

Code of Ethics and Conduct

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MESSAGE FROM THE PRESIDENT

At TRIBEMD GROUP, we believe that sustainable results are only possible when built on solid foundations of ethics, integrity, and respect for people.

This Code of Conduct reflects the principles and values that guide our activities and establishes the standards of behavior expected of all those who act on behalf of TRIBEMD GROUP, regardless of their role or connection to the organization.

More than a set of formal guidelines, this Code represents the TRIBEMD GROUP's institutional commitment to responsible business practices, respect for human rights, legal and regulatory compliance, and the promotion of professional relationships based on transparency, trust, and cooperation. With this, we reinforce our commitment to a safe, inclusive, and open environment for dialogue.

Our actions seek to generate value in a responsible and sustainable manner, considering the impacts of our activities on environmental, social, and governance aspects. In this context, integrity must guide all our decisions and interactions with employees, customers, partners, suppliers, and other stakeholders.

The organization's leadership has a duty to promote and strengthen this culture of integrity. Likewise, each person who is part of the TRIBEMD GROUP has an individual responsibility to know, understand, and apply the principles established in this Code in the performance of their activities.

We invite everyone to adopt this Code as a practical guide for their daily decisions and actions, contributing to the strengthening of an ethical and respectful work environment committed to institutional responsibility.

By acting in accordance with these principles, we strengthen not only our organization, but also the positive impact we seek to generate for our customers, partners, employees, and society.

Sincerely,



Thomas de Almeida
President of TRIBEMD GROUP

ABOUT THE TRIBEMD GROUP

The TRIBEMD GROUP is an ecosystem dedicated to developing initiatives, knowledge, and solutions that contribute to the advancement of health, science, and education. We work in an integrated manner with professionals, institutions, and partners committed to responsible innovation and generating a positive impact in the health sector.

Through its different business units, the TRIBEMD GROUP promotes initiatives focused on health education, the production and dissemination of scientific knowledge, support for scientific research, and the development of projects and solutions that contribute to the evolution of healthcare practices. These initiatives also seek to strengthen the convergence and connection between professionals, institutions, and scientific communities, promoting a collaborative ecosystem oriented toward professional development, the exchange of experiences, and the construction of solutions.

Our work is guided by a commitment to ethics, integrity, scientific responsibility, and the promotion of evidence-based practices. We believe that advances in medicine, health education, and innovation depend on collaborative environments that favor methodological rigor, transparency, scientific dialogue, and the continuous development of professionals working in the sector.

In this context, we value cooperation between different actors in the health and education ecosystem, as well as the creation of spaces that favor the integration of knowledge, the sharing of experiences, and the collective evolution of professional practices.

We seek to contribute to an environment of responsible innovation, in which the development of initiatives, solutions, and knowledge occurs with respect for people, institutions, and society.

It is in this environment of institutional responsibility, collaboration, and commitment to integrity that this Code of Conduct establishes the ethical principles and standards of behavior that guide the activities and institutional relationships of the TRIBEMD GROUP.

PURPOSE AND OBJECTIVES OF THIS CODE

This Code of Conduct establishes the **ethical principles, guidelines, and standards of behavior** that guide the **activities and institutional relationships** of the TRIBEMD GROUP.

Its purpose is to promote an organizational culture based on integrity, responsibility, and respect for people, offering clear guidelines for decision-making and the conduct of professional activities within the TRIBEMD GROUP.

This Code is part of the TRIBEMD GROUP 's **governance system and integrity program**, contributing to the prevention of inappropriate conduct, the mitigation of legal, ethical, and reputational risks, and the strengthening of responsible business practices.

In addition to guiding the behavior of employees, managers, and third parties acting on behalf of the TRIBEMD GROUP, the Code reaffirms the organization's institutional commitment to complying with applicable laws and regulations, respecting human rights, and promoting practices aligned with the principles of environmental, social, and governance (ESG) sustainability.

Through this Code, the TRIBEMD GROUP seeks to ensure that its activities are conducted with transparency, responsibility, and respect for best practices in business ethics, contributing to the strengthening of institutional relationships based on trust and integrity.

The provisions of this Code apply to all those who act on behalf of or in the interest of the TRIBEMD GROUP, as detailed in the following chapter.

SCOPE AND APPLICABILITY

The provisions of this Code apply regardless of where activities are carried out and must be observed in all operations, institutional relationships, and professional interactions conducted on behalf of the TRIBEMD GROUP.

The following are **subject** to the provisions of this Code:

- Employees, interns, apprentices, temporary workers;
- Administrators, partners, directors, advisors, and other representatives;
- Service providers, consultants, contractors;
- Business partners, suppliers, customers, and any third parties acting on behalf of or for the benefit of the TRIBEMD GROUP.

All such persons are expected to conduct their activities in accordance with the principles and standards of conduct set forth in this Code, as well as with applicable laws and regulations.

The TRIBEMD GROUP also encourages and expects its business partners, suppliers, and other members of its value chain to adopt ethical practices consistent with the principles set forth in this Code.

The provisions of this Code apply **regardless of where** the activities are carried out and must be observed in all operations, institutional relationships, and professional interactions conducted on behalf of the TRIBEMD GROUP.

All those covered by this Code must **know, understand, and observe its provisions**, seeking guidance whenever questions arise regarding its application.

GENERAL PRINCIPLES

The activities of the TRIBEMD GROUP are guided by principles that reflect the institutional values of the organization and that should guide the behavior of all those who act on its behalf or in its interest.

These principles represent the basis of the TRIBEMD GROUP 's **organizational culture** and **guide decision-making**, the conduct of **professional relationships**, and the development of institutional **activities**.



INTEGRITY

We act with integrity in all our activities, conducting our professional relationships with **ethics, rectitude, and coherence**. We seek to act **consistently** with our institutional **values**, maintaining alignment between what we declare and the decisions and **actions** we adopt in the performance of our activities.

Integrity guides our decisions and interactions with professionals, partners, clients, suppliers, and other stakeholders.

HONESTY

We value honesty in professional and institutional relationships, guiding our interactions by **truthfulness, loyalty, and good faith**. Everyone is expected to act with frankness and correctness in the communication of information and in the performance of their responsibilities.

RESPECT

We treat all people with **dignity**, consideration, and respect, recognizing and valuing the **diversity** of perspectives, experiences, and knowledge that make up the ecosystem in

which we operate. We seek to promote professional relationships based on **trust, cooperation, and mutual recognition.**

RESPONSIBILITY

We conduct our activities with a sense of **individual** and **institutional responsibility**, recognizing that our **decisions and actions** produce relevant impacts on people, institutions, and the health and education ecosystem in which we operate.

For this reason, we seek to adopt **informed, well-founded decisions** aligned with applicable best practices and the ethical principles that guide our conduct.

Responsibility also implies **accountability**: each person who acts on behalf of TRIBEMD GROUP must assume responsibility for their decisions and conduct, contributing to the strengthening of an organizational culture based on integrity, diligence, and institutional commitment.

TRANSPARENCY

We conduct our activities with **clarity**, responsibility, and appropriate disclosure of **information**, promoting institutional relationships based on **trust and credibility**. Transparency guides the way we communicate our decisions, processes, and results to the people and institutions with which we interact.

COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

TRIBEMD GROUP operates in strict **compliance** with the laws, regulations, and **standards applicable** to its activities, as well as with the ethical principles and guidelines established in this Code of Conduct.

All those who act on behalf of TRIBEMD GROUP must comply with applicable legislation and conduct their activities in a responsible manner aligned with the organization's ethical standards.

OUR INSTITUTIONAL COMMITMENT

The principles established in this Code guide the actions of TRIBEMD GROUP and translate into institutional commitments that must direct the behavior of all those who act on behalf of the organization.

