

HEALTH, SAFETY AND ENVIRONMENT POLICY

REDE D'OR SÃO LUIZ S.A.

1. PURPOSE

- 1.1. To declare the commitment of Rede D'Or São Luiz S.A. ("Company") to the prevention or mitigation of significant adverse impacts in the dimensions of health, occupational safety, and environment, and that are directly linked to its operations, products, and services, as well as by its various social and business relationships.

2. SCOPE

The guidelines contained in this Policy apply to all hospital units, corporate areas and other business units of the Company and must be complied with by all employees, whether direct or indirect, and with coverage in their social and business relations.

3. DEFINITION

- 3.1. “Occupational Accident or Occupational Disease”: negative impacts on health resulting from exposure to hazards at work. Note 1: This definition is based on International Labor Organization (ILO), Guidelines on Occupational Safety and Health Management Systems, ILO-OSH 2001, 2001. Note 2: "Occupational disease" indicates damage to health that includes illness, disease, and disorder. The terms "illness" and "disorder" are generally used interchangeably and refer to health conditions with specific symptoms and diagnoses. Note 3: Industrial accidents or occupational diseases result from exposure to hazards on the job. Other types of incidents may occur which are not work-related;
- 3.2. “Environmental aspect”: element of activities, products or services of an organization that interacts, or can interact with the environment (ABNT NBR ISO 14001:2015);
- 3.3. “Environmental performance”: is the result of the management of environmental aspects of an organization, expressed through specific performance indicators;
- 3.4. “Hierarchy of controls”: systematic approach to improve occupational health and safety, eliminate hazards and minimize risks Note 1: The hierarchy of controls seeks to protect workers by ranking the ways in which hazards can be controlled. Each control in the hierarchy is considered less effective than the one before it. The priority is to eliminate the hazard, which is the most effective way to control it. Note 2: The Guidelines on Occupational Safety and Health Management Systems of the International Labour Organization (ILO), 2001, and ISO 45001:2018 list the following preventive and protective measures in the following order of priority: •eliminate the hazard/risk; • replace the hazard/risk with less hazardous processes, operations, materials or equipment; • control the hazard/risk at source

by adopting engineering controls or administrative measures; • minimize the hazard/risk by designing safe systems of work that comprise administrative control measures; • where remaining hazards/risks cannot be controlled by collective measures, provide appropriate personal protective equipment, including protective clothing at no cost to the worker, and apply measures to ensure its use and maintenance;

- 3.5. “Work incident”: event resulting from work or occurring during work that could or does result in an occupational accident or disease Note 1: This definition is based on ISO 45001:2018. Note 2: Incidents can result from, for example, electrical problems, explosion, fire; flooding, tipping over, leaking, overflowing; breaking, bursting, cracking; loss of control, slipping, tripping, and falling; unstressed body movement; stressed body movement; shock, fright; workplace violence or harassment (such as sexual harassment). Note 3: An incident that results in an occupational injury or illness is often referred to as an "accident." An incident that has the potential to result in an occupational accident or illness, but where neither occurs, is often referred to as a "near miss" or "dangerous occurrence";
- 3.6. “Impact”: This refers to the effect an organization has on the economy, the environment and/or society, which in turn may indicate its contribution (positive or negative) to sustainable development;
- 3.7. “Environmental impact”: modification in the environment, both adverse and beneficial, wholly or partially resulting from the environmental aspects of an organization; (ABNT NBR ISO 14001:2015);
- 3.8. “Environment”: surroundings in which an organization operates, including air, water, soil, natural resources, flora, fauna, human beings and their interrelationships; (ABNT NBR ISO 14001:2015);
- 3.9. “Health promotion”: process of empowering people to increase control of their health and improve it. Note 1: The terms "health promotion" and "well-being" are often used interchangeably. Note 2: This definition comes from the World Health Organization (WHO), Ottawa Charter, 1986;
- 3.10. “Almost accident”: a work incident that did not result in an occupational accident or illness, but has the potential to cause them GRI 403: Occupational Health and Safety 2018 29 Obs. 1: An almost accident may also be called a "dangerous occurrence". Obs. 2: This definition is based on ISO 45001:2018;
- 3.11. “Occupational Risk”: source or situation of danger with the potential to cause an accident at work or an occupational illness. Note. 1: The dangers can be - physical (e.g.: radiation, extreme temperatures, constant loud noise, slippery or tripping hazards, unprotected machinery, defective electrical equipment) biological (e.g.: exposure to blood

and body fluids, fungi, bacteria, viruses, insect bites); - psychosocial (e.g.: verbal aggression, harassment, bullying); - work-related in the organization (e.g.: excessive demand for work, shift work, very long hours, night work, violence in the workplace). Note 2: This definition is based on the International Labour Organization (ILO), Guidelines on Occupational Safety and Health Management Systems, 2001, and ISO 45001:2018;

3.12. “Occupational health and safety risk”: a combination of the probability of occurrence of a hazardous situation or exposure to a work-related hazard and the severity of the occupational accident or illness that may be caused by the situation or exposure. Note: This definition is based on ISO 45001:2018;

3.13. “Occupational Health and Safety”: conditions necessary for work-related injuries and illnesses to be prevented and to provide safe and healthy workplaces;

3.14. “Occupational and environmental health and safety management system (OSHEMS)”: set of interrelated or interconnected elements for establishing occupational and environmental health and safety policy and objectives and for achieving those objectives.

