

Code

Of Conduct





Introduction

Hello.

Welcome to the BP Code of Conduct.

Here we present the way of being at BP, translated into guidelines that direct our attitudes, guide our coexistence and guarantee an ethical, harmonious and inclusive environment.

Have a nice journey.

BP – A Beneficência Portuguesa de São Paulo

Summary



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A BP

About Us

We are BP - The Beneficência Portuguesa Hospital of São Paulo, a health hub that offers medical-hospital services to the entire population. We have over 160 years of history, marked by a unique look focused on health and the generation of a positive impact on society.

We rely on a modern infrastructure and a team of employees and physicians who are references in medical-hospital care in several specialties. We also offer complementary services such as diagnostic and therapeutic medicine, outpatient care and education and research - all this to follow our purpose: to value life.

BP Governance

We are a non-profit private civil association of a charitable, social and scientific nature with patrimonial, administrative and financial autonomy.

Since our inception, we have relied on the support of the Associates, who meet in annual General Meetings to elect the governing body members, as well as to approve the accounts and the activities report.

Our governance structure is composed of a Board of Directors and a Board of Executive Officers, supported by an Advisory Board, and overseen by a Fiscal Council. All members of these governance bodies perform their functions at no cost.

The institution's administrative management is carried out by the Executive Board, and by a Chief Executive Officer (CEO), the organization's main executive.

This entire structure follows the rules established in the BP Bylaws, in this Code of Conduct, and in the other regulatory documents approved by the Board of Directors.

Learn more!

For more information about BP's Bylaws, please visit:
<https://www.bp.org.br/institucional/estatuto-social-da-bp>

Learn about our governance structure:
<https://www.bp.org.br/institucional/governanca-corporativa>

Purpose and values

Our way of being at BP

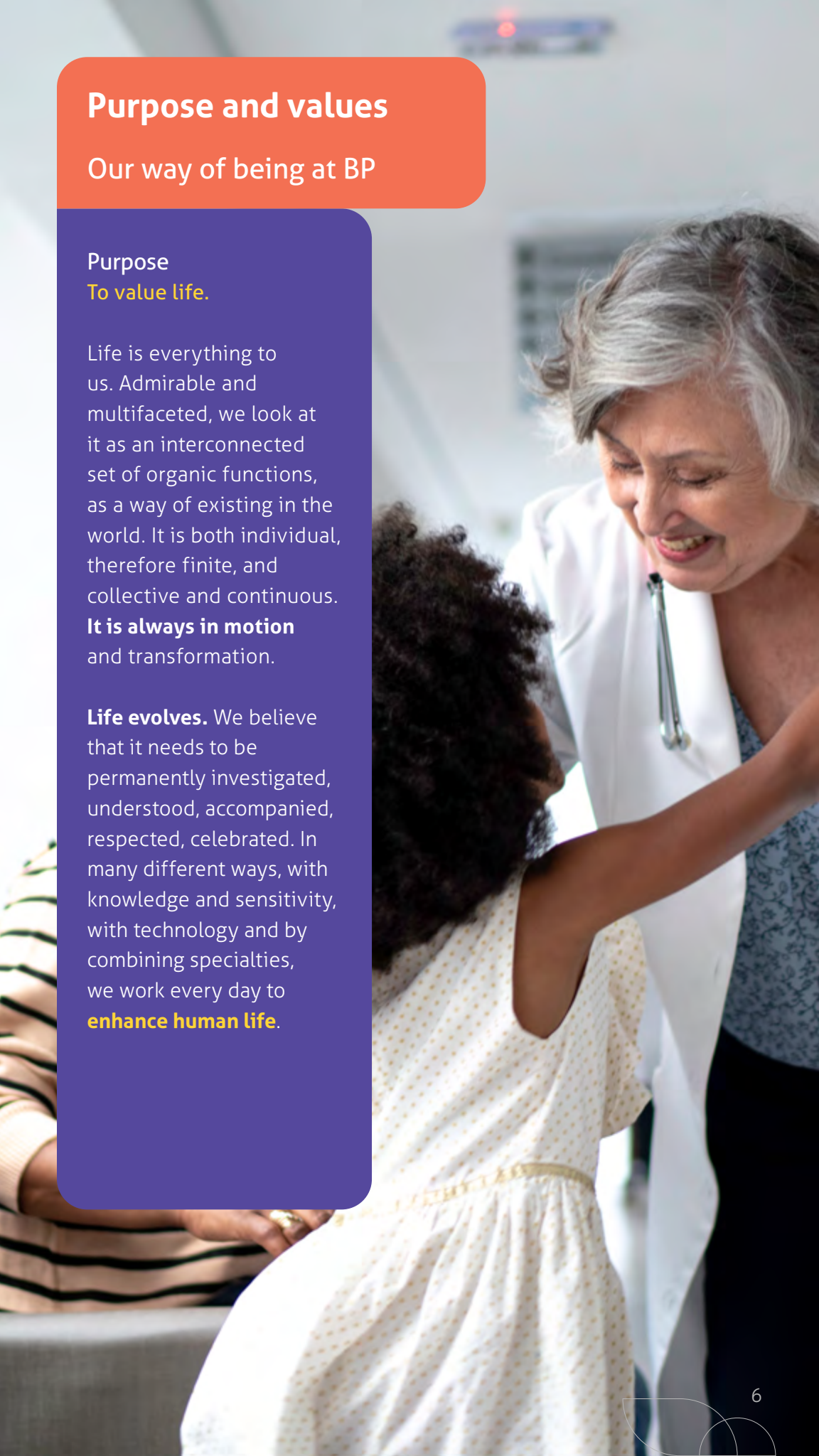
Purpose

To value life.

Life is everything to us. Admirable and multifaceted, we look at it as an interconnected set of organic functions, as a way of existing in the world. It is both individual, therefore finite, and collective and continuous.

It is always in motion and transformation.

Life evolves. We believe that it needs to be permanently investigated, understood, accompanied, respected, celebrated. In many different ways, with knowledge and sensitivity, with technology and by combining specialties, we work every day to **enhance human life.**



Our values



Health comes first: with a holistic view of treatment, we seek our patients' well-being and recovery above all.



Credibility is cultivated: we build a reputation based on service excellence, on transparent, ethical attitudes, and on integrity. We nurture relationships that are sustainable, true, and long-lasting.



It feels good to do good: we believe that to create a better world and a fairer society it is not enough for everyone to do their part. It is necessary to go beyond. Philanthropy is in our DNA.



We are always in motion: dealing with human lives requires constant updating and renewal - of knowledge, of infrastructure, and of ways of thinking. In an ever-evolving world we can never stop.



Collaboration takes us further: together we achieve more robust, efficient, and innovative results. We value alliances and partnerships that make us more comprehensive and complete.



Connected lives: we nurture relationships that awaken a sense of meaning and connection to life. We believe that acting in such ways transforms, brings lightness, and inspires.



Sustainable growth takes us into the future: we generate economic value to ensure growth, improvement, and expansion. We believe that distinctive performance levels allow us to increase our capacity to value life.

Message from the management



"For over 160 years, BP has operated in an ethical and responsible manner, with an outstanding reputation in support of Brazilian health, teaching and research. Over the years, we have cultivated and strengthened our credibility before society and government institutions, with emphasis on our performance through partnerships and social impact projects, in which we support the health of the most vulnerable population.

This Code of Conduct is a tool that guides us and guides our constant search for the perpetuity of the organization. In this document, we clearly and transparently present the values and the conduct guidelines that guide our actions."

Josué Dimas
Chairman of the
Board of Directors



"BP has worked, since its foundation, with human life. In our society's scale of values, human life is the supreme value. In our daily lives, BP, its employees and its related parties must make choices and decisions.

