



A Beneficência
Portuguesa
de São Paulo



Code of conduct

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Introduction

Welcome to BP - A Beneficência Portuguesa de São Paulo. We are happy to have you with us.

In the coming pages, you will get to know the standards of behavior that translate our positioning, purpose and values, that is, our way of being at BP.

These practices represent our attitudes, guide our shared experiences and guarantee a healthy working environment, one that is harmonious, and consequently, more productive.

Your attitudes reflect you. You reflect the BP.

Have a good journey.

BP – A Beneficência Portuguesa de São Paulo

Integrity

Personnel

We reject discrimination

BP - A Beneficência Portuguesa de São Paulo strives to offer a healthy working environment, one that is respectful and dignified. Thus, we repudiate any behavior that will lead to discrimination or prejudice of any nature, be it race, color, religion, nationality, gender identity, marital status, physical condition, sexual orientation, political convictions, etc.

In our recruiting, selection and promotion processes, the candidates are assessed solely based on their competences and ability to execute what the position requires. Therefore, we do not consider any other criteria. We believe in that and will continue to do so always.

We refuse harassment in any circumstance

We, at BP – A Beneficência Portuguesa de São Paulo, reject harassment of any sort, be it sexual, economic, moral, etc. We additionally disapprove of any situation which might constitute pressure, intimidation or threats in the relationship among our employees, regardless of their hierarchical level.

Sexual harassment

If anyone in a higher hierarchical position attempts to offer advantages, employment vacancies, promotions or threatens to lay off employees for a quid pro quo demands involving sex, this constitutes sexual harassment. This is most certainly a crime provided in Article 216 - A of the Penal Code.

Moral harassment

It is characterized by abusive behavior through gestures, actions, words or attitudes, which turn the working environment into an abusive, humiliating and intolerable context. To spread rumors, disseminate false information or similar actions or to proceed with these, generating strong and violent psychological pressure on the victim, threatening their jobs or degrading the working atmosphere.

If you are confronted or testify against any harassment case belonging to the categories above, please get in touch with your manager or the Human Resources department. This will allow us to adopt the necessary measures. You can also denounce this through a confidential channel: cconfdencialbpsp@deloitte.com.

How we act regarding the granting of privileges

All employees at BP – A Beneficência Portuguesa de São Paulo must refuse promotional gifts or presents that may grant privileges to the parties involved in some type of negotiation with the organization. This way, we wish to eliminate any expectation of advantage or favoritism to clients and suppliers, offering the greatest transparency possible. It is our understanding that, very broadly and generally, all should be treated equally and without differences in all situations, based on clear and broadly disseminated criteria.

Political and religious manifestation in the right spaces

We, at BP - A Beneficência Portuguesa de São Paulo, respect all political party and/or religious activities of our employees, with no restrictions. Notwithstanding this, it is our understanding they should be maintained and always manifested privately. We believe that a free political or religious manifestation carried out in the appropriate spaces (churches, political party headquarters, unions, etc.) allow for a more harmonious and productive working environment, and do not interfere in the professional responsibilities of our employees.

How we deal with conflicts of interest

BP fosters transparent relationships, without favoritism with its clients and partners. Thus, it is our belief that conflicts of interest should be avoided in all their forms.



Due to this, a general rule is that suppliers who have in their company make-up – or in their decision- making levels - direct or indirect employees at BP, cannot participate in any quotation or sales processes with BP – A Beneficência

Portuguesa de São Paulo. This is extensive as well to spouses and relatives (father, mother, siblings, grandparents, children, cousins, uncles or aunts) of any other institution employees.

Integrity Institutional

Confidentiality is of the essence at BP

As an employee, you are accountable for treating all the information on intellectual property and any other you may have access to, during your work, in a confidential way, using it with caution.

Therefore, we disapprove of the dissemination of such information without the express authorization of the hospital management.