Based on these values, TRIBEMD GROUP seeks to conduct its activities in an ethical, responsible, and transparent manner, promoting professional practices aligned with the best scientific, institutional, and regulatory references applicable to the health and education sector.

In this regard, we commit to:

- √ Promote respect for people, human dignity, and fundamental rights in all our professional and institutional relationships;
- √ Conduct our activities with scientific responsibility, methodological rigor, and a commitment to evidence-based practices;
- √ Act with integrity, honesty, and transparency in relationships with professionals, partners, institutions, and other stakeholders;
- √ Ensure compliance with the laws, regulations, and standards applicable to our activities;
- √ Promote ethical, inclusive, safe, and respectful professional environments;
- √ Encourage cooperation among professionals, institutions, and different actors within the health and education ecosystem;
- √ Value dialogue and the consensus-based construction of solutions in institutional relationships, encouraging the responsible use of appropriate methods for conflict prevention and resolution;
- √ Conduct our activities with social and environmental responsibility, seeking to minimize environmental impacts and promote sustainable organizational practices;
- √ Protect sensitive information and personal data handled in the course of our activities, respecting applicable confidentiality and data protection rules.

The commitments established herein reflect the institutional values of TRIBEMD GROUP and are detailed in the following chapters of this Code, which address the specific guidelines applicable to the different areas of activity of the organization.

IN CASE OF DOUBT

Whenever there are doubts regarding the interpretation or application of this Code, **stop** the intended action and seek guidance.

You may reach out to your **manager, Human Resources, Legal/Compliance**, or use the institutional communication channels and the ombudsman.

Acting in compliance with the principles of this Code is the responsibility of everyone who acts on behalf of **Grupo TribemD**.

CODE OF CONDUCTS GUIDELINES

1. RESPECT FOR PEOPLE AND HUMAN RIGHTS

The TRIBEMD GROUP recognizes that respect for **human dignity** is an essential foundation of ethical and responsible professional relationships. For this reason, it conducts its activities in accordance with **internationally recognized human rights** and the laws and regulations applicable to its operations.

The organization seeks to promote a **work environment** based on **mutual respect, inclusion, and cooperation**, in which all individuals are treated with dignity, consideration, and **fairness**. We work to identify risks, prevent harm, mitigate impacts, and, when necessary, remedy them appropriately.

All those acting on behalf of the TRIBEMD GROUP are expected to contribute to building respectful professional relationships and to maintaining a safe, healthy work environment free from discrimination or abuse.

In this context, the TRIBEMD GROUP guides its actions through the following commitments:

1.1. EQUALITY, DIVERSITY, AND NON-DISCRIMINATION

TRIBEMD GROUP values the **diversity** of people, experiences, and perspectives as an essential element for the development of knowledge, innovation, and professional collaboration.

TRIBEMD GROUP adopts a **zero-tolerance policy toward discrimination**, and practices of discrimination or unequal treatment based on personal characteristics or individual conditions are not permitted, such as origin, race, color, gender, sexual orientation, gender identity, age, religion, nationality, disability, socioeconomic status, or any other condition protected by law.

The organization promotes **equal opportunities** in professional and institutional relationships, seeking to ensure that decisions related to recruitment, professional development, performance evaluation, and other aspects of professional life are based on **objective and professional criteria**.

1.2. RESPECTFUL AND HARASSMENT-FREE WORK ENVIRONMENT

TRIBEMD GROUP does **not tolerate any form of moral harassment**, sexual harassment, intimidation, abuse of authority, or conduct that compromises the dignity of individuals in the workplace.

Everyone must contribute to building a professional environment guided by **respect**, collaboration, and cordiality in relationships among colleagues, managers, partners, and all others with whom they interact in the performance of their activities.

RESPECT AND COEXISTENCE IN THE PROFESSIONAL ENVIRONMENT	
PROHIBITED CONDUCT	EXPECTED BEHAVIORS
<ul style="list-style-type: none"> ✘ Offensive jokes, stereotypes, exclusions, or degrading comments. ✘ Hiring or promotion decisions based on discriminatory biases. ✘ Verbal aggression, intimidation, defamation, bullying, or humiliating exposure. ✘ Behaviors that create fear, hostility, or humiliation in the workplace. 	<ul style="list-style-type: none"> ✔ Treat everyone with respect, dignity, and consideration. ✔ Base professional decisions on objective and duly recorded criteria. ✔ Report signs of violations or inappropriate situations, including those observed in third parties. ✔ Cooperate with prevention and remediation initiatives related to the work environment.

1.3. FUNDAMENTAL RIGHTS IN EMPLOYMENT RELATIONSHIPS

TRIBEMD GROUP respects and promotes fundamental rights in employment relationships, observing applicable legislation and internationally recognized **principles** for the protection of **decent work**. We act responsibly to **prevent, identify, and curb** practices that violate human dignity in our operations and commercial relationships.

In this regard, the organization **does not accept or tolerate**:

- ✓ **Child labor**, understood as any work activity carried out in violation of applicable legislation or that may compromise the development, education, health, or dignity of children and adolescents;
- ✓ **Forced labor**, under conditions analogous to slavery or debt bondage, or any form of work performed under degrading or compulsory conditions.

The organization also respects the right of individuals to **freedom of association** and participation in representative entities, in accordance with applicable legislation.


TRIBEMD GROUP also encourages partners, suppliers, and other third parties to observe these same principles of respect for human rights and decent working conditions in their activities.

1.4. SAFE AND HEALTHY WORK ENVIRONMENT




TRIBEMD GROUP seeks to promote safe and healthy working conditions by adopting practices that contribute to the **prevention of occupational risks** and to the **protection of the health, safety, and well-being** of everyone.

All individuals are expected to act responsibly in preserving a safe professional environment, complying with standards and guidelines related to **occupational health and safety**.

The organization encourages the **identification and reporting** of situations that may pose risks, contributing to the continuous improvement of working conditions.

 **SAFETY, HEALTH, AND WELL-BEING**

EXPECTED CONDUCT

-  Follow health and safety guidelines and regulations applicable to all activities.
-  Report incidents, risks, or unsafe conditions.
-  Use personal protective equipment (PPE) when applicable.
-  Respect breaks and work shift limits, contributing to the reduction of physical and psychosocial risks.

1.5. USE OF ALCOHOL, DRUGS AND SUBSTANCES

TRIBEMD GROUP seeks to preserve a safe, healthy, and professional work environment. The improper use of substances may compromise safety, professional performance, and collective well-being.

For this reason, everyone is expected to act responsibly and in compliance with applicable regulations.

 **USE OF ALCOHOL, DRUGS, AND SUBSTANCES**

IT IS PROHIBITED TO

-  Consume or be under the influence of **alcohol, drugs, or substances** that impair safety, performance, or professional judgment during working hours or while performing activities in service of Grupo TribemD.
-  **Possess, distribute, or sell illicit drugs** in the workplace or during any activity linked to the organization's professional operations.
-  Engage in behaviors that jeopardize your **own safety or the safety of others** due to substance use.

2. ENVIRONMENTAL RESPONSIBILITY

TRIBEMD GROUP recognizes the importance of **protecting the environment** and adopting responsible practices that contribute to the **sustainability** of its organizational activities.

In this regard, the organization is committed to conducting its activities **responsibly**, seeking to **identify, prevent, and reduce** environmental impacts associated with its operations, whenever applicable.

TRIBEMD GROUP encourages and promotes the **conscious use of natural and material resources, the prevention and reduction of waste**, and the adoption of **practices** that contribute to the **sustainability** of organizational activities, even in contexts where its direct environmental impacts are limited.

Accordingly, TRIBEMD GROUP is committed to acting in compliance with applicable environmental regulations and to promoting organizational practices aligned with the principles of environmental responsibility and sustainability.

All those acting on behalf of TRIBEMD GROUP must contribute to the adoption of responsible practices in the use of natural and material resources, as well as to environmental preservation, waste prevention, and the proper disposal of waste.

