



PRODIET
MEDICAL NUTRITION



Code of Ethics and Conduct



We can be **more.**

In fact, we were born for this.

To enjoy what life offers with more energy, more dedication, more presence. Prodiet exists to help people to thrive. Drop by drop, we nourish and strengthen stories, feelings, and relationships.

And with this impulse, making people feel stronger and more supported, we take off. We fly with the calm confidence of those paving their own way, always moving forward towards endless possibilities.

Do you know what's truly great about all this?

When we realize that we can be more,

**we're already
embodying it.**



PRODIET
MEDICAL NUTRITION

We are in the world to promote life.

MISSION We exist to research, create, and supply food for special purposes, providing inclusion, health, and well-being in a sustainable way.

VISION We challenge ourselves daily in the search for innovative solutions that result in more efficient processes and products, positively impacting the company, people's health, and our global operations.

VALUES



WE'RE GLOBAL

We exist to promote human life. When it comes to health and well-being, there are no limitations, but possibilities.

DEBATE

Being healthy is communicating, listening, and embracing diverse opinions and ideas so we can grow consistently and always improve.

COMPROMISSO & RELACIONAMENTO

We stand by our promises, speech, and obligations. We prioritize people and understand that trust is crucial for strong relationships.

QUALIDADE & CIÊNCIA

Making products for life means prioritizing quality and science. We research tirelessly to ensure, in our decisions, what is best for our products and consumers.



INICIATIVA & INOVAÇÃO

We focus on the future. Embracing fresh ideas, we're not afraid to discard outdated solutions. We are agile, open to new things, and we will simplify!



EFICIÊNCIA & PERFORMANCE

In our competitive market, maximizing productivity—both in revenue and cost—is crucial.



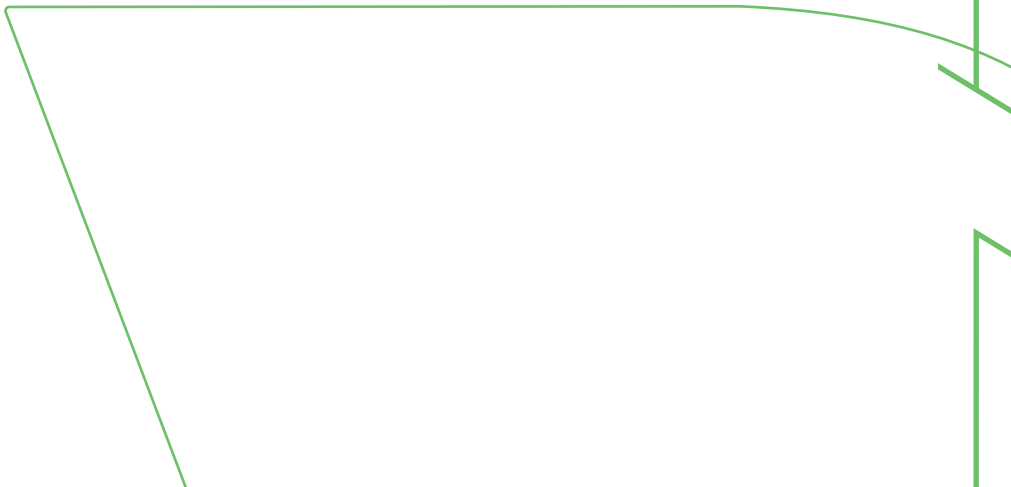
CRESCIMENTO SUSTENTÁVEL

Prodiet is dedicated to pursuing sustainability across its solutions, innovations, and actions, benefiting the company, society, and the environment.

INTRODUCTION

Prodiet conducts its activities according to the laws and the highest business conduct and ethics levels. Therefore, we have formulated this Code of Conduct and Ethics to provide our personnel with essential principles and protocols governing the Company's conduct.

This Code applies to all Company personnel, including advisors, officers, suppliers, distributors, representatives, and agents, collectively referred to as "personnel". It outlines Prodiet's expectations regarding legal adherence, work practices, ethical and moral considerations, anti-corruption measures, fraud prevention, conflict of interest, anti-money laundering practices, and interactions with the government, among other conduct requirements and guidelines detailed below.



The background features several overlapping, hand-drawn style green lines that form a large, irregular, rounded shape on the left side of the page. The lines are thin and vary in opacity, creating a layered effect. The overall aesthetic is clean and modern.

REQUIREMENTS AND GUIDELINES

1

LAW COMPLIANCE

Prodiet strictly adheres and complies with laws and conducts all transactions under the relevant regulations. We believe in achieving success through honest means and expect all personnel to uphold this belief, ensuring their conduct reflects the utmost ethics and integrity. Moreover, we aim to leverage opportunities to stimulate our operational chain toward sustainable development and growth.

