standards related to information about our products, wherever we operate. We ensure that all products are correctly and accurately identified, with all necessary information and in accordance with current legislation.
- **We refrain from any offensive / inaccurate advertising** - We at Blau respect all people and are extremely careful in the form of communication, including advertising, with the public, avoiding making false promises or creating any embarrassment.
- **We are attentive to the consumers to answer your questions/needs** – We are committed to answering and evaluating any questions that we may receive regarding our products or services in a fast, diligent, efficient and responsible manner.

We use the information provided by our consumers also for the purpose of improving our processes.

SUPPLIERS AND CUSTOMERS:

We work with passion and care every day to achieve the goals we set for ourselves, both in volume and sales mix, as well as in production costs. We guarantee that our goals are guided with responsibility and care towards our suppliers and customers.

So many of our suppliers and customers are key parts of our ability to grow and develop. With this, we believe in the importance of a true partnership and of reciprocity in our activities. Thus:

- **We are committed** to treating our suppliers and customers with integrity and respect for their rights. We are committed to fairness in the negotiations between us in the day to day business.
- **We are committed** to meeting the agreements to which we are parties and to refrain from abusing our power
- **We are committed** to taking actions to influence our suppliers to act / conduct their business following ethical principles.

COMPETITION:

We constantly strive to be leaders in the markets in which we operate and to increase

the goals that we impose on ourselves. We always do this with responsibility and are aware that we have to maintain an environment of fair and ethical competition. Thus:

- **We treat our competitors with respect** – We are committed to competing with ethics; we respect our competitors, their actions and their products. We act only ethically and transparently.
- **We respect the intellectual property of third parties** – We take special care not to disrespect the intellectual property of third parties

THE ENVIRONMENT:

As manufacturers, we are aware of the impact of our actions on the quality of the environment and take full responsibility for our attitudes. We are aware that by adopting a responsible attitude towards the environment, we are contributing to the sustainable growth that will benefit future generations.

With this, sustainable development is a goal for us. We have the constant challenge of reducing the impact of our actions on the environment and increasing awareness of environmental protection among our employees, suppliers and customers.

- **We are committed** to take actions to reduce the environmental impact of our activities, wherever we operate.
- **Our environmental awareness** is valued and constantly exercised so that we can incorporate the environmental impact into many of our decision-making processes.
- **We aim at excellence in environmental protection** in our operations and we work to raise awareness of environmental protection among our employees, consumers, customers and suppliers.

COMMUNITIES WHERE WE OPERATE:

We owe our growth to the trust that the members of communities where we operate lay upon us. So we are deeply committed to spreading our social responsibility to the communities where we operate. Thus:

- **We are attentive and careful with the communities where we operate**

– we are committed to conducting an open and continuous dialogue with the members of the communities where we operate, respecting their needs, ideas, preferences and desires, and taking them into account in our internal decision-making process.

- **We support well-being in the communities in which we operate** – we take steps to empower the communities in which we operate, and we encourage our employees to become personally involved in the activities we support.

We care about children, families, future generations, health and environment of the communities where we operate.

IMPLEMENTING THE CODE OF CONDUCT AND ETHICS AT BLAU FARMACÊUTICA:

Our Code of Conduct and Ethics serves as a guide.

Its principles, together with our mission, vision and values are willing to assist us as a reference when we have some ethical dilemma at the time of a decision.

Our daily business challenges us in our ways that will require us to use our judgment, evaluate the various alternatives and choose the one that best reflects who we are, how we think and act and who we want to be.

Likewise, the Code of Conduct and Ethics is not – and never meant to be – a guide to questions and answers to all the dilemmas we face daily.

We undertake to facilitate these decisions as much as possible; for this, we have made a Code of Ethical Conduct simple and clear and accessible to all. We will do training sessions with examples of routine cases, we will explain the logic of each of its principles.

Blau Farmacêutica's Corporate Education will train all employees, as well as make periodic reviews of such training, at least annually, so that we have the principles of conduct and ethics provided for in this Code live in our decision-making.

In addition, we are also committed to reviewing our internal policies, strategy, and objectives that we set for ourselves so that everyone is in tune with and embodies the principles of this Code of Conduct and Ethics.

Everyone of us is responsible for asking for help if you have an ethical dilemma and are

not sure which way to go.

If you are aware or suspicious of a breach of this Code, speak to your superior or use the reporting channel below to express your concern. The actual or alleged violation will be treated with agility and discretion. Under our Whistleblower Policy, an independent investigation process will be instituted and the complainant will be automatically protected, ensuring that there is no persecution, retaliation or reprisal.

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The Complaints related to violations of this Code of Conduct and Ethics will be reviewed and determined by the Company's internal auditor, according to the procedures described in our Whistleblower Policy.

The Company's internal auditor, or persons authorized to conduct the investigation, shall inform the Compliance Department or Audit Committee in a timely manner of all findings of fact, conclusions and recommendations proposed for corrective action, if any.

In any event, the Legal and Compliance Officer or the Audit Committee, as the case may be, shall review, discuss and approve the report, suggesting, as appropriate and as much as possible, improvements to the proposed corrective actions.

All violations of this Code of Conduct and Ethics will be dealt with seriously and disciplinary action will be taken, if necessary, such as oral warning, written warning, suspension, where applicable, or breach of the bond between the company and the offender.

We believe that this Code of Conduct and Ethics and the Company's control mechanisms will help us to succeed on our journey in the different locations where we operate and the paths we choose. More than standards and procedures, these are principles that align with the values of the Company and our personal values, which are pillars that are part of the legacy and success of Blau Farmacêutica.