



**Code of Ethics
and Conduct**

1. CHIEF EXECUTIVE OFFICER MESSAGE

I am honored to present the Intrials Code of Ethics and Conduct, which aims to clearly organize the ethical guidelines that should guide our company.

This document is the main source of information and instruction regarding Intrials expectations related to the behavior of its employees and partners in their professional activities.

Being part of Intrials means acting within a powerful sense of ethics and commitment to the health and well-being of everyone involved in our business. In this sense, it is imperative that our employees and partners, without exception, observe and practice the precepts exposed here.

The current Code of Ethics and Conduct must be seen as a fundamental part of our corporate culture and also a powerful tool for promoting a collaborative environment of mutual respect as well as personal and professional development.

We must refer to our Code of Ethics and Conduct when questions arise regarding our behavior or that of third parties. In it, the employee will also find the appropriate channels to resolve such doubts, if they persist. Channels that should also be used to report non-adherent behavior. We guarantee anonymity, due diligence, punishment for bad behavior and, above all, non-retaliation.

Read the Code of Ethics and Conduct carefully, disseminate and practice its principles.

Acting in accordance with our Code of Ethics and Conduct and current laws, based on the principles of integrity, honesty and respect, will ensure that our company always exceeds the expectations of our stakeholders, fulfilling the noble mission of promoting scientific development in the health area, always taking care of the well-being and health of everyone involved in this process.



Sérgio Lins Lima Braga Filho



2. INTRODUCTION

This Code of Ethics and Conduct (“Code”) applies globally to all employees, officers, directors, managers, consultants, brokers, service providers, interns, or anyone who in any way acts or collaborates directly or indirectly in Intrials’ business activities.

This Code contains standards reasonably necessary to promote honest and ethical conduct among all involved, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, as well as the encouragement of fair-trading practices, with the use of correct actions and the constant prevention of irregularities.

This Code not only includes a general description of the laws, regulations and policies we must follow, but also reflects our values and culture employed at Intrials.

We must certify and ensure that our dealings with employees, directors, customers, suppliers and government officials are invariably governed by sound, ethical and legal decisions. We must be familiar with all the policies and procedures that apply to our roles and positions, seeking constant improvement and evolution.

We must never violate any applicable law, this Code or any other company policy.

In short, this Code brings the following message: we must avoid everything that seems inappropriate or unethical, always acting for the sake of legality and good professional appearance.

First of all, ask yourself: Is it legal? Is it correct? Does it comply with Intrials policies? How could this be seen by others? Are my actions reflecting the highest standards of honesty, integrity and responsibility?

Your collaboration is critical to the strength of our culture and continuous improvement.

3. PURPOSE

Transform people's lives through science by solving the challenges of our customer' projects in a focused and exclusive way. The experience and care we put into each project uniquely connects us to their goals, resulting in innovative proposals that impact the health of individuals in society

4. COMMITMENT

Ethics: The highest ethical standards are part of Intrials' routine. Our field of activity is directly connected with people. Therefore, it is our commitment, and that of everyone who somehow provides services to us, to act with integrity, respecting laws, rules, procedures and regulations in all countries where we operate.

Life: Life is the greatest good that exists in humanity. We are so esteemed for this good that our success is linked to developing, innovating and contributing to the lives of those who work in this sector, as well as all those who benefit from it with the results of our work.

Respect: Respect is one of the most important values of human beings and is the basis for social interaction. Therefore, we act with courtesy and consideration for the actions, opinions and needs of others. Our history proves that working together has made this company the organization it is today. We could not get this far without all of us acting with respect to others.

Our people are a fundamental part of our success as a company. It is important that we take pride in our workplace, treating our colleagues with respect and actively participating in creating and maintaining a positive and meaningful work environment for society. Therefore, we do not allow and tolerate any type of discrimination and harassment in our workplace.

Intrials is committed to employing and cultivating equal opportunity, which means hiring, training and promoting employees based on merit and their skills and not through illegal means. Therefore, we do not tolerate discrimination based on race, color, sex, nationality, age, religion, citizenship, disability, medical condition, sexual orientation, gender identity or expression, marital status or any other characteristic protected by law.