2.1. COMPLIANCE WITH ENVIRONMENTAL REGULATIONS

TRIBEMD GROUP conducts its activities in compliance with the environmental laws, regulations, and standards applicable to its operations.

Whenever necessary, the organization seeks to adopt measures that ensure proper management of environmental impacts and compliance with legal obligations related to environmental protection.

2.2. CONSCIOUS USE OF RESOURCES AND WASTE PREVENTION

TRIBEMD GROUP encourages **responsible and efficient use and conscious consumption** of natural and material resources used in its activities.

Everyone is expected to contribute to conscious consumption, waste prevention, and the adoption of sustainable practices in the workplace, including the responsible use of energy, water, paper, and other resources.

The adoption of simple practices in daily professional life, such as reducing unnecessary printing and the proper use of materials and equipment, contributes to reducing environmental impacts and promoting a more sustainable organizational culture.

2.3. PROPER WASTE DISPOSAL

TRIBEMD GROUP seeks to promote proper disposal of waste generated in its activities, observing applicable regulations and encouraging responsible disposal and recycling practices whenever possible.

Everyone is expected to comply with internal guidelines related to material disposal and proper waste segregation.

2.4. REPORTING OF ENVIRONMENTAL INCIDENTS

Any situation that may pose an environmental risk or impact must be reported to the appropriate areas of the organization so that suitable assessment, prevention, or remediation measures can be adopted.

Timely reporting of incidents contributes to environmental protection and to the continuous improvement of organizational practices.

2.5. SUPPORT FOR ENVIRONMENTAL INITIATIVES

TRIBEMD GROUP encourages employee participation and engagement in initiatives that promote environmental sustainability and the adoption of responsible practices in the workplace.

2.6. CONSIDERATION OF ENVIRONMENTAL CRITERIA IN DECISIONS AND PARTNERSHIPS

TRIBEMD GROUP seeks to consider aspects of environmental sustainability in its organizational decisions whenever possible.

To this end, whenever feasible, criteria related to the environmental performance of solutions, products, suppliers, and service providers may be considered, encouraging practices that contribute to reducing environmental impacts throughout the value chain.

Accordingly, the organization also encourages partners, suppliers, and other third parties to adopt environmentally responsible practices consistent with the sustainability principles promoted by TRIBEMD GROUP.

This approach reinforces the organization's commitment to responsible practices and to promoting sustainable initiatives in its institutional relationships.

2.7. RESPONSIBLE USE OF RESOURCES IN TRAVEL AND EVENTS

In activities involving business travel, meetings, or institutional events, TRIBEMD GROUP encourages the adoption of responsible practices that contribute to efficient use of resources and the reduction of environmental impacts.

Whenever possible, alternatives that avoid unnecessary travel and promote the responsible use of resources during professional activities and corporate events should be considered.



DAILY ENVIRONMENTAL PRACTICES

Use of Resources

- ✔ Consciously use energy, water, and paper.
- ✔ Practice responsible consumption of materials and resources in the workplace.
- ✔ Avoid unnecessary printing and reduce waste.

Environmental Impact

- ✔ Follow internal guidelines for waste disposal and recycling.
- ✔ Report leaks, irregularities, or improper disposal of materials.
- ✔ Plan commutes and trips responsibly, avoiding unnecessary travel.
- ✔ Prioritize solutions and providers that adopt more sustainable practices whenever viable.

3. INTEGRITY IN PROFESSIONAL AND INSTITUTIONAL RELATIONSHIPS

TRIBEMD GROUP conducts its activities based on **principles of integrity, honesty, transparency, and institutional responsibility**. These principles guide all professional and institutional relationships maintained by the organization, both internally and in interactions with clients, partners, suppliers, institutions, and other stakeholders.

The organization adopts a zero-tolerance stance toward corruption, fraud, and any form of unlawful conduct, requiring the same commitment from all those who act on behalf of or in partnership with TRIBEMD GROUP.

All employees, officers, service providers, and partners must carry out their activities **ethically**, in strict compliance with applicable laws and with the principles established in this Code, avoiding situations that may compromise the impartiality of decisions or create conflicts between personal interests and the interests of the organization.

Upholding integrity in professional relationships strengthens trust in institutions, contributes to the credibility of the activities carried out, and promotes an organizational environment based on **ethics and responsibility**.

3.1. ANTI-CORRUPTION AND ANTI-BRIBERY

TRIBEMD GROUP adopts a firm position **against corruption and bribery**, in alignment with the **anti-corruption laws** applicable in the jurisdictions in which it operates or maintains institutional relationships.

Among the main legal references are, without limitation: Brazilian Law No. 12,846/2013 (Brazilian Anti-Corruption Law); the U.S. Foreign Corrupt Practices Act (FCPA); the UK Bribery Act; and applicable anti-corruption legislation in Latin America and the European Union.

It is strictly **prohibited** to offer, promise, authorize, give, request, or receive any undue advantage, directly or indirectly, for the purpose of obtaining improper benefits or influencing the decisions of third parties.

This prohibition applies both to relationships with public officials and to relationships with clients, partners, suppliers, or private institutions.

The following are also **prohibited**:

- ✓ Facilitation payments;
- ✓ Unjustified commissions or payments;
- ✓ Payments to intermediaries intended to circumvent processes or legal requirements;
- ✓ Any form of improper benefit intended to influence institutional decisions.

Transfers of value to third parties must always be based on **legitimate need**, reflect **fair market value**, and be properly **documented**.

In summary, it is our duty to comply with applicable laws, both locally and internationally, and with ethical standards that prohibit bribery and corruption, as well as to avoid improperly influencing medical decisions made by healthcare professionals and purchasing decisions made by entities that acquire our products and services.

The provisions set forth in this Code also apply to third parties acting on behalf of or in the interest of TRIBEMD GROUP, including consultants, representatives, service providers, and business partners.

! **WARNING SIGNS OF CORRUPTION AND FRAUD**

The signs below may indicate risks of corruption, bribery, fraud, or other misconduct.

<ul style="list-style-type: none">✓ Unjustified or cash payments.✓ Requests for "commissions" or amounts outside of the contract.✓ Unqualified intermediaries or those without a clear purpose.✓ Gifts or benefits offered without registration or justification.✓ Pressure to speed up processes or "resolve bureaucracies" in an irregular manner.	<ul style="list-style-type: none">✓ Altered or inconsistent financial reports or invoices.✓ Financial or commercial relationships with involved public agents.✓ Unusual resistance to audits, controls, or verification processes.
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In case of suspicion or doubt:
Immediately contact the
Compliance, Legal, or
Ombudsman departments.

3.2. GIFTS, HOSPITALITY AND ENTERTAINMENT

The offering or receipt of gifts, hospitality, or benefits must occur in a moderate and transparent manner and be compatible with legitimate institutional practices.

Such benefits must be:

- ✓ Reasonable and occasional;
- ✓ Permitted by applicable legislation;
- ✓ Compatible with professional and institutional standards;
- ✓ Free from any expectation of reciprocity or undue influence.

Whenever applicable, the granting or receipt of gifts or hospitality must be recorded and submitted to the **organization's internal approval rules**.

Gifts or benefits that may influence professional decisions, create undue obligations, or compromise the independence of institutional relationships are **not permitted**.

It is prohibited to offer or receive gifts that exceed **one hundred (100) U.S. dollars**, except in situations previously authorized in accordance with the organization's internal policies.

In case of doubt, guidance should be sought from the appropriate areas of the organization.

3.3. RELATIONSHIP WITH THE PUBLIC SECTOR

TRIBEMD GROUP's relationships with public bodies, government authorities, and public officials must be conducted with a high standard of **integrity, transparency**, and strict compliance with applicable **laws and regulations**.

