

# **United Nation Global Compact Communication on Progress (COP) OdontoPrev 2017**



# **OdontoPrev**

The healthcare of your smile



**Odontoprev S.A.**

Period covered by this Communication on Progress (COP)

From: January/2016 until December/2016

Declaration of continuous support by the Executive Director (CEO)

June, 2017

To Participants:

I have the pleasure to communicate that OdontoPrev re-affirms its support for the Ten Principles of the United Nation's Global Compact in the areas of Human Rights, Labor, Environment and Combating Corruption. In this annual communication concerning progress, we describe our actions of improvement for the integration of the Global Pact and its principles in our business strategy, culture and daily operations and we commit to share this information with our principal stakeholders.

Yours sincerely,

**Rodrigo Bacellar**

Director President

# OdontoPrev

## About us

OdontoPrev is the leading dental benefits company in Brazil. Over 6 million members count on our differentiated oral health solutions, provided by a highly specialized network of dentists. The company is listed in the B3 Novo Mercado since 2006, with 100% tag-along rights and quarterly cash dividends payments to investors, in 37 countries.

## Mission, Vision and Values

### Mission

To become a major link between society and dentistry, adding value to this relationship by providing excellent services to both.

### Vision

To be a benchmark in dental care services for millions of people throughout the world, significantly contributing to the evolution of these services.

### Values

The Company wants everyone who interacts with OdontoPrev to feel this is an organization which is worth it. Therefore, the Company believes it is essential:

- To offer high quality and technically competent services.
- To have relationships based on respect, transparency, integrity and trust.
- To face challenges in a participative, flexible manner and firmness of purpose.
- To acknowledge and share the success with who effectively contribute to it.
- To have constant commitment, focus and competence in the pursuit of results.

## Human Rights Principles

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** Make sure that they are not complicit in human rights abuses.

OdontoPrev supports and respects the protection of human rights recognized internationally and guarantees its non-participation in the violation of such rights. The Company, by way of the performance of its managers, guarantees that the people who work within its installations have their rights integrally respected, as well as making every effort to avoid complicity in the abuses of human rights at all of its business units.

In order to guarantee the protection of rights, OdontoPrev has developed the following mechanisms:

### Investigation and Ethics Committee

The Ethics Conduct Committee is the organ responsible for the reception, valuation, investigation and improvement recommendations in processes and sanctions for transgressors, of all consequent denunciations from the internal denunciation channel, and is responsible for defining which cases must be submitted for analysis by the Director President of OdontoPrev. Due to its importance, the Ethics Conduct Committee is a multidisciplinary, group, being made up of senior management of the Company, including the Human Resources Director, Financial Administration Director, Chief of the Judicial Department and the lead of Internal Auditing; In the case of denunciations involving member of the Investigation and Ethics Committee, the lead of Internal Auditing, responsible for the receipt of the denunciations, should take the case to the Internal Audit Committee for acknowledgment. On the other hand, denunciations involving the Director President of OdontoPrev should be taken to the Board of Directors.

The formation and mode of operation of the Investigation and Ethics Committee are presented in the Company's Code of Ethics.

### Denouncement and Ethical Conduct Channel

This is the principal means of communication in the case of complaint of diverse questions or situations involving coercion or harassment. They receive complaints from collaborators, clients, beneficiaries, the

accredited network, partners, suppliers, shareholders and the external public about facts or situations that could cause damage to the image or to OdontoPrev's businesses, as well as questions that could be in disagreement with legal provisions, normative instruments.

The complaints can be sent in by mail, e-mail, posted on the Company's homepage or made personally to the representatives of the Internal Audit Committee. The identity of the complainant is kept in secrecy. After receiving the complaint, the Internal Audit Committee makes an initial investigation to identify whether it is appropriate or unfounded. If appropriate, a more thorough investigation is carried out by the Internal Audit, Human Resources or Legal Department. After finishing the investigation, the case is taken to the Investigation and Ethics Committee for evaluation, application of sanctions and/or recommendations for improvements in procedures.

