

WHISTLEBLOWER CHANNEL POLICY

1. INTRODUCTION

1.1. As a fundamental part of its Compliance Program and aiming to promote an integrity culture, BIODINA provides a Whistleblower Channel (compliance@denuncia.info), accessible to all its employees, service providers, and channel partners, for receiving reports of irregular conduct (suspected or confirmed).

1.2. Every reported complaint will be investigated and, if the facts are confirmed, disciplinary measures will be applied in accordance with BIODINA's internal rules, legislation and/or signed contracts.

2. OBJECTIVE

2.1. BIODINA complements the Code of Conduct's guidelines indicating the following as fundamental objectives:

2.1.1. To clarify the process of reporting complaints, investigations and decisions regarding violations of the Compliance Program, Code of Conduct and applicable laws.

2.1.2. To establish a clear policy on the proper use of the Whistleblower Channel, as well as to provide guidance on the means of submitting complaints and to inform about the flow of receiving and handling complaints related to violations of its Compliance Program and current legislation.

3. SCOPE

3.1. Any employee, service provider and channel partner of BIODINA can and should use the Whistleblower Channel if they have any concern about a conduct that is likely to constitute an illegality.

4. DEFINITIONS

4.1. For the purposes of the Whistleblower Channel Policy, the terms listed below have the following meanings:

4.1.1. Employees: employees, managers, senior management, administrators, directors, trainees, apprentices, etc.

4.1.2. Channel Partners: distributors, as well as any individual or legal entity with whom BIODINA, directly or indirectly, maintains a contractual or institutional relationship for commercial purposes.

4.1.3. Service Providers: individual or legal entity that performs some type of work for BIODINA in exchange for financial compensation.

5. GUIDELINES FOR MAKING A COMPLAINT

5.1. WHICH ACTS SHOULD BE REPORTED?

5.1.1. Conducts that violate the Code of Conduct, laws, regulations and any BIODINA's internal rules are included. Some examples:

- Fraud and favoritism;
- Misappropriation of funds;
- Overpricing;
- Corruption or bribery;
- Moral or sexual harassment;
- Crimes in general;
- Document forgery;
- Leaking of confidential information or personal data;
- Coercion or threat;
- Sale or use of drugs;
- Carrying weapons;
- Acts of unfair competition;
- Violation of the Code of Conduct, regulations, rules and procedures.

5.1.2. It is not necessary to be certain of what is being reported; true situations of illegalities suspicions, violation of the Code of Conduct, applicable laws and signed contracts should be reported.

5.1.3. It is important to remember that a false complaint (when the complainant knows the report is false) is also an illegality, subject to penalties by BIODINA, the celebrated contracts and current legislation.

5.1.4. The Whistleblower Channel should not be used to express personal dissatisfaction and claims, such as, the quality of facilities, payments, etc. Any manifestations related to these subjects will be summarily disregarded, unless they constitute an illegality.

5.2. HOW SHOULD THE COMPLAINT BE MADE?

5.2.1. The complainant is not obliged to identify themselves.

5.2.2. If they choose to identify themselves, they are guaranteed that their personal information will be kept confidential and secret, as the Whistleblower Channel is monitored by an external service provider hired for this purpose.

5.2.3. The complaint must be made electronically, by sending an email to compliance@denuncia.info or through BIODINA's website, on the "Compliance" tab, <https://biodina.com.br/compliance>.

5.3. WHAT HAPPENS AFTER THE COMPLAINT IS SUBMITTED?

5.3.1. Upon receipt of the complaint, the external service provider monitoring the channel will initiate the investigation process if there are elements to start the internal investigation.

5.3.2. If necessary (and if the complaint is not anonymous), the complainant may be contacted to provide more information about the case.

6. GUIDELINES FOR HANDLING COMPLAINTS

6.1. HOW ARE COMPLAINTS HANDLED?

6.1.1. Reports that are not related to the Whistleblower Channel will be disregarded.

6.1.2. Upon receipt of the report, the person responsible for receiving the complaint will assess the need for investigation and interviews.