A public official is considered to be any individual who holds a public position, employment, or function, even on a temporary basis or without remuneration, including representatives of governmental bodies, regulatory authorities, public educational or research institutions, public hospitals, and entities linked to public administration.

Institutional interactions with the public sector must occur exclusively for **legitimate and institutional purposes**.

It is expressly prohibited to:

- ✓ Offer, promise, or grant any undue advantage to a public official;
- ✓ Make facilitation payments intended to expedite or influence administrative decisions;
- ✓ Use intermediaries or third parties to make improper payments or grant undue benefits;
- ✓ Grant benefits, hospitality, or advantages that may compromise the impartiality or independence of public officials.

All those acting on behalf of TRIBEMD GROUP must ensure that any interaction with public authorities is conducted **ethically**, transparently, and properly **documented**.

Whenever applicable, such interactions must comply with the organization's internal guidelines, and in case of doubt, guidance should be sought from the Compliance, Legal, or Institutional Relations areas.

3.4. PREVENTION OF FRAUD, MONEY LAUNDERING AND RECORD INTEGRITY

TRIBEMD GROUP does not tolerate any form of fraud, manipulation of information, misappropriation of resources, or practices related to money laundering.

The organization adopts measures aimed at preventing such conduct and expects all those acting on its behalf to act with integrity in the management of resources and information.

It is **prohibited** to:

- ✓ Commit fraud involving reimbursements, invoices, reports, or operational records;
- ✓ Alter or falsify documents or accounting records;
- ✓ Record inaccurate information in order to conceal expenses or manipulate results;
- ✓ Misappropriate organizational assets, including money, equipment, materials, or licenses.

All financial and operational records must be complete, accurate, verifiable, and properly documented, ensuring transparency and reliability of the organization's information.

3.5. PROPER USE OF ORGANIZATIONAL RESOURCES AND ASSETS

The resources, equipment, information, and other assets of TRIBEMD GROUP must be used responsibly and exclusively for purposes related to the organization's professional and institutional activities.

All those acting on behalf of TRIBEMD GROUP are responsible for ensuring the proper use and preservation of the resources made available, avoiding waste, misuse, or any use that may compromise the organization's interests.

Organizational resources and assets include, among others:

- ✓ Equipment, systems, and work tools;
- ✓ Financial and institutional material resources;
- ✓ Organizational information, documents, and records;
- ✓ Intellectual property, content, and materials produced within the scope of institutional activities.

Such resources are expected to be used diligently and in compliance with applicable internal policies.

It is **prohibited** to:

- ✓ Use organizational resources for personal purposes in an improper or unauthorized manner;
- ✓ Appropriate or divert organizational assets;
- ✓ Use equipment, systems, or institutional information in a manner contrary to internal rules or applicable laws.

The responsible use of organizational resources contributes to the integrity of institutional activities, operational efficiency, and the preservation of TRIBEMD GROUP's assets.

3.6. RELATIONS WITH PARTNERS, SUPPLIERS AND THID PARTIES

TRIBEMD GROUP seeks to establish **institutional relationships** based on **integrity, transparency, and mutual respect** with clients, suppliers, business partners, and other stakeholders.

All those acting on behalf of the organization are expected to conduct their business relationships ethically and responsibly, observing **technical, objective, and professional criteria**.

Practices of undue favoritism, granting of unjustified advantages, or any conduct that compromises the impartiality of business decisions are **expressly prohibited**.

Business relationships must be conducted transparently and responsibly, ensuring compliance with the **contractual obligations** assumed between the parties.

The organization also expects **third parties** acting on its behalf or in partnership with TRIBEMD GROUP to observe the same **ethical and legal principles** established in this Code.

Accordingly, TRIBEMD GROUP may require suppliers, business partners, and service providers to acknowledge and act in compliance with the principles set forth in this Code of Ethics and Conduct or in an equivalent document. This commitment may be formalized through contractual clauses, adherence terms, or other appropriate institutional instruments.

The **selection and engagement** of third parties, whenever applicable, must observe transparent criteria consistent with the organization's internal policies.

3.7. INTEGRITY AND DUE DILIGENCE IN THE VALUE CHAIN

TRIBEMD GROUP seeks to ensure that its relationships with suppliers, business partners, service providers, representatives, and other third parties are conducted in accordance with the principles of integrity, transparency, and responsibility set forth in this Code.

For this purpose, the organization may carry out third-party **assessment and due diligence processes**, proportionate to the risks involved in the commercial or institutional relationship.

These processes aim to **identify and mitigate risks related**, among other aspects, to integrity, regulatory compliance, data protection, human rights, and environmental responsibility.

Third-party assessments may consider factors such as:

- ✓ Nature and scope of the services provided;
- ✓ Level of interaction with public officials or regulatory authorities;
- ✓ Access to confidential information or personal data;
- ✓ Reputational history and integrity background;
- ✓ Practices related to human rights, working conditions, and safety;
- ✓ Compliance with applicable environmental and regulatory standards.

When applicable, contracts entered into with third parties may include specific clauses related to: integrity and anti-corruption prevention; data protection and confidentiality; respect for human rights; socio-environmental responsibility; and compliance with the provisions of this Code of Conduct.

The organization may also require evidence of compliance and carry out periodic assessments or audits when necessary.

It is **expressly prohibited** to request or allow third parties to perform, on behalf of TRIBEMD GROUP, any act that is prohibited by this Code.

Suspicious or **indications of irregularities** involving third parties must be promptly reported through the appropriate institutional channels.

Failure to comply with the principles set forth in this Code may result in the adoption of corrective measures, the application of contractual sanctions, or the termination of the business relationship, without prejudice to applicable legal measures.



WHAT WE EVALUATE IN OUR PARTNERS AND SUPPLIERS

To protect the integrity of our activities and reduce institutional risks, TribemD Group may conduct third-party assessment and due diligence processes before and during the business relationship.

Among the main aspects considered are:

- ✓ **Integrity and reputation:** History of ethical conduct, market reputation, and absence of involvement in illicit practices.
- ✓ **Working conditions and human rights:** Respect for labor standards, health and safety, and human rights.
- ✓ **Relationship with public agents:** Possible interaction with public authorities or exposure to regulatory risks.
- ✓ **Environmental practices and social responsibility:** Adoption of responsible practices in environmental and social aspects.
- ✓ **Data protection and confidentiality:** Ability to protect sensitive information and personal data.
- ✓ **Regulatory compliance:** Compliance with laws and regulations applicable to the activities performed.

Whenever necessary, TribemD Group may request supporting documentation, declarations of conformity, or conduct additional assessments.

3.8. CONFLICTS OF INTEREST

Conflicts of interest may arise when personal, family, financial, political, or professional interests interfere — or appear to interfere — with the ability to make impartial decisions in the performance of activities related to the organization.

All individuals acting on behalf of the organization must carry out their activities with **independence**, avoiding situations in which personal interests may influence or compromise institutional decisions.

Whenever a situation may represent an actual, potential, or perceived conflict between personal interests and the interests of TRIBEMD GROUP, it must be transparently disclosed to the appropriate areas for evaluation and proper guidance.

Examples of situations that may constitute a conflict of interest include, among others:

- ✓ Hiring or directly supervising family members without transparency or proper approval;
- ✓ Recommending or hiring suppliers with whom there is a personal relationship or financial interest;
- ✓ Receiving personal benefits as a result of decisions related to the organization's activities;
- ✓ Participating in external activities that may interfere with professional responsibilities at TRIBEMD GROUP.

TRIBEMD GROUP respects the right of employees and service providers to engage in personal or professional activities outside the workplace. However, such activities must not compromise the **performance of duties** within the organization or create conflicts with institutional interests.

In case of doubt regarding the existence of a potential conflict of interest, the situation must be reported to the Compliance, Legal, or Human Resources areas for evaluation and guidance.