There are however situations in which government authorities may request such information in a legitimate fashion. They can only be supplied if there is full certainty that they will be used in a confidential manner. Hence, to assure this happens, count upon the help of the Legal Department at BP – A Beneficência Portuguesa de São Paulo.

When it comes to information regarding clients, employees of the organization should maintain **full and complete professional confidentiality**. This is everyone's commitment, **inside as well as outside all the organization's hospitals**, to maintain confidentiality on:

- **Any pieces of information relating to clients.** This is also valid for all data obtained during diagnosis and exams, as well as other procedures referring to the professional exercise of Medicine;
- The client's health status, as well as the course of treatment;
- Everything that is witnessed during any and all care and medical actions;
- Information rendered by the client to the physician or other health professionals at the organization;
- Any data on the client's medical record. The exception will take place in the case the clients themselves or their legal representatives authorize use of such information.



We are very careful with the assets at our organization (conservation, appropriate use and preservation of IT resources, etc.)

As an employee at BP –Beneficência Portuguesa de São Paulo, you have the commitment to carefully securing the conservation of all the institution's assets. This includes our facilities, real estate, machines, devices, equipment, furniture, vehicles, valuables and others.

Special attention should be given to surgical instrumentation and other medical-use material, ensuring that are not lost, stolen or mixed with other materials. In the final account, this could impact the hospital services, and, more importantly, the health of our clients.

Equipment, the physical space and other items at BP - A Beneficência Portuguesa de São Paulo are for the use of employees while they carry out their activities during working hours.

Additionally, it is important to mention that the depredation of the institution facilities will be deemed an illegal act, subject to the enforcement of the penal legislation in effect. Take care of our BP.

The BP address, BP - A Beneficência Portuguesa de São Paulo is used merely to receive correspondence of a professional nature and that refer to the organization's activities.

Exceptions can be made in special cases, but it will be necessary to request authorization from the organization's management.



To care for the safety, integrity and confidentiality of information and electronic data of our organization and protect our resources against non-authorized uses is a commitment of one and all at the institution.

The IT resources are fundamental for the proper operations at our organization and are used in such a way that respects not only the laws but also the in-house norms and safety policies for information in effect at BP.

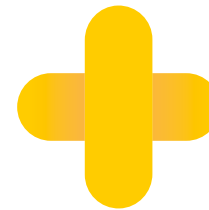
Therefore, it is important to clarify that – on behalf of the sensitivity and confidentiality of information – our employees can have their e-mails, documents, files and other material that use our IT resources monitored. Exceptions may occur by issuing a legal order.

On behalf of the security and protection of the information that circulates through the premises of the organization, BP - A Beneficência Portuguesa de São Paulo reserves the right to monitor or access the communication of data at any moment and without any prior warning. This extends to other electronic material created, received, stored, transmitted or processed through our IT resources.

Intellectual property rights, those of BP or third parties – are also treated in a very serious way by our institution. For this reason, avoid copying, under any circumstances, any and all programs and systems that are being developed in-house and/or through license contracts and through copyrights.

Exceptions are valid solely through an authorization in writing or if the software allows for this.

Moreover, to protect information and the organization’s IT infrastructure, avoid installing programs in the company computers without authorization - also in writing – through the areas involved.



How we proceed in terms of in-house trade

With your well-being and that of all our employees and clients in mind, avoid the trade or sale of goods and services, solidarity campaigns, undersigned lists, chains and donations inside the premises of BP - A Beneficência Portuguesa de São Paulo.

This recommendation is valid even when employees are off their normal working hours. Through this, we want to avoid the emergence of eventual conflicts of interest or impacting the institution’s operations.



How we proceed in terms of affective relationship between employees

BP - A Beneficência Portuguesa de São Paulo makes it possible to hire the relatives of other employees to become part of our personnel.

Notwithstanding this, on behalf of transparency and good practices, we are careful to ensure there is no relation of subordination between relatives, or that they act in the same area and/or report to the same superior.

The exception to this is in the Internal Audit Area. Since this is an area that demands full independence, any degree of relationship among employees is forbidden, regardless of the reporting structure.