The coming complaints are also submitted to the Presidency and to the Audit Committee for acknowledgment. The Director President or the Audit Committee presents to the Board of Director the most relevant cases. If necessary, additional corrective actions are taken.

The sanctions and corrective actions on coming complains are presented to those responsible for the Company's Management, Internal Audit, Human Resources and / or the Legal Department, assuring constant improvement and process reliability.

Number of contacts received by the Denouncement Channel in 2016: 282 (10% below the 312 in 2015)

Number of complaints received by the Denouncement Channel in 2016: 41 (50% below the 84 in 2015)

Number of complaints cleared in 2016: 40 (49% below the 79 in 2015)

Number of founded complains in 2016: 14 (18% below the 17 in 2015)

In relation to founded complaints, the following sanctions were applied and required the consequent corrective actions: orientation of employees, termination of employees, rules disclosure for employees, termination with partners / suppliers, refund request values for partners / suppliers, operational process improvement, policy or procedures elaboration, etc.

## **Climate Poll**

Since 2003, the Organizational Climate Survey is conducted annually. It is driven by a specialized and independent consulting firm, responsible for providing the research to all employees, tabulate the responses and make reports.

The research is applied to 100% of employees, and has maintained the average of 85% of response from the beginning.

The survey consists of 8 questions blocks distributed in themes: Company, Strategy, Leadership, Work, Process, Expectations, Communication and Integration, Internal Environment. There are also two open questions, for the most positive and negative aspects. In these open questions, the participation is around 80%, showing that, in average, mostly employees answers these questions completely.

In 2016, the methodology has been revised, and besides measuring collaborators' satisfaction level, it also started measuring engagement level. All data were tabulated by a specialized company, allowing comparison between companies from the healthcare sector and from other sectors and industries.

The result of the Climate Pool is presented annually to the entire organization, from the Board of Directors, Executive Directors, to all levels.

Usually, the climate is always positive, and the Company maintain Climate groups in order to evaluate and elaborate solutions to increase even more the collaborators' satisfaction. The results of this work is seen within the high levels of engagement and commitment.

As a result of the climate and professional valorization, there was a turnover reduction, from 12.7% in 2015 to 6.5% in 2016, a considered low level, comparing with the market and with the total number of Company's collaborators. Despite the macroeconomic environment, OdontoPrev did not make acyclic restructuring, in line with its understanding that people management and the qualification of its employees are strategic to the business. The difference between the total number of the Company's employees is due to postponement or cancelation of positions, mainly from the Call Center, which showed gains of productivity.

Managers have an "evolution corporate goal" in climate result of their departments, with a 5% weight on individual corporate goals. The rest of employees' do not have any corporate goals related to organizational environmental, avoiding thus, any kind of influence on the quality of the responses of employees.

Action plans are also prepared with the priority points for improvement. These plans have their implementation monitored throughout the year.

In 2016, there was 87% participation by our collaborators (in comparison to 86% in 2015, and 85% in 2014) and the overall result was 7.90 (in comparison to 8.090 of 2015, and 7.6 in 2014, on a scale from 1 to 10).

### **Climate Poll Organizational Committee**

In a more dynamic and competitive landscape, companies need to find solutions in order to become more solid ahead of changes and innovation. Towards that scenario, in 2016 the Climate Poll Organizational Committee was created and it is composed by leaders that are truly engaged with the Company, and

influence for the construction of an entrepreneur culture. This group evaluated a list of 135 actions suggested by the collaborators and classified them into categories, electing three actions as main features for 2017.

The main goal of the group is to improve the engagement and satisfaction of all employees with actions that make sense on a daily basis for them and are also aligned with the company's culture and values. These actions are validated by the Management, which has been supporting the group in the development of a competitive company that is attractive in the labor market.

## HR responds

By way of a specific e-mail, namely: [rhresponde@odontoprev.com.br](mailto:rhresponde@odontoprev.com.br), our collaborators send in their doubts, eulogies, complaints and suggestions with respect to the questions that affect them on a day to day basis, not necessarily questions involving Human Resources.

