

Code of Conduct

Message from the President

Our Code of Conduct is not merely a set of rules and commitments to be followed by our professionals. It reflects our conviction to establish ethical and business practices that are aligned with the honesty, integrity, and loyalty that form the foundation of our beliefs and guide us in fulfilling our purpose. It is grounded in our values, directing our people in the decision-making process.

The results achieved in recent years demonstrate the experience and resilience of the Hapvida, as well as the strength of our business model. All of this can be observed in this Code of Conduct, which reflects the attitudes and excellent work carried out daily across our organization, always striving to uphold the highest principles of conduct, ethics, and morality.

This Code of Conduct serves as a reference for everyone. It addresses the most relevant topics and guidelines of the Company and applies to all leaders, employees, healthcare professionals, and third parties. Its content will be constantly updated to ensure transparency in our intentions and open communication between the organization and all parties involved or interested in our business. We will not tolerate any lack of commitment to this Code of Conduct.

The success of our Company is guided by the best practices of Corporate Governance, Integrity, and Compliance. A proper understanding of this Code of Conduct is a fundamental prerequisite for the appropriate performance of one's responsibilities.

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1. Introduction

This **Code of Conduct** aims primarily to clarify the behaviors adopted and expected within the **Hapvida**, as well as the attitudes that must be observed by all our officers, employees, healthcare professionals, and third parties. This document also outlines how the Company interacts with its stakeholders and the possible consequences of noncompliance.

The guidelines contained in this Code of Conduct were established in accordance with the Company's **Mission, Vision, and Values**:

Mission:

- ✓ Provide integrated, high-quality healthcare accessible to generations of Brazilians.

Vision:

- ✓ Be recognized for the quality of our care and the value we create for the entire healthcare ecosystem.

Values:

- ✓ Welcoming Care
- ✓ Commitment
- ✓ Ethics and Anti-Corruption
- ✓ Innovation and Learning
- ✓ Respect
- ✓ Social Responsibility
- ✓ Sustainability
- ✓ Cost Efficiency

The **Mission, Vision, and Values** form the foundation of our structure and serve as guiding principles for the conduct of everyone acting on behalf of the Hapvida. It is essential that we cultivate integrity and transparency daily in all our relationships and decision-making processes—always striving, unconditionally, to do what is right, even when no one is watching.

A more sustainable, ethical, fair, and righteous society begins with each of us!

2. Institutional Conduct Standards

We understand that our growth as a Company is directly linked to environmental care, appreciation of social responsibility and diversity, and the maintenance of effective governance. These are fundamental pillars that enable us to foster competitiveness and ensure the longevity of our business.

2.1. Environmental

Aligned with best sustainability practices and as a signatory of the **UN Global Compact**, the Company is committed to protecting the environment, with full compliance with applicable legislation as a fundamental premise.

In addition, the management of environmental aspects related to our activities aims to **mitigate impacts** and **promote the efficient use of natural resources**.

In this regard, we are committed to:

- ✓ Building and maintaining facilities based on sustainability principles, focusing on the care of natural resources and the environment;
- ✓ Acting preventively in relation to potential environmental risks;
- ✓ Prioritizing the purchase of products and services that are socially and environmentally responsible, considering their production processes;
- ✓ Reducing consumption, reusing, and recycling materials and products whenever possible and advisable, in accordance with safety and quality standards;
- ✓ Striving to minimize waste.

Learn more: For additional information, refer to the **Sustainability, Environmental, and Climate Change Mitigation Policies**.

2.2. Social

✓ **Valuing Human Rights**

We are committed to valuing, respecting, and promoting human rights, seeking to prevent potential impacts and violations. As a signatory of the **UN Global Compact**, the Company is guided by the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**, as well as by national and international legislation that upholds these rights.

✓ **Diversity, Inclusion, and Respect**

We value the development of our employees, as the growth of the Company is directly linked to the growth of those who are part of our history and the evolution of our business.