2

RESPONSIBILITY OF PERSONNEL AND STAKEHOLDERS (STRATEGIC PUBLIC) TOWARDS THE COMPANY

All personnel are expected to dedicate their best efforts to promoting the interests of the Company. To do this, it is important to pay attention to the following:



CONFLICTS OF INTEREST

Personnel must avoid conflicts of interest, focusing solely on the Company's interests rather than their own when carrying out their duties.

A conflict of interest arises when a **personnel's personal interests interfere with the Company's interests**. For instance, when someone gains advantages due to their position in the Company.

This could include benefits for the personnel, their family, friends, or any associated individuals or entities.



SOCIAL RESPONSIBILITY

Prodiet's mission is to create and sell **food for special purposes**, so understand how It is essential to participate responsibly in their community, developing products for the

nutrition of people who are generally in a delicate clinical situation and who long to recover their health and reestablishment of their activities and social life.



RECORDS AND DOCUMENTS

Following Prodiet's accounting and internal control rules is required. Keeping unrecorded transactions is not allowed. Personnel are strictly prohibited from generating any false or deceptive reports or orders, or creating an account in the Company's name with the knowledge that any part of the payment or account is meant for a different purpose than stated in the supporting documents.

Personnel are not permitted, under any circumstances, to sign any name other than their own or sign on behalf of another individual unless explicitly authorized to do so.



RESPECT FOR THE ENVIRONMENT

Prodiect respects the environment by developing its activities in a sustainable way and wants its personnel to act in the same way.



PROTECTION AND USE OF COMPANY'S PROPERTY

Personnel are responsible for safeguarding and ensuring the efficient use of Prodiect's property, which includes not only assets and equipment but also confidential information.

Assets and equipment

Personnel are responsible for safeguarding the Company's assets and equipment. They should prevent any careless or improper use, waste, loss, or theft.

All assets and equipment should only be used to benefit the Company's operations.

General or competitor's confidential and exclusive information

Personnel have access to valuable information about the Company's activities, operations, and business plans, which is not known to the public.

All personnel must ensure proper protection of this confidential and exclusive information belonging to Prodiect.

This information should only be shared when there's a legitimate business necessity and, in such cases, only under a nondisclosure agreement, with authorization from the Company's senior management, or when legally required.

Confidential information encompasses any non-public data that may be advantageous to competitors or other parties, and could potentially cause harm to the Company or its business associates if revealed.

Unauthorized use or disclosure of exclusive information is strictly prohibited and could be against the law.



EQUAL EMPLOYMENT OPPORTUNITY AND NON-DISCRIMINATION

Discrimination and Harassment

Prodiet's policy ensures equal job opportunities, without discrimination based on race, color, nationality, citizenship, religion, marital status, sex, sexual orientation, age, disability, physical limitation, or any other legally protected status.

Personnel who believe that their work environment does not adhere to the aforementioned principles are encouraged to report their concerns and perceptions to the company's Ethics Committee. Sexual and moral harassment of personnel, suppliers, service providers, customers, and visitors is deemed serious misconduct and may result in dismissal.

Prodiet ensures that all hiring and employment practices comply with local laws and regulations. Recruitment and promotion are solely based on qualifications and not on personal relationships, promoting an inclusive, supportive environment free from discrimination, ensuring fair treatment for everyone.

Any action or practice that degrades employees or could harm the Company's reputation must be reported to the employee's manager, Human Resources, or the Ethics Committee.

hours and/or degrading working conditions – which can be characterized as forced and/or slave-like labor.

Prohibition of child labor

Prodiet and its suppliers are required to ensure that workers are at least 16 years old. For those under 18, proof of enrollment in educational programs, like Young Apprentice where necessary by local law, will be required.

Workers under 18 are prohibited from engaging in hazardous, unhealthy, or nighttime work.

Prohibition of forced labor

Prodiet and its personnel reject any restriction of worker freedom, whether through withholding documents, exhausting working



WORKPLACE SAFETY

The safety of personnel is paramount at Prodiel. A secure work environment significantly enhances well-being.

Personnel must adhere to health and safety guidelines and promptly report any unsafe conditions, equipment, or practices to their managers.

Additionally, personnel must follow all relevant laws, regulations, and internal protocols concerning environmental protection, handling hazardous materials, and waste disposal.