The aim of the Human Resources department is to answer the requests addressed to them over a period of 48 hours, which has been fulfilled. In 2016, 6,177 requests were received (49% up from 4,147 requests in 2015). The e-mails are analyzed and forwarded to the responsible department. Approximately 95% of requests are served directly by the Human Resources department, the majority being related to questions about benefits and salary.

## HR Goes To You

This program is the key to the process of internal communication. Our Human Resources professionals regularly visit all of the Group's units and branches, even those that have only a small number of collaborators.

The object of these visits is to listen to expectations, concerns, suggestions, clarifications and guidance. This contact is carried out by way of team and/or individual meetings. In anticipation, our collaborators receive a communication concerning the presence of the Human Resources representative and can set an appointment for individual conversations during the determined time period.

Many situations are resolved / clarified *in loco*, whilst other questions are taken up by the network for a more in-depth answer and are replied to within 48 hours. Many of the questions raised have altered the Company's procedures. During 2016, 11 visits took place, in comparison to 14 visits in 2015, and 22 visits in 2014.

## Principle of Labor

**Principle 3:** Business should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** The elimination of all forms of forced and compulsory labor;

**Principle 5:** The effective abolition of child labor; and

**Principle 6:** The elimination of discrimination in respect of employment and occupation.

OdontoPrev supports the initiatives of union association and values other forms of voluntary organization by its collaborators, who have the right to a free association to a union. All of our collaborators (100%) are represented by unions throughout the country.

Additionally, the Company is expressly against child labor, forced or analogous to slavery and does not accept this practice in its suppliers and third party service providers. As well, we contract suppliers and establish business relations with partners who operate with comparable ethical standards, by way of a rigorous selection process, giving ample recognition to the norms and conditions that rule the ethical behavior of our Company. It is worth mentioning that OdontoPrev never associated with any type of child labor.

Under no circumstances, is the employment and exploration of children and / or youths below the legal working age permitted. The Company does not maintain a commercial relationship nor do it contract services from organizations that adopt such practices of infantile labor.

Our Company is compromised with a Human Resources policy directed towards respect and the valuation of the human being and that person's fundamental rights, adopting practices effective towards sustainable development, integral, ethical and transparent performance. Part of the admission process is the submission of each new collaborator to an electronic training program and the tests related to such a theme. Periodically the course is revised and all collaborators again go through training.

OdontoPrev assumes the compromise concerning the National Pact for the Abolition of Slave Labor, which represents the compromise of the non-admission of slave labor in the productivity chain, as well as being against child labor and the non-acceptance of this practice in our suppliers and service providers.

Additionally, written in OdontoPrev's Code of Ethical Conduct is freedom of association, collective bargaining, the elimination of forced, infantile and discriminating labor; and in order to guarantee access to these policies, as well as the review on admission, our collaborators and all the public who are integrated with OdontoPrev have access to the Code by way of our Portal.

The promotion of diversity is constantly sought after by the Company and is demonstrated by way of the following programs:

### **Apprentice Program**

Focusing on the inclusion of the young older than 16 years, the Company promotes technical training. The program, of two-year duration, occurs under the guidance of SENAC and the accompaniment by the Human Resources area. During 2016, 53 young apprentices were contracted (71% above the 31 contracted in 2015, and 38 young apprentices contracted in 2014), 6 of whom were hired at the end of the period and 2 hired as interns. This number surpasses the amount required by the government (5% of total employees, which functions demand methodical technical-professional qualifications).

The process of evaluation of apprentices is held by the same procedure of other employees, composed by competences evaluation and individual goals evaluation, in which the first has a focus on career and development process and the second is an input for bonus process.

The cycle of performance management contemplate formal feedback meetings, that are:

- Goals evaluation: held twice a year, and its mission is to monitor goals evolution, correct the course and to be an input for bonus process.
- Competences evaluation: held once a year, and its mission is to align career expectations, clarify strengths and areas for improvement, in order to define an individual development plan. In 2016, the participation rate of the competency process was 86%, a high level, considering that this evaluation is not mandatory, but its participation is encouraged.