To that end, we promote diversity and personal dignity through inclusion and respect, ensuring a safe environment with equal opportunities. We take a firm stand against any type of conduct characterized as:

- Moral harassment
- Sexual harassment or misconduct
- Discriminatory, intolerant, or hate-inciting practices related to sexual orientation, gender, religion, political ideology, age, race, origin, or culture
- Threats or intimidation of any kind
- Any type of violence—verbal, physical, or psychological
- Offensive, harmful, aggressive, humiliating, or degrading behavior
- Abuse of power

We adopt a **zero-tolerance policy** toward any practice of moral or sexual harassment and discrimination. If you witness any such situation, even if it does not directly involve you, report it through the **Company's Whistleblowing Channel**.

The **Whistleblowing Channel** is free of charge, available **24 hours a day**, and can be accessed through the following means:

- Website: <https://www.canaldedenuncias.com.br/hapvidandi/>
- Telephone: **0800 591 5126**

Learn more: For further information, please refer to the **Diversity, Equity, and Inclusion Policy** and the **Anti-Harassment and Anti-Discrimination Policy**.

Combating Slave Labor, Child Labor, and Violations of Women's Rights

We have a firm commitment to eliminating all forms of child labor and labor analogous to slavery. Our third parties (suppliers, partners, representatives, etc.) must remain attentive and vigilant on this matter and, consequently, must not engage in relationships with individuals or companies suspected of using any form of inhumane or illegal labor.

Furthermore, we take a strong stand against any and all forms of violations of women's rights, and we spare no effort to support, value, and protect our female employees.

✓ **Work Environment**

We are committed to being fair with our employees, maintaining labor practices based on equality, respect, dignity, and integrity. To that end, we encourage the development of all, offer fair compensation, and ensure safe and healthy working conditions.

Our leaders must support the dissemination of the Company's Code of Conduct and are encouraged to lead their teams by example, following the guidelines established in this document. It is everyone's duty to safeguard the organization's good reputation and, above all, to preserve a healthy work environment.

We ensure the safety of our employees through:

- Compliance with occupational health and safety laws and regulations
- Proper and safe facilities
- Work operations that follow standardized and technical processes and protocols

✓ **Professional Development, Education, and Training**

We do our utmost to fulfill our Mission — to provide integrated, high-quality healthcare that is accessible to generations of Brazilians.

For this reason, we continuously strive to develop and recognize our internal talents, as well as to promote and encourage training and development, especially for employees in care-related areas.

It is the responsibility of managers and leaders to ensure that their teams complete all mandatory training programs and to lead by example — guiding, developing, and supporting their teams ethically and respectfully.

We are committed not only to attracting but also to retaining our talents. As a result, we give priority to internal candidates for new opportunities that may arise.

2.3. Governance

✓ **Corporate Governance**

The Company is listed on **B3 Novo Mercado**, a stock exchange segment that requires, in

addition to strong financial performance, the adoption of minimum standards of corporate governance.

Therefore, we are committed to maintaining practices that reflect our dedication to transparency, fairness, accountability, integrity, ethics, and corporate and socio-environmental responsibility.

✓ **Integrity and Risk Management**

With the support and approval of the **Board of Directors** and in alignment with our core value of "Ethics and Anti-Corruption," the Company maintains a consolidated **Integrity and Compliance Program**, established through a set of actions and mechanisms primarily designed to prevent, detect, and remediate cases of misconduct, violations of laws, or breaches of internal policies.

Accordingly, our officers and employees must participate annually in training sessions covering the guidelines set forth in this Code of Conduct as well as other policies that make up the Integrity and Compliance Program.

The **Integrity and Compliance Department** is available to clarify any questions regarding the content of this document and is committed to supporting various initiatives that strengthen our culture of integrity. You may contact this team at **integridade@hapvida.com.br**.

Aligned with sound management practices, the Company also maintains a robust structure for effective risk management and internal controls. All our employees — especially those in leadership positions — are committed to minimizing risks and their potential impacts on our business.

Learn more: For additional information, please refer to the **Integrity and Compliance Program Policy** and the **Risk Management Policy**.

Privacy

We are committed to protecting the data of our employees, business partners, and, most importantly, safeguarding the medical confidentiality of our clients' information. We adopt best practices in information security and use the best technologies available.