The Code of Conduct was prepared exactly to guide these decisions and to ensure that in them we will always respect the supreme value of life and also the general principles of Ethics, the current laws, the regulatory structure that governs our activity, the protocols and best practices applicable, with excellence. And, above all, respecting our century-old history of acting in favor of life."

Ricardo Neuding
Coordinator of the GRC Committee
(Governance, Risk and Compliance)





"The way of being at BP is grounded in a culture of integrity and fairness and translates into an ethical, plural and transparent environment. All of us who are part of BP have the duty to reflect these premises and the values of the Institution in our daily lives.

To ensure that the optimal conduct is known and practiced, we have published this Code of Conduct. The document reflects the attitudes and behaviors that we expect from our employees, business partners, suppliers and other BP stakeholders. We thank you and count on the efforts of everyone to build an increasingly conscious and responsible Institution."

Denise Santos
CEO



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Our Code of Conduct

This Code of Conduct establishes guidelines for ethical behavior that reflect BP's positioning, purpose and values, in compliance with current laws and regulations. It presents the BP way of being.

It is an important governance tool, which reinforces our corporate social responsibility by promoting ethical and responsible conduct, respect for human rights and the environment, the creation of a safe, fair, and respectful work environment, combating any other forms of violation of rights and obligations, integrity values, and the fight against all forms of corruption.



Practices presented in the Code:



They represent the attitudes expected from us



They guide our coexistence



They ensure a healthy, harmonious and inclusive work environment



They result in a more productive



They strengthen compliance with legislation, norms and procedures

At the beginning of each chapter of this Code of Conduct, we relate the guidelines described to our Values (see BP's Values on page 7). By doing so, we show the alignment of our standards of conduct with the way we are at BP.



Each one does his or her part

Together we promote ethical and responsible conduct.

Our Code of Conduct is applicable to everyone involved in activities performed by or for BP, including senior management, employees, business partners and suppliers, physicians and other stakeholders.

To whom the Code of Conduct is addressed



Senior Management (including Board members, CEO and Executive Board)



Employees at all levels and business units



Physicians



Business partners



Service and product suppliers



Other BP Stakeholders



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Integrity

Our Compliance department

At BP, we have a Compliance department that operates independently and reports directly to senior management, with periodic and structured reports to the Board of Directors.

It is the area's responsibility to structure and manage the BP Integrity Program, approved by the Board of Directors, which includes the preparation and disclosure of the Code of Conduct and Policies related to the topic, as well as training and periodic communications.



*What is
Compliance?*

Compliance-based management is guided by compliance and adequacy to the legislation in force.

Integrity Program

BP's Integrity Program is based on our value "**Credibility is cultivated**", we build reputation based on service excellence, transparent ethical attitudes and fairness. We nurture true relationships, sustainable, to last.

The program was developed with the support of senior management. This is a crucial tool to **ensure the governance** and perpetuity of the institution, acting to prevent, detect and respond to any deviations, frauds or irregularities occurring at BP.

Learn more!

It is the responsibility of all BP employees to ensure compliance with the Integrity Policy.

Access the Integrity Policy through Tasy!



The Integrity Programs were instituted by law 12.846, the Anticorruption Law and its regulating decree 11.129/2022.

In addition, they are also foreseen in international legislations such as the Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UKBA).

Code of Conduct and Compliance Policies

In addition to the Code of Conduct, we rely on:

- Integrity Policy (TASY 6372)
- Government Relations Policy (TASY 6374)
- Due Diligence Policy (TASY 6376)
- Antitrust Policy - Competitive Practices (TASY 6375)
- Gifts, Entertainment, and Free Samples Policy (TASY 6377)
- Conflicts of Interest Policy (TASY 6315)
- Donations & Sponsorship Policy (TASY 6373)
- Disciplinary Measures Policy (TASY 6380)
- Whistleblower and Non-Retaliation Policy (TASY 6378)

All policies are available to our internal public through Tasy.

Learn more!

Compliance training and communications address important topics aligned to our values.

Access the training courses through the Compliance page on the Distance Learning Platform.



Compliance Channels

You may contact our team in case of questions through the Compliance Channel.

To make complaints, access our Confidential Channel, which is handled by a third-party company and guarantees anonymity and confidentiality of information, available 24 hours a day, 7 days a week to all interested parties.

Website:
www.canalconfidencial.com.br/bp/
E-mail:
bp@canalconfidencial.com.br
Telephone: 0800-882-0628

In case of doubts or requests, access the **Compliance Channel**:

Website:
<https://bp.topdesk.net/tas/public/ssp/>

Questions & Answers

I am a team manager at BP. What are my responsibilities regarding Compliance and Integrity Policy?

It is the responsibility of all BP employees to ensure compliance with the Code of Conduct and the Integrity Policy. However, managers play a vital role in the disclosure and dissemination of the Integrity Program guidelines, encouraging their team's participation and addressing any irregular situation that come to their attention.

BP's Code of Conduct provides for compliance with several standards, policies and values. However, on a daily basis I notice that they are not respected by some of the peers that work with me. What should I do?

All of BP's policies and regulations are aimed at ensuring that the rules and responsibilities of the parties that interact with the Institution are followed and complied with, mitigating risks of a legal and reputational nature and even financial losses. If you are aware that any policy or regulation is not being complied with, the Confidential Channel is at your disposal to receive your report.

Integrity Culture

By establishing a culture of Integrity at BP, we help prevent illegal practices and guide responsible conduct based on principles, values and corporate social responsibility.

To help you make decisions that strengthen our culture of integrity, we recommend that you reflect on the following points before you make your decision:

Let's think about it?

1

Evaluate the integrity and legality of your decision:

Considerarei todos as diretrizes de conduta, políticas e requisitos legais para a minha tomada de decisão?

2

Evaluate how you feel towards your co-workers and superiors:

Can I talk openly to everyone about my decision, including my managers?

3

Evaluate the scope of the subject in the institution:

Could someone else in my place make the same decision as me in other cases?

4

Evaluate the impact on the institution's reputation:

Do I consider my decision correct even when the institution is obliged to justify it publicly?

5

Evaluate your personal involvement:

Is my decision being made based purely on professional character?



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BP way of being

Cultivating respect

We believe that respect is a core element and should be essential to the institutional and professional relationships of everyone at BP, regardless of position or hierarchy.

We encourage a harmonious working and social environment in line with our values and guidelines. We must not make derogatory or unsubstantiated comments about other employees, the work they do, medical records, or any other information related to our customers, suppliers, and other third parties who work for BP. This can result in a hostile work environment and can damage BP's overall image.

How can we create a more harmonious work environment?

Respecting the norms of the Institution.

Being cordial to everyone, regardless of position.

Respectfully answering, even if I do not agree with the point of view presented.

Not getting involved in judging and/or spreading rumors about the people around you.

Be aware of personal opinions

We must avoid demonstrating and/or expressing personal or professional dissatisfaction with those under our care, as well as expressing unfounded or personal opinions about the conditions under which their work is performed.

We must also avoid implying to the customer that any service problems may have originated elsewhere in the institution. Our role is to solve these problems internally, as quickly and effectively as possible.

In case of any dissatisfaction, contact your immediate superior.

Human Rights

We operate in line with the Human Rights principles, and all of us must comply with and promote activities that adhere to the international commitments and regulations that govern the topic, such as the right to life, freedom to work and education, respect for inclusion and diversity, and the fight against labor analogous to slavery and/or child labor. The confirmation of non-compliance with human rights commitments by third parties and suppliers may lead to contract termination, without prejudice to other applicable legal sanctions. Disciplinary measures may be applied to employees, as well as possible legal sanctions.