### **Internal Opportunity Program**

For the replacement or hiring of collaborators, OdontoPrev 's Human Resources policy establishes that firstly the professional must be sought internally, following basic requirements, such as having been at least one year with the Company, having achieved at least 90% of the goal of the last performance evaluation and the requirements that the position demands. Of the 48 positions advertised internally during 2016, 17 were filled with collaborators, that is, an occupancy rate of 35%, in comparison to 86 vacancies divulged in 2015, and 33 filled, or 38% and 62 vacancies divulged in 2014, and 36 filled, or 58%. This has made

possible, for example, that collaborators of the Call Center / cleaning teams have conquered opportunities in other departments.

In order to make professional growth possible, the OdontoPrev University is made available to collaborators, thus allowing them to take courses that focus on their development and employability and for leadership positions the formation is internal and by way of a specific program (Key People).

During 2016, 258 contractions took place (in comparison to 467 in 2015 and 537 in 2014), in the majority of cases related to Call Center; and there were 102 promotions (in comparison to 115 in 2015 and 144 in 2014). Below, the contractions composition made in 2015 and 2016:

Gender	% of total	
	2015	2016
Female	73%	76%
Male	27%	24%

Age group (years)	% of total	
	2015	2016
Under 30	65%	75%
30 to 50	31%	24%
Above 50	5%	1%

Geographic localization	% of total	
	2015	2016
Southeast	96%	94%
Northeast	2%	3%
South	2%	3%
North	0%	0%
Midwest	0%	0%

## Health and Safety

The Company maintains an Internal Commission for Accident Prevention (ICAP), which is made up of collaborators who, as well as activities linked to their position, act as multipliers and agents focusing on the reduction of accidents and occupational illnesses.

In 2014, the health area was in action every day of the week with the presence of a nurse and a doctor. The responsibility of this area is to accompany the collaborator's health, providing guidance in the promotion of good health practices. During 2016, 6,276 attendances to collaborators were registered (in comparison to 4,928 in 2015 and 2,593 in 2014).

The Company constantly seeks, with the support of the building administration area, to accompany, inspect and monitor its installations, in such a manner that all collaborators have comfortable installations and are not exposed to risks. This was an indicator highly evaluated and recognized by our collaborators in the Climate Organizational Poll.

## Environmental Principles

**Principle 7:** Business should support a precautionary approach to environmental challenges;

**Principle 8:** Undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.

OdontoPrev is pledged to preventative approaches to environmental challenges, as well as promoting environmental responsibility in its operations through actions of conscientiousness, environmental education and consumer conscious education and signs off its compromise via its Environmental Policy, where the compromise of making its activities compatible with the conservation of the environment, within the Principles of Sustainable Development are realized.

All of our activities, products and services are in harmony with the environment, always looking towards its conservation for future generations, and making certain that our activities attend to legal requirements and the applicable environmental norms, together with a continual improvement in the work involving environmental degradation prevention. Additionally, we have the compromise of reducing the environmental impact on our processes, products and services, incentivizing research into new technologies, processes and raw materials that minimize these impacts and make every effort to maintain an open dialogue with the community, clients and suppliers, as seen through the exchange of information concerning relevant environmental themes.

In 2015 we developed a mandatory training, which was applied in 2016, and involves knowledge about the three pillars of Sustainability: Social projects, Environment and Governance. The implementation took place in 2016 and all employees ended the training to date.

OdontoPrev conducts various activities and actions that provide support the principles laid out in the Environmental Policy, such as:

## **Apoena Project**

The Apoena Project is OdontoPrev's main environmental initiative and it has been designed to minimize its environmental impacts by means of conscious consumption, waste reduction and recycling. Apoena is a Tupi word, meaning "one who sees further".

In line with the concept of sustainability development, which puts a great value in the well-being of future generations, the initiative aims to engage and influence both the internal and external audiences. Initially, the project expects to have the adhesion of the Company's employees. Once engaged, they are responsible for disseminating the concept and encouraging conscious consumption on the part of clients and suppliers. This way, the principles will have the required echo in society, so that each citizen and each organization plays their role in building a more nature-friendly future.