The processing of data is grounded in the preservation of privacy and the inviolability of intimacy, honor, and image, in full compliance with the provisions and principles set forth in the **General Data Protection Law (Law No. 13.709/2018)**. All employees are required to respect the Company's internal policies and regulations related to information security and data protection.

Learn more: For additional information, please refer to the **Data Privacy Policy**.

3. Expected Conduct of Officers and Employees

✓ **Commitment to Welcoming Care**

We understand that welcoming care fosters a healthy work environment and a positive organizational climate, which in turn enhances the experience of our beneficiaries and employees. This principle should be practiced in all activities — from administrative to healthcare areas, across all units, departments, and by all employees or third parties acting on behalf of the Company.

Especially in patient care, we must put ourselves in the other's position, understanding and respecting each person's needs. Hostility or aggression — verbal or physical — is never tolerated.

✓ **Compliance with Laws and Regulations**

It is the duty of every employee to commit to always acting in accordance with the rules and,

consequently, to comply with all applicable laws, regulations, and standards governing our business.

We operate in a regulated market; therefore, it is essential that, in addition to all applicable laws, we comply with each rule set by our regulators, such as the **Instructions of the Brazilian Securities and Exchange Commission (CVM)**, the **B3 Novo Mercado Regulation**, and the **Resolutions of the National Supplementary Health Agency (ANS)**, among others.

It is the responsibility of everyone — especially leaders and managers — to ensure compliance with these guidelines. Finally, this **Code of Conduct**, as well as the Company's policies, standards, manuals, and procedures, must be strictly followed by all.

✓ **Combating Corruption, Bribery, and Fraud**

The term *corruption* covers both public and private spheres and is characterized by the promise, payment, or receipt of money, goods, rights, or any other advantage, for oneself or others, in an improper or illegal manner.

In performing our activities, we are committed to acting ethically and to preventing and combating any type of fraud, corruption, or similar practice, regardless of purpose or intent.

No one should give, offer, pay, promise to pay, or authorize the payment of any amount of money or anything of value — such as benefits, donations, gifts, jobs, favors, or any advantage, direct or indirect, even if without financial value — to any authority, public official, association representative, politician, candidate for political office, or person related to them, with the purpose of facilitating, expediting, circumventing, or influencing any act or decision by such individuals or the government.

Employees, officers, third parties, and stakeholders are expected to report any form of pressure, offer, or request from public agents, associations, or political entities that may violate the principles and standards outlined in this Code — even if the situation is unclear or uncertain. Reports may be made through the **Whistleblowing Channel**, immediate management, or the **Integrity and Compliance Department**.

We uphold a **zero-tolerance policy** toward such practices.

Learn more: For additional information, refer to the **Anti-Corruption, Anti-Bribery, and Anti-Money Laundering and Combating Criminal Activities Policy**.

✓ **Conflict of Interest**

Our officers and employees must avoid any and all conflicts between their personal interests and those of the Company. It is essential to comply with the provisions set forth in this Code of Conduct and in the **Conflict of Interest Policy**.

All situations involving a real, potential, or apparent conflict of interest must be self-declared by officers and employees, without omission. Such declarations may occur during the hiring process, through the mandatory annual form sent to leadership, or proactively at any time via the channels made available by the **Integrity and Compliance Department**. Failure to disclose information is considered fraud and may result in disciplinary action.

Any officer or employee who has a personal or conflicting interest in a given deliberation — particularly within the **Board of Directors**, its **statutory or advisory committees**, the **Fiscal Council**, or the **Executive Board** — must immediately disclose the matter and refrain, including physically, from participating in the meeting.

Examples of conflicts of interest include:

- Using Company assets, resources, or confidential/privileged information for personal or third-party benefit;
- Holding a direct or indirect financial or equity interest in suppliers, clients, service providers, or competitors;
- Influencing, inducing, or participating in the hiring of third parties or in transactions involving personal interest;
- Having a familial, intimate, or close personal relationship with another employee when there is a direct or indirect reporting line, or when activities of review or influence are involved.

