

YDUQS PARTICIPAÇÕES S.A.

CNPJ/ME n.º 08.807.432/0001-10

Policy of Environment and Climate Change

1. Objective

Establish the guidelines that steer YDUQS Group's actions regarding environmental protection, promoting sustainability and the response to climate change, ensuring that these principles are integrated into its operations and corporate decision-making. This Policy reaffirms the organization's commitment to preventing and mitigating environmental impacts, conserving biodiversity and adapting to climate change, in alignment with applicable environmental legislation and the United Nations Sustainable Development Goals (SDGs).

In addition, it consolidates the institutional commitment by YDUQS and its subsidiaries to respect and protect the environment, promote awareness initiatives and adopt effective measures that generate positive environmental impacts and contribute to the transition to a low-carbon economy.

2. Reference Documents

- Code of Ethics <u>Link</u>
- POL.01.003 Policy of Sustainability
- POL.06.008 Policy of Human Rights
- PGE Internal Management Procedures (PGE)

3. Sphere of Application

This Policy applies to all YDUQS Group operating units, including its subsidiaries, officers, employees at all hierarchical levels, service providers, suppliers and other business partners acting on its behalf or in its representation.

All stakeholders covered by this Policy must observe and integrate its guidelines into their activities, actively contributing to the Company's environmental and climate performance.

4. Description

This Policy is intended to establish the general guidelines for YDUQS Group's approach to environmental protection, promotion of sustainability and response to climate change, serving as a reference for the Company's other normative and operational



instruments.

Its content is structured around strategic and operational themes, including principles of conduct, institutional commitments, governance responsibilities and guidelines for managing environmental and climate-related aspects across operations.

4.1 Thematic and Operational Guidelines

YDUQS' Environment and Climate Change Policy establishes the principles that guide the Company's conduct with regard to environmental sustainability and coping with climate change. Its guidelines aim to promote responsible conduct, efficient resource usage and fewer direct and indirect socio-environmental impacts from operations.

The priority actions and themes are:

- Integrated environmental management, with a focus on preventing and reducing the negative impacts from operational activities on the environment;
- Continuous energy matrix management improvements, prioritizing ecoefficiency, rational energy use and the transition to clean and renewable sources;
- Rationalizing the consumption of natural resources, emphasizing water use efficiency and waste reductions;
- Adequate solid waste management, encouraging recycling, reuse and minimal disposal in landfills;
- Measurement and reduction of greenhouse gas (GHG) emissions, with priority focus on Scopes 1 and 2, whose results are consolidated in the Company's annual inventory, audited by an independent organization. Residual emissions may be voluntarily offset by cancelling traceable carbon credits. The Company is also committed to the progressive Scope 3 emissions measurement, in line with SBTi's goals.
- Engagement with strategic stakeholders and promoting environmental education and sustainable practices across the supply chain;
- Managing climate risks and opportunities, through the identification, assessment and mitigating environmental and climate risks with direct or indirect impact on YDUQS' activities;
- Encouraging research, innovation and project development, focusing on solutions aimed at mitigating climate change and promoting sustainability;
- Respecting and protecting Human Rights and the rights of traditional communities, including Indigenous peoples, riverine populations, and quilombola communities, recognizing the essential role regarding conserving natural resources to preserve their lifestyles and supporting the climate justice agenda.



4.2 Strategic Commitmets and Governance

YDUQS recognizes that climate change impacts present a growing challenge for society, with direct effects on organizations worldwide. This context requires institutions to adopt a proactive stance in risk management, emergency preparedness and adaptation to the new climate scenario.

In this context, the Company reaffirms its commitment to adopting measures that protect and promote the well-being of students, employees, partners and the communities in which it operates. This approach also responds to growing regulatory requirements, investor expectations and market demands for greater transparency, resilience, and socioenvironmental responsibility.

It allows YDUQS to strengthen its commitment to environmental protection, continuously monitoring the environmental performance of its operations and full compliance with applicable legislation. It is also important to highlight the relevance of continuous engagement with internal and external stakeholders through active listening, engaging in consultations and disclosing environmental indicators.

In line with its educational mission, the Company promotes environmental awareness through learning pathways, open courses, and other initiatives available to students, employees and other stakeholders.

This reaffirms the institutional commitment to building a safer, more sustainable future aligned with global transformations, ensuring everyone's right to an ecologically balanced environment.

4.2.1 Commitment from Senior Management

The Company's senior leadership, through its Committees and Board of Directors, systematically monitors environmental and climate-related matters, ensuring the Policy's guidelines are integrated with strategic planning, risk management and corporate decision-making.

4.2.2 Establishment and Disclosure of Environmental Goals

YDUQS sets environmental performance targets and KPIs, with a focus on reducing emissions, promoting the responsible use of natural resources and minimizing environmental impacts. These targets are monitored periodically and publicly disclosed in its ESG reports and institutional channels.

