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1. Goal

Marketing aims to influence consumer behavior through the promotion of brands, products, and services. Responsible Marketing commits to conduct this process in a transparent, ethical, and fair manner, actively considering the impacts, both positive and negative, on stakeholders and the environment when promoting the Afya brand, its products, and services.

All guidelines in this Policy are based on recognized external codes and regulations, such as the Código Brasileiro de Autorregulamentação Publicitária (Conar), the Code of Advertising and Marketing Communication Practice of International Chamber of Commerce (ICC), and the resolutions of the Conselho Federal de Medicina (CFM) applicable to actions involving physicians. Afya adopts these references as the foundation for its practices, avoiding the creation of manuals or rules that may diverge from official sector standards.

2. Definitions

- **Marketing:** A set of strategies and actions aimed at understanding, attracting, and satisfying consumer needs and desires, promoting products, services, or ideas to generate value for the public and the organization.
- **Responsible Marketing:** Marketing practice that considers the social, environmental, and ethical impacts of promotional actions, seeking transparency, inclusion, respect for human rights, and positive contribution to society.
- **Communications:** The process of exchanging information using different channels and formats (verbal, written, visual, and digital) to inform, influence, or engage.
- **Advertising:** A specific form of paid and planned communication aimed at promoting products, services, ideas, or brands and influencing public behavior.

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- **Positive Impact:** A beneficial effect generated by an action, project, or decision that contributes to social, environmental, economic, or cultural well-being.
- **Negative Impact:** A harmful or undesirable effect caused by an action, project, or decision that may compromise environmental balance, generate social inequalities, affect health, or deteriorate economic and cultural relations.
- **Stakeholders:** All individuals or groups affected by or interested in an organization's activities, such as employees, customers, suppliers, investors, local communities, governments, and society in general.

3. Related documents

- Code of Ethics and Conduct (COE-CAD-001)
- Diversity, Equity, and Inclusion Policy (POL-CAD-044)
- Privacy Policy (POL-CAD-022)


4. Monitoring indicators

- 1 - Number of non-compliance cases in marketing, advertising, and communication topics resulting in fines, penalties, or warnings by regulatory bodies.
- 2 - Number of complaints in the Ethics Channel regarding communication.
- 3 - Number of communications with the ESG label.
- 4 - Verified complaints related to privacy violations and customer data loss.

5. Responsible area

The Marketing Area is responsible for applying, disseminating, reviewing, and updating this Policy.

6. Scope

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This Policy applies to all Afya communications and advertisements such as text, image and voice, digital and print, promoted directly by the Group or indirectly through external partnerships. All Afya employees, especially those responsible for communication and marketing, sales, and commercial areas, as well as management, partners, and service providers, must follow its guidelines.

7. Responsibilities

- **Marketing:** Responsible for drafting and periodically reviewing this policy, sharing it during onboarding, requiring annual training, classifying communications with the ESG label, and submitting the Policy for annual Internal Audit verification.
- **Internal Audit:** Verifies compliance and provides data for indicator 2.
- **Legal:** Provides data for indicator 1.
- **Public Relations and Sustainability:** Must follow guidelines when communicating with the press and ensure ESG communications are factual, avoiding socialwashing and greenwashing.
- **IT:** Provides data for indicator 4.

8. Description

8.1 COMPLIANCE WITH LEGAL ASPECTS: All marketing communications promoted by the Afya Group must comply with applicable legislation, sector regulations, and recognized self-regulation codes. Afya adopts as its main reference the Código Brasileiro de Autorregulamentação Publicitária (Conar), especially Annex “B” — Education, Courses, and Teaching — and the guidelines of the ICC (International Chamber of Commerce) for marketing communication. For communications involving medical professionals, medical students, or references to clinical practices, the norms of the Conselho Federal de Medicina (CFM) must be followed, particularly Resolutions No. 1.974/11 and No. 2.336/23 (or any that may replace them), which regulate medical advertising, image use, and interaction with the general public.

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8.2 TRANSPARENT AND HONEST COMMUNICATION: All marketing communications promoted by the Afya Group must be transparent and honest regarding the content disseminated and must be based on reliable data and facts.

8.3 ETHICAL AND FAIR COMMUNICATION: All marketing communications promoted by the Afya Group must respect human rights, ensure diversity and inclusion, and must not incite any form of discrimination.

8.4 COMMUNICATION OF SUSTAINABLE ATTRIBUTES: Afya Group commits to using marketing proactively to disseminate sustainable attributes of the brand, services, and products, aiming to strengthen the brand's leadership and influence within the Medicine and sustainability ecosystem. This disclosure must always be based on facts and data, thus avoiding socialwashing and/or greenwashing practices, and should be inspired by sector best practices defined by Article 36 of the Código Brasileiro de Autorregulamentação Publicitária ("Section 10 — Environment and Communication of Socio-Environmental Aspects") and its Annex "U," which addresses advertising with sustainability and socio-environmental responsibility appeals.

8.5 RESPECT FOR USER PRIVACY: Afya commits to ensuring the privacy and protection of personal data of all users, students, employees, and partners, in compliance with the General Data Protection Law (Law No. 13.709/2018) and the guidelines established in Afya's Privacy Policy. All communications and marketing actions must observe the principles of transparency, necessity, and purpose, ensuring ethical and secure handling of collected information.

8.6 PARTICIPATION OF PHYSICIANS IN CAMPAIGNS: Any advertising, institutional, or content action involving physicians, whether employees, teachers, students, or partners, must follow the current norms and recommendations of the Conselho Federal de Medicina (CFM). Afya fully observes CFM guidelines regarding medical advertising, image use, and professional participation in

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campaigns, ensuring that all communications are ethical, responsible, and compliant with applicable legislation.

8.7 IMAGE USE AND AUTHORIZATION: Any advertising, institutional, or content action involving the use of a person's image, voice, or name must have prior, express, and documented authorization from the participant. The authorization must clearly indicate the purpose, channels of dissemination, and duration of image use, as per the signed agreement. It is prohibited to reuse images outside the originally authorized scope or in subsequent campaigns without new formal permission. Responsible areas must keep authorizations on file and ensure that suppliers and partners also comply with this requirement.

9. References

- Conar (Conselho Nacional de Autorregulamentação Publicitária) — www.conar.org.br
- ICC (International Chamber of Commerce) — iccwbo.org/marketingcode
- CFM (Conselho Federal de Medicina) — portal.cfm.org.br

10. Appendix

Non applicable