We also do not tolerate any form of harassment, that is, we do not tolerate and is expressly prohibited any unwanted conduct that creates an intimidating, hostile or uncomfortable work environment, whether verbally and/or physically, sexual or otherwise, as harassment will never be accepted in our organization.

If you feel that you were a victim or you realize that someone has been a victim, you have an obligation to report the situation to your immediate superior, the HR and/or the Compliance Department for appropriate action.

Remember, Intrials' non-retaliation policy/culture prohibits you from being treated negatively by anyone for your communication or cooperation in investigating potential violations of the law, this Code or any other Intrials policy.

No employee who reports in good faith suspected violations will suffer any kind of harassment, retaliation or adverse employment consequences – such as dismissal, demotion, suspension or discrimination.

We emphasize that Intrials defends the principles set out in the Universal Declaration of Human Rights and rejects any act against human dignity. We do not condone child labor (except for the hiring of minor apprentices, under the terms of the current law), nor do we allow labor relations that can be characterized as slave labor, either in the Company or in commercial partners.

We believe in coexistence as a vector of social transformation and we encourage diversity at Intrials.

5. HEALTH, WELL-BEING AND WORKPLACE

Intrials supports the health and well-being of everyone. That is why Intrials maintains the policy and culture that all its employees carry out their professional activities within their working hours, valuing their quality of life and efficiency. Time management must also be a characteristic of the employee and their manager, ensuring fluidity and delivery on time.

Intrials is a workplace where the possession and/or use of illicit drugs, alcohol or other substances is not allowed while you are working and during your working hours.

In addition, the fact that this is a safe and healthy workplace makes it necessary for us to always resolve our conflicts in a peaceful and professional manner. We must never tolerate or resort to violence or threats of violence against anyone, including our co-workers or others with whom we interact in the course of our professional activities.

6. QUALITY

Intrials is committed to always acting with the highest levels of quality in all the services it provides to its customers, and this is a responsibility shared among all of us, regardless of hierarchical level.

Numerous laws, regulations and other external standards govern the services provided by Intrials, including, but not limited to the following: ICH's Guide for Good Clinical Practices, GDPR, Good Manufacturing Practices, FDA, local VISAs, Good Pharmacovigilance Practice Standards, among others.

In addition, Intrials customers have their own requirements documented in agreements, plans and procedures. The Intrials' Quality Policy aims to ensure that we provide services that consistently meet all necessary requirements in a proactive and transparent manner, thereby demonstrating Intrials' professionalism and trust.

If you have any questions, please contact our Quality Department directly.

7. CONFLICT OF INTEREST

Conflicts of interest can be characterized by actions aimed at private interests to the detriment of the Company's interests. Thus, our employees will not be able to participate directly or indirectly in companies that compete with Intrials and/or represent Intrials in the relationship with companies in which they have a direct or indirect interest or participation that may influence their decisions, or even that may harm the company's image.

If a situation where a conflict of interest is identified, the employee must immediately communicate the fact in writing to the immediate superior and/or the Compliance Department.

A conflict of interest occurs when we allow our personal interests to interfere with our responsibility to Intrials. It is essential that we act to benefit our company and to avoid situations that could cause such conflicts or be perceived as such by others.

When we allow outside activities or relationships that may influence our judgment, or that interfere with our professional responsibilities, we are not only harming Intrials, but also our colleagues, customers and others who trust or demonstrate their confidence in our work.

Although it is not possible to cover all possible situations of conflicts of interest in our professional routine, below are some of the most common examples of possible conflicts of interest:

- Have a family member who owns any equity interest (other than a "face" value of securities in a private or publicly traded company) in any customer, supplier or competitor;

- Any consulting or employment relationship with a customer, supplier or competitor while acting for Intrials;

- Compete in any way with our company's business;

- Exchanging gifts or gratuities (other than an occasional item) or excessive entertainment with any company we do business with - see our Anti-Corruption Policy for more information on this matter;

- Take on any outside employment that interferes with our work and commitment to Intrials;

- Have a personal relationship with our immediate supervisor without the approval of the HR department;

- The use of confidential information that becomes known in the course of work or employment for investment or personal gain or for third parties;

- Take advantage of opportunities for your own benefit, which you had access through the use of property, information or position in Intrials.