ENTERTAINMENT, GIFTS, AND AWARDS

When involved in making business decisions on behalf of the Company, personnel must **base their decisions on fair and objective assessments.**

Personnel who engage with individuals conducting business with the Company (including suppliers, customers, distributors, competitors, contractors, and consultants) must conduct themselves in the Company's best interests, adhering to consistent and impartial standards.

In personal commercial relationships, it's common to exchange gifts or other items of direct or indirect value, reflecting kindness and courtesy.

Receiving gifts

Personnel are not permitted to accept gifts from any organization or individual involved or seeking involvement in business with the Company, unless the gift:

- Is of **insignificant value**, such as calendars, mouse pads, or other items typically distributed by companies on special occasions;
- Is considered by a third party as **incapable of influencing the recipient's judgment.**

Gifts received by any personnel as a result of their job, whether from a client or a current/potential supplier, **must be handed over to HR for distribution among all Company personnel.** Gifts considered to have an insignificant value are exempt from this rule.

If there are questions regarding accepting gifts, please reach out to HR.

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COMPETITION AND FAIR TRADING

Prodiet conducts business and succeeds based on its performance and merit, in compliance with applicable laws and regulations. Personnel are required to engage in fair negotiations with customers, distributors, competitors, and suppliers.

It is strictly prohibited for personnel to use illegal or unethical tactics to gain an unfair advantage over others. This includes manipulation, concealment, abuse of privileged information, making false statements, or any other unfair negotiation practices.



ANTITRUST LAWSE

Prodiet operates with integrity in all business endeavors and follows antitrust and competition laws. It refrains from actions that undermine free competition and prohibits its personnel from engaging in agreements aimed at unfair competition. Prodiet competes independently, relying on the quality of its products, the skills of its personnel, and its performance. Therefore, personnel should avoid entering into any agreements with competitors, as most agreements, whether written or verbal, are typically illegal.

Therefore, when talking to competitors, personnel should not:

- Discussing or agreeing on prices, sharing price lists, or negotiating sales terms;
- Revealing current or future production levels;
- Sharing details about contract proposals, contract content, or marketing strategies;
- Entering into agreements to sell or not to sell to any customers, class of customers, territories or product markets with any competitor;
- Making unfair criticisms about rival products.



CORRUPTION, UNLAWFUL PAYMENTS, AND FRAUD

During negotiations with personnel, distributors, customers, suppliers, agents, representatives, competitors, government collaborators, or any other personnel, Prodiet operates with integrity. Hence, personnel must refrain from offering, giving, or receiving any form of unlawful payment or compensation (whether in cash, goods, benefits for themselves or others, or any other form) with the intent of influencing decisions that impact the Company's business or for personal gain or third parties.

In Brazil and internationally, there are laws against corruption, fraud, and bribery. Hence, all personnel must understand the severe criminal and civil penalties, including fines and imprisonment, that apply to both individuals and the Company in case of violation of these laws, regardless of where the violations occur worldwide.

Prodiel strictly prohibits any actions that could amount to fraud in its activities, business, and operations.

Examples include altering payment beneficiaries or processes, forging documents or signatures, and manipulating records of any kind.

Moreover, Companies whose personnel, agents, representatives, or distributors are found to have violated anti-corruption, anti-fraud, and/or anti-bribery laws will be barred from conducting negotiations with governmental entities, including internal public services or those operated by government agencies or authorities. This policy must also be adhered to by other third parties who, through contract, agreement, or relationship, act on behalf of Prodiel in joint activities, businesses, and commercial operations in Brazil and abroad.

Prodiel will not tolerate any form of corruption, whether it's active (paying) or passive (receiving) - including monetary or illicit advantages. Violation of this Code will lead to disciplinary actions by Prodiel, which may involve termination of employment contracts and, in certain cases, civil and criminal proceedings against the personnel.

4 INTERACTIONS WITH THE GOVERNMENT

All provisions outlined in this Code, particularly those concerning corruption, illicit payments, and fraud, must be rigorously adhered to by personnel when engaging with public entities. This applies equally to interactions with customers, partners, distributors, or suppliers.

Personnel representing Prodiel in bidding processes must strictly adhere to the regulations stipulated in the call notices and relevant current legislation.

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PRIVACY POLICY AND PERSONAL DATA PROTECTION

Prodiet is a company that has relationships with several Stakeholders in the country and around the world and, therefore, has a policy of protecting the data it holds from these Stakeholders, especially personal data.



WHAT IS PERSONAL DATA

According to Brazilian law, "personal data" refers to information that identifies or can identify a individual. This includes any data that enables the identification of an individual. Furthermore, personal data can be sensitive or non-sensitive.