6.1.3. If an internal investigation is necessary, the investigator will conduct interviews and analyze documents, as appropriate.

6.1.4. The interview will always be conducted by two people and may be recorded, only for documentation.

6.1.5. The term of awareness will be read to the interviewee, explaining the absence of attorney-client privilege in relation to the interviewee and informing that, if he/she wishes, he/she can postpone the interview to obtain legal advice from someone he/she trusts.

6.1.6. The term must be signed by the interviewee.

6.1.7. Ultimately, the person responsible for the internal investigation will inform the employee or service provider allegedly involved about the facts alleged against him/her (keeping the complainant's name confidential) and about how he/she can access the information and, eventually, correct it.

6.1.8. The moment for this communication will be determined by the investigator to protect the collection of information about the case.

6.1.9. Once all information has been collected and the internal investigation is concluded, the case will be forwarded to the Integrity Committee.

6.1.10. The respective Committee will be responsible for deciding on the applicable disciplinary measures.

6.1.11. All reports will be analyzed as quickly as possible, taking into account their nature and complexity.

6.2. CONCLUSION OF INVESTIGATIONS

6.2.1. The complainant (if not anonymous) may receive a response about the handling of his/her report and will be informed if any corrective action or improvement in procedures has been recommended as well as if any additional action will be taken.

6.2.2. Details relating to specific individuals will not be presented, and the response may be generic, taking into account BIODINA's interest in protecting its confidential information, as well as the rights of third parties.

6.2.3. All cases presented will be compiled for statistical data and will be reported to senior management and Compliance.

6.2.4. Both will consider the complaints received to provide an opinion on improvements in internal procedures or corrective measures.

7. CONFIDENTIALITY AND SECRECY OF INFORMATION

7.1. Reports will only be disclosed to those involved, so they can be aware of the information being investigated.

7.2. All parties involved in the complaint must maintain strict secrecy, in accordance with applicable laws, regarding the content of any reports made.

7.3. If the interviews are conducted by a lawyer from the legal department, it is important to understand that they serve as BIODINA's advisor and cannot give legal advice to the interviewee.

7.4. The attorney-client privilege belongs only to the company, which means that BIODINA may choose to waive the privilege and disclose the information in a lawsuit, for example. Therefore, the interviewee can obtain legal advice from a professional of his/her choice.

8. NON-RETALIATION

8.1. BIODINA encourages and values the assistance of the employee, service provider and channel partner.

8.2. The company will take the necessary measures to protect those who, in good faith, make reports through the Whistleblower Channel against any retaliation by other employees, service

providers and channel partners, being expressly prohibited demotion, harassment or discrimination, threats of job loss, removal, loss of benefits, as well as treating them differently than usual.

9. DOCUMENT RETENTION

9.1. Records of all reports will be maintained with information about their receipt, investigation and resolution for the case of future inquiries and for the preparation and analysis of statistics.

9.2. Statistical data on the types of received reports and the corrective measures taken will be kept in the legal department's file.

9.3. Information referring to facts that prove to be unfounded will be immediately eliminated.

10. TRAINING, DISCLOSURE AND REVIEW OF THE WHISTLEBLOWER CHANNEL POLICY

10.1. There will be training on the Whistleblower Channel policy for all employees and service providers.

10.2. This policy must be updated whenever necessary or after substantial changes in its content, for the continuous improvement of the company's integrity conduct.

11. DISCLOSURE OF THE WHISTLEBLOWER CHANNEL POLICY

11.1. This policy must be made available on BIODINA's website, for access by all employees, service providers, channel partners and BIODINA's public.

12. FINAL CONSIDERATIONS

12.1. BIODINA reinforces, through this policy, its commitment to ethics, transparency and respect for laws and people. The Whistleblower Channel is an essential instrument to ensure an integral, safe and responsible environment for all who relate to the company.

12.2. We count on the active and conscious participation of our employees, partners and service providers to continuously strengthen our culture of integrity.

12.3. Reporting responsibly is an act of courage and commitment to BIODINA.