Learn more: For additional information, refer to the **Conflict of Interest Policy**.

✓ Rules for Gifts, Presents, Hospitality, and Entertainment

It is prohibited to promise, offer, authorize, give, accept, request, or receive — directly or through third parties — any type of gift, present, hospitality, entertainment, or other benefit of value **exceeding 20% of the current minimum wage**, or that, even if below this threshold, constitutes an improper advantage to the Company, oneself, or others.

Although not encouraged, the offering or receipt of such items is permitted if:

- The individual value is **equal to or below 20% of the current minimum wage**;
- It does not occur more than **twice within the last 12 months** from the same sender;
- It complies with current laws, policies, and internal regulations;
- It is **not** in the form of cash or equivalent (e.g., vouchers or gift cards), even below the value limit above;
- There are **no ongoing negotiations** between the involved parties;
- The offer or receipt does not cause embarrassment or a negative perception that could affect the Company's image or that of its stakeholders;
- The recipient's company policy **permits** the acceptance;
- It is **free from pressure, coercion, intimidation, or prior solicitation**.

It is strictly prohibited to offer or receive gifts, presents, hospitality, entertainment, or other benefits to or from **public officials**, regardless of value or frequency, **except** for promotional items containing the Company's logo or institutional message (e.g., pens, calendars, or notebooks).

If a third party or partner offers hospitality related to a **technical event** that is connected to the employee's professional activities — and not associated with leisure — the **Integrity and Compliance Department** may be consulted for case-by-case analysis and possible authorization, in accordance with the **Sponsorships, Donations, Voluntary Contributions, and Tax Incentive Policy**.

Official commercial or scientific actions promoted by the Company may follow specific rules, provided they are consistent with the Company's policies — particularly those under the **Integrity and Compliance Program** — and have been duly evaluated by the Integrity and Compliance team.

When offering or receiving meals, any consumption of alcohol must comply with applicable laws and always observe moderation and good judgment.

Finally, all **receipts of gifts, presents, entertainment, etc.** must be formally declared to the **Integrity and Compliance Department** through the established and communicated official channels.

Participation in Civic, Political, and Religious Activities

The Company believes in democracy and exercises it in its daily actions, not tolerating any kind of political or religious imposition, ensuring mutual respect for differing opinions and beliefs. Political, partisan, ideological, and religious opinions shall not influence professional development, and everyone must safeguard the Company's reputation by avoiding any personal stance that could be mistaken for the organization's position.

We respect each administrator's and employee's right to engage in civic, political, and religious activities, provided that:

- The activities are voluntary;
- They take place outside the workplace and working hours;
- They do not involve the Company's resources, assets, or brands;
- They do not harm the Company's reputation.

Engagement in Parallel Activities

Administrators and employees may perform other activities, provided that:

- No conflict of interest exists between those activities and their role within the Company;
- Such activities do not negatively impact their professional performance or interfere with their responsibilities;
- They occur outside the workplace and working hours;
- They do not expose the Company to legal or reputational risks, directly or indirectly.

The sale of personal products within Company premises is not permitted. Exceptions must be evaluated and approved by unit leadership and the Integrity and Compliance Department.

Consumption of Alcohol and Other Drugs

The purchase, sale, possession, or consumption of illicit substances — or any that may impair behavior, professional judgment, safety, or life — is strictly prohibited during working hours or within Company premises. Likewise, the use or misuse of substances causing chemical dependency is strictly forbidden. Alcoholic beverages may only be consumed within Company premises during corporate events or strategic meetings, with prior authorization from the **Chief Executive Officer** or the **Chairman of the Board of Directors**.

Carrying guns

The possession or carrying of weapons of any kind — whether firearms or knives — within Company premises is strictly prohibited, except when duly authorized due to professional requirements and following established safety protocols.

Dress Code

Healthcare employees must wear the uniform provided by the organization to ensure a standardized, safe environment in compliance with sanitary regulations. We also encourage and monitor the use of personal protective equipment (PPE) provided free of charge by the Company. Administrative employees are not required to wear a uniform; however, they must maintain personal and corporate appearance standards consistent with Company guidelines.