If you have questions about any activity that could create a conflict of interest, seek to immediately discuss the situation with your line manager or the Compliance Department.

Acting preventively helps us to avoid situations that may appear to be conflicts of interest, as well as possible harm to Intrials.

If you suspect you are facing a situation that could give rise to a conflict of interest, or something that others may justifiably perceive as a conflict of interest, you must report this situation to your line manager and the Intrials Compliance Department immediately.

Intrials reserves the right to determine when actual or potential conflicts of interest exist and to take any action that, in the Company's sole discretion, is necessary to prevent or mitigate the conflict. Such action may include, but is not limited to, you having to withdraw from the conflict of interest or return any benefit or gain received, redefining your duties and responsibilities, or through disciplinary action, which, in severe cases, may include terminating your employment relationship with Intrials.

8. CONFIDENTIALITY

Intrials' confidential information is a valuable asset that deserves the same protection as the company's physical assets. It is very important that you protect Intrials' confidential information and refuse any and all inappropriate access to such information entrusted to you or any employee for any reason whatsoever. Examples of confidential information include, but are not limited to customer lists, business proposals, financial results, business strategies, documents related to clinical trials, confidential information of customers and partners that are protected by a confidentiality agreement, company financial information etc.

Each of us must retain and protect such information from any unauthorized disclosure by Intrials or other companies with which our business is associated.

All Intrials employees are committed to confidentiality, undertaking to protect all confidential information of the company or to which they have access.

If you are unsure whether information is confidential or not, speak directly to your superior, the Intrials Legal or Compliance Department.

9. PRIVACY AND INFORMATION RECORDS

We respect everyone's privacy. Any employee personal information that we collect, store, maintain or use must be handled responsibly and according to applicable data protection laws in the territories in which we do business.

Everything from names, contact information, personal identification numbers issued by the local government etc. must be protected and must not be shared with anyone inside or outside Intrials who does not have a business need/purpose to use this information.

The same is true for any information that we have access to through third parties with whom we interact, such as clinical trial participants, study centers, principal investigator, sponsor etc.

If you have any questions, just contact our Data Protection Department directly (dpo@intrials.com.br) or access our Privacy Policy which is available on our website (www.intrials.com.br).

Intrials is also committed to keeping accurate books and records of our financial performance, being current with all of your legal and tax obligations, payroll, expense reporting, all under applicable accounting rules, laws and regulations.

Failure to keep such accurate records, or to keep such records according to our internal policies for managing these documents, may violate our Anti-Corruption Policy and, in some cases, may be illegal and punishable.

If you suspect any misconduct, even if it is merely a suspicion, immediately inform Intrials' HR and/or Compliance Department.

10. RELATIONSHIP WITH THIRD PARTIES

It is essential that the relationship with any third party, whether a public or private individual or legal entity, is always respectful, following the ethical standards set forth herein, as well as complying with the laws, regulations and internal policies of Intrials that are applicable to the specific case.

The entire company is constantly evaluated on its collective performance and on the perception of the people who trade with it.

a) Anti-corruption

We take a zero-tolerance approach to bribery and corruption. We are committed to complying with anti-corruption laws and implementing systems to prevent bribery and corruption in all of our operations, according to our Anti-Corruption Policy.

As part of this policy, we comply with all global anti-corruption laws, including not only Brazilian law (Law No. 12,846/2013), the FCPA (Foreign Corrupt Practices Act – 1977), and the UK Bribery Act (2010), but also local laws in each of the countries in which Intrials currently operates (Peru, Chile, Colombia, Mexico and Argentina).

The reputation of our company depends on all of us to ensure in our professional routine the highest ethical standards, complying with all applicable laws. The Anti-Corruption Policy has the sole objective of reinforcing compliance with the anti-corruption and anti-bribery laws applicable to our activity, reaffirming concepts, explaining how to act correctly in the most diverse practical situations, using examples relevant to our business activity.

We are strictly prohibited from engaging in or tolerating any acts of corruption or bribery. We may not make, offer, promise or authorize any gift, payment or anything of value on behalf of Intrials to gain an improper advantage. In addition, we may not request, agree to receive or accept any gift, payment or anything of value that you know, or suspect is offered or given to you in the expectation that Intrials will provide an improper advantage in return.

