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|  | <h2>Human Rights Policy</h2> | Prepared by: Opy Health Approved by: Opy Health Date of 1st approval: June 15, 2022 Date of 1st release: June 27, 2022 Revision date: - Validity: For an indefinite period of time Version: 1.0 |
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HUMAN RIGHTS POLICY

1. INTRODUCTION

Opy Healthcare Gestão de Ativos e Investimentos S.A. ("Opy" or "Company"), together with its subsidiaries (referred to as "Opy Companies"), recognizes its responsibility to protect and respect human rights in the conduct of its activities, thereby contributing to a more equitable and just society. Opy Companies' commitment to protecting the dignity of people and social rights is reflected in its corporate purpose, encompassing the relationship with all of its employees, shareholders, partners, customers, suppliers, subcontractors, and the communities where it operates.

The purpose of this Human Rights Policy ("Policy") is, among other things, to formalize Opy Companies' commitment to human rights, which is further reinforced by the Code of Ethics and Conduct ("Code of Ethics") and other integrity policies that guarantee a governance model based on respect for people and consolidate the importance given to protecting a safe and fair work environment for employees. In addition, Opy Companies have a department dedicated to protecting human rights - the Integrity Area - which has internal procedures that allow the prevention, mitigation, and identification of human rights violations, whereby any measures to remedy violations will be taken fairly and reasonably.

Aligned with the United Nations ("UN") Guiding Principles on Business and Human Rights, Opy Companies are signatories to the UN Global Compact and are committed to integrating the Social Development Goals ("SDGs") into their internal practices and corporate procedures. Additionally, the commitment to human rights is grounded in accordance with the following international principles and standards¹ to which Opy Companies adhere:

- United Nations Universal Declaration of Human Rights;
- UN International Covenant on Economic, Social and Cultural Rights;
- Convention on the Rights of the Child;
- Declaration of the International Labor Organization on Fundamental Principles and Rights at Work;
- SDG guidelines, targets, and indicators.

2. PURPOSE AND SCOPE

The purpose of this Policy is (i) to reaffirm and formalize the commitment of Opy Companies to respect and promote the protection of human rights in their operations and supply chain, sharing the

¹ Other international principles and guidelines on issues related to human rights may be incorporated into the practices of Opy Companies at a date subsequent to the publication of this Policy, without implying, by itself, a necessary revision of its text, maintaining its merit and validity.



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values and principles with their suppliers and partners; and (ii) to establish general guidelines necessary to ensure this commitment and to prevent human rights risks.

The Policy applies to all Opy Companies' employees, directors, committee members, and officers. It covers all business and supply chain relationships, that is, all stakeholders impacted by the activities of Opy Companies who, to the extent of the impacts, enjoy the same rights and protections of human rights outlined in the paragraph above, including openness to reporting violations under the item "6 - Reporting Violations" below.

3. OPERATION AND MANAGEMENT GUIDELINES FOR RESPECT, AWARENESS, PROMOTION, AND REMEDIATION OF VIOLATIONS

Anchored in the United Nations Guiding Principles on Business and Human Rights, Opy Companies operate as follows:

- Normative Commitment. In addition to the Code, this Policy, and other policies on related topics, Opy Companies make the contents of these documents available to all employees through dissemination processes and in-person and online training.
- Risk Matrix. The possibility of human rights violations is part of the Opy Companies' risk matrix. For this reason, the commitments assumed herein are part of the plans of senior management and the areas responsible for correctly handling these risks, including allocating adequate resources and specific mitigation measures, monitoring procedures and policies, and improving them whenever necessary.
- Due Diligence. Opy Companies implement the Human Rights *due diligence* process by following, without limitation, the steps below:
 - Assess potential risks and impacts of its activities on Human Rights through the identification, elaboration, and implementation of detective, preventive and mitigating controls;
 - Integrate the results of the assessments mentioned above into the processes of Opy Companies, including the revision of policies and standards, procedures, and budget, among others;
 - Monitor controls to analyze their effectiveness in the activities of Opy Companies and relation to their suppliers and their production chain;
 - Report on the performance of Opy Companies' management of Human Rights risks and impacts;
- Remediation. Opy Companies undertake, when necessary, to remediate adverse Human Rights impacts that they have directly or indirectly caused or contributed to and collaborate with other relevant Human Rights initiatives in their territories. Opy Companies do this directly and/or