Within this project are the following actions:

### **Carbon Compensation Program**

Since 2008 OdontoPrev counts on the support of an environmental consulting firm specializing in the monitoring of carbon emission from energy consumption, employees commuting (by road or by air), fleet fuel and hauling. Based on calculations, such consulting firm verifies the necessary amount of trees to be sowed to neutralize the equivalent carbon. In 2016, there was an emission of 729.84 t of CO<sub>2</sub>, in relation to 718.84t in 2015.

Until 2016 the plantation of native trees was made in springs and/or deforested areas, contributing to the creation of an ecological corridor in the Vale do Paraíba (SP) region. Since the beginning of the project, 11,363 trees have been planted, an area equivalent to 13 soccer fields (93,800 m<sup>2</sup> was recovered).

To reforest environmentally damaged parks in large Brazilian cities, the project was redesigned in 2016. The objective is to increase the society's awareness of ecological issues, in addition to making green spaces available for leisure. In 2017, the initiative will be implemented in parks at the São Paulo's Metropolitan Area.

## **Amalgam Recycling Program**

Amalgam is a material consisting of heavy and toxic metals, including mercury and silver, used by dentists to fill cavities caused by tooth decays. If disposed of inappropriately, amalgam can contaminate people and nature. Aware of the importance of recycling this material, OdontoPrev maintains a partnership with University of São Paulo - USP and with the accredited network of dentists for the development of new technology to recycle amalgam.

The project involves negotiation with government health and environment agencies, such as São Paulo State's Environmental Authority (Cetesb), Research and Measurement Institute (Ipem) and São Paulo's Health Secretariat. In addition, amalgam packaging and transport are special and certified by the Technology Research Institute (IPT).

Since the beginning of the project, in 2005, around 3,244 accredited dentists have adhered to the initiative and already forwarded 18 kg of amalgam, from which approximately 8.5 kg of mercury and silver could be recovered.

1. Dentists are provided with a kit containing handling instructions and a container to accommodate the amalgam waste.
2. Professionals are instructed to forward the amalgam waste to USP's Chemical Waste Laboratory in the municipality of Bauru, State of São Paulo.
3. The material is submitted to a recycling process.
4. The recycled material is sold.

## **Recycling – waste management**

OdontoPrev manages its solid waste, which allows to appropriately dispose of such waste, monitor the volume of solid waste generated by the Company, and establish a plan for reduction. The waste is forwarded to an outsourced company for recycling and inventory-taking of the waste.

Likewise, the Company recycles office supplies and obsolete communication parts, including monitors, computer keyboards and flyers. In 2016, used papers were recycled and transformed into seed and pens. Other materials intensively used are disposable plastic cups and printing paper. Worth of noting is that all A4 paper acquired derives from certified reforestation.

The effectiveness of this management is assessed by internal reports. In 2016, OdontoPrev generated 31 percent less recycling waste than in 2015.

Recycling	2015	2016	Reduction
Paper	24,604 kg	14,227 kg	-42%
Plastics	3,021 kg	2,970 kg	-2%
Aluminum/Metal	91 kg	31 kg	-66%
Glass	96 kg	97 kg	1%
Electronic devices	316 units	173 units	-45%