To maintain a neutral and harmonious environment, entry into Company premises wearing religious, political, or sports-related clothing or accessories (e.g., football team attire) is not permitted.

Protection of Company Assets, Resources, and Intellectual Property

Our assets include tangible property (facilities, equipment, IT systems, etc.) and intangible assets (intellectual property, know-how, strategic and technical commercial information, etc.) and must be used properly and exclusively for professional purposes in the Company's best interest. All must safeguard the Company's processes, services, results, systems, brands, patents, protocols, methodologies, and strategies from any improper, unauthorized, or illegal use. These assets may not be transferred to third parties or used for personal benefit. Company assets must not be used for personal purposes. Employees are responsible for protecting the assets in their care or possession. Materials produced, created, or used in the course of work, or as a result thereof, are the Company's property and are protected by copyright laws. Reproduction, distribution, or alteration of copyrighted materials is prohibited.

Appropriate Use of Internet, Emails, and Software

Information and documents stored on computers, mobile phones, and other electronic devices provided by **Hapvida** to administrators, employees, healthcare professionals, and third parties — including emails exchanged via corporate accounts — belong to the Company. Therefore, such equipment, information, and documents may be monitored, inspected, and accessed by the Company at any time, without prior notice to the users responsible for them. It is prohibited to use Company equipment or documents for illegal content or activities that could harm the Company's image or reputation. The use or installation of unlicensed or pirated software, as well as sharing passwords or confidential or legally protected information with unauthorized individuals, is also prohibited.

Learn more: For further information, please refer to the **Information Security Policy**.

4. Relationships with Stakeholders

4.1 Clients

Our team is committed to providing our clients with high-quality products and services, treating each with respect and dignity to ensure that trust and credibility prevail. Our primary guideline is to deliver care that is welcoming and free of any form of discrimination, with a focus on health and adherence to established protocols and transparency in applying all available resources. Any behavior not supported by ethics, current legislation, or scientific evidence and consensus will not be tolerated. All products and services provided must prioritize our beneficiaries' and patients' health and safety.

We operate under the **Comprehensive Health Management** model, promoting a healthy environment and society through prevention and care. We believe in innovation combined with continuous excellence and quality, aligned with cost efficiency, to ensure the best conditions for our beneficiaries. All beneficiary information is treated confidentially, and doctor–patient relationships are maintained under absolute confidentiality. Lastly, we emphasize that our service — regardless of the client's behavior — must always remain

welcoming and respectful. The Company does not tolerate physical or verbal aggression in its units and expects reciprocal courtesy from clients.

4.2 Doctors and Healthcare Professionals

We value the respect and autonomy of our physicians' and other healthcare professionals' technical decisions. The well-being and safety of our beneficiaries remain the top priority, ensuring that no external or non-scientific factor outweighs patient health. Our relationship with these professionals is based on ethics, integrity, credibility, and transparency, generating value for our clients and society. Finally, our physicians, healthcare professionals, and administrators must comply with the guidelines set forth in this **Code of Conduct**, as well as with the principles established in the **Medical Ethics Code** and other professional regulations issued by the relevant councils, such as:

the **Federal Council of Medicine (CFM)**, **Federal Council of Nursing (COFEN)**, **Federal Council of Dentistry (CFO)**, **Federal Council of Psychology (CFP)**, **Federal Council of Physiotherapy and Occupational Therapy (COFFITO)**, among others.

4.3. Investors and the Market

We are continuously committed to providing superior returns to our investors, protecting assets, and increasing the value of investments through the conscious and responsible use of financial resources.

Our relationship with investors is based on:

- **Fairness and equity;**
- **Transparency in information and relations;**
- **Truthfulness and accuracy in reporting;**
- **Compliance with laws, rules, and regulations governing the disclosure of information**, especially the Novo Mercado Rules of B3 and the normative instructions of the Brazilian Securities Commission (CVM).