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through partners, seeking to involve stakeholders in the design and implementation of remediation actions, and are committed to the principle of non-recurrence;

- Establishment of listening, response, and reporting mechanisms. Opy Companies establish legitimate, accessible, and equitable reporting channels to capture all types of communications, including demands, complaints, and grievances. In this context, Opy Companies have a specific reporting channel with guaranteed anonymity and provide professionals for the relationship with the community to strengthen dialogue and promote engagement. The listening and reporting channels do not prevent access to other judicial or non-judicial mechanisms for reporting possible breaches or defending human rights. Opy Companies consider that listening and reporting are fundamental tools for actions to prevent and remedy potential human rights impacts and violations. For more information about the Integrity Channel, see item "6 - Reporting Violations" below;

4. COMMITMENTS OF OPY COMPANIES

Opy Companies commit to the following:

4.1. Combating child, slave, or forced labor

Opy Companies recognize the following as a severe violation of human rights (i) the use of child labor in violation of current legislation, and (ii) all forms of forced, slave, or slavery-like labor. For this reason, they adopt and demand a zero-tolerance policy regarding such conduct from their suppliers and partners.

The rights of children and adolescents and the minimum age for work established in Brazilian legislation and ILO Convention No. 138 must be respected, as well as all applicable labor laws and rules, including, among others, those that limit working hours. Furthermore, employees' payment conditions must be clarified prior to their hiring, and any overtime agreed upon, remunerated, and compensated responsibly.

Under no circumstances should personal documents or monetary values be confiscated to withhold employees against their will.

4.2. Occupational Health and Safety

Opy Companies' priority is to ensure a safe and healthy work environment for its employees, as they believe that enjoying physical and mental health is essential for an existence compatible with human dignity.

In our facilities, we adopt measures to prevent accidents and encourage employees to adopt healthy habits. In addition, since Opy Companies operate in hospital environments, we promote regular



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occupational health and safety training, carry out waste management, including infectious waste, and provide our employees with adequate personal protective equipment.

4.3. Freedom of Association and Collective Bargaining

Opy Companies recognize and guarantee employees the right of free union association. Accordingly, discrimination against associated employees and/or representatives of the union of professional categories is expressly forbidden and subject to disciplinary measures.

4.4. Respect for Diversity and Non-Discrimination

Opy Companies adopt a zero-tolerance policy for any discriminatory practice. Furthermore, they are committed to building a more inclusive society by promoting diversity in the workplace and equal treatment for all.

Internal procedures are adopted to ensure that all current and potential employees have equal opportunities, regardless of, without limitation, gender, race, sexual orientation, age, culture, nationality, disability, or social status, granting special protection to any group recognized as vulnerable to such behaviors. Furthermore, we respect and understand the different realities and needs of our customers, employees, investors, suppliers, business partners, and society in general.

4.5. Combating Harassment

To ensure a fair and respectful work environment, Opy Companies do not tolerate any kind of harassment (verbal, physical, sexual, or psychological), threat, or intimidation in the workplace, promoting periodic training on the subject.

The Integrity Channel made available by Opy Companies (see item 6 below) must be used to forward reports of harassment, which will be duly investigated and, if appropriate, will result in the application of disciplinary measures.

4.6. Data Protection

Opy Companies respect the confidentiality and right to data protection of customers, suppliers, employees, and partners with whom they relate, striving to ensure a secure and reliable information environment and committing to the correct and authorized use of all information and data in their possession.

