

MAY 2020

CODE OF ETHICS AND CONDUCT

PRESENTATION

Our Code of Ethics and Conduct seeks to establish a standard of conduct and ethical behavior among Inovax employees and improve our relationships with customers, suppliers and partners.

The Code of Ethics and Conduct aims to preserve our values and improve business practices, promoting team spirit and making sure that employees' actions are in line with current legislation.

The Code of Ethics and Conduct serves as an important resource to help employees and people involved to make informed decisions, within the bounds accepted by Inovax.

OUR PHILOSOPHICAL VALUES

Inovax believes that:

INNOVATION can lead to the creation of technologies capable of improving the world we live in;

TECHNOLOGY is the great tool for transformation of the world, and, through its application, we enhance the individual's and company's role in transforming society;

Only through **RESPONSIBLE** actions and attitudes are we qualified to take up a leadership position;

Both individuals and organizations are able to achieve so much more **AS A TEAM** than alone;

Through teamwork we are able to reach goals and objectives shared by the group and, therefore, we make improvements in our processes to fulfill any **COMMITMENTS** undertaken;

TRUST is the common element that unites people and organizations;

The principle of **QUALITY** is key to fulfilling our mission;

EFFICIENCY is first and foremost, in other words, we do everything as it should be done;

We must be **ETHICAL**, that is, everything we do must be done for the right reasons, with fairness, courage and balance; and

The success of a business is only possible when the company is able to establish a **LONG-TERM RELATIONSHIP** with its customers.

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TRANSPARENCY

Inovax values transparency in the disclosure of any communication or information. The intentions and actions must be complete, clear and in compliance with the current legislation and internal rules of the company, fully respecting the right to confidentiality.

WE RECOMMEND:

1. Proactive action with objectivity, reliability, transparency, loyalty and cooperation in the company's business, activities and interests.
2. Render accounts for activities, decisions, resources and results, when necessary, to superiors, interested parties, internal and external control bodies.
3. Encourage good internal and external communication, in a transparent, frank, appropriate, clear, objective and accessible way.
4. Through the appropriate area, and in compliance with the current legislation, collaborate with the demands of internal and external auditors, investigations and inquiries, granting complete and accurate access to the company's information, documents, records, people, assets and facilities.
5. Treat, in a transparent and appropriate manner, all the economic, financial, accounting, company, environmental and corporate governance information of Inovax.
6. Provide interested parties or cooperation, benchmarking and similar programs with information about our processes, safeguarding the confidentiality of information (of Inovax and third parties) and respecting internal rules.
7. Share the company's guidelines for conducting business management with the stakeholders.

DO NOT:

1. Disclose confidential company information.
2. Disclose inside information and relevant facts of the company before they become public.
3. Use confidential and privileged business information for personal benefit or that of others.
4. Use it for personal benefit or that of others, disclose or pass on confidential information obtained from interested parties.

CONFORMITY

Inovax stresses that respect for applicable national and foreign laws, regulations, policies, norms, standards, procedures and good organizational practices are fundamental in all the activities on behalf of the company, wherever it operates.

WE RECOMMEND:

1. Commitment to meeting the requirements established by applicable national and foreign laws, regulations, policies, norms, standards, procedures and good organizational practices.
2. Contribute toward improving Inovax's policies, norms, standards, procedures and practices.
3. Verify prior to the execution of any activities on behalf of the company, compliance with laws and regulations where they are practiced. In case of doubt, the Inovax legal department should be contacted.
4. Report to Ombudsman any and all acts of administrative impropriety and crimes committed by employees, administrators, customers and suppliers against the economic and taxation system that you may become aware of.
5. Collaborate with any investigation or investigation carried out internally or by external inspection bodies.
6. Maintain absolute secrecy about any type of information or operation that involves the strategic nature of Inovax.
7. At the end of the employment or professional relationship, all confidential information must be returned, including documents and storage devices, while continuing to respect the obligation of confidentiality.
8. Respect the brand, image and visual identity of Inovax.
9. Inform the company about the beginning, development and outcome of any judicial, criminal or administrative proceeding, in which penalties may be applied, in which you may be a party and which may affect your right to practice your profession or damage the image or interests of Inovax.
10. Use the internet, access to the network, corporate systems and electronic mail made available with responsibility and security, always respecting Inovax's Internet and Computer Use Policy.

