



# Annual Compliance Report

Eurofarma Group | Base year 2024



# This 2024 annual report covers our compliance actions

across all our operations (Brazil and International), highlighting the effectiveness of our Compliance Program through its indicators

We adhere to high standards of conduct in all our interactions, thereby demonstrating our commitment to the sustainability of our business, our industry and the market in general. For our team, caring for people is a non-negotiable premise and we strive for continuous improvement in order to provide a safe and ethical environment for all our talents.

**A safe environment is an ethical environment.**  
**We will continue on our path for the next 100 years, maintaining our values, our standards of conduct and our desire to take care of people**

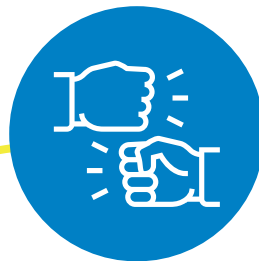
## Values Institute



**Entrepreneurship  
Focus on health**



**Sustainable  
development  
Reinvestment**



**Respect  
Equality**



**Agility  
Commitment  
Result**

## Ethics as a core value and the path to our sustainability

Business integrity, transparent and respectful relationships are part of our DNA, and that is the reason why ETHICS is one of our corporate values.



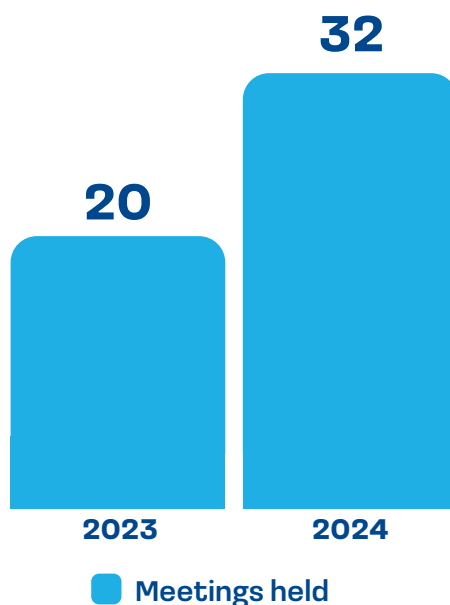
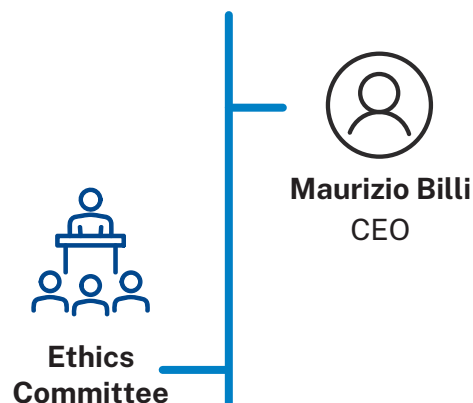
# Corporate Governance

We have a robust Corporate Governance structure. Our Compliance has autonomy and functional independence, reporting its issues periodically to the Ethics Committee, the Audit and Compliance Committee, the Executive Committee and the Board of Directors

## Composition of the Ethics Committee in 2024



Demonstrating the extreme commitment of the Ethics Committee, meetings that were held every two weeks in 2023 became weekly in 2024.





# Support from top management beyond lip service

Our senior management representatives are committed to compliance actions and issues, and are really the replicators and first line of defense for their areas, thereby ensuring that the tone of leadership is properly aligned with the highest standards of conduct.



**Eurofarma has made important commitments in support of Compliance, such as:**



**Ethos Institute Business Pact for Integrity and Against Corruption**



**Brazil Pact of the Office of the Comptroller General**

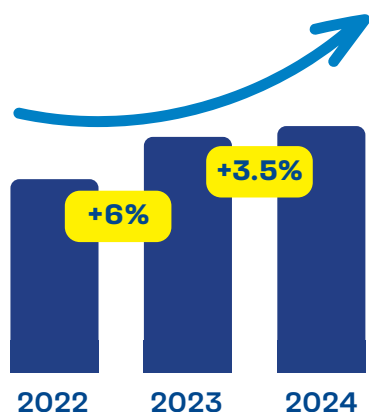


**UN Global Compact with exclusive SDG on fighting corruption**



For us, Compliance is a strategic issue and that's why we devote proper attention to it, ensuring constant investment in both human and financial resources, as well as space in the most important forums of our Corporate Governance.