Learn more about the Universal Declaration of Human Rights:

<https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf>



We promote an inclusive, ethical, respectful, and harassment-free work environment

We are inclusive. We understand differences and respect individuality to provide opportunities and development for all.

We do this by providing a healthy, respectful and ethical environment where all our employees feel safe and contribute their best to our purpose of valuing life.

We do not tolerate discrimination and prejudice, and their practice will result in appropriate disciplinary action.

If you witness any situation of prejudice/discrimination, the situation should be reported in the Confidential Channel.

Some examples of prejudice:

- Racism
- Chauvinism
- Homophobia
- Transphobia
- Intolerances (religious, ideological, political etc)
- Capacitism
- Xenophobia

Learn more!

We respect what our patients want to be called by and always identify them by their social name.

Get to know the Patient Identification Policy on Tasy.

Let's think about it?



Inclusion and diversity brings plurality, stimulating our collaboration and capacity to understand society's demands and trends, as well as to create and innovate.



As a consequence, we positively impact our customers and results.



Inclusion is associated with the sense of belonging of each one of our employees, who should feel safe and comfortable to express themselves free of prejudice or discrimination.



This culture promotes a healthy environment and increases pride in belonging, engagement, and, as a result, our productivity.

Let's practice?



Our attraction, selection and hiring processes must be free of any form of discrimination.



It is considered a discriminatory practice any conduct that favors, benefits or undermines any right of the candidates to an opportunity in our company because of their race, age, gender, sexual orientation, marital status, family situation, nationality, political and/or religious convictions, among other individual characteristics.



Internal and external candidates are evaluated only according to the competencies and skills required for the opportunities in question.



The same is true when talking about growth and development opportunities for our professionals that should be measured solely by their performance management and performance.

Harassment is condemned under any circumstances

We do not tolerate any kind of harassment, be it sexual, economic, moral, etc., as well as any situation that constitutes pressure, intimidation or threats in the relationship among our employees, whatever their hierarchical level.

Moral Harassment

It is defined by abusive actions, which, repeatedly, through gestures, acts, words or repeated abusive actions, make the work environment offensive, humiliating and intolerable.

Examples that may constitute moral harassment:

- Verbal abuse or swearing.
- Treating someone in a publicly offensive way.
- Offensive jokes.
- Derogatory nicknames.

Examples that do not constitute moral harassment:

- Criticism or evaluations of the work carried out by co-workers or superiors, as long as they do not expose the employee to embarrassing situations.
- Healthy dialogs even if made up of differing opinions with co-workers or superiors.

Sexual Harassment

Conduct of a sexual nature, which can be expressed physically, by words, gestures, or other means, and is proposed or imposed on a person against their will, causing embarrassment and violating their sexual freedom.

Sexual harassment examples:

- Making direct or indirect threats with the aim of obtaining sexual favors.
- Evaluating people by physical attributes.
- Looking at someone in a lewd or embarrassing way.
- Making inquiries about someone's intimacy.
- Touching, kissing, or leaning on someone without permission, causing discomfort and embarrassment.
- Pressuring to attend events or get-togethers after work.
- Sending messages or e-mails of sexual nature.

If you ever witness or experience any case of discrimination or harassment, contact your manager or Human Resources. If you feel more comfortable, you can use our Confidential Channel to make a report.



Political and religious demonstrations in the appropriate spaces

We respect all political and religious activities, with no restrictions. However, we understand that they must always be held and conducted in a personal manner and in the appropriate places.

How we proceed in terms of in-house trade

For your well-being and that of all other employees and customers, the trading of goods and services within the BP facilities is prohibited. This recommendation is valid even during off-hours hours. This way, we intend to prevent conflicts and/or compromising BP's operations.

Questions & Answers

For some time now, my superior often suggests we meet after work. I've noticed that this invitation is directed only to me and does not involve other team members. I've refused the invitations but one day he jokingly informed me that if I didn't accept one invitation, the salary increase planned for next month may be reconsidered. What should I do?

BP does not tolerate any kind of harassment, regardless of the hierarchical level involved. If you ever witness or experience this type of situation, contact the Compliance department or use BP's Confidential Channel to submit a report.

Trade union organizations and class associations

We recognize labor unions as legal representatives of our employees. We are always seeking open dialogue to discuss labor issues and aspects that involve our professionals. The goal is always to find the best solution for both parties.

We understand the need and importance of building ethical relations with trade associations for the development of the market in which we operate. We encourage employees who participate in trade associations to follow the guidelines established in the Antitrust Policy.

Alcohol, drugs and other substances

The use of alcohol, drugs (legal or illegal) and other substances that affect the performance of his or her professional duties or that offer risks to people’s safety is prohibited on BP premises, or when at the service of BP.

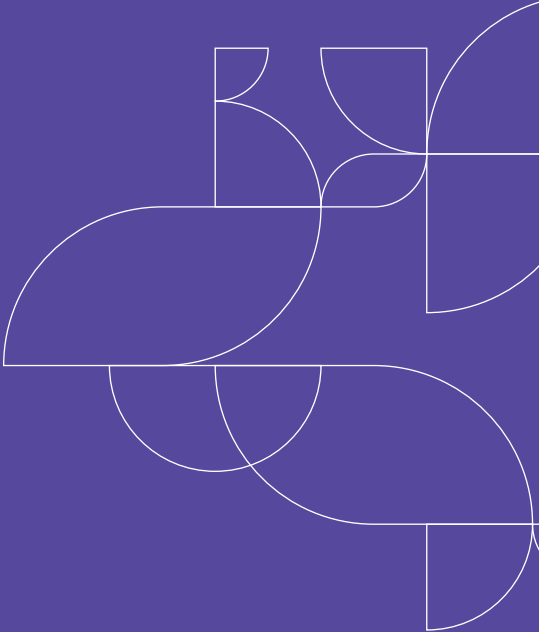
If you witness any case of use or possession of alcohol or drugs (legal or illegal), contact your direct Management or use the Confidential Channel to make a report.



Questions & Answers

Can I sell food and products or trade goods on BP premises?

- To ensure the well-being of everyone and avoid the occurrence of any conflicts of interest or the compromising of the Institution’s operations, the practice of trading any products and services within the BP facilities is prohibited.





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Our Conduct Guidelines

Respect for institutional norms, procedures, and values

We believe in relationships based on honesty and professionalism.

Everyone must respect and follow BP's internal rules, protocols, procedures, and other regulatory provisions and/or those related to the position held. All rules and procedures are responsibility of the area that has issued them and are available on the TASY System.

Always read the norms, policies and procedures related to your activity, besides, of course, the corporate policies, which guide the various processes of the Institution.

If you find a non-compliant regulation, policy or procedure, notify your immediate manager or use the Confidential Channel to make a report.

Anti-Corruption Practices

Corruption is not accepted under any circumstances

We are committed to fighting corruption of any kind, whether in the private or public sphere, fraud, bribery or similar practices. Therefore, it is prohibited to act directly or indirectly on behalf of BP with this purpose.

It will not be allowed to hire or establish partnerships with third parties to perform activities or offer improper advantage to Public Officials in order to secure any interest.



What is improper advantage?

Improper advantage occurs when someone, using his/her attributions and position is able to make decisions or carry out actions that may favor gains for himself/herself, a family member or a third party with whom he/she is involved, or that may interfere with unbiased judgment at the expense of the BP's activities and objectives.

What is bribery?

An illegal act that consists of inducing someone to perform a certain act in exchange for money, material goods or other private benefits.

What is fraud?

It is any intentional act or omission designed to deceive others, resulting in loss to the victim and/or gain to the perpetrator.

Learn more!