Intrials performs a transparent, constructive and honest work with all agencies, entities, institutions and public instances. Therefore, it is everyone's obligation to provide complete, precise and clear information in all public communications

and documents sent to Government bodies.

Intrials, being aware that our field of activity often requires contact with public officials and healthcare professionals, establishes that negotiations are always done in a clear manner and according to current laws, this Code, our policies and procedures.

Therefore, we do not tolerate and repudiate any practice considered illegal or immoral. Bribery practices by employees or third parties to public officials, aimed at obtaining privileged treatment, influencing decisions or even entering into any business deal in favor of the Company, will not be tolerated under any circumstances.

For more information, access our Anti-Corruption Policy and/or contact the Compliance Department directly.

b) Sponsors and Customers

The relationship with sponsors and customers must always be guided by transparency, availability, and honesty. All our actions must be clear and objective, always seeking to preserve the integrity of our Company and of sponsors and customers, respecting all contractual conditions and not seeking to obtain undue advantages in the agreements entered into.

We must always be available, being solicitous and seeking, whenever possible, a satisfactory solution within the highest ethical standards for the problems of our sponsors and customers.

All sensitive customer, patient, and sponsor information must be protected and kept confidential, following all applicable regulations and policies.

We reject anti-competitive actions, actions that are contrary to good market practices or that are characterized as a violation of the principles of free competition.

c) Study Centers

Clinical Study Centers are fundamental to our business, and we are proud to work with them. The relationship of trust and mutual respect that we maintain with them is one of the main bases for the development of our business activities

and we must always act to preserve it, without violating any regulation or rule.

The relationship of any Intrials employee with anyone who has a relationship with the Study Center must be based on ethics, transparency and compliance with all internal policies and legislation, so that no illegal, corrupt or conflict of interest conduct is characterized.

d) Patient Associations

Interaction with legally constituted Patient Associations is encouraged and consented as long as it aims to support patients and the study in progress, as well as support for projects aimed at disseminating information related to health issues, raising awareness among the population or providing technical training.

Such interaction must always take place while preserving the independence of the parties involved and the ethical standards that permeate our services. Always be aware that the appearance of this relationship is not considered a conflict of interest.

In case of doubt, always consult the Intrials Compliance Department in advance.

e) Suppliers

We value our suppliers, and we value our professional relationships with them. We treat our suppliers fairly and with the respect we show each other at Intrials. That is why we make all purchases based on price, quality and service, and we deal with our suppliers fairly, honestly and openly.

We must avoid any actions during the supplier selection process that might give third parties (or even internally) the impression of favoritism or other undue advantage. Offering one supplier an unfair advantage over another is not just bad for the market - it is not in our company's best interests either.

Examples of suppliers for our business activity include brokers, consultants, customs brokers, logistics operator, administrative services, law firms, accountants, IT services, auditing, marketing, among others.

Intrials is firmly committed to validating, qualifying, following up and monitoring all our suppliers, regardless of whether they are directly or indirectly linked to a

a clinical trial, always seeking to preserve the quality and reliability of our activity, ensuring that third parties acting on our behalf reproduce our culture and ethics in all their activities.

f) Press

Intrials believes in a free society and recognizes that, for this, the means of communication are indispensable elements. In this way, Intrials will always, when requested, cooperate with the efforts of the Press.

However, only spokespersons approved by the Shareholders may issue any information or opinion regarding Intrials. These determinations are also valid for social and digital media. Any request from the Press must be immediately forwarded to the Intrials Communication/Marketing Department.

We must always guide our relationship with the Press with respect and, above all, urgency, as the speed with which we respond to the media can define our image for society in general.

Never answer questions from the media on your own initiative. Instead, you must politely inform the requester of our policy and refer such matters to the appropriate department.

Acting preventively will always be the best way to avoid conflicts, losses and illegalities.

g) Political Parties

No employee or third party is authorized, on behalf of Intrials, to:

- Issue any political opinion;
- Support or make donations to political candidates or parties;
- Use company resources for political purposes;
- Act or present themselves as a representative of the company in the political exercise.

