



INTEGRITY AND COMPLIANCE PROGRAM POLICY

Issue and approval date: 09/22/2021	Revision date: 02/26/2025	Version: 3.0
Prepared by: Integrity and Compliance Area		Approved by: Board of Directors

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1. PURPOSE

The guidelines set forth herein collectively represent an important corporate integrity instrument, outlining the commitments undertaken by Hapvida Participações e Investimentos S.A. ("Company" or "Group"), its affiliates, subsidiaries, and/or controlled entities with respect to promoting ethical values and transparency in the conduct of its business, with zero tolerance for fraud, corruption, and money laundering.

This Policy aims to establish and foster integrity standards that must be experienced and encouraged by the Group's companies, to establish the body responsible for preventing, detecting, and responding to Compliance risks to which the Company is or may become exposed, and to define the Integrity and Compliance Program ("Program").

2. SCOPE

This Policy applies to all employees of Hapvida Participações e Investimentos S.A., including members of senior management, representatives, and third parties who maintain any type of relationship or interaction with the Company.

3. REFERENCES

The Company's Integrity Program has been designed and implemented in accordance with applicable national and, where relevant, international laws and regulations (both external and internal), including but not limited to:

- (i) Code of Conduct;
- (ii) Brazilian Anti-Corruption Law No. 12.846/13 and its Regulatory Decree;
- (iii) U.S. Foreign Corrupt Practices Act ("FCPA");
- (iv) U.K. Bribery Act ("UKBA");
- (v) United Nations Convention against Corruption ("UNCAC");
- (vi) ISO Standard 37301:2021 – Compliance Management Systems;
- (vii) Applicable Normative Resolutions of the Brazilian National Supplementary Health Agency (ANS).



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4. DEFINITIONS AND ACRONYMS

(i) Public Official: An individual, whether a civil servant or not, even if temporarily or without remuneration, acting in an official capacity or holding a position, job, or public function for agencies, entities, or branches of government at the municipal, state, or federal level;

(ii) Top Management: Composed of the administrators, including members of the Board of Directors and its committees (statutory and advisory), as well as members of the Fiscal Council and the Executive Board;

(iii) Integrity Analysis (Due Diligence): A detailed procedure for analyzing information and documents aimed at better understanding a person or organization and its executives with whom Hapvida Participações e Investimentos S.A. maintains or intends to establish a relationship;

(iv) Corruption: Any activity involving the abuse of power or position to obtain an undue advantage, whether professional or personal. The term includes corruption in both public and private sectors, whether active (paying) or passive (receiving), involving money, assets, rights, or any other advantages for oneself or others;

(v) Fraud: The act of obtaining, for oneself or others, an unlawful advantage to the detriment of another, by inducing or keeping someone in error through deceit, trickery, or any other fraudulent means;

(vi) Money Laundering: A set of commercial or financial operations intended to integrate into the economy assets, rights, or values originating from any criminal offense. Through "laundering," "dirty money" (derived from illicit activities) is transformed into "clean money" (with the appearance of lawful origin);

(vii) Anti-Corruption Laws: A body of anti-corruption laws and regulations, including the Brazilian Penal Code, the Administrative Improbity Law (Law No. 8.429/1992), and the Anti-Corruption Law (Law No. 12.846/2013) along with its Regulatory Decree;

(viii) Morality: A set of values, individual or collective, universally considered as guiding principles for social relations and conduct;

(ix) Reputational Risk: The possibility of loss arising from the breakdown of trust or credibility enjoyed in the business environment. This risk may result from press coverage, actions and statements by the company's representatives, or external events that may affect its reputation and/or shareholder value.

(x) Integrity/Compliance Risk: Risks involving actions or omissions that may facilitate the occurrence of fraud or acts of corruption. These risks may serve as causes, events, or consequences of other risks, such as strategic, financial, or operational risks;



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(xi) Bribery or Kickback: The means by which corruption is committed, consisting of the act of promising, offering, or paying any amount of money or other benefits to an authority, government official, public agent, or private party in order to induce unethical conduct in the fulfillment of their professional duties;

(xii) Third Parties: All partners, suppliers, commercial representatives, and subcontractors who provide services, supply materials/products, or act on behalf of the Company;

(xiii) Undue Advantage: Any form of unlawful profit, gain, privilege, or benefit that violates legal or ethical standards, even if it only offends moral or customary principles.