### Investment in environmental impact technology

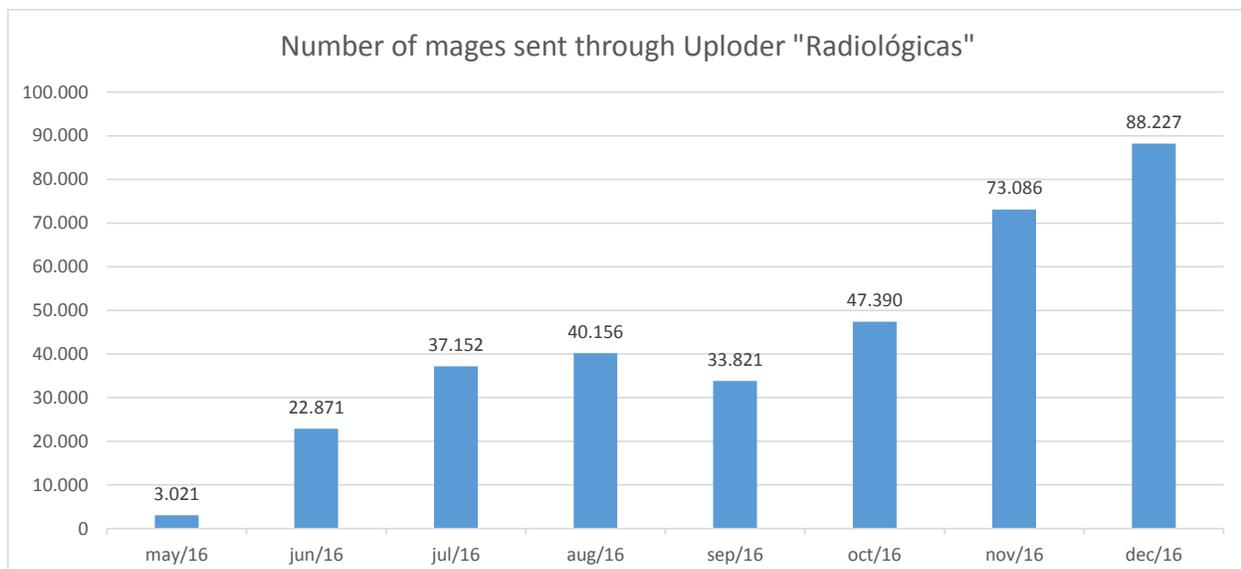
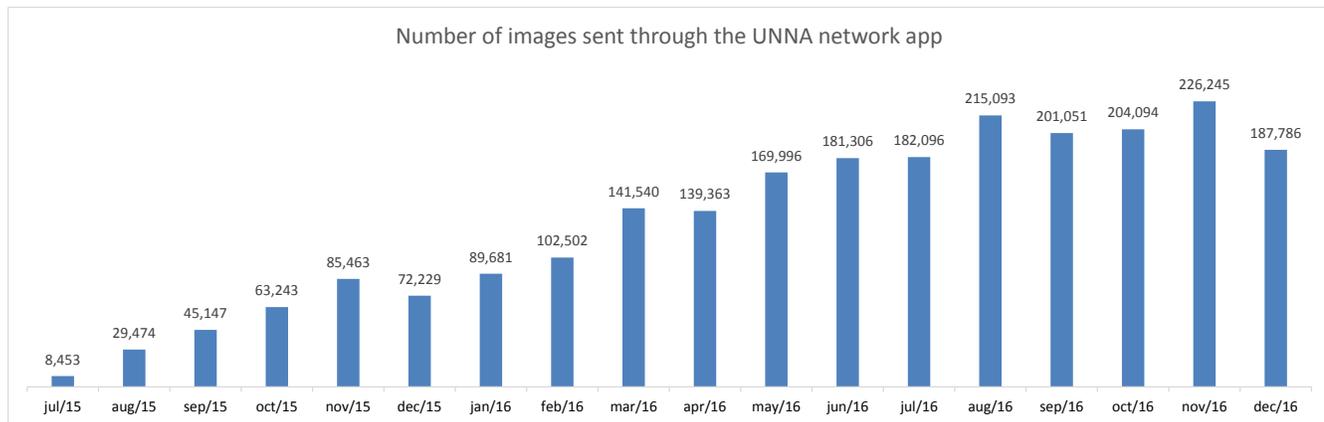
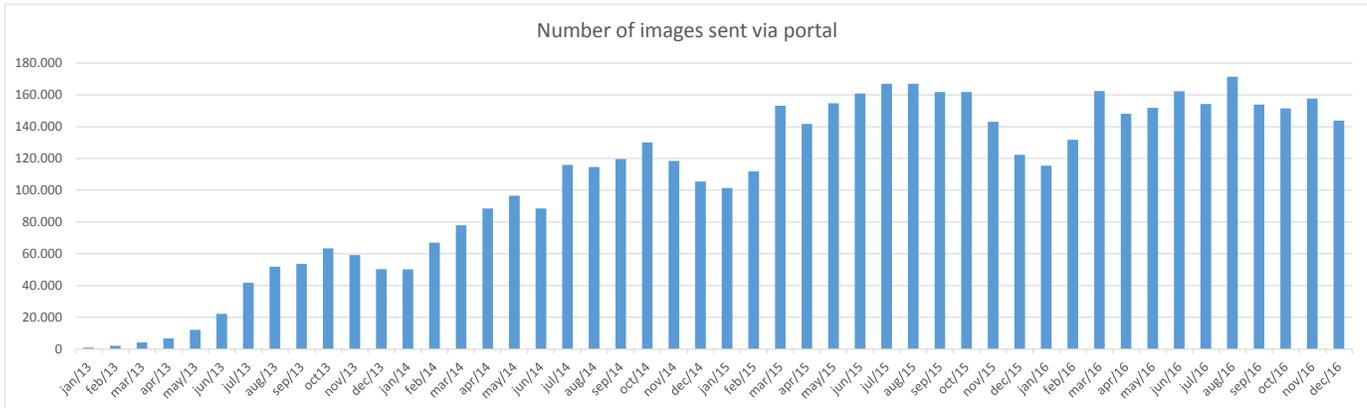
Radiographs must be included in the patient’s records for purposes of analyses and support to the accredited network professional. The radiograph revelation process, however, requires the use of chemical products, such as silver. Moreover, all radiographs should be forwarded to OdontoPrev and, subsequently, returned to the accredited dentist. To minimize the environmental impacts of the revelation process and reduce the need to return them by mail, the Company has developed specific innovative technologies.