We emphasize analyzing the impact of our decisions on investors and strive to communicate in a precise, clear, effective, and appropriate manner, adopting strict controls, workflows, and procedures. Based on responsible and effective governance, we also maintain robust controls regarding transactions with related parties.

Learn more: For questions or more information about our relationship with investors, visit our website: <https://ri.hapvida.com.br/>.

Transparency in Accounting Records

All assets, liabilities, revenues, and expenses are recorded in the Company's accounting books according to the accounting practices adopted in Brazil, which include CVM and ANS standards, and the accounting policies established by the Company.

All commercial transactions comply with internal procedures, respecting the approval limits of each responsible manager. This diligence is essential for combating corruption and fraud.

Trading of Securities and Disclosure of Material Non-Public Information

Material non-public information refers to information not yet disclosed to the market by the Company and that a reasonable investor would consider important for making an investment decision. The disclosure of such information is prohibited.

Therefore, it is the duty of our officers and employees to maintain the confidentiality of material non-public information, which may only be disclosed to the market, if necessary, through duly authorized spokespersons. Officers and employees, as well as their relatives and close persons, are prohibited from trading and/or advising or suggesting trades in the securities or shares of Hapvida, when they have access to material non-public information or are subject to trading blackout periods. This rule also applies to suppliers or third parties who may gain access to material non-public information.

Officers and employees must not use such information to obtain, directly or indirectly, for themselves or for third parties, any financial advantage, including through the purchase or sale of securities issued by Hapvida, taking special care to avoid potential conflicts of interest due to access to confidential information because of their roles or positions.

Learn more: For further information, please refer to the *Securities Trading Policy* and the *Material Fact Disclosure Policy*.

4.4. Third Parties

We consider third parties to include all partners, suppliers, commercial representatives, and subcontractors providing services, supplying materials/products, or acting on behalf of the Company.

To promote a fair and sustainable environment, the Company expects and requires that the third parties it engages with adhere to the same conduct guidelines applicable to its employees and remain committed to the values of the Hapvida.

Third-party engagement occurs according to the Company's internal policy and follows a rigorous assessment of the third party's technical qualifications and integrity. In general, all communications with third parties must occur exclusively via corporate email and telephone.

We are committed to treating all third parties with fairness, impartiality, and professionalism, rejecting any attempt, or even the appearance, of favoritism.

In addition to complying with the directives of this Code of Conduct, we expect third parties to respect:

- **Legal principles**, combating corruption and other harmful acts (Brazilian Anti-Corruption Law No. 12,846/13 and Regulatory Decree);
- **The right to free competition** (Brazilian Competition Law No. 12,529/11);
- **Legal guidelines when interacting with Public Administration;**
- **Environmental legal requirements**, when applicable to the contract scope;
- **Labor legislation**, as well as the Conventions of the International Labour Organization (ILO) ratified by Brazil;
- **Human Rights;**
- **Data Protection and Information Security;**

- **Commitment to self-declare any situation that may constitute an apparent, potential, or real conflict of interest.**

Our commercial representatives undergo continuous qualification processes and must additionally:

- **Act ethically and morally in client relationships**, in accordance with this Code of Conduct;
- **Commit to dignified and transparent commercial conduct;**
- **Prohibit the provision of misleading or false information about offered plans and services;**
- **Avoid altering or manipulating documents or information;**
- **Be formally established and authorized to provide such services under applicable law**, especially tax/fiscal legislation.

Learn more: For additional information, please refer to the *Third-Party Integrity Analysis Policy* and the procurement and approval policies.

4.5. Partners for Research, Development, Sponsorships, and Donations

To enable research and develop new techniques in healthcare, we encourage maintaining relationships with industry partners. These partnerships aim to promote high-quality healthcare to our beneficiaries, selecting only partners with integrity who do not compromise the Company's image and reputation.

Scientific Research:

The Company's activities in this area aim primarily to provide quality healthcare to our beneficiaries and society.

Educational Activities:

We encourage courses that promote the professional development of Company staff, aiming to improve service to our beneficiaries and to promote best practices and health protocols.