5. GENERAL CONTENT

5.1 Guidelines

Commitment and Support from Top Management

This refers to the commitment of all areas of the Company, especially its Senior Management. In other words, the Integrity and Compliance Program has the unconditional support of officers, board members, directors, and leaders, who will contribute to its implementation and development, thereby ensuring its reach to all levels of the companies that make up the Group, as well as the adherence of all employees.

Code of Conduct and Policies

As a mechanism to manage and mitigate Integrity and Compliance Risk, and to foster the development of an ethical culture within the Company, the Program relies on a robust set of documentation, which includes: the Code of Conduct; Whistleblower Channel Policy; Disciplinary Consequences Policy; Sponsorships, Donations, Voluntary Contributions and Social Incentives Policy; Third-Party Integrity Assessment Policy; Gifts, Presents and Hospitality Policy; Anti-Corruption and Anti-Bribery Policy; Anti-Money Laundering and Counter-Terrorism Financing Policy; Antitrust Policy; Conflict of Interest and PEP Policy; Public Sector Contracting Policy; Internal Disciplinary Committee Charter, as well as other internal rules and procedures.

Training and Communication

In order for the Integrity and Compliance Program to be properly understood and embraced by all employees of the Group, it must be an inseparable part of the Company's culture and way of doing business. Therefore, it is essential to provide training on the contents of this document, as well as to conduct campaigns to widely disseminate the Program, with full support from the Human Resources, Organizational Development, and Internal/External Communication departments.



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Accordingly, it is the responsibility of the Integrity and Compliance department to develop a monthly communication and training plan aimed at promoting the guidelines set forth in this Program. Compliance training is mandatory and must be completed by all employees at least every twelve (12) months. Failure to complete such training may result in the application of disciplinary measures.

Finally, the dissemination of the Company's Integrity and Compliance Program to suppliers and third parties is generally carried out through specific clauses in contracts or legal instruments that formalize the commercial relationship.

Continuous Monitoring

In addition to drafting and revising the documents mentioned above, as well as conducting training sessions and communication campaigns, the Integrity and Compliance Program is continuously monitored for compliance with the Code of Conduct, policies, and regulations by all members and employees of the Company, regardless of hierarchical level.

This monitoring is also ensured through periodic inspections conducted by the Integrity and Compliance department, the maintenance of a Whistleblower Channel aligned with market best practices, and the support of Internal Audit in reviewing the Company's processes with a focus on Integrity/Compliance Risks.

Análise de Perfil e Riscos de Terceiros

A fim de assegurar que a Companhia estabeleça relações com indivíduos e instituições idôneas, éticas e íntegras é realizado procedimento de Avaliação de Integridade (*Due Diligence*), conforme previsto na Política de Análise de Integridade de Terceiros, visando a promoção da sustentabilidade da empresa, além da mitigação do Risco de Integridade e do Risco de Imagem. Este procedimento também é aplicável à colaboradores e, especialmente, aos administradores.

Third-Party Risk and Profile Assessment

To ensure that the Company establishes relationships only with reputable, ethical, and trustworthy individuals and institutions, a Third-Party Integrity Due Diligence process is carried out, as outlined in the Third-Party Integrity Assessment Policy. This process promotes the sustainability of the Company and mitigates both Integrity Risk and Reputational Risk. The procedure also applies to employees and, in particular, to Company officers.



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Advisory Role of the Integrity and Compliance Area

Aiming to always be present in the business routine, the Integrity and Compliance area maintains effective means of communication available to all employees, in addition to the electronic correspondence address: integrity@hapvida.com.br, for questions and queries about the Program or requests for technical opinions.

Furthermore, the Integrity and Compliance area is responsible for providing advice and reviewing the preparation of corporate policies within the company, assessing any guidelines that are not in accordance with the Integrity and Compliance Program and other legislation/regulations or that increase exposure to Integrity/Compliance Risks.