3.9. FAIR COMPETITION AND CONDUCT WITH COMPETITORS

TRIBEMD GROUP conducts its activities in compliance with **competition laws** and the **principles of fair competition** applicable in the markets in which it operates.

The organization values ethical and transparent business practices, seeking to compete legitimately based on the quality of its services, innovation, and respect for market rules.

It is **expressly prohibited** to establish or participate in formal or informal agreements with competitors aimed at restricting or distorting free competition.

Prohibited conduct includes, among others:

- ✓ Fixing prices, commercial terms, or market strategies with competitors;
- ✓ Dividing markets, customers, or territories;
- ✓ Limiting or coordinating the supply of services or products;
- ✓ Exchanging sensitive commercial information — such as prices, margins, commercial strategies, or market plans — without legal basis or proper authorization.

All individuals acting on behalf of TRIBEMD GROUP must conduct their relationships with competitors ethically, avoiding any behavior that may compromise the integrity of competitive practices.

The organization's commercial and operational information must be **recorded** and maintained in a complete, accurate, and verifiable manner. The manipulation of records or the creation of documents intended to conceal expenses, alter results, or distort institutional information is prohibited.

If discussions with competitors occur in institutional environments, events, or industry forums, participants must avoid sharing sensitive commercial information and, in case of doubt, interrupt the conversation and seek guidance from the appropriate organizational areas.


INTERACTIONS WITH COMPETITORS: WHAT TO AVOID

-  Fixing prices or commercial conditions.
-  Limiting service offerings or dividing markets/customers.
-  Exchanging sensitive information without legal authorization.
-  Participating in meetings or conversations to restrict competition.
-  Discussing margins, plans, or commercial strategies.

WHEN IN DOUBT:
End the conversation and consult the Compliance or Legal departments.


**CHAPTER 3 SUMMARY
INTEGRITY AND INSTITUTIONAL RELATIONS**

 <p>Corruption and Fraud Prevention: Avoid undue advantages, facilitation payments, or conflicts of interest.</p>	 <p>Relationship with the Public Sector: Do not offer undue benefits or make payments to public agents.</p>
 <p>Relations with Customers, Suppliers, and Partners: Conduct business with ethics, responsibility, and transparency.</p>	 <p>Integrity and Due Diligence: Assess the integrity risks of third parties and compliance within the value chain.</p>
 <p>Conflicts of Interest: Declare situations that may affect your professional impartiality.</p>	 <p>Fair Competition and Relations with Competitors: Avoid anti-competitive practices and improper agreements with competitors.</p>

WHEN IN DOUBT

 Consult the **Compliance, Legal, or Human Resources** departments.

4. SCIENTIFIC, EDUCATIONAL AND PROFESSIONAL RESPONSIBILITY

TRIBEMD GROUP carries out activities related to healthcare, education, and the production of scientific knowledge. In this context, the organization recognizes the importance of conducting its activities with **methodological rigor**, scientific integrity, and a commitment to generating a positive impact on society.

The initiatives promoted by the organization seek to contribute to the advancement of healthcare and educational practices by encouraging the generation, integration, and responsible dissemination of knowledge, as well as the development of innovative solutions aligned with the ethical and scientific principles that guide medical and academic activities.

TRIBEMD GROUP's actions are guided by its institutional responsibility to promote learning, research, and collaboration environments that strengthen professional development, scientific advancement, and the continuous improvement of healthcare practices.

4.1. SCIENTIFIC INTEGRITY

The **credibility** of the scientific and educational initiatives associated with TRIBEMD GROUP depends on integrity in the conduct of research, analysis, and the dissemination of results.

All individuals participating in scientific initiatives linked to the organization are expected to act with methodological rigor, transparency, and respect for good research practices.

It is prohibited to:

- ✓ Manipulate, omit, or distort scientific data or results;
- ✓ Present conclusions that are not adequately supported by evidence;
- ✓ Wrongfully assign authorship or omit relevant contributions in scientific productions.

Whenever applicable, scientific activities must comply with relevant **ethical and regulatory standards**, including guidelines from research ethics committees and principles of good scientific practice.

4.2. HEALTH EDUCATION AND CONTINUOUS KNOWLEDGE UPDATING

TRIBEMD GROUP recognizes education and knowledge sharing as fundamental elements for professional development and the improvement of healthcare practices.

Educational initiatives associated with the organization must encourage **continuous knowledge updating**, fostering learning environments that promote critical thinking, scientific dialogue, and the evolution of professional practices.

Educational and scientific content must be developed responsibly, based on reliable scientific references and approaches that contribute to the ethical and technical development of the professionals involved.

4.3. RESPONSIBLE INNOVATION IN HEALTHCARE AND EDUCATION

TRIBEMD GROUP seeks to stimulate innovation in healthcare and education in a responsible manner, recognizing that the development of new solutions, technologies, and approaches must respect the **ethical, scientific, and social principles** that guide these fields.

Innovation initiatives promoted by the organization must consider not only technical and scientific feasibility, but also their **impact** on professional practice, the academic environment, and society.

Responsible innovation presupposes a commitment to **quality**, transparency, and the **integrity** of the information used in the development of new initiatives and solutions. The production and dissemination of scientific, educational, and technical content must observe principles of accuracy, transparency, and institutional responsibility.

4.4 ETHICAL RELATIONSHIP WITH THE SCIENTIFIC AND MEDICAL COMMUNITY

TRIBEMD GROUP values transparent and responsible institutional relationships with healthcare professionals, researchers, academic institutions, and scientific organizations.

These relationships must be conducted with respect for the technical and scientific independence of the professionals involved, as well as respect for the autonomy of academic and research institutions, always adhering to applicable ethical principles.

The organization seeks to contribute to the strengthening of the scientific and healthcare professional ecosystem by encouraging collaboration, scientific dialogue, and the collective development of knowledge.



SCIENTIFIC AND EDUCATIONAL COMMITMENTS OF TRIBEMD GROUP



Scientific integrity

Conduct research with methodological rigor, transparency, and ethics.



Continuing education

Promote learning environments and updates in healthcare.



Responsible innovation

Develop innovative solutions with responsibility and quality.



Scientific cooperation

Contribute to the collective advancement of healthcare knowledge.

All institutional interactions with the scientific and medical community are expected to:

Respect the technical and scientific independence of the professionals involved;

Be conducted with transparency and integrity;

Comply with applicable regulatory standards.

5. PROTECTION OF INFORMATION, DATA AND INTELLECTUAL PROPERTY

TRIBEMD GROUP recognizes the importance of protecting institutional information, personal data, and intellectual assets related to its activities, adopting responsible information security practices that ensure confidentiality, integrity, and availability of information handled within its operations.

Proper management of such information contributes to the security of the organization's operations, the protection of **individuals' privacy**, and the preservation of the **integrity** of institutional initiatives developed by the Group.

All individuals acting on behalf of TRIBEMD GROUP must handle institutional information responsibly, in compliance with applicable internal policies and current legislation related to **data protection**, confidentiality, and **information security**.

Considering that the organization interacts with partners, institutions, and stakeholders across different jurisdictions, the processing of data and information must comply, as applicable, with **Brazil's General Data Protection Law (LGPD)**, the European Union's General Data Protection Regulation (**GDPR**), and other relevant legislation in the jurisdictions where activities are carried out.

Due to the organization's activities in healthcare, education, and knowledge production, certain activities may involve the processing of **sensitive personal data**, requiring heightened attention to **privacy**, confidentiality, and **information security** regulations.

5.1 RESPONSIBLE INFORMATION MANAGEMENT

Institutional, scientific, administrative, or strategic information of TRIBEMD GROUP must be handled with care, responsibility, and in compliance with applicable **confidentiality** standards.

All individuals acting on behalf of the organization must:

- √ Use institutional information solely for legitimate professional purposes;
- √ Protect documents, records, and data related to the organization's activities;
- √ Refrain from improper sharing of confidential or strategic information.

