	MANAGEMENT POLICY		
	PROOFREAD: 00	DATE: 07/11/2023	COD: POL.CAD.044
TITLE:	DIVERSITY, EQUITY & INCLUSION POLICY		

1. Objective

The Afya group has established a policy for Diversity, Equity & Inclusion to guide the relationship between employees at all hierarchical levels, including board members and stakeholders. These guidelines envision a safe, healthy and plural environment, free from discrimination, one which encourages and values respect and equal opportunities in all circumstances, as provided for in the group's Code of Ethics and Conduct.

We have defined priority themes, with their respective affinity groups, as a way of disseminating the Diversity, Equity & Inclusion Policy and inviting all teams to discuss the following topics:

Gender equity: promoting equity in a space free from any type of gender-based violence, through actions that encourage the empowerment of our women as well as provide them with equal opportunities.

People with disabilities: promoting the inclusion of people with disabilities in the professional environment, through attraction, retention and development actions, based on a policy of inclusion and representation.

Ethnic-racial: promoting an inclusive work environment, free from discrimination based on race and ethnicity, in addition to promoting an overall anti-racist culture.


LGBTQIAPN+: promoting an environment free from all types of discrimination based on sexual orientation and/or sexual or gender identity, ensuring a safe environment with equal opportunities and rights to everybody.

Generations: promoting a work environment for people of all ages, enabling generational diversity.

2. Definitions

Affirmative actions: Political or institutional measures to balance the scales and reduce social, cultural and economic exclusion of individuals who belong to groups that suffer any type of discrimination.

Moral harassment: Abusive conduct (gesture, word, behavior, attitude) that attacks the dignity of an individual through repetition or systematization. Going

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against the psychological or physical integrity of a person, threatening their job or degrading the work climate.

Sexual harassment: Crime defined in the article 216-A of the Brazilian Penal Code as “to embarrass someone with the intention of obtaining sexual advantage or favor, prevailing the agent taking advantage of their status as superior hierarchy or ancestry inherent to the exercise of a job, position or function”.

Disability: Long-term impairments of a physical, mental, intellectual or sensory nature, which, in interaction with various barriers, can obstruct a person’s full and effective participation in society on equal terms with other people.

Human rights: Norms that recognize and protect the dignity of all human beings. Human rights govern the way individual human beings live in society and among themselves, as well as their relationship with the State and the obligations that the State has towards them.


Discrimination: Any distinction, exclusion or preference based on race, skin color, sex, age, marital status, appearance, sexual orientation, disability, illness, religion, political opinion, nationality, social origin or any other reason, which has the effect of nullifying or reducing equality of opportunity or treatment in employment or profession; prejudice in action.

Diversity: In the Koogan/Houaiss encyclopedia and dictionary (1988), diversity has the same meaning as “a character that distinguishes one being from another”.

Ethnicity: Set of customs, traditions and beliefs attributed to a social group. It is also a form of cultural identification (marked by physical characteristics, origin and set of customs).

Gender: Refers to the socially constructed roles, behaviors, expressions, and characteristics attributed to people according to their gender (men, women, non-binary people). Gender does not refer to biological sex.

Affinity groups: These are groups that gather in recurring meetings to share information and knowledge, or to define actions to be carried out, encouraging the engagement of other employees. Affinity groups can focus on gender, race and ethnicity, disability, LGBTQIAPN+ community, generations, among other characteristics shared by their members.

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Minoritized groups: The term refers to social groups that, regardless of the quantity of individuals they comprehend, have little social, economic (insertion in the job market, occupation of positions of power), and political representation.


Inclusion: It is the act of including people belonging to minoritized groups, allowing them full participation in all education, work, leisure, community, and domestic-related activities.

LGBTQIAPN+: Each letter represents a group of people: lesbians (women who are sexually attracted to, or have an emotional and/or sexual relationship with, other women), gays (people who are sexually attracted to and/or have a romantic relationship with an individual of the same sex), bisexuals (people who present sexual attraction or sexual behavior toward both men and women, or toward more than one sex or gender), transgender (people whose gender identity differs from their biological physical sex) or transvestites (people who dress in clothes mostly associated with another sex), queer (people who do not fit into heterosexual norms), intersex (people who are born with biological sexual characteristics that do not fit into typical female or male characteristics), asexual (people who do not feel sexual attraction), pansexual (people who relate to any gender or sexual orientation), non-binary (people who do not identify with either gender). The “plus” symbol at the end of the acronym is used to include other gender identities and sexual orientations that do not fit into the cis-heteronormative pattern (heterosexual people, that is, who feel emotional/sexual attraction only to a sex/gender different from their own), but which do not (yet) appear prominently in the acronym.

Sexual orientation: is the sexual or affective attraction (involuntary and inherent) that a person feels for other people.

3. Related documents

- COE.CAD.001 – CODE OF ETHICS AND CONDUCT;
- Good practice manual entitled *Somos Plurais*, or *We are plural* (attached to this document);
- Inclusive leadership manual (attached to this document).

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4. Monitoring indicators

Number of complaints received via compliance.