3.15. “Worker”: a person who performs work .Note 1: The term "workers" includes but is not limited to employees. Note 2: Other examples of workers include interns, apprentices, the self-employed and people who work for organizations other than the reporting organization such as suppliers. Note 3: In the context of the GRI Standards, in some cases it is specified whether a particular subgroup of workers should be used;

3.16. “Business units”: This is defined as a subdivision of the company by business area, product line or market segment. It is not an independent unit, although it can manage the transactions and financial results presented in the company's balance sheet and statements to the extent that they concern the business areas. The business unit concept makes it possible to extract results from a segmented profitability analysis. A hospital or a clinic, for example, are considered a business unit, in the case of Rede D'OR São Luiz.

4. REFERENCE DOCUMENTS

- 4.1. ABNT NBR ISO 14001:2015
- 4.2. ABNT NBR ISO 45001:2018
- 4.3. CODE OF CONDUCT OF REDE D'OR SÃO LUIZ
- 4.4. POLDOR 005 - SUSTAINABILITY POLICY
- 4.5. POLDOR 017 - HUMAN RIGHTS POLICY
- 4.6. GRI STANDARDS

5. RESPONSIBILITY MATRIX

- 5.1. Board of Directors: to approve the Health, Safety and Environment Policy (HSE);

- 5.2. Chief Risk and Internal Control Officer: To validate and encourage implementation of the guidelines contained in this Policy;
- 5.3. Human Resources Executive Board: to validate and encourage the implementation of the guidelines contained in this Policy;
- 5.4. Other Executive Officers: Support the implementation of the guidelines contained in this Policy;
- 5.5. Business Units: To ensure the implementation of the Health, Safety and Environment Policy (HSE);
- 5.6. Internal Sustainability Committee: To propose procedures for the implementation and monitoring of the Health, Safety and Environment Policy (HSE);
- 5.7. Building Engineering Areas: Operationalize the implementation, follow-up and evaluation activities of this Policy;
- 5.8. Corporate Licensing: To permanently monitor and evaluate the legislation applicable to the company's activities, aiming at compliance;
- 5.9. Marketing and Communication: Disclose the Health, Safety and Environment Policy (HSE) to the company's internal and external audiences, as well as provide transparency on the implemented socio-environmental actions.

6. GENERAL PROVISIONS

- 6.1. The Company establishes in its HSE Policy the main guidelines that synthesize its commitment in consonance with the principles of Sustainable Development. They are:
 - 6.1.1. Comply with environmental legislation inherent to our activities, in addition to the mapping of opportunities for improvement in order to achieve the Company's objectives;
 - 6.1.2. Comply with the Health, Safety, and Occupational Accident or Occupational Disease prevention and Workplace Incident legislation;
 - 6.1.3. Disseminate culture and prevention practices, as well as encourage good practices in health and safety and improve the perception before dangers and risks;
 - 6.1.4. Keep registration, follow-up and control systems for environmental aspects and impacts related to its business;
 - 6.1.5. Keep a systematic record, control and analysis of near-accidents;
 - 6.1.6. Maintain a Hierarchy of controls with a systematic approach to improve occupational health and safety;
 - 6.1.7. Identify the most relevant occupational and environmental risks in order to provide safe and healthy workplaces and establish an appropriate treatment with monitoring and control, eliminating, neutralizing or minimizing the risks of health and safety of the worker and the environment;
 - 6.1.8. Maintain the mental health promotion and the well-being of its workers, contributing to the minimization of non-transmissible diseases via prevention and aid in diagnosis and the improvement of quality of life;

- 6.1.9. Promote awareness and health campaigns with the dissemination of information and knowledge for health care in a preventive way;
 - 6.1.10. To neutralize diseases caused by dangerous chemicals, air and water contamination and pollution of the soil;
 - 6.1.11. Adopt practices for the efficient use of natural and other resources required for our services;
 - 6.1.12. Encourage and develop projects and socio-environmental initiatives according to the specificities of the regions where we operate;
 - 6.1.13. Seek opportunities to contribute to the achievement of global sustainability goals adherent to our business, seeking partnerships, solutions and technologies for our commitments with sustainable development;
 - 6.1.14. Promote the continuous improvement of the SHE Management System, in all our units, by means of periodic evaluations of performance results and of specific objectives and goals.
- 6.2. The Company's performance will be evaluated by means of systemic audits of adherence to the HSE.

7. MISCELLANEOUS

- 7.1. This Policy becomes effective as of its approval by the Board of Directors. Cases not covered in this material shall be forwarded to the Health, Safety and Environment area, as deliberated by the Human Resources and Risks and Internal Controls Departments.

8. RECOMMENDATIONS

- 8.1. Given the relevance of Health, Safety and Environmental issues for the company, all employees must observe the HSE practices established in this Policy, as well as ensure its application with customers, suppliers, society and other stakeholders.

9. ANNEX

- 9.1. NOT APPLICABLE.

10. APPENDIX

- 10.1. NOT APPLICABLE