

**YDUQS PARTICIPAÇÕES S.A.**  
CNPJ/ME n.º 08.807.432/0001-10

## **Human Rights Policy**

### **1. Human Rights Commitment**

This document formalizes the guidelines and general principles that govern Grupo YDUQS's commitment to respecting and promoting all Human Rights. It also establishes the framework for a Human Rights Due Diligence process, aimed at identifying, preventing, mitigating, remedying, and addressing any adverse impacts caused or contributed to by the institution. Finally, it reaffirms Grupo YDUQS's commitment to respecting, protecting, raising awareness of, and promoting Human Rights across all its operations and subsidiaries.

### **2. References**

The Human Rights Policy is founded on internationally recognized and widely legitimized Human Rights initiatives that have been ratified within the Brazilian legal framework. It also incorporates Brazilian regulations and existing internal policies of Grupo YDUQS, which include:

#### **Reference Documents and External Commitments**

- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- UN International Bill of Human Rights and its instruments
- Guidelines for Multinational Enterprises by the Organization for Economic Co-operation and Development (OECD)
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- American Convention on Human Rights (Pact of San José, Costa Rica)
- UN Women's Principles for Women's Empowerment (WEPs)
- Consolidation of Labor Laws (CLT)
- Brazilian Federal Constitution of 1988

## Internal Reference Documents

- Code of Ethics and Conduct
- POL.01.003 Sustainability Policy
- POL.05.051 Diversity, Equity, and Inclusion Policy
- PGE.06.003 ESG Risk Management
- POL.04.011 Corporate Risk Management Policy

## 3. Application

This Policy applies to the entire Grupo YDUQS, hereinafter referred to as the “Company” or simply “YDUQS,” including its subsidiaries, administrators, and employees at all hierarchical levels. It also extends to shareholders, service providers, suppliers, third parties, and other business partners of YDUQS, as well as any individuals representing YDUQS in dealings with third parties. All parties are expected to commit to the rules outlined in this Policy, taking responsibility for disseminating and adhering to the guidelines contained herein.

## 4. Definitions and Acronyms

- **Human Rights:** A set of norms and principles that recognize and protect the dignity of all human beings, regardless of race, gender, nationality, ethnicity, language, religion, or any other condition. These rights are inherent to each individual and are fundamental to a just and dignified life.
- **Due Diligence:** A process of in-depth investigation and analysis of relevant information before making a significant decision. This process ensures that all critical information is considered and that decisions are made consciously and responsibly.
- **Vulnerable Groups:** Segments of society that, due to specific characteristics such as race, ethnicity, gender, sexual orientation, age, disability, socioeconomic status, or others, are more susceptible to violations of their human rights.
- **Stakeholders:** Individuals, groups, or organizations with an interest in or who are affected by a company's activities and decisions. In other words, stakeholders are the interested parties in a business.
- **Zero-Tolerance Policy:** An approach aimed at preventing and punishing all infractions, regardless of their severity, with maximum strictness. This policy is based on the principle that tolerating minor offenses can lead to increased crime and social disorder.

## **5. Description**

YDUQS's Human Rights Policy is aligned with the UN Guiding Principles on Business and Human Rights, the Brazilian Constitution of 1988, and other national and international Human Rights laws, as well as the company's internal documents referenced above.

In this regard, the Policy highlights the importance of maintaining dialogue with both internal and external stakeholders and implementing responsible practices throughout the value chain. This approach reaffirms the company's commitment to human dignity, equality, and respect.

## **6. Guidelines for Action and Management to Respect, Raise Awareness, Promote, and Remedial Actions for Human Rights**

### **Guarantee of the Right to Education**

YDUQS is committed to providing quality education to promote social mobility and the holistic development of each client. Recognizing that access to quality education is the foundation for the employability of millions, the company focuses its efforts on expanding and democratizing access to higher and vocational education. YDUQS strives to empower its students to become agents of transformation in their own lives and in society.

### **Commitment to Diversity, Equity, Inclusion, and Equal Rights**

The company recognizes and values diversity as an essential resource for innovation and success, committing to fostering an inclusive work environment where all individuals—regardless of race, color, gender, age, sexual orientation, religion, disability, or any other personal characteristic—are respected and provided with equal opportunities.

This commitment is reinforced by the adoption of practices that ensure equitable treatment and non-discrimination, guaranteeing that everyone has access to the same opportunities and resources.

The company strives to eliminate all forms of discrimination and barriers that hinder full participation, with a focus on building a safe and welcoming environment for all.

