



2019 Annual Sustainability Report



Internal Controls and Compliance

GRI 102-16, 205-1

The commitment to ethics and integrity is present in all OdontoPrev's activities. The Anti-corruption and other Illegal Acts Program, launched in March 2015, expresses the conduct expected from Management, employees, and suppliers concerning the prevention and repression of acts or omissions to characterize corruption and/or illegal acts. All employees and the senior management are notified and receive training on OdontoPrev's anti-corruption procedures.

OdontoPrev's corporate governance recorded relevant achievements in 2019, especially due to the setup of the Compliance area, the nomination of the Compliance Officer and the approval of the Compliance Program, as resolved by the Board of Directors. This Program aims at maintaining, improving, and disseminating good corporate governance practices, besides updating compliance and anti-corruption-related codes and policies.

Supported by external legal counsels, the efforts endeavored in 2019 focused on a compliance risk evaluation that resulted in a risk matrix. In 2020, this work will aim at devising action plans to mitigate these risks.

The Company has its Code of Ethical Conduct and its Anti-corruption and Other Illegal Acts Policy, disseminated to all employees. The Compliance Program provides for the review of the Code of Ethical Conduct and the approval of the Governance, Risks, and Compliance Policy (GRC).

Ethics & Transparency

GRI 205-2

To ensure the best corporate governance practices, besides maintaining the business in compliance with prevailing laws, OdontoPrev has its Code of Ethical Conduct - a practical, personal and professional guide to be adopted by all OdontoPrev Group's managers, employees, partners and suppliers. The Code is presented during new employees' integration and is available on the Intranet and the Investor Relations website. Partners and suppliers also adopt the Code of Ethics and Conduct in the contractual instruments maintained with the Company.

Complaints on behavior to infringe the rules of conduct may be personally addressed to the Internal Audit, via letter, e-mail, or the Whistleblowing Channel, available on OdontoPrev portal. Suspicious cases are submitted to the analysis of the Assessment and Ethics Committee, and monthly reported to the Chief Executive Officer, and half-yearly to the Audit Committee. Complaints are verified by Audit Area and valid cases are forwarded to the Assessment and Ethics Committee which will resolve on corrective and punishment actions to be applied to those involved. In 2019, 34 suspected cases were reported via the Whistleblowing Channel and 30 of them were submitted to the analysis of the Assessment and Ethics Committee. Out of this amount, 14 of them were considered valid.

OdontoPrev is non-partisan and respects the political opinion of its employees and suppliers. The

Company neither finances nor supports any political campaigns, candidates, and parties.

Ethics training courses

OdontoPrev's new employees receive the Code of Ethical Conduct and shall sign a statement, through which they affirm they are aware of guidelines. In 2019, the Company launched an Ethical Conduct training course mandatory to all employees. This course focused on ethical behavior, became available at OdontoPrev University. At the end of the course, the professional must answer multiple-choice questions, for us to verify whether the content was correctly understood.

Besides online training, the Company has an annual schedule to disseminate the Compliance Program. This initiative began in 2019 and envisaged OdontoPrev's senior management. In 2020, the Program will be disseminated to all employees.