As individuals, we are encouraged to be involved in our communities by voting and participating in the political process. However, under federal law and the laws of some states, Intrials is prohibited from making any kind of political contribution to candidates.

Because of these prohibitions, we cannot use company funds/resources to support a candidate for public office or political parties.

This prohibition refers not only to direct contributions, but also indirect assistance or support to candidates or political parties through the purchase of tickets to special dinners or other events to raise funds and provision of any other goods, services or equipment of political parties and committees.

Political contributions or activities for your benefit, with your own money and in your spare time are, of course, at your own discretion. Intrials will not reimburse you directly or indirectly for any political contribution or cost attending any political event.

In case of doubt, the employee or third party should consult the Compliance Department.

h) Relationship with Healthcare Professionals

Intrials is committed to conducting business with Healthcare Professionals (HCPs) in an ethical and professional manner, consistent with applicable laws, regulations and industry codes, with the best interests of patients in mind.

An HCP is anyone who administers, purchases, prescribes, provides or recommends prescription drugs or products, which includes, for example, principal investigators of study centers participating in a clinical trial.

The regulations governing HCP interactions can be complex and vary from country to country. Therefore, in case of any doubts regarding the relationship with these professionals, please contact the Intrials Quality Department and the Compliance Department directly.

11. ENVIRONMENT

We live and work in diverse types of communities and environments around the world. As a good citizen, we want our employees to benefit these communities and help maintain our natural environments.

As a company, we comply with all environmental laws and regulations applicable to our business operations at our locations. We also seek to preserve natural resources to the extent possible and reasonable in the course of our business.

12. GIFTS

Intrials employees will be allowed to provide or receive gifts, provided that the following conditions are observed:

- Do not influence the negotiation or conduct of the company's business.
- Be limited to a frequency of, at most, two occurrences per year.
- Do not exceed the total value of 1/3 of the current minimum wage.
- The granting of gifts to civil servants is prohibited.
- If they are considered to be a public official, consult the Compliance Committee in advance.

In some countries, it may be customary to provide reasonable gifts, business meals and entertainment to government officials and business contacts in connection with business meetings.

Be especially careful when considering giving something of value to a government official (and remember that in many countries in which we operate, investigators and others involved in the study are or may be considered government officials). Make sure you comply with the Anti-Corruption Policy and all conditions defined therein.

We approve, control and record all relevant gifts and entertainment – given and received – through our gifts and hospitality register. If you are faced with giving or receiving a gift or entertainment, please consult this Code and applicable Policies, as well as the Compliance Department.

Excessive entertainment of any kind - involving government officials, customers or suppliers - is never permitted.

If any employee receives a gift that does not comply with the above conditions, he/she must cordially return it, informing the existence of this Code and, subsequently, inform the Compliance Department.

13. INVITATIONS AND TRAVELS

Invitations or travel-related expenses, such as transport, accommodation and food, may be paid or reimbursed by the Company to third parties as long as they are linked to professional activity or intended for an agreement or clinical research project, provided that there is a real relationship with the development of activities and have been previously agreed between the Parties, always following Intrials' internal policies in this regard.

Similarly, our employees may have travel expenses paid by suppliers, provided that they are for strictly professional purposes and that they do not have any commercial consideration and provided that they are previously authorized by the Compliance Committee, according to Intrials' internal Policies on the matter.

If you have any questions about this topic, please consult the Intrials' Compliance Department or your direct supervisor.

14. DONATIONS AND SPONSORSHIPS

Any company charitable donations on behalf of Intrials or events organized by Intrials in support of charities must be pre-approved in writing by an Intrials leader, the Compliance Department and a member of the Board of Directors.

Any charity institution that we wish to relate to via donations/incentives cannot be an entity with whom we are seeking business or reward for new business.

Contributions or charitable activities made by you, personally, with your own money and in your spare time are, of course, at your own discretion. Intrials will not reimburse you directly or indirectly for any charitable contribution or cost of attending any charitable event.

Our employees must not distribute bulletins or printed materials of any kind, sell goods, request personal financial contributions, or request contributions for any personal cause during business hours, unless that activity has been pre-approved or sponsored by Intrials.