DO NOT:

1. Use illegal or unethical methods to obtain competitive information for the company.
2. Disclose or induce the disclosure of confidential Inovax information by current employees and administrators or former employees and former company administrators.
3. Pass on to third parties privileged, strategic or confidential information, about the company and its business, not yet publicly disclosed.
4. Erasing, tampering with, destroying, retaining company documents, records, cadasters and information systems, and/or creating false documentation or records, to mislead or influence others about any issue based on them.
5. Prevent any internal or external investigations or inquiries.
6. Enable unauthorized persons to access the company's computer systems or facilities.
7. Copy, distribute or use, without authorization, any works, publications, projects, products or software acquired or developed by the company.
8. Install or use programs on company computers that have not been authorized by the infrastructure area.
9. Disclose information that could denigrate Inovax's image.
10. Register corporate email on social media, websites and discussion forums unrelated to Inovax's interests and/or businesses and services.
11. Use Inovax materials, image, brand or assets for personal or third party benefit.
12. Carry out political or religious partisanship in the workplace or during activities performed on behalf of Inovax.
13. Comment publicly on behalf of Inovax without authorization from the Board.

RESPECT

Inovax conducts its actions respecting the interested parties, valuing the trust acquired over the years and encouraging consideration and courtesy towards others. With a commitment to support, protect and preserve human rights and labor relations, the company adopts policies and practices that contribute to this end.

WE RECOMMEND:

1. Treat everyone fairly, respectfully and equally.
2. Conduct relations with harmony, solidarity, dignity, respect, transparency and clarity.
3. Negotiate fairly and honestly.
4. Respect diversity.
5. Guarantee the right to anonymity.
6. Preserve confidentiality and information security.
7. Value a friendly, courteous, collaborative and responsible attitude, maintaining composure in the work environment.
8. Comply with everything agreed in the contract, communicating any eventuality to the competent channels.
9. Respect people with disabilities, defend their social inclusion and promote accessibility.
10. Respect the right to privacy of all audiences.
11. Treat information with interested parties in such a way as to preserve confidentiality.
12. Promote collaborative and team work.

DO NOT:

1. Issue false accusations.
2. Adopt an attitude that detracts from the image of Inovax, employees, etc.
3. Denounce any individual demonstrating prejudice.
4. Discriminate against any person, on the basis of color, ethnicity, social class, place of birth, sex, sexual orientation, creed, religion, age, disability, illness, ideology, regional origin, appearance, nationality, marital status, education, hierarchy, position or function.
5. Disseminate and foster intrigue and rumors.
6. Practice personal and institutional aggression.
7. Accept a discriminatory attitude, policy or practice under any pretext.
8. Adopt retaliatory measures against anyone who, in good faith, presents an opinion, question, concern or complaint about irregularities.
9. Create a hostile professional environment that interferes with people's performance or affects working conditions.
10. Practice the unacceptable conduct discussed in this principle on social media or any other means of communication in order to expose the company and/or any interested party.

INTEGRITY

Since its founding in 1989, Inovax has valued integrity and loyal conduct towards its employees, service providers, suppliers, partners, customers, with society in general or any interested party. Based on commitment to its activities, Inovax expects each one to discipline his actions based on the law, be guided by ethics in the performance of his duties and defend, as a professional and moral commitment, the objectives, guidelines and legitimate interests of the company.

WE RECOMMEND:

1. Being committed to Inovax's mission, vision and philosophical values, as a true modifying agent, in the constant quest for excellence, growth and perpetuation of the company.
2. Act with honesty, impersonality, respect and transparency in activities, without seeking to obtain undue advantages.
3. Commit to continuous improvement in the quality of services through technical and professional training and suggesting, whenever possible, projects, initiatives and actions that contribute toward the development of the company.
4. Disclose any risk to the company's business, image, reputation and equity to the immediate manager or HR, acting preventively.
5. Contribute to the improvement of processes, products and services based on experiences with cooperation initiatives, such as visits, meetings, benchmarking and others.
6. Do not solicit, demand, accept, or offer, promise, give any kind of value, advantage, benefit, gratuity or kickback, to yourself or to third parties.
7. Report cases of fraud and corruption, in any form, whether or not they involve monetary values.
8. Act proactively and preventively to reduce the company's risks.
9. Aggregate ethical, moral, social and economic values.
10. Optimize and care for assets and for the proper use of all the company's facilities, assets and resources.
11. Observe the principles of economy, reasonableness and socio-environmental responsibility, in the acquisition, operation and maintenance of the company's facilities, assets and resources.
12. Bring to the attention of your immediate management or HR any situation that represents a conflict of interest or violation of ethical conduct.