## Growing Budget



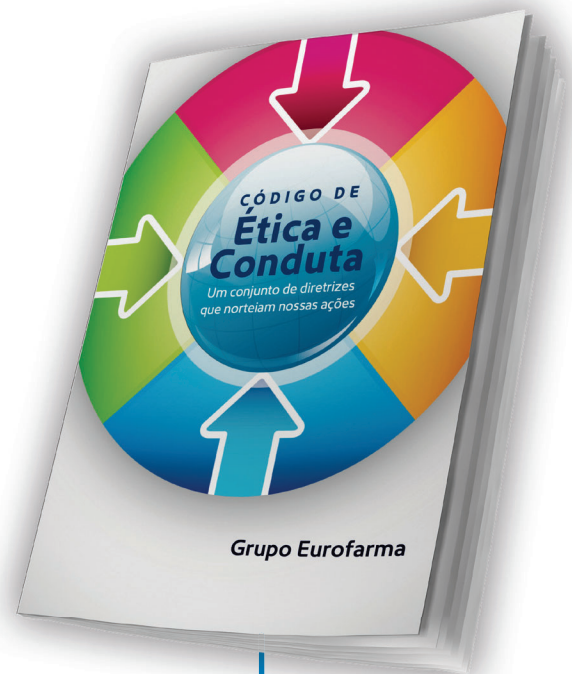
## Reinforced Team

- 2022 **Legal and Corporate Integrity Director**  
Compliance Manager
- 2023 **Legal and Corporate Integrity Director**  
Compliance Manager  
Compliance Specialist
- 2024 **Legal and Corporate Integrity Director**  
Compliance Manager  
Compliance Specialist  
Compliance Analyst  
2 Young Apprentices

# Compliance documents

We have a robust set of internal compliance guidelines, especially our Code of Ethics and Conduct, which clearly and objectively establishes our way of being and acting. Our DNA can be seen very clearly through these standards, after all, there is no safe environment without compliance with laws, internal policies, technical regulations and integrity principles.

We are a company made up of people for people, so our DNA and our soul are in the line of always doing the right thing!



Our employees and third parties are already aware of our Code of Conduct in D1, are trained and sign terms of commitment periodically!



## Code of Ethics and Conduct for Suppliers

Committed to having a positive influence on our ecosystem and ensuring healthy and transparent relationships, we work with partners who share our values, which is why we have developed a **Code of Ethics and Conduct** dedicated to our partners.

# Our Compliance Program

We have a committed Compliance team, which positions itself as a business partner, supporting our activities, encouraging us to remain innovative and agile, but without losing our premises of ethics and sustainability. This team manages our Compliance Program, which is continuously strengthened, focusing on prevention, detection and reaction to any ethical misalignments.

## Improvement Plan 2023



## Improvement Plan 2024



## Continuous improvement

Our commitment to continuous improvement never stops. Every year we define an improvement plan based on a benchmark of excellence and good compliance practices. In 2023 our work was based on Brazil's Anti-Corruption Law and its Regulatory Decree, resulting in a plan with 64 improvement actions to be carried out. In 2024, the improvements were based on good practices issued by the Office of the Comptroller General of Brazil, resulting in a plan with 68 actions to be carried out. Both plans focused more on preventive actions and ensured substantial progress in the effectiveness of our Compliance Program



Our work to improve our Compliance Program has already been validated and recognized externally. In an evaluation by the CGU during its adhesion to Pacto Brasil, our program received a score of **97.5** out of 100.

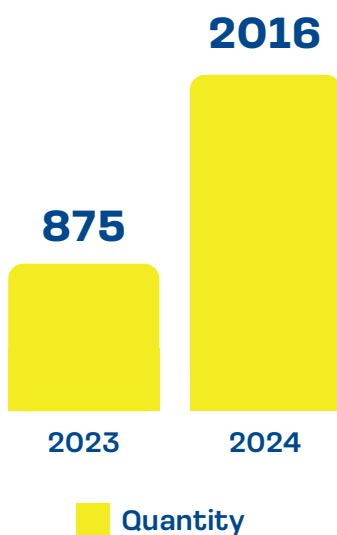


# We are very diligent in our interactions

For us, trust is an essential element in our interactions, whether with internal or external audiences. Therefore, in order to be in line with legal mandates, as well as to ensure that we are dealing with parties who share our values and premises, we have a robust due diligence process under which we seek to get to know our potential partners before we even begin our relationships.