Research and Development activities follow specific guidelines and, when necessary, must involve the Company's responsible Research Ethics body, as well as comply with specific approval rules.

Employees involved in such projects must act impartially, ethically, and professionally, respecting applicable laws and the Company's Code of Conduct.

Finally, opportunities for sponsorships, donations, voluntary contributions, and tax incentives, whether related to research and development or other areas, must comply with internal policies, especially rules for project evaluation and approval.

Learn more: For additional information, please refer to our *Sponsorship, Donation, Voluntary Contribution, and Tax Incentive Policies*.

4.6. Public Administration

Our relationships with Public Administration and public agents are strictly institutional and conducted with legality, transparency, ethics, and integrity. Our professionals must adhere to the internal policies that establish the guidelines for these interactions.

Public Contracts and Bidding

Our employees and representatives who interact with or participate in projects or processes with public entities are obliged to fully know and comply with applicable legislation, such as:

- Law No. 14,133/2021 (Bidding Law)
- Law No. 12,846/2013 (Anti-Corruption Law and its Regulatory Decree)
- Law No. 8,429/1992 (Administrative Misconduct Law)

These employees and representatives must also act in accordance with the guidelines set forth in this Code of Conduct and the rules contained in other Company policies and regulations, particularly the *Public Administration Contract Guidelines* and the *Anti-Corruption, Anti-Bribery, and Anti-Money Laundering Policy*.

Learn more: For further information, consult the *Public Administration Contract Guidelines* and the *Anti-Corruption, Anti-Bribery, and Anti-Money Laundering Policy*.

Interactions with Politically Exposed Persons (PEPs)

Politically Exposed Persons are individuals who hold or have held, in Brazil or abroad, a relevant public office, employment, or position, or who have, in these circumstances, relatives, representatives, or other close associates.

Hiring public agents or PEPs is not permitted for obtaining any type of facilitated access to public agencies or authorities, nor for acquiring privileged information. Accordingly, we commit to:

- Ensure that selection is based exclusively on professional qualifications;
- Analyze whether the hiring complies with rules that prevent conflicts of interest for the Company;
- Verify if the candidate is subject to a cooling-off or quarantine period from the sector in which they previously held a public office;
- Offer compensation consistent with the quality and relevance of the service provided by the individual being hired.

Companies and third parties with PEPs in their shareholder structure are carefully evaluated by the Integrity and Compliance area, and their hiring may depend on approval from competent authorities, according to internal policies.

Commitment to Combating Money Laundering and Financing Criminal Activities

We oppose the financing of illegal activities and adopt specific mechanisms to prevent qualified crimes, such as money laundering, financing criminal organizations, and terrorism. In this regard, and in compliance with the directives of the Brazilian National Supplementary Health Agency (ANS), we implement specific measures related to the health insurance market, as established in our internal policy.

Learn more: For additional information, consult the *Anti-Corruption, Anti-Bribery, and Anti-Money Laundering Policy*.

Cooperation with Investigations and Inspections

We cooperate and do not obstruct any investigative or inspection activities by public agencies, entities, or agents. Our employees must not hinder these activities, and any type of intervention

is prohibited, especially if it aims to favor themselves or the Company. When necessary, employees should seek support from the Legal Department and/or Integrity and Compliance.

Prohibition on Political Donations

As we do not engage in political-party activities, we do not make financial contributions or political donations to candidates, political parties, party representatives, or related campaigns. Our employees and officers may make donations as private individuals, provided they do not do so in the Company's name or to benefit the Hapvida.

4.7. Competition

We are committed to competing in the market transparently, independently, and honestly, basing our efforts exclusively on the merits of our commercial proposals, the strength of our brands, and the quality of our services, ensuring fair and respectful relationships with competitors.

We comply with applicable laws and regulations and, consequently, reject all forms of industrial espionage, cartel formation, and other unfair or anti-competitive practices.

Regarding Mergers and Acquisitions (M&A), we exercise particular care in complying with applicable guidelines, especially those from the Brazilian Administrative Council for Economic Defense (CADE).

Learn more: For further information, consult the *Antitrust and Competition Policy*.