Proper information management contributes to the security of institutional activities and to **trust** in the organization's relationships.

5.2 INFORMATION SECURITY AND ACCEPTABLE USE OF TECHNOLOGICAL RESOURCES

Information technology resources provided by TRIBEMD GROUP must be used exclusively for professional and institutional purposes.

All users must use equipment, systems, and digital platforms responsibly and in accordance with the organization's internal information security policies.

It is **prohibited** to:

- √ Install unauthorized software or applications on organizational equipment;
- √ Share access credentials or passwords with third parties;
- √ Send institutional or confidential information to personal email accounts without authorization;
- √ Expose internal information in public environments or on social media.

Information security is the responsibility of everyone who uses the organization's technological resources.

5.3 RESPONSIBLE USE OF SOCIAL MEDIA

The use of social media and other digital platforms must be carried out responsibly and in accordance with institutional rules.

When expressing themselves publicly in digital environments, individuals must act responsibly, avoiding the disclosure of confidential information or content that may compromise the reputation or institutional interests of TRIBEMD GROUP.

Institutional, scientific, or strategic information must not be shared on social media without proper authorization.

5.4 RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE TOOLS

TRIBEMD GROUP recognizes the potential of artificial intelligence as a tool for innovation and technological development, including initiatives related to software creation and AI-based solutions.

The use of AI tools within the scope of organizational activities must occur responsibly, transparently, and in compliance with ethical, legal, and scientific principles.

When using artificial intelligence tools, all individuals are expected to:

- √ Avoid entering sensitive personal data, confidential information, or trade secrets without explicit authorization;
- √ Critically review outputs generated by AI systems before using them in professional activities;
- √ Be aware of potential biases, errors, or limitations of such technologies;
- √ Respect copyright and intellectual property rules.

Whenever applicable, the use of AI systems must comply with internal organizational policies and applicable regulatory standards.

5.5 PROTECTION OF PERSONAL DATA

TRIBEMD GROUP is committed to processing personal data responsibly, transparently, and in compliance with applicable legislation.

The processing of personal data must observe, as applicable, the LGPD, the GDPR, and other data protection regulations relevant to the organization's activities.

It is **mandatory** to:

- √ Collect only the data necessary for the informed legitimate purposes;
- √ Protect access and credentials associated with personal data;
- √ Immediately report incidents related to data breaches or unauthorized access.

It is **prohibited** to:

- √ Share personal data without necessity or authorization;
- √ Use data for purposes other than those originally communicated;
- √ Store personal data on tools or platforms not approved by the organization.

Personal data processed within the scope of TRIBEMD GROUP's activities must be collected, used, and stored only for the period necessary to fulfill legitimate and **properly informed purposes**, in accordance with the **principles of necessity and data minimization**.

When data retention is no longer necessary, data must be deleted, anonymized, or securely stored in accordance with internal information governance and data protection policies.

Whenever data processing involves third parties, partners, or service providers, the same security, confidentiality, and protection requirements established in internal policies and applicable legislation must be observed.

In the event of information security incidents, including unauthorized access, loss, leakage, or data compromise, responsible parties must immediately report the incident through the appropriate institutional channels.

Such situations must be addressed with priority, in compliance with internal incident management policies, through the adoption of appropriate measures to mitigate impacts, restore information security, and prevent future occurrences.

5.6 CONFIDENTIALITY OF INSTITUTIONAL INFORMATION

The protection of information confidentiality is an essential principle for the integrity of TRIBEMD GROUP's activities and for trust in relationships with employees, partners, clients, institutions, and other stakeholders.

All individuals acting on behalf of TRIBEMD GROUP must protect institutional information against unauthorized access, use, or disclosure.

Access to institutional information must occur only when necessary for the performance of professional activities, in accordance with the **need-to-know principle**.

Confidential information may include, among others:

- √ Research data or scientific initiatives;
- √ Institutional or commercial strategies;
- √ Administrative, financial, or operational information;
- √ Personal data or other legally protected information;
- √ Content, methodologies, or technological solutions under development.

Confidential information must not be disclosed to third parties without proper authorization or legal basis.

Individuals are also expected to exercise caution when handling institutional information in public environments, external meetings, digital communications, or online platforms, avoiding any undue exposure of sensitive information.

The duty of confidentiality remains applicable even after the end of the professional or institutional relationship with TRIBEMD GROUP, as long as the information remains confidential or legally protected.

5.7 INTELLECTUAL PROPERTY AND COPYRIGHT

Intellectual property constitutes a relevant asset for TRIBEMD GROUP and for the institutional partners with whom the organization maintains relationships.

Scientific content, educational materials, software, methodologies, studies, publications, databases, technological solutions, and other intellectual productions developed within the scope of the organization's activities must be respected, protected, and responsibly used.

All individuals acting on behalf of TRIBEMD GROUP must respect the intellectual property rights of the organization, partners, clients, and third parties.

This includes, among other aspects:

- √ Copyright related to scientific, educational, or technical content;
- √ Software, systems, and technological solutions;
- √ Methodologies, teaching materials, and training content;
- √ Studies, publications, and scientific works;
- √ Trademarks, designs, databases, and other intellectual assets.

All individuals are expected to comply with applicable copyright and intellectual property regulations, including appropriate citation practices, authorship attribution, and recognition of academic or professional contributions.

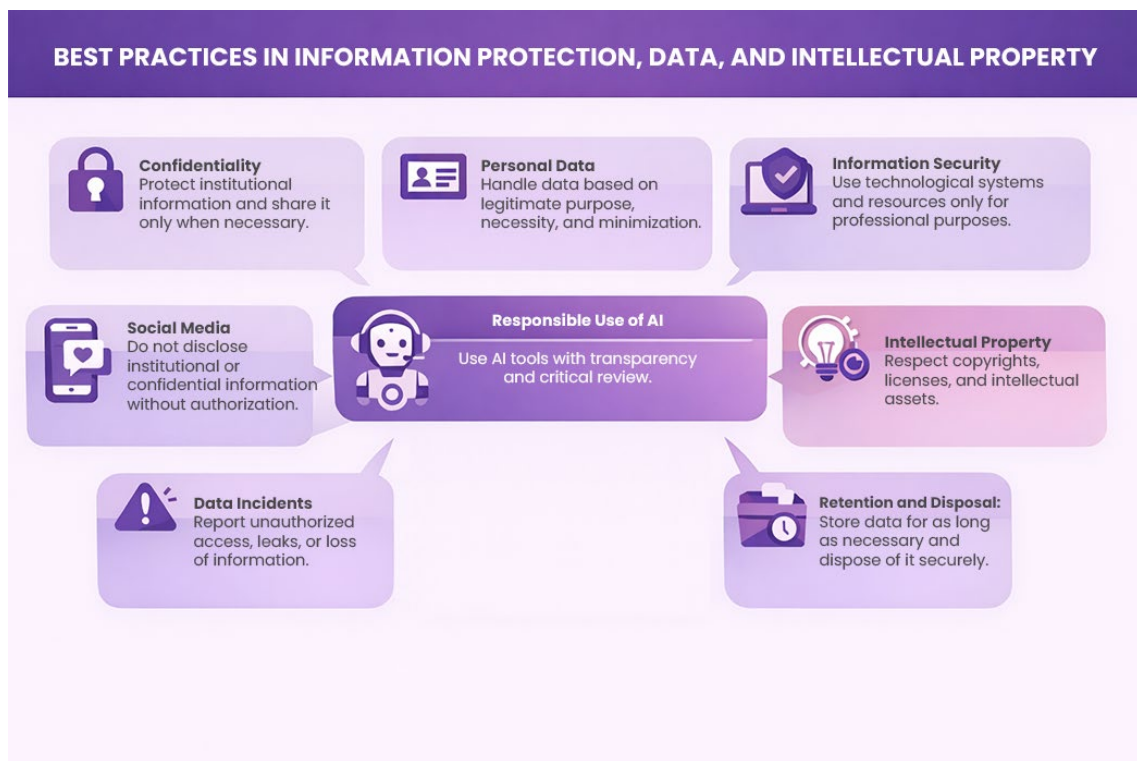
It is **prohibited** to:

- √ Use, reproduce, or share protected content without proper authorization or license;

- ✓ Misappropriate ideas, works, or intellectual productions of third parties;
- ✓ Use software, databases, or technological tools in violation of applicable licenses.