4.2.3 Inventory and Reduction of GHG Emissions

The Company prepares an annual Greenhouse Gas (GHG) emissions inventory, which is audited by an independent organization. It maintains a continuous focus on



reducing Scope 1 and 2 emissions and on the progressive measurement regarding Scope 3, aiming for alignment with the Science Based Targets initiative (SBTi) targets.

4.2.4 Commitment to Climate Neutrality (Net Zero)

YDUQS evaluates and structures its formal commitment to net-zero emissions by adopting medium- and long-term targets, in addition to voluntarily offsetting residual emissions with certified and traceable carbon credits.

4.2.5 Climate Adaptation Plan

The Company recognizes the urgent need to address the physical risks associated with climate change and undertakes to structure initiatives aimed at identifying vulnerabilities and making its operations more resilient.

4.2.6 Integrated Risk Management with ESG Approach

Socio-environmental and climate risks are assessed in conjunction with strategic, operational, financial, reputational and regulatory risks, considering short-, medium- and long-term horizons. Management of these risks is reported periodically to the Board of Directors.

4.2.7 Continuous Stakeholder Engagement

The Company promotes continuous engagement with its internal and external stakeholders through mechanisms including consultation, active listening and social participation. This process aims to strengthen the legitimacy of environmental actions and foster co-responsibility across the value chain.

4.3 Waste Management

Along with its commitment to responsible environmental management, YDUQS adopts guidelines for effectively managing waste generated in its operating units, promoting minimal environmental and public health impacts and risks.

The Solid Waste Management Plan (PGRS) is the instrument that organizes and guides actions for the proper handling of generated waste, encompassing strategies for segregation, packaging, identification, temporary storage, internal transport and environmentally appropriate end destination and disposal.

After its preparation or update, the units must provide specific training for all those involved in the waste management process, ensuring awareness about the operational guidelines and technical criteria established in the plan.

Waste disposal must be carried out exclusively through legally authorized service providers, contracted based on documentation proving their environmental compliance



and technical capacity for collection, transport, treatment and final disposal.

Procedures related to waste management must be integrated into YDUQS's internal environmental management processes and should be continuously updated in line with best practices and applicable regulatory requirements.

4.4 Socio-Environmental Management

Aimed at safeguarding effective socio-environmental management aligned with market best practices, YDUQS continuously updates its internal environmental requirements, assuring integration with applicable federal, state and municipal legislation . These requirements are consolidated into control and monitoring instruments accessible to operating units; the objective is to disseminate knowledge regarding legal obligations and reinforce compliance at all operational stages.

Based on this approach, the Company implements systematic actions aimed at complying with legal requirements, reinforcing its commitment to the socio-environmental integrity of its activities. Specific guidelines and instructions related to socio-environmental management are incorporated into internal management systems, enabling continuous monitoring and alignment with current regulatory requirements.

4.5 Greenhouse Gas Emissions Management

Designed to effectively contribute to the fight against climate change, YDUQS adopts a structured approach for managing its Greenhouse Gas (GHG) emissions. The Company relies on an emissions management platform integrated into its environmental governance system, operated in partnership with specialized technical consultancies, enabling each operating unit to report its emission sources linked to their respective activities.

The information reported is validated by the Environment team in accordance with technical guidelines aligned with the GHG Protocol, ensuring the uniformity, consistency and traceability of reported data. The corporate inventory is periodically subjected to verification by an independent audit, which reinforces the organization's commitment to transparency and reliable published information.

Grounded on this data, strategies are developed for emissions reduction and technology substitution, with priority to solutions that have a lower environmental impact. For residual emissions, YDUQS offsets through carbon credits from projects recognized by international standards, contributing to the neutralization of CO₂ emissions in its operations.

When there are doubts about the procedures or access to the emissions management platform, the units must contact the Environment team, responsible for



ensuring the technical governance with regard to the process at the corporate level.

4.6 Natural Resource Management

YDUQS recognizes that natural resource preservation and responsible use are fundamental to the sustainability of its operations and ecosystem protections. In this context, the Company adopts guidelines to efficiently manage water, energy and other natural resources used in its activities.

Operating units are instructed to implement actions that promote consumption reduction, loss minimization and conscious resource usage: water reuse, alternative sourcing, system automation, demand control and renewable energy source prioritization whenever technically and economically feasible.

Monitoring consumption, adopting performance indicators and assessing the feasibility of innovative solutions are found in YDUQS's corporate eco-efficiency strategy. These actions reinforce the institutional commitment to environmental sustainability, operational competitiveness and resilience when facing climate and water challenges.

4.7 Environmental and Climate Risk Management

YDUQS adopts a structured approach to identifying, assessing and managing environmental and climate risks that may affect its operations, strategy and institutional reputation. These risks are continuously monitored, with integration into the corporate management processes and alignment with the Company's governance and sustainability principles.