Some behaviors can be seen as red flags and indicative of corruption acts. Such as offering or receiving gifts; promising, offering, giving, or authorizing the granting of an improper advantage to any public official; and payments to public officials, their relatives, or to legal entities in which they have an ownership interest.

For more information on behavior that may be indicative of acts of corruption, access Tasy's Public Sector Relations Policy.



Questions & Answers

I have a licensing case in my department. A civil servant told me that if I paid a certain amount, he would move my case ahead of others. How should I handle this situation?

In the event of a request by a Public Official or any other individual, whether in person, by e-mail, telephone contact or message, the BP employee must refuse to make such payment and inform his or her immediate superior and the Compliance department immediately.

The advisor of a public official has contacted BP offering additional payments and benefits to secure special medical care for the Public Official. How should I handle this situation?

BP's employees must excel in ethics and transparency when conducting their activities and perform them with professionalism. If there is any such request, the employee must refuse to comply with the request and inform his or her immediate superior and the Compliance department immediately.

Relationship with the government and public agencies

Our relationship with the government and public agencies in general is guided by the highest integrity level, in a transparent and constructive manner.

We comply with all applicable laws and regulations, including any bidding procedure, contract, or agreement established with these agencies.

We strive to be neutral and impartial on political issues and are not guided by any partisan ideology. We do not make donations and/or sponsor, with financial or non financial resources, any political party, political campaign or candidates running for office. We also do not allow any person, individual or legal entity acting on behalf of BP to take these actions.

Every contact with a public agent must be made only by an employee or attorney-in-fact with representation powers duly granted by the leadership. All meetings with public officials must, preferably, be included in the official agenda, with the formalization of the topic proposed for the meeting. In addition, the meeting with the public official must be formalized, internally, using the Compliance Channel on Service Desk.

We support the authorities in investigation

We are committed to cooperating with any investigation conducted by the public authorities (police, prosecutors, justice authorities).

We do not hinder or interfere with any investigation or create any obstacle to the course of the work. However, contact with these agencies and agents must necessarily be accompanied and/or guided by representatives of BP's Legal Department.

If you are approached by any of these authorities, contact your direct Manager or the Legal or Compliance department.

Gifts, presents, and entertainment

No benefit may be offered or promised to obtain any improper advantage or to influence the action or decision of any person.

We understand that providing gifts and entertainment is part of everyday business life.

Gifts should have business purpose and not personal use. Under no circumstances may any gifts or hospitality be given or received in cash or cash equivalents.

You should always consult the Gifts, Presents, Entertainment and Free Samples Policy. If you have any questions, contact the Compliance department through the Compliance Channel on Service Desk.

Learn more!

Everyone is responsible for following the Compliance policies and the legislation regarding the receipt of gifts, presents and entertainment.

Access our Gifts, Presents, Entertainment Policy on Tasy!

What is the difference between gifts, presents, entertainment, and free samples, after all?

Gifts: are items distributed as a courtesy or for advertising purposes, contain the company's logo, and have a low market value.

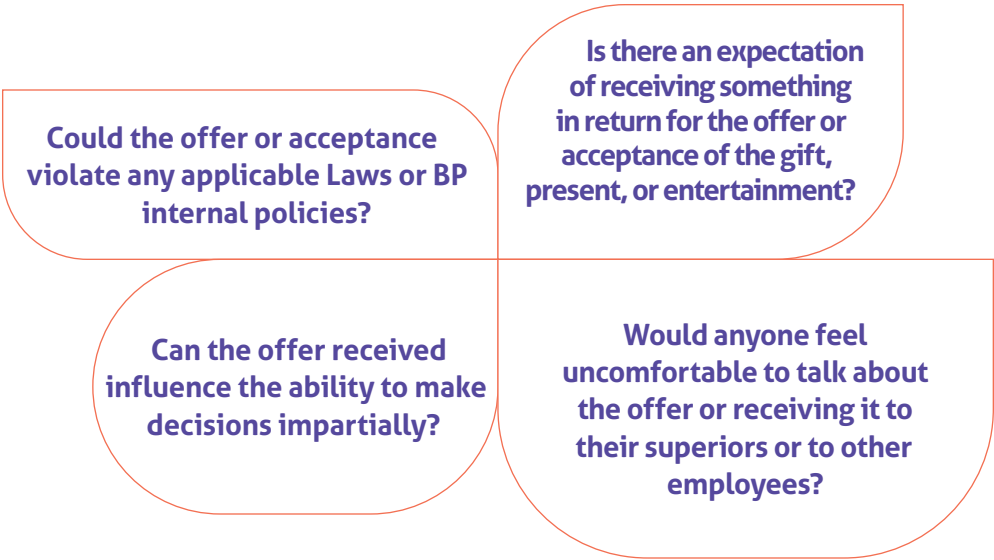
Presents: items that have commercial value and have no advertising nature.

Entertainment: activities or events, such as parties, concerts, sports events, meals, trips, among others.

Free samples: product with no commercial purpose, exclusively for promotional purposes, in the form of advertisement or publicity.

Let’s think about it?

We should always perform a self-evaluation about receiving gifts, presents, and granting privileges:



Accepting Free Samples

Materials, medication and dermo cosmetics that may be offered as free samples by manufacturers or distributors are prohibited from being used, stored or distributed on BP premises.

Exceptions to these rules must be evaluated and approved by the Material Standardization Committee. If you have any questions, consult the Quality department.



Questions & Answers

I received a gift from a patient as a way to thank me for services rendered. How should I proceed?

BP’s Policy on Gifts, Presents, Entertainment and Free Samples sets out the guidelines that must be followed when offering or receiving gifts, presents, hospitality and entertainment. If the gift offered meets the requirements of the policy, such as value, frequency and context, it can be accepted. In case of exceptions or when it is not possible to refuse the item, the Compliance department must be immediately involved.

Participation in events

In order to maintain transparency with our competitors, we must not attend any events promoted by suppliers that does not have a professional nature.

Any support received for events related to BP professionals must not be made conditional on the prescription or promotion of any type of product, and the professionals invited may not receive any direct or indirect compensation of any kind.



Questions & Answers

A pharmaceutical company representative offered me free samples of a medicine. Can I use it?

The acceptance and distribution of free samples of medicines by health professionals or in doctor's offices allocated in the BP premises is prohibited. Exceptions to this are the standardization committees, which may use the samples exclusively for quality tests and technical feasibility studies.

I was invited to attend an international Congress, sponsored by a BP partner company. The company representative has made airline tickets available for some of the guests. Can I accept?

Events involving international travel and/or sponsored by the industry, which include expenses with registration, air tickets, accommodation and meals, are allowed as long as the conditions established in BP's Donations and Sponsorship Policy are observed, always subject to the approval of the area's management and board of directors together with Compliance.

Conflict of interest

We foster transparent and favoritism-free relationships, whether with our employees, customers, suppliers, partners, or any stakeholders.

We believe that conflicts of interest should be avoided in every way, whether real, apparent or potential.

Real conflict: clear and indisputable fact of conflict of interest

Potential conflict: situation that may evolve and become an actual conflict of interest in the future.

Apparent conflict: situation in which the real conflict may not have existed, however, the form, context and people involved show a conflict situation, compromising the institution's image.



What is Conflict of Interest?

Conflict of interest exists when a party related to BP is involved in a decision process, being able to influence the outcome, favoring gain for themselves, a family member and/or third party with whom they are involved, or that may interfere with impartial judgment.

Here are some examples of Conflict of Interest cases:

- Suppliers that have in their corporate structure - or decision-making levels - direct or indirect employees of BP itself.
- Parallel activities, directly or indirectly, that conflict with BP's business, interests and sectors of activity.
- Hiring family-related professionals in situations of direct subordination.



