

HUMAN RIGHTS POLICY  
REDE D'OR SÃO LUIZ S.A.

1. INTRODUCTION AND PURPOSE

- 1.1. This Human Rights Policy ("Policy") aims to establish the guidelines and principles for the operations of Rede D'Or São Luiz ("Company") regarding respect for human rights in its operations, activities, and supply chain in the regions where it is present.
- 1.2. This Policy is based on the principle of raising awareness and respecting human rights in our activities, in accordance with the UN Human Rights principles.

2. SCOPE

- 2.1. The guidelines established in this Policy apply to all hospital units, corporate areas, and business units of the Company, and must be observed by all employees, whether direct or indirect. For business units in which the Company has a shareholding interest, adoption of this Policy is recommended.

3. REFERENCE DOCUMENTS

- POLDOR 004 – Human Resources Policy
- POLDOR 005 – Sustainability Policy
- Company's Code of Conduct
- NORDOR 006 – Whistleblowing Channel

4. NATIONAL AND INTERNATIONAL REFERENCES AND APPLICATION

- 4.1. The Company's Human Rights Policy, as well as its actions, are guided by commitments and international references on human rights, including:
  - a) Institutional Commitments:
    - United Nations Global Compact
  - b) References:
    - International Bill of Human Rights – UN Universal Declaration of Human Rights
    - International Covenant on Civil and Political Rights
    - International Covenant on Economic, Social and Cultural Rights
    - UN Guiding Principles on Business and Human Rights
    - Voluntary Principles on Security and Human Rights (VPSHR)

- ILO – Fundamental Conventions of the International Labour Organization (29, 87, 98, 100, 105, 111, 138, 182)
- IFC Performance Standards
- Global Reporting Initiative (GRI Standards)

## 5. DEFINITIONS

5.1. For the purposes of this Policy, the following definitions apply:

“Human Rights” are the basic rights granted to all human beings. There are two main categories of human rights. The first category refers to civil and political rights and includes rights such as the right to life and freedom, equality before the law, and freedom of expression. The second category refers to economic, social, and cultural rights and includes rights such as the right to work, the right to food, the right to the highest possible standard of health, the right to education, and the right to social security. Source: ISO 26000;

“Labor Rights” are the set of legal norms that govern the relationships between employees and employers, and the rights resulting from the legal status of workers. These norms, in Brazil, are governed by the CLT (Consolidation of Labor Laws), the Federal Constitution, and other specific laws. Labor rights also arise from agreements, contracts, and collective conventions established through representative organizations of employees and employers. They also include the regulation of the union system and collective representation. Source: ISE B3;

“Psychological Harassment” or moral harassment consists of carrying out any conduct, frequent and intentional, with the purpose of humiliating another person in the corporate environment or context, offending their dignity and harming their psychological integrity, which can be manifested through acts, behaviors, gestures, words, or repeated writings;

“Sexual Harassment” consists of engaging in any behavior that constrains and violates another person's sexual freedom in the workplace or work-related context, through coercion, intimidation, or blackmail, with the aim of obtaining sexual advantage or favor;

“Race/Color” characteristic declared by people based on the following options: white, black, yellow (person of Japanese, Chinese, Korean origin, etc.), brown (mulatto, caboclo, cafuzo, mameluco, or mixed with a black person and another color or race) or Indigenous (Indigenous person). Source: IBGE [www.ibge.gov.br](http://www.ibge.gov.br);

“Forced or Compulsory Labor” as referred to in Conventions 29 and 105 of the International Labour Organization (ILO) relates to the issue of forced or mandatory labor. Convention 29 (Forced Labor - 1930) addresses the elimination of forced or compulsory labor in all its forms. Some exceptions are allowed, such as military service, properly supervised prison labor, and compulsory work in emergency situations, such as wars, fires, earthquakes, etc. Convention 105 (Abolition of Forced Labor - 1957) prohibits the use of all forms of forced or compulsory labor

in the following ways: as a means of coercion or political education; as punishment for expressing political or ideological opinions; for labor mobilization; as a disciplinary measure at work; as punishment for participating in strikes or as a means of discrimination. Source: ISE B3;

“Child Labor” several conventions of the International Labour Organization (ILO) require signatory countries to promote the abolition of child labor. In particular, Convention No. 138 (C138 of 1973), on Minimum Age, aims to abolish child labor by stipulating that the minimum age for admission to employment shall not be lower than the age of completion of compulsory schooling. Convention No. 182 (C182 of 1999), in turn, addresses the Worst Forms of Child Labor and advocates the adoption of immediate and effective measures to ensure the prohibition and elimination of the worst forms of child labor. Source: ISE B3;

“Valuing Diversity” as Policies and actions aimed at promoting the inclusion of people from groups in society who are more likely to face discrimination or are underrepresented within the company. Valuing diversity should focus, for example, on aspects such as race, color, sex, religion, political opinion, national descent, or social origin (recognized as sources of discrimination in ILO Convention 111). Other aspects where discrimination frequently occurs and where there is a consequent need to value diversity include sexual orientation, appearance, age, regional origin, physical disabilities, and special needs. Source: ISE B3.