Under Brazilian law, sensitive data includes information related to racial or ethnic origin, religious beliefs, political opinions, membership in unions or organizations of a religious, philosophical, or political nature, as well as data concerning health, sexual life, genetics, or biometrics when linked to an individual.

In the case of Prodiet, personal data may pertain to personnel, service providers, suppliers, customers, and other individuals with relationships with the company. For these individuals, only the minimum necessary data required for the legal relationship should be requested, with efforts made to minimize the collection and use of identifiable data, particularly sensitive data.



DATA COLLECTION

In case there's a need to collect personal data and there's uncertainty regarding its sensitivity, please reach out to the Data Protection Officer (DPO).

The DPO is responsible for analyzing the sensitivity of personal data used by the company and ensuring its proper handling to prevent violations.

Prodiet expects all personnel to handle personal data securely, free from theft or breaches. Therefore, any doubts regarding the identification of personal data or any violations should be promptly reported to the DPO or the Ethics Committee for appropriate action.

Improper handling of personal data, whether accidental, unlawful destruction, or unauthorized disclosure, will be considered a violation. In such cases, investigations, penalties, and liability will be enforced according to existing sanctions, potentially resulting in the termination of contracts between parties.



QUALITY POLICY, FOOD SAFETY, AND SUSTAINABILITY

Prodiet is dedicated to ensuring the quality and safety of the food it produces. The company expects its personnel to share this commitment, ensuring that its products the highest standards of food quality and safety. Alongside, [the principles of its Quality, Food Safety, and Sustainability Policy](#), which must be followed by everyone.
(FOR-SGQ-004A-06)

- We provide [food for life](#)
- [Food Quality and Safety](#) are our core values
- We comply with current [laws](#), Halal, and [customer requirements](#)
- We [reduce](#) process risks
- We [monitor](#) all steps
- We [empower](#) because people are essential
- [Communication](#) is the strength of our team
- We [grow sustainable](#) to nurture the future
- [Continuous improvement](#)



7 CODE IMPLEMENTATION



DUTY TO SEEK ADVICE

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

Therefore, there may be situations where guidance is needed on how to proceed.

In such cases, Prodiet encourages personnel to seek **advice from their manager, HR, or the Ethics Committee.**

any member of the Ethics Committee. If you're unsure who the members of the Ethics Committee are, ask HR for guidance. Additionally, reports can be made anonymously using the form prodiet.com.br/denuncia by completing all the required fields. This ensures that there is enough information to initiate an investigation.

The Company will not tolerate any form of retaliation regarding communications or complaints made in good faith regarding inappropriate conduct. Personnel can report potential violations while remaining anonymous.



REPORTING CODE VIOLATION

Prodiet encourages all personnel or any interested third party (whether a customer, distributor, supplier, agent, representative, or public personnel) **who is aware of or suspects a violation of applicable laws or regulations or the Company's Code of Ethics** to report this information to the Company immediately.

To facilitate this, the Company has set up a reporting channel that will be reviewed and managed by an Ethics Committee.

If you have something to report, you can do so via email (comitedeetica@prodiet.com.br) or in person through



INVESTIGATION OF POTENTIAL VIOLATIONS

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

Personnel who have reported a violation **should refrain from conducting their own preliminary investigations.**

Investigations of alleged violations may involve complex legal issues. Therefore, the involvement of specialized legal advice can be used, if the Committee considers it necessary.

Personnel who act on their own may compromise the integrity of an

investigation and harm both themselves and the Company. Any unauthorized investigation, as well as failure to cooperate with an authorized investigation, constitutes a violation of this Code.



DISCIPLINARY ACTION RELATING TO VIOLATIONS

The Company intends to prevent any behavior that goes against this Code and to promptly address such conduct once discovered.

Personnel who breach this Code and relevant legislation may face disciplinary action, including potential dismissal by the company, in accordance with applicable laws and agreements, regardless of cause.

Depending on the severity of the violation, the personnel may be charged civilly and criminally.



ACKNOWLEDGMENT CONFIRMATION


All personnel must confirm they have received, read, and will comply with this Code of Business Conduct and Ethics by signing and dating the attached acknowledgment and returning it to HR.

The Code is currently in effect, and all other national and/or international standards, regulations, and internal policies established by Prodiel remain applicable.

QUESTIONS?

All personnel who come across situations that breach this code of ethics or who are uncertain whether their actions, or the actions of others, violate or will violate this Code of Ethics and Conduct, must reach out to a member of the Ethics Committee or submit an anonymous form via: prodiet.com.br/denuncia.



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