Likewise, all individuals must ensure that materials, content, methodologies, or technologies belonging to partners, clients, or collaborating institutions are used in compliance with applicable **legal, contractual, and ethical permissions**.

Respect for intellectual property is essential to the integrity of institutional relationships, the protection of innovation, and the strengthening of the scientific, educational, and technological ecosystem in which TRIBEMD GROUP operates.



6. INSTITUTIONAL COOPERATION AND APPROPRIATE METHODS FOR CONFLICT RESOLUTION

TRIBEMD GROUP values institutional relationships guided by respect, cooperation, good faith, and loyalty in professional interactions.

We acknowledge that disagreements may arise in the course of institutional and business activities. In such cases, we encourage responsible and constructive approaches to **conflict management**, prioritizing **dialogue**, **negotiation**, and the pursuit of **balanced solutions** whenever possible.

In alignment with the **principles of responsible governance**, **institutional integrity**, and the **sustainability** of professional relationships, TRIBEMD GROUP encourages the adoption of **appropriate dispute resolution methods (ADR – Alternative Dispute Resolution)**, widely recognized as best practices in both national and international institutional and commercial environments.

The adoption of these practices contributes to:

- √ Preservation of institutional and business relationships;
- √ Promotion of more collaborative professional environments;
- √ Promotion of balanced solutions;
- √ Efficient management of disagreements;
- √ Reduction of institutional impacts arising from prolonged disputes;
- √ Strengthening of relationships based on trust.

Whenever appropriate and legally feasible, TRIBEMD GROUP will seek to prioritize consensual and cooperative solutions, without prejudice to the right of the parties to resort to formal dispute resolution mechanisms when necessary.

6.1 VALUING DIALOGUE AND COOPERATION

TRIBEMD GROUP encourages that disagreements or conflicts be addressed, whenever possible, through open, respectful, and constructive dialogue between the parties involved.

All individuals acting on behalf of the organization are expected to conduct their professional interactions with a **collaborative spirit**, seeking to understand different perspectives and to contribute to balanced and responsible solutions.

Valuing **dialogue** and **cooperation** is an essential element for maintaining healthy institutional relationships and for developing professional environments based on trust and mutual respect.

6.2 CONSENSUAL CONSTRUCTION OF SOLUTIONS

Whenever possible, TRIBEMD GROUP encourages the pursuit of consensual solutions in the face of institutional disagreements or conflicts.

The consensual construction of solutions presupposes the parties' willingness to engage in dialogue, transparency in interactions, and a commitment to seeking alternatives that **reconcile legitimate interests** in a balanced manner.

This approach contributes to preserving institutional and business relationships, **reducing impacts** from prolonged disputes, and strengthening professional environments based on **cooperation** and **shared responsibility**.

6.3 MEDIATION AND APPROPRIATE METHODS FOR CONFLICT RESOLUTION

Whenever possible, TRIBEMD GROUP encourages the pursuit of consensual solutions to disagreements through the adoption of appropriate dispute resolution methods, such as:

- √ Structured **negotiation** between the parties;
- √ Conflict **mediation**;
- √ **Other** consensual dispute resolution mechanisms.

Mediation and other ADR mechanisms are widely used in international institutional and commercial environments as effective tools for managing disputes, especially in relationships involving scientific cooperation, institutional partnerships, or long-term commercial relationships.

Among the advantages of these methods are:

- √ Greater **speed** in resolving disputes;
- √ **Reduction of** institutional and operational **costs**;
- √ **Preservation** of professional and institutional relationships;
- √ Development of solutions better suited to the parties' **needs**.

The appreciation of these mechanisms reflects TRIBEMD GROUP's commitment to modern corporate governance practices, responsible conflict management, and the promotion of institutional environments based on cooperation and mutual respect.

Responsible conflict management is a relevant element for the integrity of institutional relationships and for building professional environments guided by trust, cooperation, and shared responsibility.

Responsible conflict management strengthens the **integrity** of institutional relationships.

It is based on **trust, cooperation, and shared responsibility.**

Alternative Dispute Resolution (**ADR**) methods are part of **modern corporate governance** and reflect **international best practices.**



7. COMPLIANCE WITH THE CODE AND COMMUNICATION CHANNELS

The TRIBEMD GROUP Code of Ethics and Conduct guides the expected behavior of all individuals acting on behalf of the organization.

All employees, managers, partners, and third parties acting on behalf of or in the interest of TRIBEMD GROUP must be aware of, respect, and comply with the principles and guidelines set forth in this Code.

Compliance with the guidelines established herein contributes to the integrity of institutional activities, the prevention of inappropriate conduct, and the strengthening of an organizational culture based on ethics, responsibility, and transparency.

7.1 INDIVIDUAL RESPONSIBILITY FOR COMPLIANCE WITH THE CODE

Each person acting on behalf of TRIBEMD GROUP is responsible for conducting their activities in accordance with the principles and standards of conduct established in this Code.

Everyone is expected to:

- √ **Act** with integrity and responsibility in the performance of their duties;
- √ Seek **guidance** whenever there are doubts regarding the application of the Code's guidelines;
- √ **Report** situations that may represent violations of internal policies or applicable legislation.

The organization's **leadership** plays a fundamental role in promoting a culture of integrity and must serve as a **reference** in complying with the guidelines established in this Code.

7.2 COMMUNICATION OF QUESTIONS AND REPORTING OF IRREGULARITIES

TRIBEMD GROUP encourages that any questions or concerns related to the application of this Code be communicated through the appropriate institutional channels.

All individuals acting on behalf of the organization have the responsibility to report situations that may represent violations of internal regulations, applicable legislation, or the principles established in this Code.

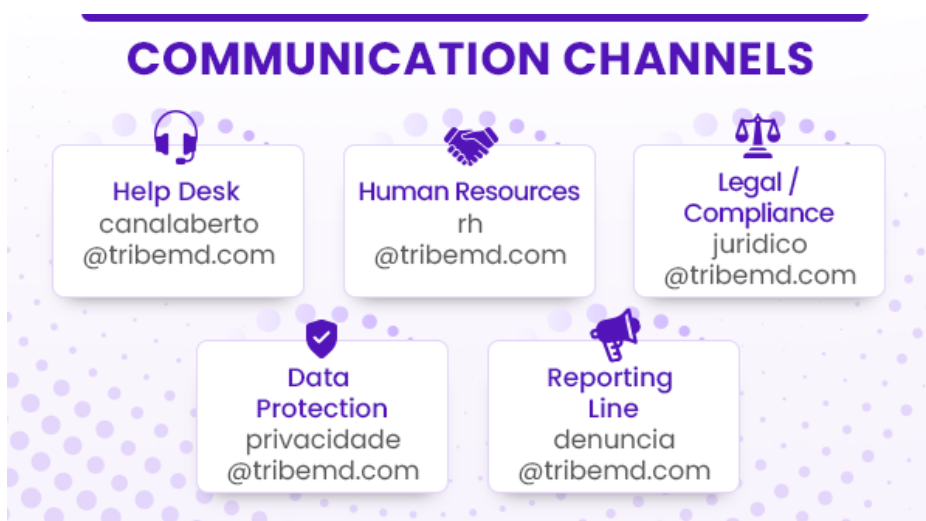
TRIBEMD GROUP is committed to handling all reports received with **seriousness**, **confidentiality**, and **responsibility**, ensuring the appropriate treatment of information and, whenever possible, the protection of the identity of the individuals involved.