5. Responsible areas

Diversity, Equity & Inclusion.

Talent Attraction and Development.

6. Scope

Document applicable to the entire Afya group team, including the board of directors, as well as suppliers, service providers, and other interested parties.


7. Responsibilities

Employees:

- To observe and ensure compliance with the present policy and, if necessary, contact the Diversity, Equity & Inclusion Area for consultation on situations in conflict with this policy or upon occurrences described in it;
- To know this policy and regularly update knowledge on these regulations.

Diversity, Equity & Inclusion Area:

- To define priorities related to diversity, equity and inclusion;
- To design action plans in compliance with the policy;
- To promote and ensure compliance with this policy;
- To educate and sensitize employees to comply with this policy;
- To raise awareness among Afya's main audiences regarding the diversity, equity and inclusion agenda.

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Internal Communication, Institutional Communication and Marketing:

- To publicize diversity and inclusion actions at Afya, internally and externally, according to the communication strategy defined for the topic.

Legal Department:

- To analyze documents, affirmative policies, and any issues or actions related to diversity and inclusion under the legal scope, thus protecting Afya's operations in accordance with the applicable legislation.

Compliance:

- To investigate complaints registered in the reporting channel, covering the topic of diversity and inclusion at Afya, in line with the guidelines set out in this policy and the Code of Ethics and Conduct.

Culture and Climate:


- To define and execute, together with the Diversity and Inclusion area, strategic professional and cultural development actions for Afya employees and leaders, in line with the guidelines set out in this policy.

Attraction and Selection:

- To define and execute, together with the Diversity and Inclusion Area, the strategy for recruiting and selecting professionals, in line with the guidelines set out in this policy.

8. Description

This policy is guided by Human Rights principles, which guarantee equal rights to all people, regardless of race, color, gender, sexual orientation, religion, nationality, political opinion, social status, or any other characteristic and situation.

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Given this context, in order to build a safe and healthy work environment, all actions must be based on valuing diversity and the inclusion of people with their own cultures, identities, religions, ethnicities, beliefs and special needs.

COMMITMENTS:

- To promote diversity, equity and inclusion in all their forms, building a safe, healthy and increasingly plural environment, free from any discrimination or prejudice, in which each person can be who they are, with their individualities both valued and respected;
- To promote an environment of respect, valuing and recognizing the differences and individualities of each of our teams, ensuring a fair environment in which all people have access to equal opportunities for their development;
- To ensure safe and healthy spaces, free from violence, by providing safe working conditions, reinforcing our reporting channels and the rigor of investigation in relation to all forms of violence at work, as well as moral or sexual harassment and verbal or physical abuse;
- To maintain and to strengthen an environment of trust, ensuring a space of psychological safety so that everyone feels free to be themselves, sharing ideas and points of view respectfully with everyone, through transparent dialogue;
- To carry out prejudice-free processes, treating everyone fairly and equally, without discrimination based on gender, race, gender identity, sexual orientation, age, religion, social class, disability, ethnicity, and political belief in recruitment rules and processes, as well as in promotions, dismissals, training, and benefit packages, which should all be solely based on performance;

To promote diversity, equity, inclusion and an anti-racism attitude by stimulating dialogue and debates to increase awareness among teams, members of the Administrative Council and other interested parties on the respect for diversity, as well as by combating discrimination through awareness and education in internal campaigns, training, and affirmative actions;

To incorporate diversity into culture by transforming diversity into a value within the strategic planning of the company, which include indicators on the topic in the group's programs, projects, events, and actions.

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STRATEGIC GUIDELINES:

Institutional commitment: value and respect for the uniqueness of the Afya team, promoting an inclusive environment and combating all forms of discrimination and prejudice;

Inclusive and affirmative processes: ensuring practices and designing inclusive policies, standards, and internal processes to recognize, attract, retain and develop the best and most diverse talents;

Inclusive and inspiring leadership: developing a committed leadership that promotes Diversity, Equity & Inclusion; guarantees the respect, development, and growth of talents; represents plurality; makes sensitive and empathetic decisions that are free from prejudice; promotes inclusive environments; encourages moments of active listening; takes a stand when witnessing exclusionary and/or discriminatory conduct; and, finally, inspires people by example.


REPORTING CHANNEL

Through its Compliance Department, the Afya Group offers an Integrity Program that provides an Ethics Channel created to receive reports of violations and non-compliance situations in conflict with the guidelines of diversity, equity and inclusion as described here. The channel encompasses all the company's business activities, including, but not limited to, relationships with employees, students, customers, suppliers, competitors, government, the public, and shareholders.

Any discriminatory conduct and/or conduct in disagreement with this Policy must be reported through the Ethics Channel, regardless of the position or situation of the person who carried it out. Disciplinary measures will be applied in accordance with the Company's Code of Ethics and Conduct. For more information, access <https://www.afya.com.br/investidores/etica-e-integridade>.

9. References

Diversity and inclusion policies from Natura&Co, GPA, and Atento.

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10. Attachments

Our good practices manual, *Somos Plurais*.

Inclusive leadership manual.