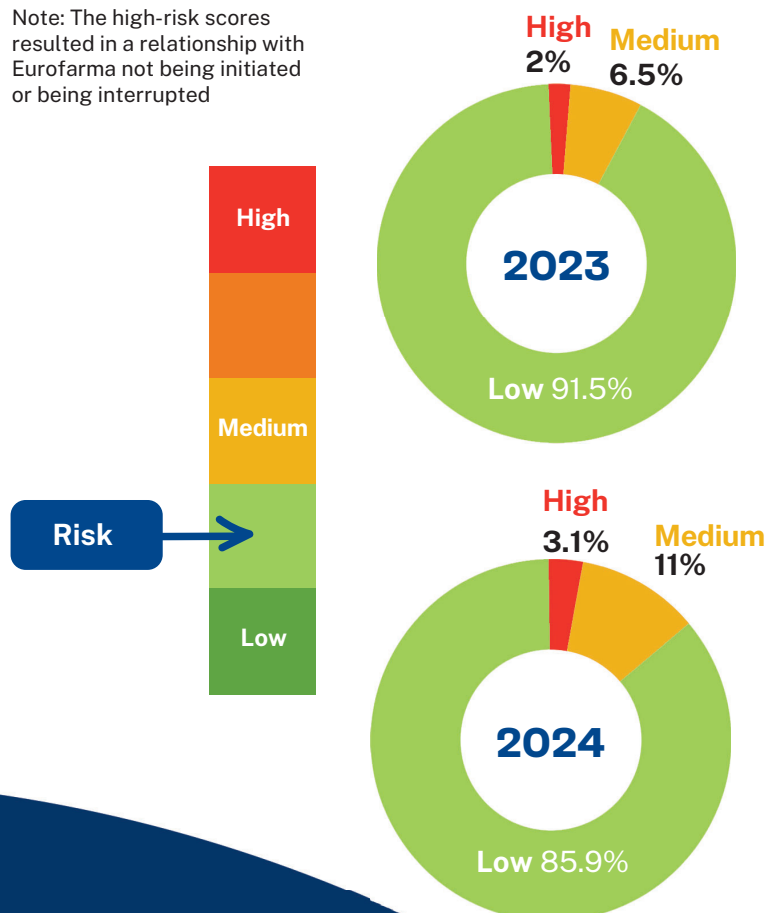
**We have an annual Due Diligence plan, which includes all the due diligence that will be carried out throughout the year, so that we can keep an eye on our existing relationships**

## Due diligence carried out in the last 2 years



Our relationship management is based on risks (**high**, **medium** or **low**) and with this, we can objectively define the paths of our relationships, which can be **recommended**, **monitored** or **not recommended**. This work has resulted in a healthy network of relationships for our businesses.

Note: The high-risk scores resulted in a relationship with Eurofarma not being initiated or being interrupted



# Ombudsman channel

Our Ombudsman Channel, which is widely publicized in all our operations (Brazil and International) and accessible to both internal and external audiences, guarantees anonymity to the whistleblower, as well as non-retaliation against whistleblowers in good faith. In this context, it is worth noting that we consider overreporting to be an ethics violation.

Here we deal with complaints with three main goals in mind:

- 1) stopping misconduct immediately
- 2) proposing improvements to the internal processes involved in order to address the root cause
- 3) repairing and rebalancing the relationships and processes affected.

The following is the flow that reports go through from the moment they are registered on our ombudsman channel until they are handled



1

Complaints made through an external, independent and auditable channel



2

A specialized team receives the report and ensures its confidentiality



3

Our Compliance receives the information and determines the best way to handle it, based on in the Ethics Committee definitions

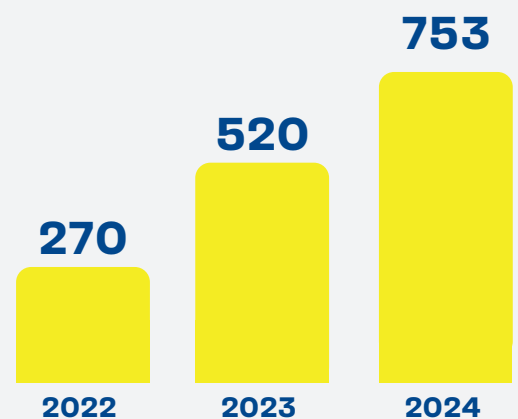


4

Finally, the necessary measures are taken

## Reporting indicators

Our whistleblowing indicators demonstrate the growing trust in our ombudsman channel, in the work of our compliance department and in the decisions of our Ethics Committee. Our employees and partners have already understood that sharing their concerns allows us to act to resolve any situations of ethical non-compliance promptly.





# Communication

Approximately 20 communication actions were carried out for our internal and external audiences.

We have an annual compliance communication plan which, duly approved by our Ethics Committee, drawn up by the Compliance team and executed with the support of the Corporate Communications team, ensures that important topics of compliance interest and related to our risks, are constantly worked on with our internal audiences and our third parties.