Responsible communication of concerns or irregularities contributes to the prevention of institutional risks and to the strengthening of the organization's culture of integrity.

7.3 INSTITUTIONAL GUIDANCE AND REPORTING CHANNELS

TRIBEMD GROUP provides the channels below for clarifying questions, seeking guidance, and responsibly reporting potential violations of the guidelines set forth in this Code.

Reports may be submitted on an **identified basis** or, when applicable, **anonymously**. TRIBEMD GROUP is committed to treating all communications received with **confidentiality**, **responsibility**, and **respect** for the parties involved, ensuring protection against any form of retaliation toward individuals who report concerns or irregularities in good faith.



In addition to the channels mentioned above, employees and professionals of TRIBEMD GROUP may access the **internal Ombudsman channel** through the **Feedz® platform**. Through this channel, it is possible to submit feedback, incidents, reports, complaints, suggestions, or statements, either on an identified or anonymous basis.

7.4 PROTECTION AGAINST REATALIATION

TRIBEMD GROUP **does not tolerate** any form of retaliation against individuals who, in good faith, report questions, concerns, or potential violations of the rules established in this Code.

No individual shall suffer harm, intimidation, or unfavorable treatment for responsibly reporting a situation they believe to be inconsistent with the organization's principles and guidelines.

Protection **against retaliation** is a fundamental element in building a safe, transparent, and trust-based institutional environment.

7.5 INVESTIGATION PROCESS

Situations reported through institutional channels may be subject to review and, where applicable, an **internal investigation** process conducted by the responsible areas.

Investigation processes shall observe fundamental principles of governance and institutional integrity, including:

- √ **Confidentiality and need-to-know**, ensuring that information is shared only with individuals responsible for analyzing the case;
- √ **Impartiality, respect, and protection of the parties involved**, ensuring fair and appropriate treatment throughout the investigation process;
- √ **Documentation and traceability**, ensuring proper records of the stages of the process and of the decisions made;
- √ **Reasoned decisions and proportionality**, taking into account the facts identified and the seriousness of the situation.

Whenever necessary, the organization may adopt immediate measures to reduce institutional risks or prevent the continuation of potential irregularities, without prejudice to the conduct of the analysis or investigation process.

7.6 CONSEQUENCES AND ACCOUNTABILITY

Failure to comply with the guidelines established in this Code may result in the adoption of appropriate institutional measures, observing proportionality criteria according to the seriousness of the conduct and the circumstances of the specific case.

Violations may result in **disciplinary** or **contractual measures**, including, among others:

- √ Formal guidance or corrective measures;
- √ Disciplinary warning;
- √ Suspension, where applicable;
- √ Termination for cause, in cases provided for under labor legislation;
- √ Termination of contracts with partners, service providers, or third parties acting on behalf of or in the interest of TRIBEMD GROUP;
- √ Adoption of applicable legal measures or notification of competent authorities, when necessary.

The application of measures may occur in proportion to the nature of the violation, considering the principles of responsibility, institutional integrity, and compliance with applicable rules.

8. UPDATE AND REVIEW OF THE CODE

The TRIBEMD GROUP Code of Ethics and Conduct is a fundamental instrument for institutional guidance and for promoting the organization's culture of integrity.

In order to ensure its effectiveness and continuous alignment with the Group's activities, applicable legal standards, and best corporate governance practices, this Code will be reviewed periodically, with updates expected at least every two years, or whenever necessary.

Revisions may occur as a result of:

- √ Changes in legislation or regulatory requirements applicable to the organization's activities;
- √ Evolution of TRIBEMD GROUP's institutional practices and internal processes;
- √ Improvement of governance, integrity, and compliance policies and mechanisms;
- √ Recommendations arising from internal or external assessments, including audits, integrity programs, or ESG evaluations.

The maintenance and updating of this Code are conducted by the areas responsible for institutional governance, especially Legal & Compliance and Human Resources which may propose revisions whenever necessary.










Updated versions of the Code will be submitted for approval by the Presidency of TRIBEMD GROUP and subsequently communicated to employees, partners, and other relevant institutional audiences.



TRIBEMD GROUP encourages all individuals acting on behalf of the organization to contribute to the continuous improvement of this Code by submitting suggestions or feedback through the available institutional channels.

The periodic review of this document reflects TRIBEMD GROUP's commitment to the continuous evolution of its governance, integrity, and institutional responsibility practices.

Governance, Drafting, and Approval of the Code

Institutional Drafting, Review, and Validation of this version:

	Thomas Almeida	President of TribemD Group
	Mario Alvarez	Head of TribemD
	Lilian Mazza Barbosa	Head of BCRI
	Luiz Henrique J. Dieckmann	Head of MDLife
	Marcello Di Pietro	CIO
	Renato Chiodaro	CFO / Backoffice
	Juliana G. Cruz	Legal & Compliance
	Vivian Perazzolo	Human Resources
	Amanda Risnik	Quality Assurance

	Departments responsible for maintenance	Legal & Compliance, Human Resources.
	Institutional approval of this version	TribemD Group Presidency.

9. TRAINING AND COMPLEMENTARY POLICIES

TRIBEMD GROUP promotes the dissemination and strengthening of a culture of integrity through communication and training initiatives related to this Code of Ethics and Conduct.

Employees, managers, and other individuals acting on behalf of the organization may participate in training, guidance, and periodic update programs, with the objective of ensuring proper understanding of the principles and guidelines established herein.

Compliance with this Code must occur in conjunction with TRIBEMD GROUP's complementary internal policies and standards, which address specific topics related to governance, integrity, data protection, information security, anti-corruption, among others.

All individuals acting on behalf of the organization must observe the guidelines established in this Code and in the institutional policies applicable to their activities.



FINAL INSTITUTIONAL STATEMENT

TRIBEMD GROUP believes that integrity, respect for people, institutional responsibility, and the constant pursuit of excellence constitute essential foundations for the sustainable development of its activities.

This Code of Ethics and Conduct reflects the Group's commitment to responsible governance practices, to the promotion of professional environments based on trust and cooperation, and to the generation of positive impact in the fields of healthcare, science, and education.

Compliance with the principles set forth herein strengthens the organization's credibility, contributes to ethical and transparent institutional relationships, and reinforces the role of TRIBEMD GROUP in the development of responsible and innovative solutions for society.

Each individual acting on behalf of TRIBEMD GROUP plays a fundamental role in preserving these values and in consolidating an organizational culture based on integrity, responsibility, and respect.

ACKNOWLEDGMENT AND COMMITMENT STATEMENT

I hereby declare that I have had access to the TRIBEMD GROUP Code of Ethics and Conduct, that I have understood its principles, guidelines, and standards of conduct, and that I commit to observing them in the performance of my professional activities.

I further commit to acting in compliance with the related institutional policies and standards, as well as to participating in the training, guidance, and capacity-building initiatives promoted by the organization for the purpose of strengthening the culture of integrity and institutional responsibility.

I declare that I am aware of the existence of the institutional channels for guidance, communication, and reporting, intended to clarify doubts and to responsibly report situations that may represent violations of the guidelines of this Code or of applicable regulations.

I commit to using these channels responsibly and in good faith whenever necessary, contributing to the promotion of an institutional environment based on ethics, transparency, and respect for rules.

Through this statement, I reaffirm my commitment to the values and principles that guide the activities of TRIBEMD GROUP.

NAME:

POSITION/ROLE:

BUSINESS UNIT:

DATE:

SIGNATURE / ELECTRONIC ACCEPTANCE:

This statement may be formalized through a physical signature or by means of electronic acceptance in TRIBEMD GROUP's institutional systems.