4.8. Media, Press, and Social Media

Media

We believe in the power of communication to promote transparency and integrity within the Company. Therefore, we invest in official channels and tools to improve relationships with our stakeholders, encouraging individual expression, free thought, and mutual respect among our officers, employees, clients, investors, third parties, and other stakeholders.

Press

We base our relationships with the press on transparency, honesty, and credibility. This approach ensures a consistent image aligned with our values among clients, beneficiaries, investors, third parties, and the general public.

To this end, we follow these guidelines:

- All contact with the press, whether print or digital, including newspapers, television networks, or social media channels, must be mediated by the Company's Public Relations department;
- Giving interviews on behalf of the Company without prior authorization from the Public Relations department is prohibited.

In addition to the risk of disseminating incorrect or inappropriate information, noncompliance may seriously damage the reputation of both the employee and the Company.

In interviews related to personal matters of our employees, we advise against mentioning the Hapvida, so as not to associate the Company's image with individual opinions.

Social Media

We do not permit, in any external communications or social media, the:

- Use of internal images or Company information without Marketing authorization, except if previously disclosed through official channels;
- Use of Company trademarks without prior Marketing approval;
- Expression of personal opinions implying they represent the Company's official position;
- Disclosure of information about patients, users, business partners, or other individuals interacting with the Company in the course of their duties;
- Expression of ideas or statements that violate the law or constitute discrimination or hate speech.

4.9. Other Stakeholders

We base our interactions with unions, professional associations, civil organizations, foundations, and other stakeholders on our values and integrity principles, observing laws and following best governance practices.

5. Violations of the Code of Conduct

Consequences

The guidelines presented here strengthen our culture of integrity, promoting transparency and the conduct of "doing the right thing," preventing acts that could harm the Company's reputation, image, or business sustainability. These guidelines apply to all stakeholders interacting with the organization, regardless of position, and noncompliance with this Code of Conduct may result in penalties, according to internal policy and/or the Disciplinary Measures Committee's decisions.

Penalties are always applied fairly and impartially. For third parties, violations may result in fines or even termination of existing contracts.

If violations constitute a crime, the Company will report such incidents to the competent authorities, without prejudice to the sanctions described above.

Learn more: For additional information, consult the *Consequences Policy*.

Whistleblowing Channel

The Whistleblowing Channel is available to all our officers, employees, clients, and third parties who wish to report breaches of the Code of Conduct, Company policies, or applicable laws.

Reports are received by an independent specialized company, ensuring absolute confidentiality. The Company also maintains controls to prevent retaliation against good-faith whistleblowers.

Learn more: For additional information, consult the *Whistleblowing and Non-Retaliation Policy*.

No disciplinary measure or punishment is applied until the investigation is concluded and the report is deemed substantiated.

Access to the Whistleblowing Channel is free, 24 hours a day, through:

- Website: www.hapvida.com.br/canaldedenuncias
- Telephone: 0800 810 8706

6. Ask Yourself

When faced with an ethical question, apparent conflict of interest, or any other Integrity and Compliance-related topic, consider the following questions:

- Will my action violate the conduct listed in the Code of Conduct?
- Could this harm the Company's reputation or image?
- Are my actions illegal?
- Would I be unfair or dishonest by acting this way?
- Could my actions harm others?
- Will I be able to sleep peacefully after taking this action?
- Does my action violate my profession's code of ethics?

If you answer "yes" to one or more of the above questions, you may be committing a misconduct, putting yourself or the Company's reputation at risk.

The Integrity and Compliance area is available to clarify any questions regarding this document and is committed to supporting matters that strengthen our culture of integrity. Contact this area via email at integridade@hapvida.com.br or through other internally communicated channels.

7. Change History

Date	Version	Area	Activity description
01/08/2014	1.0	Executivity Presidency	Approval
09/02/2018	2.0	Board	Approval
09/08/2018	3.0	Board	Approval
22/09/2021	4.0	Board	Approval
19/04/2022	5.0	Board	Approval
24/05/2023	6.0	Board	Approval
26/02/2025	7.0	Board	Approval