4.7. Environment

Opy Companies are committed to generating a positive impact on the environment and contributing to the future of the next generations, acting actively in (i) preventing pollution, (ii) protecting biodiversity, (iii) efficient use of resources, and (iv) reducing and offsetting the emission of

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greenhouse gases in its operations and achieving neutralization of emissions by 2040.

4.8. Local Communities

Included in Opy Companies' strategy are social development actions with initiatives related, among others, to education, culture, sports, and urban mobility, taken to local communities. In addition, Opy Companies are committed to respecting and promoting these communities' economic, social, and cultural rights, maintaining a relationship of collaboration and respect.

We prioritize initiatives with the local community that foster its engagement with our projects, ensuring the management of potential risks and impacts on human rights. Furthermore, whenever possible, we involve the communities in the risk assessment processes and the definition of prevention, mitigation, and, when necessary, remediation measures. We have people dedicated to actively listening to the Opy Companies' stakeholders, understanding their expectations, and effectively contributing to building a relationship of trust with the local community.

5. SUPPLY CHAIN

Opy Companies require that all its partners and suppliers base their actions on the principles and values outlined in the Opy's Code of Ethics and other internal policies and reasonably adopt the same standards of ethics and sustainability as the Company in conducting its business.

To ensure that partners and suppliers adhere to these standards, we have implemented a *due diligence* procedure detailed in the Third-Party Management and Contracting Policy. Refer to the Policy for more information.

The contracts of Opy Companies contain specific clauses on appropriate conduct and monitoring of issues related to human rights, labor obligations, occupational health and safety standards, social and environmental issues, adherence to environmental legislation, combating corruption, liability for damages, and information security, among others applicable to our suppliers and partners and their supply chain. We periodically audit our critical suppliers to map and assess their respect for human rights, ethics and integrity standards, and social and environmental issues. If remediable irregularities are identified, action plans can be developed to assist the supplier in solving the problem.

Opy Companies wish to establish business relationships with entities that have the same principles and share the same guiding values. For this reason, any violation of human rights, as well as any other internal rules of the Company, will result in the immediate review of the business relationship with Opy Companies and may even result in the termination of the existing business relationship.

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6. REPORTING VIOLATIONS

Compliance with Opy policies, including this one, is expected of all employees, directors, committee members, and officers when acting on behalf of Opy Companies. Each employee, director, committee member, or officer will be responsible for maintaining compliance with these policies within their respective areas.

As a result, employees, directors, committee members, and officers must report any knowledge or suspicion of a violation of this Policy, Opy's Code of Conduct, or applicable law.

In case of doubts about non-compliance with the instruments mentioned above, contact the Integrity Area for further guidance or use the Opy Companies Integrity Channel, which allows anonymous reporting and can be reached through the following channels:

- Phone: 0800 792 1001
- Internet: <https://www.canalconfidencial.com.br/opyhealth/>
- E-mail: integridade@opyhealth.com.br

Every employee, director, committee member, and officer has the right to raise ethical issues, in good faith, without fear of punishment, harassment, or retaliation from others (peers, superiors, or senior management). Opy Companies prohibits any form of retaliation against good faith whistleblowers.

Failure to report a known, even if only suspected, violation of Opy Companies' conduct guidelines or applicable law will lead to disciplinary action, including termination of employment for cause.

7. INTERNAL INVESTIGATION AND DISCIPLINARY MEASURES

In the event of non-compliance with this Policy, corrective and disciplinary actions will be promptly taken under Opy's Integrity Program. Furthermore, any corrective or disciplinary action that Opy Companies may apply within the scope of its rules of conduct will not exempt the employee, director, or officer from any administrative, civil, and/or criminal sanctions that may arise from any legal violation.

Suppliers and partners of Opy Companies must also be bound to the provisions of this Policy, and failure to comply may result in the application of penalties, suspension, or unilateral termination of the contract.



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8. REVISION HISTORY

This Policy and other related documents are subject to continuous monitoring. They will be periodically updated as deemed necessary for the effectiveness of the Opy Companies' Integrity Program and Sustainability Plan.