









Integrity Program

REDE D'OR



REDE D'OR



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Introduction



Fighting corruption depends on the efforts of all and it is essential to growth, sustainability and business longevity.

It was based on Rede D'Or's commitment to its employees, clients, partners, suppliers and the community in general, that we developed the Integrity Program.



The program brings together all the tools used to prevent, detect and fight corruption, ensuring the company's full commitment to ethics and transparency.



The Integrity Program

Based on Brazil's Anti-corruption Law (12.843/13), the program is aimed at implementing mechanisms used to prevent, detect and remedy harmful acts such as bribery, fraud in bidding processes and government relations.



Program's Pillars



Top management
commitment

The Integrity Program is the basis for creating an organizational culture where employees and contractors effectively cherish ethical conduct.

Top management executives are committed to the ethical values laid down by the company and ensure compliance with the Program, stressing the obligation to observe the rules established.

The Integrity Program is aimed at implementing and monitoring policies, standards and procedures in order to standardize the processes involved in its activities.



Policies, standards
and procedures

In addition, our employees' and related parties' conduct is guided by the Code of Conduct, which establishes guidelines and sets the company's values.

The Program includes the following policies and standards:

Integrity Program's Pillars

POLDOR 005	Sustainability Policy
POLDOR 006	Corporate Anti-corruption Policy
POLDOR 009	Compliance
POLDOR 013	Corporate Risk Management Policy
POLDOR 015	Privacy and Data Protection
POLDOR 017	Human Rights
POLDOR 019	Corporate Social Responsibility Policy
POLDOR 021	Transaction with Related Parties
POLDOR 022	Internal Controls Management
POLDOR 024	Internal Audit Policy
NORDOR 006	Reporting Channel
NORDOR 024	Supplier Record
NORDOR 026	Gifts and Hospitality
NORDOR 028	Relationship and Agreements with Government Authorities
NORDOR 030	Sponsorships and Donations
NORDOR 032	Disciplinary Measure
NORDOR 035	Conflict of Interests
NORDOR 039	Due Diligence in Mergers and Acquisitions
NORDOR 057	Third-party Integrity Diligence



Our risk assessment is based on the characteristics of the markets where the company operates (local culture, government regulation level, corruption history). This assessment considers the likelihood of fraud and corruption, including in relation to bids and contracts and the impact of these harmful acts on the company's operations.

Based on the risks identified, we developed the rules, policies and procedures for preventing, detecting and remedying undesirable acts.

We understand that the Integrity Program's success depends on efficient communication and training.



We disclose our Code of Conduct in our main channels (website and intranet) and our regulatory documents (intranet). We also offer training in all company units and relevant areas to strengthen our ethical culture and disseminate the initiatives and projects developed by the Compliance Department.

We created the Reporting Channel for communication of violations and/or breaches of the Code of Conduct, policies, standards, regulations and procedures of Rede D'Or.



The agents involved in investigating reports should maintain confidentiality, under penalty of the labor and administrative sanctions provided for in applicable legislation and regulations.

Rede D'Or Compliance Department has the necessary independence, impartiality, and the material, human and financial resources to enable full operation, with direct access, when needed, to the company's highest decision-making instances, such as the CEO's office and the Board of Directors.



Main Benefits





Our Commitment

We are committed to complying with and enforcing the laws, standards and regulations applicable to our business.

Rede D'Or Code of Conduct is available on our website and intranet and, in addition to the Reporting Channel,

we have other customer and stakeholder relationship channels, such as our Customer Services (SAC) and Ombudsman.



We understand that by investing in integrity-related actions, we also invest in the sustainability of our business.

Our commitment to integrity enables us to act in a market where ethics and transparency are seen as competitive advantages.

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Compliance Department
Phone: (21) 3239-4700 - Extension 9263
compliance@rededor.com.br