## **Promotion of Gender Equality and Women's Rights**

YDUQS recognizes the importance of gender equality and is committed to fostering a safe, fair, and inclusive work environment for all its female employees. Women's empowerment is essential for the success of the business and the development of a more equitable society. For this reason, the company is dedicated to ensuring pay equity between genders, setting public targets to increase the representation of women in senior leadership roles, and making external commitments to advance this agenda. This commitment is further strengthened by the company's adherence to the UN's "Women's Empowerment Principles (WEPs)."

For its part, YDUQS condemns harassment and all related forms of violence against women.

## **Respect and Freedom of Expression**

YDUQS values and respects freedom of expression as a fundamental right. It furthermore actively fosters a multicultural environment where individuals can express their opinions, ideas, and concerns in a responsible, respectful, and ethical manner. Moreover, the company recognizes that a diversity of thoughts and perspectives is essential for growth and innovation. Accordingly, it reinforces that the right to freedom of expression does not override other rights protected in this policy or current legislation, so that it vehemently repudiates any incitement to discrimination, harassment, hatred and/or other related forms of oppression, widely defending constructive dialogue and mutual respect.

## **Responsibility for the Environment, Workplace Relations and Conditions**

The Company is committed to maintaining ethical workplace relations in full compliance with applicable labor laws and regulations across its workforce and supply chain, ensuring that all employees receive fair and competitive wages within legal standards. Towards this end, it guarantees adherence to legally established working hours, respecting statutory limits and providing appropriate breaks and rest periods, whether in on-campus, hybrid, or remote work arrangements.

It fosters a safe, healthy, and welcoming work environment, ensuring that fundamental labor rights, such as freedom of association and collective bargaining, are strictly upheld.

It also promotes non-discrimination in employment and occupation, ensuring that all work-related decisions are based on criteria of merit and competence, without

prejudice of any kind, guaranteeing decent, dignified and fair working conditions that favor the well-being and development of our employees and society.

### **Fighting forced and child labor**

YDUQS recognizes the fundamental importance of human rights and is committed to operating ethically and responsibly in all its activities. In this regard, it reaffirms its rejection of forced, compulsory and/or bonded labor in all its operations and value chain, and is committed to their eradication throughout society.

The Company also respects the rights of children and adolescents, as well as labor rights. Thus, in accordance with the principles of human dignity and the UN Global Compact, it unequivocally rejects any form of child labor and/or work in degrading conditions, applying a zero-tolerance policy in all situations described in this section of the policy.

### **Defense of the Rights of Indigenous, Riverine and Quilombola Peoples and the Rights of Refugees and Migrants**

YDUQS understands, protects and respects the rights of indigenous, riverine and quilombola peoples, guaranteeing the recognition of their cultures, knowledge, traditions, territories and contributions to the cultural formation of Brazil. It also recognizes the importance of preserving natural resources for these peoples.

The company is also committed to respecting the rights of refugees and migrants by providing a welcoming work environment free from discrimination. Ethnic and cultural diversity is valued by ensuring equal access to employment opportunities, decent working conditions and respectful treatment.

### **Promoting Health and Safety**

The company promotes a safe and healthy working environment for all its employees, including staff and service providers. Strict safety standards are adopted in the workplace in compliance with current legislation, designed to prevent accidents and encourage physical and mental well-being.

Through risk assessments, training and continuous monitoring, the dangers present in the workplace are proactively identified and mitigated. Occupational health and safety indicators are also monitored on a regular basis, both for our employees and for service providers, taking corrective measures when necessary.

## **Ensuring Digital Security and Data Privacy**

YDUQS is committed to digital security and the protection of personal data, as required by the General Data Protection Law (LGPD) and other applicable regulations, as well as the provisions of the Personal Data Privacy Policy.

To this end, it is dedicated to implementing measures to ensure that the collection, storage and processing of information is carried out in an ethical, transparent and secure manner, respecting the right to privacy and the confidentiality of the data of consumers, employees and partners.

## **Commitment to Client Relations**

The Company is committed to providing high quality service to all its clients, acting with transparency in accordance with the guidelines of its Responsible Marketing Policy.

At all times open to dialogue and corrective action, YDUQS maintains open channels of communication with its clients through satisfaction surveys, forums and consultative councils. The information collected is analyzed to identify opportunities for improvement and strengthen the quality of the products and services offered to meet consumer needs.

## **Responsibility in Supplier Relations**

YDUQS maintains a rigorous hiring process for service providers, encompassing both the approval of companies to be hired and the monitoring of activities throughout the contract term.