In 2013 a portal for the accredited network was created, whereby images can be transmitted over the internet. The online delivery of dental treatment images replaces the otherwise only mail delivery option. To make the delivery of images even easier, without the need of computers and intraoral or photography cameras, an app called UNNA Network was developed, making the transmission of images from dental offices simpler and more agile, ultimately speeding up the accredited network’s service process.

1. The dentist accesses the UNNA Network app.
2. - When radiographs are not necessary: the dentists make photos of patients’ images and documents.  
- When radiographs are necessary: the dentists use the app to transmit images, with no need of providing images physically.
3. The related data remain filed at the individual patient’s records.
4. The process avoids the revelation of part of the radiographs, and the emission of CO2.

In addition to the technologies used by dental offices, a tool was developed in 2016 to be used by the accredited network’s radiology centers. By using the uploader technology, radiology clinics no longer need to print radiographic documentations and can send them only by digital means to OdontoPrev, which, subsequently, makes images available to the beneficiary, and the dentist responsible for their treatment.

In 2016, more than 4.2 million images were transmitted via digital resources, representing 71 percent of the total, reaching the goal established in 2015 of 50% in 2016, demonstrating OdontoPrev's success in campaigns and guidance with the professionals. In December 2015, six months after its implementation, 20 percent of images were already being sent digitally.



## **Easy Dental**

With the objective of a reduction in paper consumption and the transport of clinical transportation by the accredited dentists network, our Company made available, with exclusive commercial conditions, the acquisition of Easy Dental, which is a software for the management of dental clinics.

## **ECOnomize Program**

OdontoPrev has developed an energy consumption reduction campaign through the Environmental Management Program. The ECOnomizar program proposes three related actions, for energy consumption reduction at OdontoPrev's headquarters and branches, at the dental offices of the accredited network and at the Company's employees' houses. This initiative is intended to increase everyone's awareness of the impact of the use of energy at office and at home, in order to save energy.

## **Energy Management**

The energy consumption in 2016 was 1,135 thousand kW/h, 7.4 percent lower in relation to the previous year. The reduction was due to specific medium-term impact measures, such as the replacement of incandescent with LED bulbs, and the elimination of unnecessary points of light.

All areas are always engaged, which contributes to conceive better ways to save energy, bringing benefits to the environment and reducing the Company's costs. Actions such as the Yellow Card were taken in 2016 to encourage all employees to supervise the conscious energy consumption, and show yellow cards to those who are not collaborating with the initiative. The campaign is educational in nature and no punishments are applied.

