MISSION
We create and sell “Products for Life”. We develop products for the feeding of people who are usually in a delicate clinical situation and who yearn for the recovery of their health and restoration of their activities and social life.

VISION
Develop our operational efficiency and expand productive capacity to increase market share with profitability.

VALUES
- We value the debate of opinions and ideas in the pursuit of development;
- Commitment to employees, customers, suppliers, governments and shareholders
- We believe that a systemic view is important for corporate and personal growth.

PRODIET 10 YEARS
NEW POSSIBILITIES FOR LIFE.
INTRODUCTION

Prodiet is committed to carrying out its business in accordance with the laws and within the highest standards of business conduct and ethics. Therefore, it prepared this Code of Ethics and Business Conduct which will provide all of its employees with the fundamental principles and procedures that govern the conduct of the Company.

This Code applies to all Company employees, including directors and officers and also to its distributors, representatives and agents (hereinafter referred to as “employees” only).

COMPLIANCE WITH LAW

Prodiet strictly follows and complies with the laws and carries out transactions in full compliance with applicable regulations. We believe in our ability to be honestly successful and expect all of our employees to act on this conviction and that their conduct reflects the highest level of ethics and integrity.
RESPONSIBILITY FROM THE EMPLOYEE AND STAKEHOLDERS (PUBLIC STRATEGY) TO THE COMPANY

All employees are expected to do their best to promote the Company’s interests. For this, it is important to note the following:

**Conflict of interests**

All employees, in the performance of their duties, must be exempt from conflict of interests so that their performance occurs only in the interest of the Company and not the personnel.

A **conflict of interest** occurs when the private interest of an employee interferes with the interests of the Company, for example, when an individual obtains benefits due to their position in the Company. This includes direct benefits to the employee or his / her relatives, friends or individuals or legal entities of interest to the employee ...

**Social responsibility**

The mission of **Prodiet** is to create and sell “Products for Life”, so it understands how fundamental it is to participate responsibly in its community. Developing products for the feeding of people who are generally in a delicate clinical situation and who yearn for the recovery of their health and restoration of their activities and social life.

**Records and documents**

Compliance with **Prodiet’s** accounting and internal control procedures is mandatory.

It is not permitted to keep any transaction not registered. Employees may not, under any circumstances, create a false or misleading report or request or create an account on behalf of the Company with the understanding that any part of the payment or account is intended to be used for a purpose other than that described by the supporting documents.

Employees may not, under any circumstances, sign another name or sign on behalf of any person other than their own unless there is authorization to do so.

**Respect for the environment**

**Prodiet** respects the environment, developing its activities in a sustainable way and wants its employees to act in the same way.
Protection and use of Company assets

The employees are expected to protect and ensure the efficient use of Prodiet’s assets. In this context, the assets of the company include, in addition to goods and equipment, also confidential information.

• Assets and equipment

Employees must preserve the Company’s assets and equipment and act to prevent negligent and/or incorrect use, waste, loss or theft.

The Company’s assets and equipment must be used exclusively in favor of the Company’s business.

• Confidential and proprietary information in general or competitors

Employees have access to a considerable amount of information about activities, operations and business plans of great value to the Company and they are unknown to the public.

All employees must adequately protect this information, which is confidential and exclusive to Prodiet.

This information should only be disclosed when there is a commercial need in terms of business and, at that time, only when subject to a confidentiality agreement if authorized by the Company’s senior management or required by law.

Confidential information covers all non-public information that may be useful to competitors or others that could be harmful to the Company or to anyone doing business with the Company if disclosed.

Unauthorized use or distribution of proprietary information is not permitted and may be illegal.

Entertainment, gifts and gratuities

When involved in business decision making on behalf of the Company, employee decisions should be based on a fair and objective assessment.

Employees who interact with someone who engages in business with the Company (including suppliers, customers, distributors, competitors, contractors and consultants) shall perform such activities in the best interests of the Company on the basis of consistent and unbiased standards.

Personal relationships, gifts, hospitality or any other situation of direct or indirect value, cannot be used to influence decisions.

Receiving gifts

Employees should not receive gifts from any organization or individual with whom the Company does or seeks to do business unless it is present:
Equal opportunity for employment and non-discrimination

It is Prodiet’s policy to ensure equal employment opportunities without discrimination based on race, color, nationality, citizenship, religion, marital status, sex, sexual orientation, age, physical disability or any other status protected by law.

All Prodiet hiring and employment practices are in accordance with local laws and regulations. Recruitment and promotion are based solely on qualifications and not on personal relationships.

Any action or practice that results in employee degradation or that may have a negative impact on the Company’s reputation should be reported to the employee’s manager, Human Resources or Ethics Committee.

Safety in the workplace

The safety of employees is of the utmost importance for Prodiet. A safe work environment contributes greatly to good health.

Employees must observe the indicated health and safety guidelines and communicate to their managers unsafe conditions, equipment or practices. Employees also have to comply with all applicable laws, regulations and internal guidelines with respect to environmental protection, handling of hazardous materials and waste disposal.