Society

Society and the relationship of BP with the media

We, at BP - A Beneficência Portuguesa de São Paulo, respect the most diverse means of communication and attempt and seek to maintain a respectful relationship with the media in general always at their disposal to clarify any doubts. Therefore, we also request that our associates care for the image and reputation of our institution, avoiding any action that will stain our reputation.

Our relationship with the press

We advocate for free and exempt media. Therefore, relationships of four employees with the press should not be deemed – under no circumstances – as a commercial relation. How we grant interviews.



How we grant interviews

As in any large corporation, contacts with the press should be carried out exclusively through our communications area, who will put at the adequate authorized spokespersons at their disposal. The authorized employee, upon granting an interview, publishing an article or using any other form of public manifestation, will restrict their comments to technical aspects, in a precise and direct way, avoiding the use of judgement, and respecting the confidentiality of information relating to clients and other aspects of the organization.

Giving interviews on behalf of the organization

For a discourse that is aligned and in accordance to the institution's values, it is important to underscore that no employee, physician, supplier or partner can speak to the press on behalf of BP - A Beneficência Portuguesa de São Paulo without the prior authorization of our communications area. This encompasses face-to-face interviews as well as sending any information, be it through e-mail, telephone, letters, etc.



Image production at our facilities

As in the interviews, BP - A Beneficência Portuguesa de São Paulo also restricts the possibility of taking images of its premises (photos, videos, etc.). For this to be possible, it is necessary to have the express authorization of the communications area. Hence our employees should avoid having this happen, besides offering orientation to our clients and visitors regarding this practice. In the case they see any type of image being taken, they should immediately contact the security area. This attitude respects the principles of privacy and confidentiality of information, besides the wellbeing of our clients.

How we proceed in terms of hospital uniforms or attire outside of designated areas

Because of issues relating to our Quality Policies, as well as our safety standards, our employees should not circulate through our facilities- or leave the premises using the hospital uniforms. Their use is restricted to the environments specified in our internal norms.



How we relate with labor unions

BP - A Beneficência Portuguesa de São Paulo acknowledges that union entities are the legal representatives of its employees. Through this, we constantly seek an open dialogue for the discussion of labor issues and other aspects involving our professionals. The objective is to permanently find the best solution for both parties.

Our clients

We value humanized attention for all. Without distinction.

Above all else, we value life. For this, we offer the appropriate facilities, state-of-the-art technology and, as important as all that:

we seek to humanize our services in all possible situations.

Aligning care to technical quality requires having qualified personnel and state-of-the-art equipment. However, it is also necessary to include delivering care with affection, dedication and respect for our clients. Thus, our employees – be them physicians, nurses or from the administrative área – should provide uniform, humanized and welcoming care at all the units of our organization.



We encourage to avoid caring for our clients through a number, code, name of their disease or worsening of their health. Instead, it should be through their identity, their individuality, their history.

Therefore, we guarantee that prejudice due to origin, race, gender identity, age, social bracket or any other form of discrimination will not be tolerated at BP – A Beneficência Portuguesa de São Paulo.

Responsibility for servicing our clients

We take on full responsibility for servicing our clients within the institution premises, rendering excellent care. For this purpose, we discourage transferring responsibility to companions or caretakers that have some sort of training/technical education in health to carry out such procedures.

Careful with personal opinions

To service our clients in the best possible way, our employees should avoid demonstrations and/or manifestations of their personal or professional dissatisfactions with those that are under our care, as well as issuing unfounded opinions or personal opinions on the working conditions. They should equally avoid insinuations to the client regarding eventual care problems that may have emerged in another sector of the organization. Remember our role is to solve such problems with the greatest efficiency possible and internally.

Gifts from clients

We avoid favoritism at any level and our employees do not accept gifts of any nature, including amounts in money offered by the clients or their companions.