If you have any questions or suspicion of a conflict of interest situation, we recommend informing the direct manager, contacting the Compliance department or report a conflict situation through the Compliance Channel on Service Desk or Confidential Channel.

Learn more!

The responsibility to ensure compliance with the conflict of interest policy lies with everyone.

Check out what other situations may be considered conflict of interest in the Conflict of Interest Policy.

[Access the Conflict of Interest Policy on Tasy!](#)

What should I do in case of a Conflict of Interest?

- Declare conflict of interest on admission to the Institution, by filling out the form provided by HR.
- Communicate to your direct manager in case of new conflict situations.
- Communicate to the Compliance department.

Managers:

- Disclose, monitor and contribute to your team’s full compliance with the BP’s Code of Conduct guidelines and Conflict of Interest Policy.
- Report to the Compliance department the situations that you identify or suspect to represent a Conflict of Interest.

Questions & Answers

During BP’s selection process, a candidate informed that he is related to a person working in the department for which he is being interviewed. Is it possible to proceed with the hiring?

- The family relationship and affective relationship between BP employees and service providers is allowed, provided there is no level of hierarchical subordination, influence and management between those involved.

Relationship with suppliers



Fostering Fair Competition

We strive for suppliers to participate in a procurement process based on fair and transparent criteria.

For this reason, we evaluate our suppliers based on their reputation, adherence to legislation, and good social and environmental practices, thus we observe quality and our technical and ethical standards.

We reject any type of targeted competition, price fixing, price discrimination, or unfair trade practices that violate federal, state, or local laws, as well as our internal rules and policies.

No supplier or representative will be allowed access to the hospital unless duly identified at the reception and authorized by the responsible department.

Good practices when hiring suppliers:

- Pay attention to the requirements established in BP's internal rules and policies for contracting third parties.
- Work with responsible companies that share BP's values and ethical principles.
- When applicable, evaluate company's technical and integrity criteria, according to the BP Due Diligence policy*.

Learn more!

Due Diligence is the process by which risks in corporate relationships are analyzed and identified. It is an in-depth process of analysis and evaluation of information and documents of a particular company or person.

[Access the Due Diligence Policy on Tasy!](#)

*Exceptions must be evaluated by the compliance department and the requesting board.



Questions & Answers

A supplier has offered a BP employee a commission if he commits to using a certain brand of product over others. Is this correct?

BP has rules and procedures for when hiring a product or service supplier, as well as a dedicated team for the technical analysis and approval of equipment and medication. Receiving commissions or advantages from suppliers is forbidden and if you find yourself or become aware of this situation with another employee, contact the Confidential Channel.

Conduct and ethics above all

We encourage and expect our suppliers to behave ethically and transparently in line with our values. They must act to protect human rights and the environment, and adopt anti-corruption, integrity, privacy and information security practices.

Our suppliers must comply with the laws, regulations, standards and practices appropriate to their activities in their direct or indirect relationships with BP. In addition, they are subject to compliance with this Code of Conduct.

We do not enter into relationships with suppliers who have the practice of:

- discrimination;
- lack of dignity and respect in the relationship with their (and our) employees;
- employment of child labor, labor analogous to slavery or sexual exploitation of children;
- fraud;
- corruption;
- money laundering;
- direct or indirect involvement in an act, transaction or operation of questionable nature;
- performance of activities that generate negative impacts on the environment, the market or society in general;
- Reputational issues.



Our competitors

How we deal with competitors

We must not make comments that affect the image of our competitors.

We must not maintain personal and/or virtual contacts with competitors with the objective of transmitting confidential data, either technical, scientific, financial or any other of a secret and/or confidential nature.

When dealing with competitors it is prohibited to exchange competitively sensitive information, which interferes with free competition, either to favor BP or the competitor, or to harm a third party, such as:

- Innovation Strategies;
- Goals and performance indicators;
- Profit or loss, among others.



Questions & Answers

I was invited to join an association in which professionals from BP’s competitors participate. How should I proceed?

BP understands that cooperation and exchange of experiences, expertise and best practices to achieve common goals is healthy for all involved and may generate several benefits to our customers. Accordingly, we do not forbid participation in trade associations, as long as the premises established in BP’s Antitrust Policy - Anti-competitive Practices are observed, especially the duty of secrecy and confidentiality, as well as the non-disclosure of strategic and competitively sensitive information.

Learn more!

What is a competitor?

Organizations that operate in the same market segment as BP.



We respect antitrust laws

We believe that fair competition brings benefits to the development of BP and is directly aligned with our purpose of continuing to connect doctors, employees, partners and customers, and to bring to all levels of the population an excellent service offering.

Agreements and/or any practices with the purpose or effect of restricting or eliminating competition are not permitted.

We recommend attention and caution in situations that are, or may apparently be, configured as anti-competitive practices, such as, for example, agreements on prices, collusion in bids, customer allocation, production and sales quotas, or geographic market distributions.

Learn more!

We are committed to respecting all healthcare organizations, following competitive practices.

Access the
Antitrust Policy
- Competitive
Practices on Tasy!



What is antitrust, anyway?

Antitrust: refers to competition law, bringing together a set of laws and regulations that aim to ensure respect for the free market principle.

Antitrust Laws: are those intended to punish competitive practices that use market power to restrict production and raise prices so as not to attract new competitors or to eliminate competition, such as, for example, cartel formation, corruption of public agents and use of privileged information.

Let's think about it?

We must avoid conversations, directly or indirectly, with competitors in which sensitive information is exchanged, such as:

Costs, prices, margins, calculation methods, discounts, health plan operators and suppliers.

Sales volume of services or trends.

Market division, either geographic or customer.

Data on strategic plans, including project and program descriptions, list of physicians, among others.

Inside information

Inside information is important data and information about a company that is not published to the general public and must be handled with confidentiality.

We may not use inside information from BP, business partners or suppliers to obtain or provide benefits.



Questions & Answers

An employee from a competitor company contacted me with interest in benchmarking a certain tool used by BP in its internal processes. What should I do?

- Exchanging information with competitors for benchmarking purposes, with non-confidential information or to assist in the definition of common standards in the health sector is permitted, always observing the secrecy, confidentiality and non-disclosure of BP's strategic and sensitive information. If you have any questions as to the content that may or may not be disclosed, contact BP's Brand and Communication department or the Compliance department.

What information is considered inside information?

Some Inside Information Examples:

- Company's financial results;
- Acquisitions or sales;
- Industrial Secrecy;
- Future investments;
- Corporate strategy.

A decorative graphic consisting of several overlapping circles of different sizes, some solid and some outlined, arranged in a cluster on the left side of the page.

6

Using our corporate resources

We take care of BP's assets and resources

We are committed to looking after the conservation of all BP's assets and resources and this includes the installations, real estate, machinery, apparatus, equipment, furniture, vehicles, data, information and values, among others. Their use is intended for employees, service providers and third parties (as applicable), during the performance of their functions and activities for BP.

The occurrence of damage or misuse of the facilities and assets, as well as the destruction, loss or leakage of BP's, its clients', employees' and suppliers' data and information, among others, may be considered unlawful and subject to the application of the penalties provided in our policies, as well as in the legislation in force.

Audits and accounting records

Our accounting records are accurate and complete and are kept in accordance with the applicable legal requirements, as well as in accordance with Brazilian accounting standards.


We collaborate with external and internal audit activities, which allow the identification and adoption of preventive and mitigating measures, whenever necessary.

The safekeeping and destruction of records or documents are carried out in accordance with BP’s internal rules and policies, observing the deadlines and conditions laid down in the current legislation, including the Brazilian General Data Protection Law - “LGPD” (Federal Law No. 13,709/18).