13. Do not practice or engage in any activity that conflicts with Inovax's interests.
14. Maintain proper conduct in the work environment and when using the name or logo of Inovax, uniform or any material that can identify you as its representative, always aiming to preserve the company's image and reputation.
15. Respect competitors, partners and customers, promoting fair and open competition, fighting unfair conduct, piracy, smuggling and adulteration of products.
16. Combat active and passive corruption and bribery in all its forms.
17. Whenever any conflict of interest in relation to processes or activities is identified, it is the duty of the individual involved to speak immediately to their immediate manager or HR.
18. Use the internet, access to the network, corporate systems and electronic mail made available with responsibility and security, always respecting Inovax's Internet and Computer Use Policy.
19. Do not provide or use third party passwords for systems or computers.
20. Fully comply with internal rules regarding information security, to guarantee the integrity and reliability of company and customer information.

DO NOT:

1. Manage the business in disagreement with the company's mission, vision, philosophical and political values.
2. Subordinate the organizational and occupational structure of the company to personal interests of employees, managers and other interested parties.
3. Use, disclose or pass on, for personal benefit or that of third parties, confidential and privileged information of the company, employees or customers.
4. Use company resources for private or third party purposes.
5. Use personal or company communication tools during the workday for private purposes beyond the minimum time required.
6. Erasing, tampering, retaining or appropriating company documents and information systems, or allowing third parties to access them.
7. Establish relationships that present a conflict of interest.
8. Develop activities outside the work environment that may conflict with Inovax's business.

9. Maintain personal, political, economic and financial interests with partner companies, competitors, customers or suppliers, if these interests might influence Inovax's related activities.
10. Provide remunerated services or receive remuneration for services rendered to any competitor, customer or supplier that are characterized as a conflict of interest.
11. Perform tasks foreign to Inovax's activities during working hours.
12. Obtain, for yourself or for third parties, benefits from business deals or opportunities that you may have in the performance of your activities at Inovax without the prior consent of the Board.
13. Accept gifts or courtesies whose value may characterize a benefit or receive an advantage, with gifts of symbolic value not exceeding 20% of the national minimum wage being tolerated.
14. Provide services, gifts or amenities whose value exceeds 20% of the national minimum wage.
15. Make any public communication on behalf of the company, in any situation, unless it is within the competence of the interlocutor.
16. Offer or sell any products and services within the work environment.
17. Take ownership of an idea, study or work that was prepared by another, or pass it on without due quotes, references or authorizations.
18. Induce others to act in breach of laws, regulations, policies, norms, standards, procedures and good organizational practices.
19. Encourage, practice or tolerate pedophilia and pornography.
20. Failing to meet the requirements established by the codes of conduct or ethics of the respective professions.
21. Participate, tolerate, facilitate or support any type of corrupt activity, active or passive, involving or not financial values.
22. Participate, facilitate, support or tolerate any type of negotiation, formal or informal, with competitors, with the aim of overpricing and/ or any other matter that may raise doubts regarding ethical conduct in the market.
23. Participate, facilitate, support or tolerate any type of deviation, fraud, irregularity and unlawful act performed against interested parties.
24. Exercise or condone activities and/or practices that involve concealing the illicit source of funds - "money laundering".

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Inovax conducts its businesses and activities with social and environmental responsibility, contributing to sustainable development and eco-efficiency in all company processes.