Physicians

Institutional

Respect as a fundamental pillar

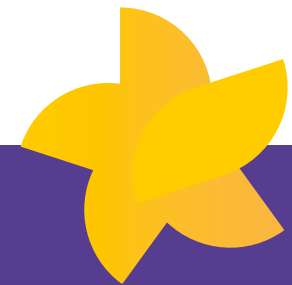
Our physicians are a fundamental pillar for the well-being of our clients and those who accompany them. We base our relationship on deep respect and trust. And the result is an ever-growing credibility in the public at large.

Through this, we are receptive and open to the opinion of physicians and, at the same time, we encourage their enhancement and development. This generates continuous improvement of our processes and protocols, for the benefit of our clients.

Our infrastructure under permanent enhancement

BP – Beneficência Portuguesa de São Paulo strives to offer the best infrastructure, with state-of-the-art technology, technical and administrative support, besides teams that are committed with the needs of their clients, be it on the physician side,

be it in care that is evermore humanized. All of this allied to the need to provide clear and precise information, compatible with each situation.



Physicians Staff

Respect: fundamental element for our employees and other teams

We believe that respect is a fundamental element not only for the clinical staff, but also the rest of the employees of the organization. With this, we motivate a harmonious relationship, in accordance to the standards set forth in this document.

We expect the same respect to be shown among the diverse medical teams at the organization.

Avoid comments on the practices of other teams, when speaking to clients. This could hamper the organization's image in general.

Any issues relating to behavior should be resolved with the Medical Ethics Committee or the Conduct Committee.

Respect in-house standards

As happens with the other employees, the entire medical staff at the organization respects and follows our in-house standards, protocols and other regulatory devices. This guarantees that all processes will be put in place with efficiency, guaranteeing our acknowledged excellence.

The same holds true for the norms, medical resolutions and legislation that applies to the profession as its code of ethics.

Make sure information remains confidential

Information on the health status of our clients is confidential and treated as such by our employees.

Additionally, disclosing copies of medical records of our clients - total or partially - is only allowed with the express authorization of the latter or of the Medical Superintendence.

This is extensive to requests for information destined to research work for our entrepreneurial, accounting, financial or commercial strategies, or any other information that our employees may get wind of as a result of the services rendered.



Suppliers

Institutional

How to proceed in sponsorship proposals

No employee at BP - A Beneficência Portuguesa de São Paulo is authorized to ask for or accept sponsorships, bonuses and donations from third parties. Issues of this sort should be referred to our marketing area and the Conduct Committee that will analyze the requests.

Besides that, sponsorship proposals for BP – A Beneficência Portuguesa de São Paulo should include in their context a positive way of disseminating the organization. Such actions do not subject the institution to any present or future commitment.

How to proceed in events organized by suppliers

We maintain transparency in our competitions or tenders and therefore our employees should avoid participating in any event hosted by suppliers that do not have a merely professional nature. This is especially valid for members of the procurement area.

Even for events that do not pose any conflict of interest, the invitations should go through the approval of the immediate superior and be aligned with the norms in effect at BP - A Beneficência Portuguesa de São Paulo. Events involving international travelling should also be approved previously by the area superintendence.

Additionally, visits to the supplier's premises, when paid for by the latter will only be allowed through the prior authorization of the area management or area superintendence



Promotional gifts and presents: can we accept them?

Institutional and promotional gifts, if they have no commercial value (office material and similar in general, books, flowers and candy, etc.), will be accepted in situations in which the sender had no goal in terms of favoritism and/or retribution.

However, it is important to underscore situations that differ from the ones mentioned need to be referred to the Conduct Committee of the organization.

Important: our employees should also avoid receiving benefits (financial or of any other type) in their favor or that of relatives given by suppliers and external clients of BP.

How to proceed in lunches and dinners

Lunches, dinners and other relationship activities on festive dates held by suppliers and other external clients are permitted, if offered to groups of employees from the organization.

Similarly, business meals are allowed strictly for those positions and areas duly authorized by the superintendence area. Besides that, each event of this type needs to be justified as being a business meeting or as normal business courtesy.