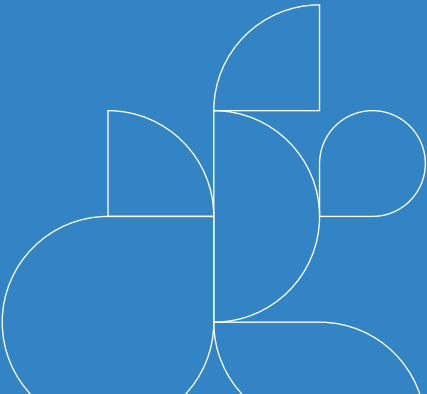
Using and recording information

We prohibit the manipulation of information, regardless of its category, to obtain improper personal advantage.

We prohibit the signing of contracts or documents of any nature on behalf of BP, or the representation of BP in disagreement with the powers of attorney and delegations granted by the Board of Directors.



Always check the document retention period in accordance with commercial, environmental, tax, labor, regulatory and legal requirements, in the Document Retention Table.





7

Information Security

We care for the security and privacy of your information

We must use BP's resources, such as medical equipment, papers, utensils and technology items, in a rational, respectful and conscientious manner, observing the guidelines established in this Code of Conduct, in the Information Security Policy, as well as in the legislation in force, in particular, Law No. 13,709/2018 - General Data Protection Law ("LGPD").

We must not install programs on BP's computers without proper authorization from the required areas, just as we may not copy, under any circumstances, any and all programs, information or systems that are protected or patented by copyright, which have been developed internally and/or are the subject of licensing agreements. Any exception must be dealt with jointly with the IT department.

Information Classification

We follow the information classification as next:

Public information	A piece of information that can be shared on social networks.
Internal Information	All employees may access, for example, internal rules and regulations, and cannot be shared, with the exception of the authorizations, exceptions provided for in the rules and regulations.
Confidential Information	Not every employee has access to the information, such as, for example, medical records, employment contracts, salaries, etc., and cannot be shared, except when authorized, with exceptions provided for in the regulations.

The disposal of internal and confidential information must be carried out in such a way that data cannot be recovered. Confidential papers, for example, can be shredded, and media such as CDs, DVDs and hard drives must be physically destroyed.

Information Security Incident

An incident is when one or a number of confirmed or suspected undesired information security events may compromise business operations or the principles of Information Security (Confidentiality, Integrity and Availability).



To report Information Security incidents, please get in touch via e-mail below or through Service Desk.

E-mail: incidente.seguranca@bp.org.br

Taking into account the confidentiality and sensitivity of information, at any time and without prior notice, e-mails, documents, files or other materials available or provided through BP's IT resources and infrastructure may be monitored.

Learn more!

We are committed to ensuring information security and privacy.

Access the Governance of Privacy and Data Protection Policy on Tasy!



The Information Security Policy is a directive that provides guidelines to protect information against access, change, destruction, disclosure, collection, use, storage, sharing, and disposal of information/ data. In addition, the document defines the roles and responsibilities for handling information.

Access the Information Security Policy on TASY.

? Questions & Answers

Can I install other programs and software to download Internet content on the computer I use at work?

It is not allowed to install programs and software unless authorized by the Information Security department.

The use of improper programs to download piracy content is prohibited. The Information Security department constantly monitors the content of the Network. If you encounter non-compliance with these guidelines, you may report it to the Information Security department or through the Confidential Channel.



8

Privacy and Personal Data Protection

Personal Data Protection

Ensuring the security, integrity and confidentiality of physical and/or digital information, electronic and personal data and protecting BP's resources from unreasonable, unauthorized use, misappropriation and loss is everyone's commitment.

BP takes technical and organizational measures to protect the personal data of data holders against accidental or unlawful destruction, loss, change, disclosure, dissemination or unauthorized access.

The Data Protection Officer (DPO) is the person appointed by the Data Controllers to act as the communication channel between the controller, the data owners and the National Data Protection Authority.

The person in charge can be contacted by the e-mail below or through Service Desk.
dpo@bp.org.br

In addition, we ensure that the environment, whether physical or virtual, used by BP for the treatment of personal data is structured to meet the security requirements, best practices and governance standards and the general principles provided for in the LGPD and other applicable regulatory standards.

According to LGPD, personal data is considered to be all information relating to an identified or identifiable natural person.



Personal data: Name, date of birth, telephone number, registration data, location data, physical, physiological, genetic, mental, economic identification data, among others.

The law also defined sensitive personal data that have special protection, such as personal data on racial or ethnic origin, religious beliefs, political opinions, membership in trade unions or religious, philosophical or political organizations, data concerning health or sex life, and genetic or biometric data when linked to a natural person.



What is LGPD?

LGPD is the Brazilian General Data Protection Law, number 13,709 of August 14, 2018, which came into force on September 18, 2020, with the aim of regulating and protecting data processing relationships of individuals in organizations and individuals aimed at offering or providing goods or services.

Access the full content:
http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/l13709.htm

If you participate in any project or activity that involves the processing of personal data under our responsibility, whether as an employee, partner or supplier, you have a major commitment to the enforcement and monitoring of BP's security controls.



In this context, it is worth highlighting some principles that should guide our activities involving personal data:

- Be proactive and not reactive, act preventively and correctively whenever necessary.
- Ensure that the parties involved in the processing of personal data (business areas, partners, suppliers, etc.) perform their activities properly, observing BP's policies, current legislation, rules and procedures for the protection of personal data, and that they clearly understand the purposes of the processing.
- Access to this information is authorized only for those who need to know it due to the professional activity performed in the company.

If you have any questions about the processing of personal data, whether related to your activities or to ensuring privacy and data protection in the design of new projects within BP, you may contact the Data Protection Officer (DPO).

Remember that it is your duty to formally report any events concerning personal data breaches or suspicious activities to the data controller.



Questions & Answers

After organizing folders and files in my department, I have separated for disposal several papers that contain confidential information, personal data, and sensitive personal data of BP employees and patients. What should I do with these documents?

Papers that contain personal information such as name, document number, NA, telephone contact, sales volume data or BP's strategies must be disposed of properly. All BP areas have containers designated for the disposal of paper for recycling and that must be used for this purpose.

You can also request the collection and shredding of documents as described in our waste disposal policy, available on Tasy. If you have any questions, please contact the privacy and data protection department.





9

Quality of care and service

Quality of care: we prioritize patient safety

Safety is not just the absence of adverse events. It is the presence of resilient processes, with an emphasis on trust, communication, and organizational learning.

Therefore, we disseminate the safety culture and continuously raise the standard of the services offered, based on national and international best practices. BP's quality system is structured on the basic pillars of patient safety culture and the promotion of improvements in care processes.

If you witness an atypical situation or a possible assistance or operational failure, activate the Notify Channel on the Intranet.

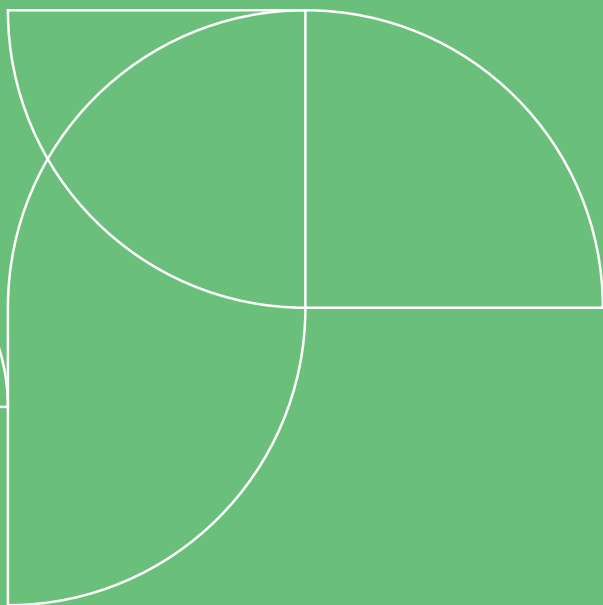
We are responsible for the service

We take full responsibility for the excellent service provided to our clients at BP facilities. Therefore, we forbid the transfer of responsibility to companions who have some type of training / technical training in health to carry out such procedures.