In 2016, the campaign "Economy Challenge" (Desfio da Economia) took place, which invited the collaborators to give suggestions related to saving energy and water. Some of them were implemented, such as:

- Password for printers  
Avoids the unnecessary print of documents, saving energy and paper
- Access to fire escape  
Reduce in 50% the collaborators' transport by elevators. The Company is installed in two floors, and requested the condominium to have access to the fire escape, so the collaborators could easily move from one floor to another

One of the goals for 2017 is the installation of switches in places where there are windows, so to avoid the use of lights in sunny days. It is expected that the measure, among others, will reduce 5% of energy use.

### **Water management**

In 2016 OdontoPrev consumed 3,618.8 m<sup>3</sup> of water originated from the public supply system or reuse. At the Company's headquarters, a Sewage Treatment Station (ETE) has been set up to allow water reuse at the restrooms and condominium facilities. During the recycling process, around 25% of the water evaporates and the rest is reused.

Water consumption control is made by the headquarters' condominium, which prepares a monthly report to monitor expenditures and identify problems. Employees are constantly reminded of the importance of saving water. In 2016, water consumption declined 31.2 m<sup>3</sup> against 2015, due to initiatives taken to increase employees' awareness.

## Anti-Corruption Principles

**Principle 10:** Business should work against corruption in all of its forms, including extortion and bribery

OdontoPrev does not allow any form of corruption, inclusive in relation to the terms of Law 12,846/13 (Anti-Corruption Law). Our principles are expressed in our Code of Ethical Conduct, which covers the following aspects:

- Mission, Vision and Values of the Company;
- Conflicts of Interest;
- Internal Relations and those in the Working Environment;
- Relations with Clients and Suppliers;
- Relations with Shareholders and the Capital Market
- Relations with Governments, Governmental Organ, Regulators and Public Agencies;
- Relations with the Media;
- Confidentiality and Information Security;
- Channel for Denouncements and Ethical Conduct.

As presented in OdontoPrev's Code of Ethical Conduct, the Company does not tolerate any criminal act or against the law or legal framework. This way, a Program to Combat Corruption was developed and is being announced to all Company is collaborators.

The program includes:

- 1) A Code of Ethical Conduct that is released to all OdontoPrev's collaborators and partners. The Code attest that certain expected ethical conduct is applicable to all management, employees, partners and good and services suppliers.
- 2) A corporate policy to combat corruption and other unlawful acts, with the description of the rules that must be followed by OdontoPrev employees, in addition to determining the responsibilities of each one in the process. The policy requires that the accounting records and financial statements have adequate internal controls and are audited by an independent auditor; determines that financial statements must be reviewed by the Audit Committee and the Fiscal Council; establishes rules for the relation with the public sector and to participate in public bidding; defines the process of review and approval of donations to candidates and political parties; and informs on disciplinary measures in case of violations of the integrity program. It is worth mentioning that OdontoPrev's corporate standards require a periodically evaluation and updates.

- 3) The program promotion through adhesion terms and mandatory training.
- 4) The availability of a complaints channel of communication, with assurance that the complainant identity will be kept confidential.
- 5) Definition of procedures for opportune interruption of irregularities and remediation of damages.
- 6) Verification of illicit acts in merger and acquisition processes.
- 7) Availability of a structure, with independence and authority, to review the Program's applicability.
- 8) Continuous monitoring of the Program by the Chief Executive and Audit Committee.

The above aspects cover questions related to gifts, presents, benefits, advantages, favors and other courtesies; activities carried out outside of the Company; political activities; among others.

During 2014, OdontoPrev implanted its Ethics Course, mandatory for all of our collaborators; the objective being to update with respect to the items laid out in the Code of Ethical Conduct. Periodically, the Code is revised and all collaborators are informed about this and the course is revisited. Additionally, all collaborators sign a Term of Ethical Awareness, physically delivered to all at the moment of contracting or when there is a revision/updating. The Code is available on our Intranet and Internet for both our internal and external publics.

In the case of some denouncement/identification of whatever cases could infringe the items described in the Code, these are remitted to and analyzed by the Company's Investigation and Ethics Committee.

We emphasize that have not been identified nor reported any corruption case in the years of 2016, 2015 and 2014.