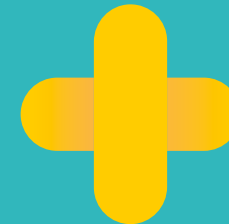
In addition to this, before accepting invitations to events, our employees should observe if such programs will demand some sort of retribution by the department where they work, or contain any action that may be deemed embarrassing or awkward for them or for the organization.

Promoting fair competition

Another extremely important pillar for BP – A Beneficência Portuguesa de São Paulo is holding price tenders that stand out for being fair and transparent, guided by the principles of the best cost-benefit ratio for the institution.

With this, it is essential for all suppliers to have access to the same basis of information during the quotation and procurement process.

Therefore, we reject any type of rigged tenders, price fixing, price discrimination or unfair commercial practices that breach federal, state or local legislation. Employees that make use of such practices are subject to the penalties provided in the law.



Suppliers Personnel

Integrity: a permanent pillar at BP

We, at BP – A Beneficência Portuguesa de São Paulo, reject commissions, favors, gratifications, entertainment or any item offered by our suppliers. The aim is to avoid accusations of favoritism by the organization. Any occurrence of this type is subject to the penalties foreseen in our internal regiment.

Conduct and ethics above all

We encourage and expect our suppliers to have ethical and transparent behavior, duly aligned with their (and our) values.

Through this, we avoid setting up relationships with suppliers that practice discrimination, lack of dignity and respect in the treatment of their own employees (and ours).

This extends to issues such as the use of child and/or what is deemed to be slave labor. Our suppliers take the commitment to comply with legislation, regulations, norms and practices that refer to the nature of their activities in their direct and indirect relationships with BP – A Beneficência Portuguesa de São Paulo. In addition to that, they are subject to compliance with our internal standards and procedures.

Such standards include – among others – safety and circulation conditions, technical qualification, references, besides trustworthiness and impartiality when presenting products and services. We deem such actions to be basic premises for their participation in any commercial process involving the organization.

How we deal with conflicts of interest

We ask our suppliers to notify BP – A Beneficência Portuguesa de São Paulo immediately on any case of conflict of interest or inadequate behavior on the part of our employees.

Any situation that falls within those scenarios will lead to the annulment of the procurement processes. The practice of these conditions is a sine qua non condition for the hiring of a supplier, and for being able to remain as a partner and supplier at the organization.

Market



How we proceed in the relationship with our competitors

All health organizations should be treated with respect, and we reject making comments that will impact the image of our competitors.

As a result, we do not encourage our employees to maintain personal contact or virtual contact with our competitors, with the aim of conveying confidential data, be these technical, scientific or financial results of the organization.

Such information is made available only to authorized employees, who are subject to the established penalties for breaching this practice.

Maintain confidentiality of information

We discourage our employees from discussing whichever strategies we have in terms of our competitive edge with third parties. This includes price policies, contract terms, costs, marketing, new product development, market surveys, among other information deemed to be confidential.

How we proceed with partnerships with other organizations

We, at BP - A Beneficência Portuguesa de São Paulo, have the understanding that cooperation in information exchange to comply with common goals is healthy for all of those involved, and can generate a diversity of benefits for our clients. Nevertheless, it is necessary to always comply with legal standards and for both parties to maintain the confidentiality of information.

It is also important to highlight that discussions with partners with other institutions, be they similar in nature to Beneficência Portuguesa de São Paulo or not, is the **exclusive responsibility of our Superintendence**. Therefore, no one is authorized to initiate discussions of this sort.

Under any circumstance will corruption* be accepted

We are committed to combating any type of corruption and practices of that sort. Therefore, we discourage our employees, partners, agents and third parties to act on behalf of the organization and take part in any type of bribery.

This includes payments for “facilitation” or “offering kickbacks” to public authorities to facilitate administrative procedures or official actions to which the individual or company are entitled to.

It is important to underscore that, in the case our employees feel threatened or pressured to practice acts of corruption, they should immediately communicate this to their superiors.