Whistleblower Channel and Internal Investigations

In the event of a suspected breach or violation of any of the terms of this document or any other documents that form part of the Integrity and Compliance Program, it is the duty of employees and/or third parties to report the incident to the Integrity and Compliance department through the available channels, including the Whistleblower Channel, which is widely disclosed on the Company's websites and intranet and managed by the Internal Audit department.

The Whistleblower Channel is available to individuals or legal entities, public or private, internal or external to the Company. Reports are received by an independent and specialized company, ensuring absolute confidentiality and protection from retaliation for whistleblowers who act in good faith. The whistleblower has the opportunity to track the process, which guarantees security, transparency, and credibility to the investigative procedure.

Noncompliance with the laws and the guidelines outlined in the Company's policies—particularly those related to Integrity and Compliance—may result in serious administrative and criminal penalties for Hapvida Participações e Investimentos S.A. and/or its employees and stakeholders. Any such practices are condemned, not tolerated, and will be punished in accordance with applicable law and the Company's Disciplinary Measures Policy, including the possibility of termination of the employment contract of the employee, representatives acting on behalf of the Company, or third parties involved.

Furthermore, any fines imposed on individuals due to violations of any laws will not be the responsibility of Hapvida Participações e Investimentos S.A. Additionally, claiming ignorance of the rules is not accepted as a justification in cases of noncompliance with this Policy.

Finally, Hapvida Participações e Investimentos S.A. has specific Policies, Procedures, and workflows in place for the process of investigating and handling received reports, treating all claims autonomously, impartially, and independently.



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Responsible Body

Structurally, the Integrity and Compliance department of Hapvida Participações e Investimentos S.A. is the body responsible for the planning, management, and continuous monitoring of activities related to the Program.

The Integrity and Compliance department, which is part of the ESG Executive Board and reports directly to the CEO, has its activities reviewed and supervised by the Audit, Risk, Internal Controls, and Compliance Committee (COAUD), as defined by its internal charter.

It is COAUD's responsibility to review this document as well as other policies prepared by the Integrity and Compliance department before they are submitted for deliberation by the Company's Board of Directors.

Autonomy, Impartiality, and Confidentiality

The Integrity and Compliance department of Hapvida Participações e Investimentos S.A., in addition to enjoying the full support of Senior Management, has broad autonomy to carry out its activities and fulfill its objectives.

Upon formal request, employees of the Integrity and Compliance department will have unrestricted access to the Company's documents and information necessary for the performance of their duties, always prioritizing strict confidentiality of all information handled.

Moreover, the enforcement of the Code of Conduct, policies, and standards established under the Integrity and Compliance Program is uniform for everyone, regardless of position, function, or importance to the Company.

Budget

The budget allocated to the Program must be calculated in a way that ensures the achievement of the objectives established for the Integrity and Compliance department. The pursuit of an adequate budget is expected, balancing the Program's needs with the size of the Company and the complexity of its operations, avoiding waste or the allocation of resources to activities that do not add value.

The budget must be approved by the Company's Senior Management, but the responsibility for presenting the needs and how they should be met from a financial standpoint lies with the Integrity and Compliance department, subject to review and consideration by COAUD.



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Periodic Assessment

The Integrity and Compliance Program may be periodically reviewed by an independent auditor to ensure that the activities, guidelines, and controls are consistently evaluated and, whenever necessary, adjusted to promote continuous improvement and alignment with market best practices.

The results of these audits will be reported directly to COAUD.

5.2 Responsibilities

Top Management:

- (i) It is the exclusive responsibility of the Company's Board of Directors (CA) to approve this Policy;
- (ii) Ensure that business practices comply with applicable national and international laws and adhere to the Company's Integrity and Compliance Program;
- (iii) Support the Integrity and Compliance department in its actions and the maintenance of the Program, including ensuring resources appropriate to the size and complexity of the company;
- (iv) Consistently reinforce the Integrity and Compliance Program and the Code of Conduct to the stakeholders of Hapvida Participações e Investimentos S.A.;
- (v) Actively participate in training and other initiatives promoted by the Integrity and Compliance department;
- (vi) Ensure the independence and autonomy of the Integrity and Compliance department in conducting activities related to maintaining the Program.