Intrials believes that events can be very useful in disseminating and promoting knowledge, practices and interesting discussions to the healthcare chain. Therefore, it may sponsor events of a scientific or educational nature related to the health area, through a written agreement with the organizing entity, without interfering with its schedule, themes, objectives, selection of speakers and location.

In case of doubt, consult the Compliance Department.

15. USE OF ASSETS AND EQUITY

Intrials provides all employees with computers, telephones, printers, photocopiers, among other various office equipment for professional purposes, which must be used responsibly, sustainably, exclusively for professional and legal purposes, and use other than that described in this Code or in the specific Information Security Policy for this purpose is strictly prohibited.

Therefore, all employees are aware that Intrials monitors the use of company resources to ensure that they are being used properly and according to our policies, where permitted by local law.

Thus, it is important that every employee is aware and follow the following guidelines:

a) Conserve the materials and equipment entrusted to you, avoiding waste and eliminating unnecessary costs and expenses;

b) Electronic communication equipment are Intrials' assets, and are provided as tools to enable employees to better develop their professional tasks for the company;

c) The available electronic communication resources must be used solely and exclusively for professional purposes, and the transmission/sending of defamatory comments, images or files that are offensive or induce any form of discrimination is prohibited;

d) Access to any website, through Intrials servers, is restricted to the development of your activities in the company;

e) Intrials reserves the right, without prior notice, to block and/or monitor internet usage on its premises or mobile access devices, emails and messages. Therefore, inappropriate use of the internet is strictly prohibited.

Theft, loss or damage to Intrials property has a direct impact on the Company's financial performance. Employees, officers and directors are expected to use, transport or retain Company property with care and for Intrials' legitimate business purposes and not for any personal benefit or the benefit of another person.

Any suspected incidents of fraud or theft must be immediately reported for investigation through the channels described in this Code.

16. CORPORATE OPPORTUNITIES

No Intrials employee, officer or director may use corporate property or information or their position in the company for improper personal gain. You have a duty to enforce Intrials' legitimate interests when any business opportunity arises, but not for personal purposes.

You must report any corporate opportunity to your immediate superior or the responsible department within the Company to determine whether Intrials wishes to take advantage of the opportunity.

17. COMITÉ DE COMPLIANCE

Situations may arise that cause doubts about the best posture to be adopted and more: how to act when you witness or become aware of situations that violate the rules and standards of this Code?

With this in mind, we created the Compliance Committee, whose objective is to resolve and direct any doubts, as well as taking necessary and appropriate actions for each situation.

If you have any questions or complaints, report to your manager immediately. If, by any chance, you are not comfortable doing so, contact the Ombudsman Channels.

Be honest and based on solid facts. Speak without fear, there will be no retaliation and your report will be completely confidential. We remind you that, as soon as you become aware of this Code, you are also responsible for its execution. Therefore, it is your duty and obligation to report any suspected non-compliance actions.

The Intrials Compliance Committee must investigate all reported cases until a resolution is reached.

Contacts:

Email: compliance@intrials.com.br

Telephone: +55 11 4688-9569

18. INVESTIGATION AND SANCTIONS

Intrials, through the Compliance Committee, places great importance on the internal reporting and processing of possible violations of this Code. Suspicions and complaints regarding any employee and/or subject will be duly investigated, and their result will be disclosed to the Compliance Committee and to the complainant, if identifiable.

Although investigations are handled with discretion and confidentiality, we may disclose the results of investigations to law enforcement authorities or regulatory agencies where necessary/mandatory under a legal obligation.

Evidence of irregularities in compliance with the provisions of this Code will be subject to an internal investigation by the Compliance Officer and, if the actual irregularity is verified through a regular process, the person responsible will be subject to penalties (verbal warning, written warning, suspension, dismissal, immediate termination of contract, in addition to any other contractually and legally applicable actions).

Legal entities that violate this Code may be subject to administrative and judicial sanctions as well as the payment of fines.

If you discover or suspect any of the prohibited practices described in this Code, you must immediately report it to the Intrials Compliance Officer.

Compliance Committee
INTRIALS



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Latin America Clinical Research