* The Anticorruption Law penalizes companies for acts of corruption against public administration. Once the companies are made responsible for this, they end up paying fines of up to 20% of their invoicing.

We respect antitrust* laws

We believe that fair competition brings benefits for the development of the health care practice and is directly aligned with our cause.

Through this, we fully oppose agreements and practices whose objective or effect is that of restricting competition.

Among such practices which we condemn are price agreements, colluding in tenders, allocation of clients, buying and selling terms, production quotas and the sale or distribution of geographic markets.

* Antitrust Laws are those geared to punishing anti-competitive practices that use their market power to restrict production and raise prices, so as not to attract new competitors or eliminate competition. Some examples of this are creation of a cartel, corruption of public agents, use of classified information, etc.

Government

We respect the legislation in effect

We strive to maintain an honest and constructive relationship with the Government and its agencies, at the three spheres of power.

That said, the organization aims to be exempt and impartial when it comes to political parties, not being based on any type of ideology. Therefore, we do not make financial donations to any party, politician or candidate to a public office. And we discourage our employees from doing this on our behalf without the due authorization.

We support authorities in their investigations

In cases in which BP - A Beneficência Portuguesa de São Paulo is requested to cooperate with investigations led by the public powers (police, General Prosecutor Office, etc.), it makes the commitment of not modifying or tampering with any information requested by the abovementioned authorities. Our main goal therefore is to never hamper the object of the investigation, or be an obstacle to the work underway. Nonetheless, it is important to highlight that each and all notifications in this sense - so long as emanated from official agencies – should be referred to our legal department exclusively. No other area in the organization is authorized to respond to this.

Environment

We fight against waste

BP - A Beneficência Portuguesa de São Paulo is aware of its social responsibility. We attempt to develop actions that will foster health and wellbeing of the community in general. This not only brings benefits for all, as it brings the organization closer to the population. For this reason, we expect our employees to have a behavior that will combat waste, through simple actions that are easy to execute. Using water and energy resources rationally in their day-to-day, and keeping the bathrooms in good conditions of hygiene and cleanliness. In the case you detect situations of waste, such as leaks, please communicate this immediately to your leaders or to our maintenance department.

We dispose of our own residues

The policy for the proper disposal of residues is taken very seriously at BP. We adopt management, storage and disposal practices that are recognized worldwide, always complying with the environmental legislation in effect. This way, we discourage our employees from disposing of contaminating material in ways that are different from those specified in our internal quality standards. That encompasses diverse areas, such as disposal in sinks, drains, bathroom toilets and soil. Should you have doubts regarding this item, please contact your manager.

We comply with and support environment standards and laws

We, at BP – A Beneficência Portuguesa de São Paulo, respect the environment legislation in effect, at all spheres, when conducting management actions and the treatment of residues. And we permanently encourage our employees to do the same.



Note

Communication channels

Although BP – A Beneficência Portuguesa de São Paulo has by-laws, policies, procedures, regulations and stringent standards, there always exists the possibility of cases of non-compliance and violations of this Code of Conduct, albeit being very rare. If you are faced with an occurrence of this type, do not hesitate in using our institutional communication channels, geared to reporting such cases. They are listed below:

[Website: www.ethicsdeloitte.com.br/bpsp](http://www.ethicsdeloitte.com.br/bpsp)

[E-mail: cconfidencialbpsp@deloitte.com](mailto:cconfidencialbpsp@deloitte.com)

[Telephone: 0800 721 1286](tel:08007211286)

These channels deal with reports confidentially, and denouncing a problem can be done anonymously, should you wish to do that.

However, it is important to highlight that our employees should act responsibly when making such reports, which should be coherent and true.

Management of this channel is confidential and under the responsibility of our Ethics Committee. Do not forget to speak to your area managers, who are another important channel of communication for the company.

Technical person in charge: Dr. Luiz Eduardo Loureiro Bettarello — CRM 23.706 SP

Rua Maestro Cardim, 769
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