Statutory Audit, Risk, Internal Controls, and Compliance Committee (COAUD):

- (i) Evaluate and monitor the performance of the Integrity and Compliance department as well as the implemented compliance and control structures;
- (ii) Recommend the approval of resources for the execution of activities related to the Integrity and Compliance Program, appropriately sized according to the company's complexity and size;
- (iii) Assess, monitor, and recommend to Senior Management the correction or improvement of internal policies, the resolution of any identified conflicts of interest, anti-corruption practices, and compliance with legislation and regulations applicable to the business;
- (iv) Oversee investigations of reports in which the Integrity and Compliance management is the subject of the complaint and take appropriate actions, including the engagement of third-party investigators or delegation to another independent body;



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(v) Promote the development and ongoing improvement of the Integrity and Compliance Program, in line with the evolution of the business, legal and regulatory aspects, as well as market and governance best practices.

Integrity and Compliance Department

- (i)** Implement and manage the Group's Integrity and Compliance Program;
- (ii)** Foster a culture of integrity/compliance by periodically promoting training, communications, and targeted initiatives tailored to each audience;
- (iii)** Review the Company's Program whenever necessary to ensure alignment with market best practices or the business strategy;
- (iv)** Manage non-compliance risks through effective controls, and work together with the Company's managers to resolve or at least mitigate them;
- (v)** Review corporate policies drafted by business and support departments, ensuring no guidelines contradict the Code of Conduct or other Program policies;
- (vi)** Monitor and provide evidence of the delivery of the Code of Conduct to employees;
- (vii)** Guide the Company on making the Whistleblower Channel available to employees for reporting violations of laws, policies, and internal rules;
- (viii)** Always act responsibly, with technical rigor, discretion, and in accordance with the Company's Code of Conduct and professional best practices;
- (ix)** Fully comply with the responsibilities assigned to the Integrity and Compliance department as defined in the other policies that make up the Company's Program.

Managers and Leadership

- (i)** Support, authorize, and encourage their employees to participate in training and other initiatives promoted by the Integrity and Compliance department;
- (ii)** Ensure that everyone on their team is aware of the Program's policies, preventing violations due to lack of information;
- (iii)** Managers are responsible — through the dedication of their time, their presence, experience, and, above all, their example — for ensuring their teams fully comply with this and other policies within the Program.
- (iv)** Identify potential instances of non-compliance with the Program's rules and policies and promptly report them to the Integrity and Compliance department;
- (v)** Maintain guidelines and structures to combat (identify, prevent, and correct) fraud in the processes and activities under their management;



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(vi) Support the Integrity and Compliance department in the investigation of reports, when requested and in a timely manner;

(vii) Fully comply with the responsibilities assigned to managers and leaders as set forth in the other policies that make up the Company's Integrity and Compliance Program.

Employees

(i) All employees must maintain conduct and make decisions guided by ethics, transparency, integrity, and legality;

(ii) Promptly report any suspected non-compliance with the Integrity and Compliance Program or other institutional policies through the available Whistleblower Channel;

(iii) Participate in the mandatory training and other activities promoted by the Integrity and Compliance department;

(iv) Ensure the prevention, monitoring, and enforcement of both internal and external regulations, while working to mitigate and/or eliminate potential reputation and image risks;

(v) Support and contribute, when called upon, to the investigation of reports received through the Whistleblower Channel and/or internal audit processes, acting discreetly and with complete confidentiality.

6. FINAL PROVISIONS

This policy shall come into effect on the date of its approval by the Board of Directors. The content of this document must be reviewed every 24 (twenty-four) months or whenever necessary.

In the event of suspected non-compliance or violation of any of the terms in this policy, it is the employee's duty to report the occurrence to the Integrity and Compliance Department via the available channels, including the Whistleblower Channel, which is widely disclosed on the Company's website and intranet.



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7. HISTORY OF CHANGES

Date	Version	Department	Description of the activity
09/22/2021	1.0	Board of Directors	Approval
04/19/2022	2.0	Board of Directors	Approval
02/26/2025	3.0	Board of Directors	Approval