We are in constant contact with our team, which ensures we are constantly updated and aligned



Here are some examples of these communications ...



## Panorama Magazine – September issue

The September issue of Panorama magazine, published in-house, featured a page dedicated to the theme 'The Eurofarma Way of Being: Moving Forward with Compliance'. The article reinforces that employees are responsible for making the company ethical and upstanding.

## Webinar - anti-corruption tips INAC (I Don't Accept Corruption Institute)

Webinar on anti-corruption for teams that are somehow involved in interactions with public officials.



## Canal de Ouvidoria apoia a segurança na Eurofarma

Plataforma é confidencial e garante a integridade dos colaboradores

[Acessar Notícia](#)

## Communication on the ombudsman channel

Announcement made in May 2024 through internal channels to promote the ombudsman channel.



## Chat with compliance

In 2024, Compliance held more than 60 individual chats with employees, addressing compliance issues and strengthening proximity with various company functions



## Assine a declaração anual de Compliance e fique em dia com a ética!

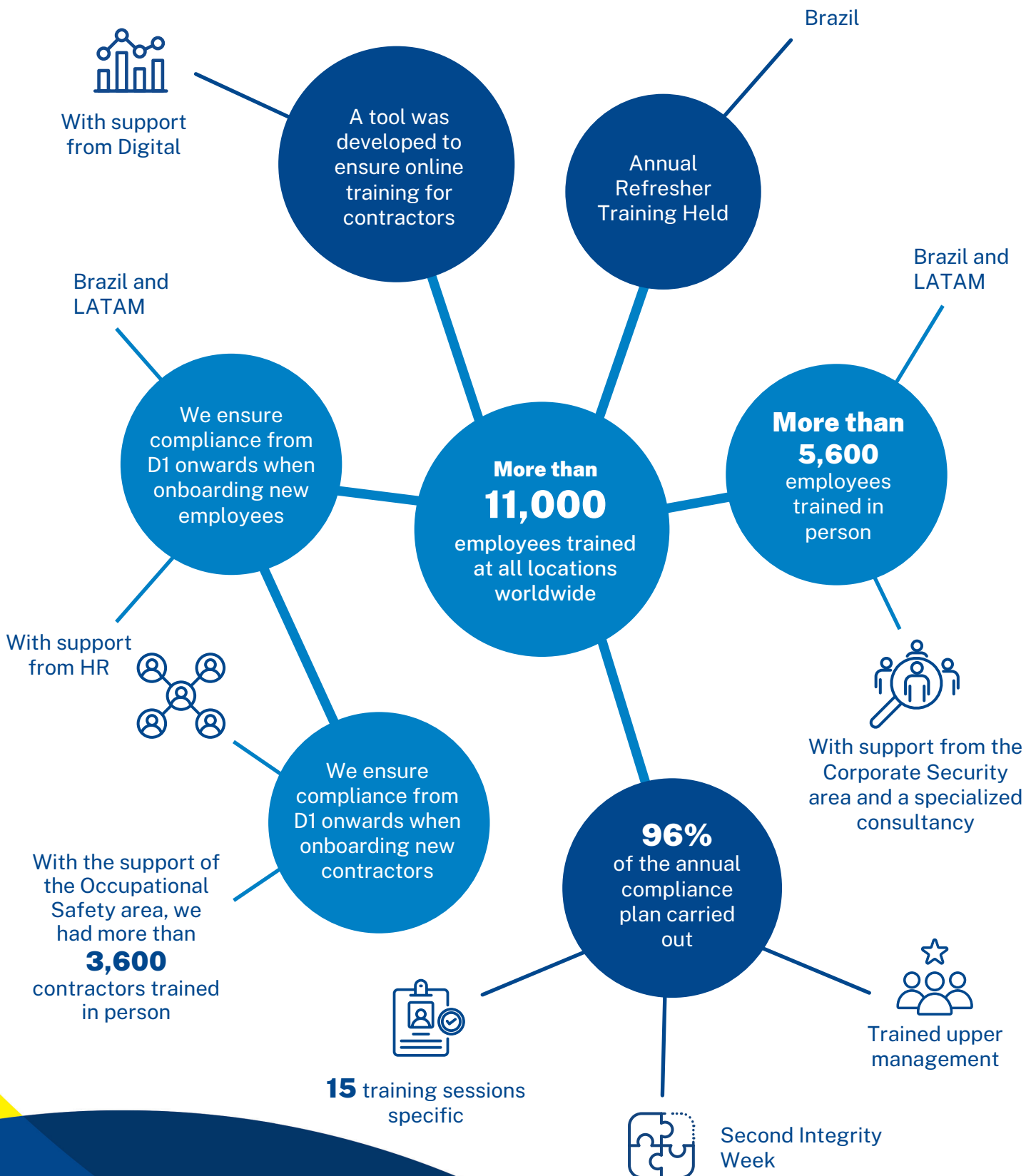
As assinaturas deverão ser realizadas até o dia 31/08/2024