Conduct guidelines for physicians

The Physician Support Service (SAM) is the main relationship channel with the physician, and the sector responsible for accreditation and support to the physicians' questions in the institution.

Physicians are not allowed to work at BP without the proper accreditation conducted by SAM. If you witness a situation where a physician is working at BP without the proper accreditation, contact the Confidential Channel.





10

Health and safety at work

Health and safety at work

We are committed to the health and safety of our employees. To this end, we have programs focused on the theme, and recommendations based on standards and regulations defined in legislation.

We have the Employee Health Center, a program through which we offer our employees horizontal monitoring of their health, with services provided by occupational physicians and a multidisciplinary team.

Examples of programs focused on employee health and safety:

- Risk Management Program (PGR)
- Radiological Protection Program (PPR)
- Accidents with Materials Risk Prevention Plan (PPRAMP)
- Occupational Accident Conduct Standard
- Fire Emergency Plan (PECI)
- Occupational Medical Control Program (PCMSO)

The Viva 365 program is focused on the integral care of professionals and their quality of life. By promoting actions to support changes in habits and lifestyles, we seek to stimulate the employee's role in five areas: Social, Physical, Intellectual, Financial and Emotional.

If you witness a situation that puts your health and safety at work at risk, contact the Workplace Safety department or, if you prefer, the Confidential Channel.

Did you know?

As per health and safety regulations, our employees must not wear open footwear on the BP premises. Likewise, the use of accessories is not permitted in areas of direct patient care.

These are accessories: wedding rings and rings, bracelets, watches for personal use, necklaces, earrings, brooches, and exposed piercings.



Questions & Answers

During my workday I noticed that one of my colleagues was using personal protective equipment (PPE) incorrectly. I told him that it was not the correct way to use it, but he didn't care and said that the equipment wouldn't make any difference because he knew what he was doing. Faced with this situation, what should I do?

BP has clear rules to ensure the preservation of its employees' health and safety. Upon observing non-compliance with these guidelines, you may report the incident to your supervisor or to the Human Resources team. In case the conduct occurs on a recurrent basis, the Confidential Channel is available to receive your report.

Environmental preservation

We respect the environmental legislation in force, in all spheres, when conducting all of our activities. And we permanently encourage our employees and any BP's stakeholders, whether a service provider, supplier or any third party, to do the same.

If you witness any environment-related violation, report it to the compliance department, through the Confidential Channel or the Environment department through the e-mail address: meioambiente@bp.org.br.

Learn more!


Access the Sustainability Report:

<https://www.bp.org.br/institucional/sobre-a-bp>

Questions & Answers

I witnessed a co-worker incorrectly disposing of waste. What should I do?

The protocols established for the management, storage and correct disposal of waste are defined according to the legislation and specific technical standards for each type of waste. It is important to follow all protocols defined by the Environmental department in order to maintain compliance with environmental legislation and, therefore, the incorrect discarding of waste must be reported to the Compliance and/or the Environmental Department via e-mail: meioambiente@bp.org.br.



11

Brand and Communication

Use of digital channels and social networks

It is important that corporate or personal digital channels such as Instagram, LinkedIn, Facebook, YouTube, Twitter and others are used correctly.

It is not allowed to talk or write on social networks on behalf of BP and/or post photos and videos of clients, of clients' records, of those accompanying them, or even of the hospital areas without prior authorization. This information is confidential and internal, and its publicity is prohibited.

Any official BP communication development must be carried out exclusively by the Brand and Communication department, whether in online, offline or press format.

Important:

1

Never speak or write on Social Media on behalf of the Institution.

2

You may share the content when it is already published on the pages of the Social Networks, this also contributes to the spreading of our Institution's information.

3

If you have any suggestions for news and publications, send them to the Brand and Communication department of the Institution at comunicacao.marca@bp.org.br. All suggestions or comments are welcome!

We do not recommend to make an institutional nature communication through tools that are not official or approved by BP's Information Technology department.

**Learn
more!**

Manuals and terms of use related to digital channels and social networks:

- Social Networking Handbook
- Facebook Workplace Terms and Conditions of Use

[Access the Policies on Tasy!](#)

Communication tools used by BP:

Internal public:
e-mail marketing, intranet, teams, Jabber, Workplace (corporate social network), Corporate TVs and WhatsApp for managers, brochures, books, banners, posters, etc.

External public:
social networks (Instagram, Facebook, LinkedIn and YouTube), website, Spotify, videowall, totems and e-mail marketing, mass media, manuals, banners, posters, exhibitions, etc.

The use of tools that may compromise the security and the confidentiality in the exchange of information or even the improper use of these channels may be harmful to BP’s image, to third parties and to those who use them, besides being in breach of the legislation in force and internal regulations that may result in the enforcement of sanctions.

Learn more!

For questions and more information about Branding and Communication, please contact us by email:

comunicacao.marca@bp.org.br

? Questions & Answers

I have been invited to teach a class on a topic related to my field at BP. Can I accept the invitation?

Participation as a speaker at events or for teaching is permitted, provided that the content does not involve patient, strategic, confidential or secret BP data. If the content or material presents BP’s logo / brands, this must be previously validated by the Brand and Communication department. Exceptions must be previously analyzed by the Compliance department and approved by the department’s board of directors and management.

Best practices in the digital environment

It is everyone's duty to make every effort to ensure the security of BP's information and data protection, as well as that of its employees, customers and third parties. Thus, we recommend:

- The use of corporate remote access tools (cell phones, notebooks, tablets);
- The use of tools approved or indicated by BP;
- Beware of personal opinions that can be misinterpreted and damage your and BP's reputation, including on websites, social networks, blogs, and instant messaging applications;
- The use of the BP trademark only upon formal and express authorization;
- The anonymization of all personal data processed by BP, whenever possible and when applicable, in compliance with the rules pertaining to LGPD; and
- If a physician, whenever applicable, meet the recommendations of CFM (opinion 14/2017) and the Physician's Manual when handling Client information, respecting, in any case, the limits of morality, secrecy and ethics applicable to the profession.

Questions & Answers

I have been invited by a TV station for an interview, in which I will talk about BP's challenges and perspectives on health-related issues. What should I do?

It is prohibited to give interviews or disclose BP's internal institutional information to the press without prior approval from BP's Brand and Communication department.

A company came to me showing interest in sponsoring an event that will be promoted by BP. What should I do?

For any action involving sponsorship, the BP Brand and Communication department must be contacted. It will be responsible for analyzing the request and submitting the theme for approval by the Compliance department.

Confidentiality is essential at BP

The party that has access to confidential information as a result of the activities, services or any other relationship established with BP may only use it for the performance of its function and/or designated activities.

Confidential information may not be used for personal benefit or for the benefit of third parties who are not directly involved with the purpose of the services or activities provided, and its disclosure will only be possible with the express authorization of BP.



Confidential information is considered to be information transmitted by written, verbal, electronic, electromagnetic or any other means regarding BP's business, financial, accounting and commercial strategies.