To this end, the company assures compliance with legislation and adherence to collective agreements, as well as addressing health and safety issues for the employees of its suppliers.

Reinforcing its position as an educational institution that promotes Human Rights, YDUQS remains committed to collaborating with its suppliers in developing corrective and proactive measures to achieve these objectives.

In alignment with this policy and the Company's Code of Ethics and Conduct, it is emphasized that the use of slave labor or labor conditions analogous to slavery will not be tolerated and will result in contract termination as stipulated. The same applies in cases of violations of legal requirements during service provision that may impact the health and safety of the company's employees, the environment, the community, or society at large.

To ensure compliance with these standards, contracts are drafted with clauses requiring suppliers to respect human and social rights, national and international legislation, compliance terms, the LGPD, and a commitment to the YDUQS Sustainability Policy.

The Company remains committed to continually strengthening its Due Diligence procedures with its partners to ensure these procedures are followed.

### **Respectful Relationships with Communities**

YDUQS, through the Yduqs Institute and its end activities, is committed to generating a positive social impact in the communities near the group's units and other operations. The company seeks to better understand the areas where it operates or intends to operate, defending respect for the surrounding communities and promoting the management of socio-cultural, human, economic and environmental impacts, committing itself to local development.

The Company respects the right to an ecologically balanced environment. For this reason, it conducts water and environmental feasibility studies on its operations, respects environmental laws and promotes initiatives that strengthen local communities, focusing on areas such as health, education, culture, sport and the environment.

### **Promoting the Preservation of Natural Resources**

The YDUQS Group is dedicated to preserving natural resources and implementing sustainable practices across all its operations and those of its subsidiaries. With a deliberate focus on minimizing environmental impacts, the group prioritizes the responsible use of water and energy while ensuring the efficient management of waste and greenhouse gas emissions, contributing to the mitigation of climate change.

We promote environmental education and develop initiatives that contribute to environmental conservation, involving employees, suppliers and partners in adopting practices that protect ecosystems and preserve natural resources for future generations.

Care for the environment is a fundamental pillar of YDUQS' corporate responsibility and is aligned with its formalized commitment to Human Rights.

## **7. Governance and Responsibilities**

### **Board of Directors**

- Ensure that the Company's Human Rights commitments are integrated into the business strategy, with the aim of promoting sustainable business

development.

- Encourage and promote ongoing discussion about advances and challenges related to Human Rights during Board of Directors meetings, recognizing the strategic importance of the topic for the company.

## **ESG Committee**

The ESG Committee, comprised of members of the company's executive leadership, plays a strategic role in overseeing the organization's sustainability governance. Its primary responsibilities include:

- Monitoring the implementation of human rights initiatives, evaluating progress indicators and ensuring the effectiveness of actions.
- Advising the Board of Directors on matters related to sustainability, with emphasis on Human Rights, labor rights, the environment and integrity, ensuring transparency in the ESG strategy and alignment with stakeholder expectations.
- Monitoring the implementation of Human Rights due diligence, defining indicators and publishing the results, with a view to ensuring compliance with the targets and commitments undertaken by Company.

## **Executive Board**

- Promote the Company's commitment to Human Rights in all areas of the organization and ensure that the principles and values are fully respected in relationships with employees, leaders, partners and other stakeholders.
- Ensure that value creation is carried out in a sustainable manner, considering the social and environmental impacts of the Company's activities and promoting the creation of shared value for all stakeholders, both in the development of new products and services and in the maintenance of existing ones.

## **Department of Institutional Relations**

- Design, implement and monitor strategies to ensure compliance with this Policy, continuously measuring and evaluating the impact of the company's actions in relation to Human Rights, and also considering aspects in sub-themes such as Labor Rights, Environment, Integrity and Transparency, among others.
- Promote and disseminate internally an organizational culture that values Human Rights, integrating the principles of this Policy into the other areas of YDUQS and encouraging the adoption of management practices that ensure shared value with all



stakeholders.

- Organize, coordinate and promote the activities of the ESG Committee, fostering debate and collaboration between the various areas of the Company on issues related to sustainability and Human Rights.
- Develop and implement a Human Rights agenda based on an analysis of risks and opportunities and due diligence, in line with national and international best practices.
- Prepare periodic reports on the Company's performance regarding sustainability and Human Rights, ensuring transparency and accountability to stakeholders. The Company integrates Human Rights into all areas of its organization, ensuring that related principles and values are fully upheld in its relationships with employees, leaders, partners, and other stakeholders.