WE RECOMMEND:

1. Perform actions to contribute to the economic, environmental and social sustainability within the scope of the company.
2. Foster social and environmental programs in the company, aimed at preserving the environment, sustainable development and respect for future generations.
3. Contribute to the implementation of good social and environmental responsibility practices within the company or in society.
4. Adopt practices that contribute to the strengthening of human and labor rights, in order to eradicate cases of forced and child labor.
5. Act with zeal to overcome any situation that may harm society or the environment.
6. Support the development and dissemination of technologies that reduce the impact on the environment.
7. Stimulate the adoption of good social and environmental responsibility practices by all stakeholders.
8. Encourage the exercise of citizenship and voluntary action.
9. Ensure that all employees develop a socio-environmental awareness and contribute to the preservation of the environment inside and outside the company.
10. Use consciously, responsibly and sustainably the natural resources essential for business development, respecting biodiversity.
11. Promote actions that lead to the improvement of the quality of life, economic, social, and environmental development in the company's environment.
12. Seek standards of excellence in the company's products and services, always respecting the environment and society.
13. Encourage and support the educational and professional development of its employees for the best development of their work and their professional growth.

DO NOT:

1. Disrespect the protection of human rights.

2. Support or practice acts or attitudes that can cause social and environmental damage.
3. Failure to report emergency situations to immediate management or HR so that the relevant measures are taken.
4. Tolerate, allow and/or compact with forced or child labor.

HEALTH AND SAFETY

Inovax acknowledges that health and safety are fundamental for the development of any company. Therefore, it values and respects the human being in its entirety and puts life first.

WE RECOMMEND:

1. Promote a healthy and safe work environment, adopting measures to preserve the physical, mental, emotional and moral integrity of employees.
2. Encourage health and safety promotion actions in all company activities.
3. Act preventively and act as the principle person responsible for your own safety and health at work and contribute to that of colleagues.
4. Contribute to the continuous development of safe practices in all your tasks and those of your colleagues.
5. Provide events related to health and safety, in addition to disseminating a preventive culture.
6. Provide safe facilities and equipment, aiming at a healthy environment and with quality of life at work.
7. Treat all safety and health information truthfully.
8. Report to the immediate management, if tasks cannot be performed adequately without compromising your own safety or that of others.
9. Postpone the performance of any task where security measures are not being met.
10. Inform and guide customers, employees and third parties about the potential risks of our products and services.
11. Fully comply with current legislation, internal rules, regulatory standards and instructions and technical standards for work safety.
12. Promote training and adherence to health and safety standards at work.

DO NOT:

1. Expose yourself or anyone else to hazards that could cause injury or accident.
2. Perform tasks without safety conditions, without observing the current legislation, standards and technical instructions for work safety.
3. Bring, sell, port or consume any type of alcoholic beverage during the exercise of your activities.
4. Bring, trade, port, consume or be under the influence of any type of illicit drug in the workplace or activity related to the company.
5. Carry weapons of any kind on the company's premises, except for security professionals hired for this purpose.
6. Fail to report to immediate management or HR any situation that could compromise the safety and physical, mental, emotional or moral health of any person.
7. Allow inadequate working conditions that may be unsafe, degrading or harmful to the physical, mental, emotional or moral health of employees.

RELATIONSHIPS

1. INTERNAL CUSTOMERS:

WE RECOMMEND:

1. Respect free union association, the right to collective bargaining and freedom of expression, as long as resources and the name of the company are not used.
2. Guarantee the accused party the right to reply.
3. Encourage and provide conditions for motivation and opportunities for professional development.
4. Acknowledge effort and value success.
5. Promote teamwork and personal responsibility.
6. Conduct professional and personal assessments fairly, addressing them privately to the person himself.
7. Promote trust and participation through open and transparent dialogue.
8. Participate in political party activities only on a personal basis and outside of their working hours and places.
9. Valuing cohesion between areas, collaboration between all Inovax units and the sharing and dissemination of best practices.

DO NOT:

1. Use the resources and the name of Inovax for action, donation or political party contribution.
2. Practice or encourage any type of harassment, of a moral, sexual and economic nature, which includes verbal or physical conduct of humiliation, coercion or threat to any person.
3. Fail to report any harassment to the immediate management or HR.

2. EXTERNAL CUSTOMERS:**WE RECOMMEND:**

1. Consider the needs and expectations of customers when offering products and services.
2. Guide the customer in the correct, effective and safe use of products and services.
3. Respect the customer's right to privacy in relation to the disclosure of personal data and business information.
4. Offer quality products and services aiming at full technical satisfaction, the maintenance of long-lasting relationships and the constant search for exceeding customer expectations.
5. Preserve and treat confidentially the registration data and customer information obtained as a result of the business relationship.
6. Monitor, with the utmost care and interest, the degree of customer satisfaction, taking care that the commitments assumed are fully fulfilled.
7. Follow the principles of legality, impersonality, morality, equality, publicity, administrative probity, binding documentation and objective judgment.