• Be irrelevant value, such as gifts, calendars, mouse pads, as well as other gifts distributed by companies on special dates, like Christmas season;

• It can not, in the opinion of a third party, affect the judgment of the recipient.

Gifts that any developer win because of their activities in any customer, supplier or potential client, should be delivered to HR for a draw between all employees of the Company. The gifts exclude the gifts described above as 'irrelevant' value.

In the category of gifts it should also be considered: offering airfare, hotels, other travel expenses, restaurants, any kind of advantage, among others.

Any questions regarding receipt of gifts, contact HR.
PRODIET conducts its business and is successful on the basis of its performance and merit, in accordance with applicable laws and regulations. It is expected that employees deal fairly with customers, distributors, competitors and suppliers. Employees may not under any circumstances, use illegal or unethical means to gain an unfair advantage over others, through the manipulation, concealment and abuse of privileged information, false statements of material facts or any other unfair trading practice.

**Antitrust laws**

**Prodiets** acts honestly in all of its business activities and acts in compliance with applicable antitrust and competition laws. It does not engage in situations that undermine free competition and will not tolerate its employees making agreements that aim at unfair competition.

**Prodiets competes independently and based on the merit** of its products, employees’ capabilities, services and performance.

Employees should not, in this way, make any kind of agreement with competitors since most agreements whether written or oral, are almost always illegal.

*Therefore, when talking to competitors, employees should not:*

- Discuss or fix prices, exchange price lists or discuss any sales terms;
- Discuss current or planned production levels;
- Discuss contract proposals, content of contracts or marketing plans;
- Make agreements to sell or not to sell to any customers, class of customers, territories or product markets with any competitor;
- Belittle unfairly competitive products.
Corruption, illicit payments and fraud

When negotiating with employees, distributors, customers, suppliers, agents, representatives, competitors or government employees of any type or other contributors, Prodiet guides its business with integrity, therefore, employees must not offer, give or receive any type of illegal payment or compensation (whether in cash, kind, advantages to themselves or others, or in any other way) in order to influence any decision affecting the Company’s business or for personal or third-party benefit.

In Brazil and abroad, there are anti-corruption laws, so all employees should be aware of the serious criminal and civil penalties (including fines and imprisonment), both for individuals and for the Company, applicable in case of violation of these laws, regardless of the place in the world where such violations may occur.

In addition, Companies found to have violated anti-corruption laws, will be barred from negotiating with state agencies, including public services in-house or operated by agencies or government authorities

Prodiet will not tolerate any form of corruption (active or passive, ie paying or receiving money or illicit advantage).

Violation of this Code will result in the application of disciplinary measures by Prodiet, which may include the termination of the employment contract and, in some cases, civil and criminal proceedings against the employee.
05
INTERACTIONS WITH GOVERNMENT

Relations with public employees

Everything described in this Code, especially that described in the item Corruption, illicit payments and fraud, should be strictly followed by employees when dealing with public agencies. And this includes our customers, partners or suppliers.

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IMPLEMENTATION OF THE CODE

Duty to seek guidance

This Code can not and is not intended to provide answers to all legal questions or to set out all examples of ethical behavior.

Therefore, situations may arise where it is necessary to seek guidance on how to proceed in certain cases. If this occurs, Prodiet encourages its employees to seek advice from their manager, from HR or from the Ethics Committee.

Reporting Code Violations

Prodiet encourages all employees or any interested third party (client, distributor, supplier, agent, representative or public employee) who is aware of or suspects a violation of applicable laws or regulations or the Company Code of Ethics, to communicate immediately to the Company.

For this, the Company has established a complaint channel that will be analyzed and treated by an Ethics Committee. Therefore, if you have something to report, you can do so by email (comitedeetica@prodiet.com.br) or
personally, through any member of the Ethics Committee. If you are unsure who the Ethics Committee members are, ask for HR guidance.

The Company will not tolerate any kind of retaliation for communications or complaints made in good faith concerning improper conduct.

Employees may report potential violations while remaining anonymous.

**investigation of potential violations**

All reported violations will be immediately investigated and treated confidentially to the extent reasonably practicable by the Ethics Committee.

Employees who have reported a violation should not conduct their own preliminary investigations. Investigations of alleged violations may involve complex legal issues.

Employees who act on their own account may compromise the integrity of an investigation and harm themselves and the Company. Any unauthorized investigation, as well as non-cooperation with an authorized investigation, constitutes a breach of this Code.

**Discipline relating to violations**

The Company intends to make every effort to avoid behaviors that violate this Code and to stop such behavior as soon as possible after its discovery.

Subject to applicable laws and agreements, employees who violate this Code and legislation will be subject to disciplinary action up to and including termination of employment contract. Depending on the severity of the violation, the employee may be civilly and criminally incriminated.

**Declaration of recognition**

All employees must indicate that they have received, read and will act in accordance with this Code of Business Conduct and Ethics, signing and dating the attached statement of recognition and returning it to HR.

**Doubts**

All employees who encounter situations that violate this code of ethics or who have doubts as to whether their actions, or actions of others or violate this Code of Conduct and Ethics, should contact HR or any member of the Ethics Committee.
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