## 6. PROVISIONS AND GUIDELINES

6.1. The Company is committed to promoting a corporate culture that embraces inclusion, diversity, innovation, and growth, while maintaining the highest ethical standards in the way it operates both internally and externally.

6.2. The Company's commitment extends to respecting the human rights of all employees, medical staff, patients, suppliers, third parties, and society.

6.3. Rede D'Or complies with all laws and regulations relating to Human Rights, including:

- (a) Forced labor / modern slavery;
- (b) Minimum employment age;
- (c) Minimum wage;
- (d) Working hours;
- (e) Equal pay for equal work;
- (f) Non-discrimination;
- (g) Prohibition of moral (psychological) and sexual harassment;
- (h) Freedom of association and the right to collective bargaining.

6.4. We are committed to equal employment opportunities, without discrimination, and we are steadfast in our efforts to cultivate a diverse and inclusive work environment for everyone. In support of our commitment, employees are required to sign and comply with the Code of Conduct, which addresses human rights issues.

6.5. Guidelines for Action:

- (a) Monitoring and Management of Human Rights Risks. Even when our ability to influence is limited, we are committed to collaborating with stakeholders, including employees, suppliers (contractors), partners, clients, patients, communities, governments, and society, to contribute to awareness and promotion of human rights.
- (b) Employees. We provide dignified working conditions and seek to promote educational actions that enable the professional and personal growth of employees. We maintain a safe and healthy work environment. We respect and value diversity and promote inclusion, not tolerating discrimination or harassment of any kind, including moral or sexual. We respect freedom of association and collective bargaining in all areas of operation, in accordance with applicable local laws. We prohibit the use of child labor or any types of employment practices that could be interpreted as equivalent to forced or compulsory labor.
- (c) Security Teams (employees and contractors). Our risk assessments for security requirements include risks related to human rights violations. We carefully select employees and contractors and monitor them rigorously, considering prior experience, technical skills, and emotional stability.
- (d) Suppliers. We seek to promote respect for human rights throughout our value chain, including the adoption of contractual clauses and documentation proving legal compliance. Suppliers must also ensure the selection of business partners who operate in accordance with labor laws and ethical standards compatible with the principles of our Code of Conduct.
- (e) Communities. We seek to understand the territories where we operate or plan to operate. We aim to establish a continuous process of engagement with communities and management of sociocultural, economic, and environmental impacts. We also strive to contribute to sustainable local development by promoting initiatives in the areas of education, cultural heritage, urban development, and sports. We promote actions to raise awareness of human rights, with special attention to the eradication of forced and child labor and the promotion of the rights of children and adolescents - with specific efforts to combat sexual exploitation of minors near our projects during both the implementation and operation phases.
- (f) Governments. We observe the laws and regulations of the places where we operate and cooperate with the authorities to respect and promote internationally recognized human rights.

#### 6.6. Communication and Grievance Mechanisms:

(a) Acting ethically, seeking the continuous improvement of relationships between the Company and the different stakeholders with whom it interacts, are values that guide the Company's corporate decisions.

(b) The Company's Code of Conduct, launched in 2009, establishes the ethical principles that guide employees' behavior in their relationships with clients, suppliers, competitors, and other stakeholders.

(c) The Whistleblower Channel is available to all of the Company's stakeholders for the confidential and secure communication of any complaints regarding violations of the Code of Conduct, as well as of the bylaws, policies, procedures, regulations, and standards.

(d) The Whistleblower Channel is available 24 hours a day, seven days a week, by phone or via the internet (on the web portal or by email):

Phone: 0800 377 8031

Website: <https://canalconfidencial.com.br/canalconfidencial/>

E-mail: [canalddenuncias@rededor.com.br](mailto:canalddenuncias@rededor.com.br)

#### 7. REVIEW

7.1. This Policy was approved by Executive Management and the Board of Directors of the Company. Any cases not covered by this Policy, as well as any potential amendments, should be submitted to the Sustainability department and decided by the Risk and Internal Controls Management.