Among them are:

Institution's and customer's information, technical specifications, know-how, drawings, software, photography, projects, contracts, research and studies, inventions and ideas, documentation, market information, applications, students, suppliers or any other information that is so identified by BP or that may jeopardize the security, the purposes and the image of BP.

Use of the BP address

The BP address is to be used only for receiving professional correspondence relating to BP activities.



Intellectual property and use of BP brand

The BP brand and all the procedures, studies, research, services, ideas, concepts, products, knowledge and other information that we develop and collect in the Institution or in partnership belong to the Institution and must be protected.

If you come across visual identities that are very close to our brands in other companies, with use of our logo in inappropriate places or that you suspect have not been authorized, inform the Communication and Legal departments, which will analyze each case.

What information is considered intellectual property:

Intellectual property refers to the right of legal protection to the ideas and creations developed, ensuring the rights of the author. Among these are:

- brand, sub-brands and their visual identities,
- researches,
- patents,
- copyright,
- software registration.

Volunteering

We have a Volunteer Program that seeks to promote actions to support our patients, providing welcoming activities, entertainment and welfare.

To join the team, the volunteer goes through a recruitment process, with awareness-raising lectures, dynamics, and face-to-face interviews, leading to institutional integration. Any action by the Volunteer department can only be carried out with the prior approval of the Volunteer department.

Learn more!

For more information about Volunteering, please visit:

<https://www.bp.org.br/institucional/voluntariado>



12

Education and Research

We contribute to the training of professionals for the public health service through the management of medical residency courses, improvement, specialization, fellowships and post-graduation courses in different medical specialties. We develop teaching initiatives through partnerships with universities and the practical training of students in surgical areas in our Institution.

We also develop and share research with society. To organize and encourage this initiative, the BP Research Center has its actions guided by its Internal Regulations, best clinical practices, and the normative requirements of Anvisa, the Research Ethics Committee, and the National Research Ethics Commission.

All educational and research activities must be reported to the Education and Research department. Therefore, it is forbidden to conduct these activities unless prior knowledge of the department is obtained.

Questions & Answers

BP is interested in partnering for a study on a certain comorbidity with a company in the pharmaceutical industry. Is it possible to proceed with the intended partnership?

BP encourages clinical study partnerships to improve and develop methods and

processes related to health. To this end, every partnership must be submitted for approval by the direct Executive Board and department managers, as well as being previously analyzed by the Compliance and Legal areas of the Institution.

Scientific Events

By holding scientific events, we contribute to the advancement of science and medicine. We follow our ethical guidelines and best practices on standards and responsibilities regarding the organization of these events, including aspects such as scientific programming, accountability, outreach, and funding.

Learn more!

The scientific events promoted by BP follow our ethical and compliance guidelines.

Access the Donations and Sponsorship Policy on Tasy



13 Social impact

Social impact is in our DNA

For more than 160 years we have offered medical-hospital services, education and research, positively impacting society.

We have a number of partnerships with public authorities, companies and third sector organizations, which increase our capacity to generate value for society. All these relationships must be guided by the institution's policies and norms, especially the Public Sector Relationship Policy. Each of the projects must be carried out and monitored by the Philanthropy and Social Impact department.

We are committed to continuous improvement of our ESG performance and any actions contrary to the ESG pillars should be reported via the Confidential Channel.

What is ESG?

ESG stands for "Environmental, Social and Governance", and corresponds to an organization's Environmental, Social and Governance practices.

Learn more!

See page 26, about relationship with Public Authorities and the Public Authorities Relationship Policy, available on TASY.



Sponsorships and donations

Considering that BP is a philanthropic entity, the making and receiving of donations is encouraged and permitted, as long as the guidelines defined in the Donations and Sponsorship Policy are complied with.

Basic Principles

No donation or sponsorship may be given, obtained, offered or promised to obtain an improper advantage or to influence the action or decision of any person.

All sponsorship and donation processes must be formalized in the appropriate contractual instrument as well as previously approved by the Legal and Compliance departments before signature. No exceptions.

The legislation in force must be complied with and respected in its entirety, as well as BP's and third parties' internal codes or norms. In case of conflict between regulations, the Compliance department must be called in.

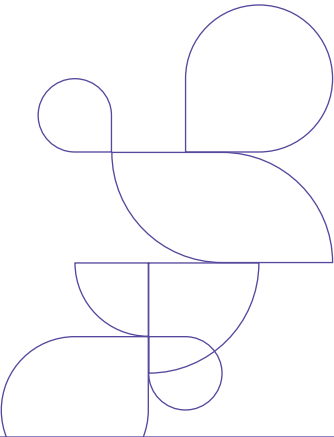
Any and all donations or sponsorships must be properly accounted for in the Institution’s official records and faithfully represent the reality, nature, values, quantities, and documents supporting the transaction.

Any receipt of donation or sponsorship in disagreement with this Policy and in the impossibility of return, must be communicated to the Compliance department (compliance@bp.org.br) immediately.

Learn
more!

We encourage the making and receiving of donations, always following the Institution’s guidelines.

Access the Donations and Sponsorship Policy on Tasy!



Questions
& Answers

A company is interested in making donations of blankets and food staples to BP. Can I accept?

We encourage the receipt of donations as long as the guidelines defined in BP’s Donations and Sponsorship Policy are met. The department responsible for receiving the donation must request approval by e-mail from the direct Executive Board and management, as well as requesting prior analysis from the Compliance, Legal and Accounting areas.

14

Code of Conduct Violations

Disciplinary Measures

If there is evidence or sufficient indications of involvement of any party, regardless of hierarchical level, in illegal, unethical or contrary conduct to this Code of Conduct, to the internal rules, to BP's policies, to the Integrity Program, to the medical protocols and applicable legal obligations, the offending party will be subject to disciplinary sanctions, without prejudice to being held civilly and criminally responsible for the act committed before BP and third parties.

The disciplinary measures will be applied, proportionally to the seriousness of the verified facts and may be decided by the employee's immediate manager, by the Disciplinary Measures Committee, or by the Conduct Committee, depending on the type of behavior or act practiced.

Learn more!

Disciplinary measures will always be applied in proportion to the seriousness of the facts found.

Access the Disciplinary Measures Policy on Tasy!

Reporting Violations

Confidential Channel

When faced with possible violations of this Code of Conduct, do not hesitate to use our confidential channel. Reports may be filed by any employee, partner, third party or representative who does business or has a relationship with BP.

BP’s Confidential Channel is handled by an independent company that ensures information confidentiality. All reported situations are treated confidentially, and reports can be made anonymously.

We emphasize that the person making the report must act responsibly and in good faith when reporting, in a consistent manner and based on the veracity of the information.

No retaliation of any kind is allowed to people who cooperate in the investigation process.

Website:

<https://www.canalconfidencial.com.br/bp/>

E-mail:

bp@canalconfidencial.com.br

Telephone:

0800-882-0628



Questions & Answers

I have found a situation that violates the guidelines set forth in BP’s Code of Conduct, but I am afraid to make a report through the Confidential Channel and be punished or suffer retaliation for reporting it. What should I do?

We do not allow any kind of retaliation against honest, good faith reporting, if you prefer, you can make a report anonymously.

Breach case management and reporting

Cases of violation or reports are sent to the Compliance department, which will promote an investigation process, always respecting the secrecy and confidentiality of the information involved.

If there is evidence or sufficient indications of involvement in illegal, unethical or unlawful conduct, disciplinary measures will be applied in proportion to the seriousness of the infraction and the facts found.

Responsibility of employees with management and leadership positions:





Corporate information

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+55 11 3505 1000

f @ t v in .. /bporgbr
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Credits

Consulting

Writing, Layout, Translation and Design

RICCA Sustentabilidade

BP Team

**Branding and Corporate Communication
Compliance**