### **Employees in General**

- Adopt and fully comply with the guidelines set out in this Policy.
- Contribute to building an organizational culture based on respect for human rights, proposing, whenever possible, ideas and initiatives that promote sustainability and equitability.

## **8. Remediation and Deviations**

### **Human Rights Due Diligence**

YDUQS is committed to promoting and protecting Human Rights in all its operations and in the value chain. To this end, it has formalized a process of continuous due diligence aimed at identifying, assessing, preventing, mitigating, remedying and redressing risks related to human rights, ensuring that actions are in line with internationally and nationally recognized principles. In this process, the company's ESG area maintains a control, monitoring and evaluation system to monitor the effectiveness of the measures implemented.

In this context, the company has adopted the following measures:

- Setting targets for Human Rights topics that are material to the company and stakeholders;
- Constant monitoring of the company's performance in relation to the targets set, using indicators and periodic reports;
- Reviewing company programs and policies on a regular basis to ensure that

they are in line with best practices and changes in the legal and social context;

- Identifying, preventing and mitigating negative Human Rights impacts, if any, through the due diligence process, rectifying them whenever necessary;
- Transparent and effective communication regarding Human Rights impacts through reports, newsletters, communication channels and other means.

## **9. Risk Management and Internal Controls**

YDUQS conducts risk analyses to identify, assess and prioritize the main challenges and opportunities related to Human Rights, labor rights, the environment and anti-corruption efforts in its operations and those of its subsidiaries, the supply chain and other locations in which it operates. If identified, it draws up specific action plans to prevent, mitigate, remedy or redress these risks, including targets, indicators and deadlines for implementing and evaluating these strategies.

The company's position is one of zero tolerance for direct or indirect complicity in acts that violate Human Rights. To this end, reactive and proactive measures are adopted, ensuring that YDUQS' activities do not contribute to violations of these rights in any way.

As stipulated in the Code of Ethics and Conduct and the Anti-Corruption Code, any violations of the company's codes, statutes, bylaws, policies and other rules shall not be tolerated and will be subject to appropriate disciplinary, administrative and/or legal measures.

The Compliance area is responsible for disseminating the Company's integrity culture. This culture is strengthened by the mandatory Ethics, Compliance and Anti-Corruption track for all employees, ensuring that anti-corruption policies, standards and ethics procedures are communicated to all employees, both in-house and outsourced.

YDUQS uses its Confidential Channel to deal with deviations from the practices set forth in this Policy.

It is an anonymous reporting channel open to all stakeholders, including employees, third parties, suppliers, customers and communities, available in local language 24 hours a day, for recording and investigating complaints about inappropriate conduct, human rights violations and unethical practices, including issues related to suppliers and partners.

The Confidential Channel is managed by an outsourced company, which guarantees a fair and impartial investigation process, the possibility of anonymity for whistleblowers and the confidentiality of reports, as well as protecting whistleblowers

against any form of retaliation. The Ethics Committee, made up of members of senior management, and in accordance with the Compliance Program, monitors the misconduct reported through this channel and communicates any crucial concerns to the Audit and Finance Committee. The channel can be accessed via the link: <https://www.canalconfidencial.com.br/yduqs/> and by telephone: 0800 770 0782. The Third-Party company hired undertakes to receive, process and forward the reports to the Company for proper treatment and investigation.

Aligned with the best governance and transparency practices, YDUQS has undertaken to disclose the number and type of complaints received annually in its Integrated Report.

## **10. Implementation and Training**

This Human Rights Policy takes effect from the date of its approval by the YDUQS group's top management, thereby formalizing the company's commitment to promoting and respecting Human Rights in all its operations and hierarchical levels. Such approval ensures that the Policy is implemented at all levels of the organization and that the established objectives are achieved.

The ESG area is committed to offering Human Rights training through the company's official channels to all its employees, regardless of their hierarchical level, equipping them with the necessary tools and knowledge to identify and address situations involving violations.

The company recognizes that continuous training is essential to ensure the effectiveness of this Policy and to promote an organizational culture based on respect for Human Rights.

## **11. Updating and Review**

This policy will be reviewed periodically once (1) a year or whenever necessary.

## **12. Conclusion**

The YDUQS Group reaffirms its commitment to human rights as a core value of its mission. For these reasons, it is committed to building a balanced education and work ecosystem that respects the dignity of all, leading to a fairer and more equal society.

Rio de Janeiro, December 3, 2024.