[Acessar Notícia](#)

## Annual Compliance Statement

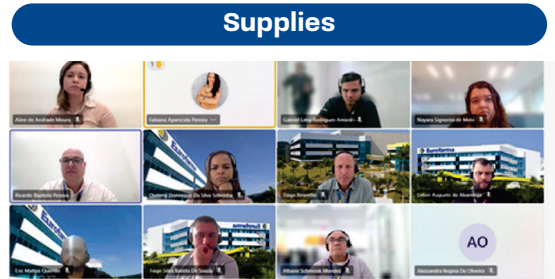
Notice sent in August 2024 through internal channels to remind employees to sign the annual compliance declaration.

# It also has an annual Training plan to ensure

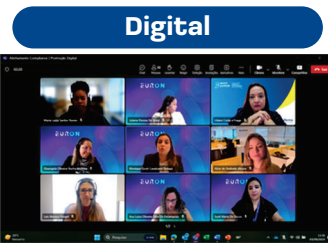


# Specific training to meet the specific needs of each department

We invest in people, because we know that Eurofarma consists of and led by them. That is why compliance matters are always on the development, integration, updating and strategic alignment agendas.



## In-person training across all factories in Brazil



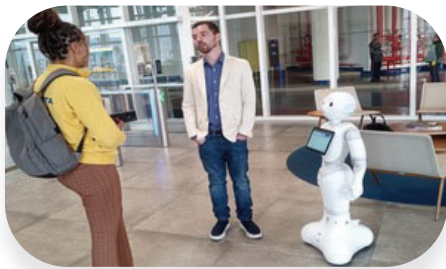
We strive to innovate constantly, offering in-person, distance learning and gamified online training, with the participation of external guests, always aiming to surprise and engage our talent



# SECOND WEEK OF INTEGRITY

The way we act reveals who we are

In 2024 we held our Second Integrity Week. We have had increasing attendance numbers at each edition.



## EVA in Itapevi

EVA, our robot, went to Itapevi to announce Integrity Week.



## Launch of Integrity Week on Conecta

News was posted on Conecta announcing the start of Integrity Week, including a link so that all employees could access our games day.



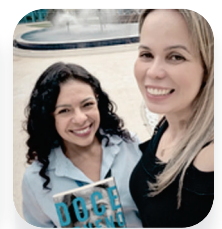
## Webinar - Integrity Week

During the webinar, which included an interactive game, we discussed essential topics such as combating harassment, discrimination and other negative behaviors, to strengthen our organizational culture.



## Webinar Awards

Six people who won the webinar game were awarded with the book "Doce Veneno".



## Gamified Week

In Integrity Week, there was a 5-day game day, where the score was awarded based on your speed and the total number of hits each day.



## Game Awards

20 employees won in Brazil, 2 in Paraguay and 1 in Colombia. Everyone received prizes according to their ranking in the compliance game.





# Compliance by design

**Our compliance team** takes seriously its position of being recognized as a business partner, safely permeating our strategies. Its open-door policy with frank conversations and transparent actions contributes to our having the concept of “**Compliance by design**” in practice, i.e. new ideas and projects are already thought out respecting the limits of our ethical premises.

Along these lines, our area answered 140 queries from a wide variety of areas. It also offered a webinar, with the participation of external guests, dedicated to the particularities of certain areas, such as:



## Webinar - IES (Ethics Health Institute)

On Donations and Sponsorships - Compliance Cautions

Invited functions: Social Responsibility - Events - Eurofarma Institutes



## Webinar - INAC (I Don't Accept Corruption)

Anti-Corruption Precautions

Invited functions: Hospital - Oncology - Tenders - Legal - Regulatory - Institutional Relations - Tax



## Webinar - ABRAIDI

**(Brazilian Association of Importers and Distributors of Health Products)**

The Importance of Compliance in interacting with healthcare professionals

Invited functions: Medical - Marketing

**Still on the subject of partnerships, it's important to highlight the areas that have been important in Compliance projects and have supported much of what has made up this report:**

**Corporate Communication, HR, Workplace Safety, Property Security, IT, Digital, Legal and Internal Audit.**



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For questions or more information  
please email us at.