DO NOT:

1. Fail to provide clear and truthful information about Inovax products and services.
2. Offer any kind of illicit favoring to customers or potential customers for a sale to be completed.
3. Offer low quality products.
4. Omit relevant information about characteristics necessary for the fulfillment of the requested function, which, perhaps, is not included in the customer's original order.
5. Do not inform the discontinuity of products and services, thus prioritizing the customer's choice.

3. SOCIETY:

WE RECOMMEND:

1. Respect the principles and traditions of the communities in which the company operates.
2. Seek a balance between the interests of the company and society.
3. Maintain dialogue in order to improve the relationship.
4. Communicate information of interest to society in an appropriate, clear and transparent manner.
5. Encourage actions that contribute to the development of society.
6. Encourage voluntary actions outside working hours.

DO NOT:

1. Disregard the legitimate interests of society.

4. SUPPLIERS AND PARTNERS:

WE RECOMMEND:

1. Encourage the development of suppliers on issues related to corporate sustainability.
2. Ensure equal treatment with suppliers.
3. Ensure the interests of the company through the drafting and monitoring of contracts, acting honestly in the inspection, control and technical inspection and promoting the professional relationship between contractors, suppliers and employees.
4. Encourage employees who work with suppliers to disseminate the company's ethical principles.
5. Conduct formal meetings during the hiring or negotiation process.
6. Communicate inappropriate conduct or behavior to suppliers and/or partners to immediate management or HR.

DO NOT:

1. Pressure suppliers to give up negotiations or contracts with Inovax competitors.
2. Hire suppliers that do not comply with current legislation and the company's internal rules.

3. Practice acts that do not allow free and fair competition in the company's hiring processes.

4. Consent treatment that may compromise the exemption and integrity in commercial relations between Inovax and suppliers.

5. COMPETITORS:

WE RECOMMEND:

1. Compete fairly, following the principles of free competition.
2. Obtain market and competitor information in a lawful and complete manner.

DO NOT:

1. Speak disparagingly about competitors' services or products.
2. Provide, acquire, disclose or pass on strategic information on commercial and/or industrial businesses.

6. PUBLIC AGENCIES:

WE RECOMMEND:

1. Support relations with public agents in an integral, collaborative, transparent and sustainable manner.
2. Collaborate with inspection and control actions by the government.
3. Share ideals of respect for human rights and the principles of social justice and well-being.
4. Provide services responsibly and in harmony with the public interest.
5. Total compliance with the principles of Law 8.666/93 (Bidding Law).

DO NOT:

1. Offer or promise directly or through third parties, payments, gifts or benefits to public agents, political parties or their members, in order to obtain a benefit.
2. Use company resources, programs and services for activities of a political party nature.
3. Make the company's internal communication channels available in order to disseminate political propaganda.

FINAL COMMENTS

1. Inovax rejects the false, conspiratorial or vindictive accusations.
2. An accusation in good faith will be considered when the one reporting it presents facts, data or situations that could harm the company or other stakeholders of Inovax. Anonymity and fact finding will be guaranteed following the procedure of the related rules and legislation.
3. The conduct of the employee must always be considered in the company's performance evaluation process based on what is established in this Code.
4. Violations of any provision of this Code are subject to measures applicable to those responsible, in accordance with the laws and regulations in force.
5. Administrative penalties applicable to non-compliance with this Code will be defined according to the seriousness of the occurrence.
6. Inovax does not admit retaliation or punishment against employees or any person who, in good faith, presents criticisms, suggestions, complaints, complaints or information to the superior authority or any other competent authority.
7. All employees and third parties acting on behalf of Inovax are required to observe the rules and procedures designed to ensure compliance with applicable national and foreign legislation, highlighting the Anti-Corruption Law (Federal Law No. 12,846/2013 and Decree 8,420/2015 that regulations) and internal rules.

CHANNELS

Committed to ethical conduct and aiming at greater transparency and security of its activities, Inovax makes this Code of Ethics and Conduct available on its institutional website, on the company's internal network and the Ombudsman contact for further information and/or complaints: ouvidoria@inovax.com.br.

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