The assessment covers physical risks (such as climate-related extreme events), transition risks (arising from regulatory, technological, and market changes), reputational risks and legal risks associated with non-compliance with environmental obligations. The analysis is conducted over different time horizons — short-, medium- and long-term — and considers technical and socio-environmental criteria.

Whenever applicable, these risks are assessed in conjunction with the Corporate Risk Committee or equivalent structure, aiming at full integration with the organization's governance and control systems.

4.8 Linking ESG Targets to Variable Compensation

To safeguard alignment between senior leadership's strategic decisions and the Company's long-term commitments, YDUQS links ESG (Environmental, Social and Governance) targets to the variable compensation for its key executives and the areas involved in managing and monitoring these targets.



This practice contributes to strengthening an organizational culture focused on sustainability and reinforces the commitment to responsible, transparent management oriented toward delivering positive socio-environmental impacts. Among the targets covered, priority is given to those related to reducing greenhouse gas (GHG) emissions and the response to climate change, with a focus on encouraging research and environmental innovation, aligned with the United Nations Sustainable Development Goals (SDGs).

4.9 Governance and Responsibilities

The governance structure for YDUQS's Environmental and Climate Change Policy ensures institutional accountability and senior leadership's commitment to the principles, targets and commitments undertaken by the Company. Involving governance bodies is essential to ensure the policy's effectiveness, strategic alignment and integration into the business model.

4.9.1 Board of Directors' Responsibilities

As the highest governance body, YDUQS's Board of Directors ensures environmental and climate guidelines are embedded in corporate strategy and long-term value creation.

Among its key attributions are:

- Ensuring that the Company's commitments to environmental management and the climate agenda are fully integrated into the business model, contributing to sustainable development and organizational resilience;
- Monitoring the Company's performance against environmental and climate targets, guaranteeing compliance with applicable regulations, publicly assumed commitments and recognized market best practices.
- Supervising implementation for initiatives related to environmental sustainability and climate change, fostering an organizational culture guided by socioenvironmental responsibility, meeting established targets and transparently communicating results and commitments.

4.9.2 Employee Responsibilities

YDUQS employees, across all areas and hierarchical levels, are responsible for acting consciously and in alignment with the Policy's principles, incorporating sustainable practices into their activities and supporting the organization's environmental compliance efforts.



4.9.3 Leadership's Responsibilities

YDUQS leadership positions — including managers, coordinators, supervisors and other hierarchical leaders — are responsible for acting as agents for dissemination and oversight of environmental and climate guidelines within their respective areas.

4.9.4 Responsibilities of the Sustainability and Social Responsibility Area

The Sustainability and Social Responsibility Department is responsible for strategically integrating environmental and climate guidelines into YDUQS's corporate sustainability agendas, contributing to the cross-cutting nature of these themes, strengthening organizational culture, and anticipating trends relevant to the business.

4.9.5 Responsibilities of the Occupational Safety and Environment Area (HSE)

The Occupational Safety and Environment Department (HSE) is responsible for strategically managing YDUQS's environmental and climate matters from both a technical and regulatory perspective, ensuring legal compliance and operational efficiency while continuously advancing the Company's environmental agenda.

4.9.6 Responsibilities of Suppliers, Service Providers and Third Parties

Suppliers, service providers and other third parties contracted or linked to YDUQS must act in accordance with this Policy's guidelines, ensuring their activities respect the sustainability and environmental responsibility principles assumed by the Company.

4.9.7 ESG Committee Responsibilities

The ESG Committee is responsible for acting as a strategic body and articulating actions related to YDUQS' environmental, social and governance agenda, promoting integration between areas, monitoring public commitments and aligning initiatives with corporate sustainability guidelines.

5. Implementation and Training

This Environmental and Climate Change Policy takes effect on the date of its approval by YDUQS's senior leadership, formalizing the institutional commitment to the responsible management of environmental aspects and to mitigating the impacts of climate change across all operations and hierarchical levels.

Policy implementation will be coordinated through the responsible areas,



ensuring broad communication over institutional channels, integration into corporate routines, and observance by employees, partners and other stakeholders.

In connection with this process, YDUQS is committed to providing training and development programs on environmental and climate topics to all employees, regardless of hierarchical level, through its corporate education platform. The objective is to provide the knowledge needed to identify, prevent and mitigate environmental impacts arising from activities, while fostering adoption of sustainable practices in daily operations.

The Company recognizes continuous training as essential to ensure this Policy's effectiveness, consolidate an internal culture for sustainability and strengthen institutional resilience against climate challenges and regulatory and market demands.

6. Penalties

Non-compliance with any item described in this policy is prohibited. Any violation, risky behavior for YDUQS or fraudulent act must be reported through the Confidential Channel by calling 0800 770 0782 or via the https://www.canalconfidencial.com.br/yduqs. The Compliance Department shall review the reports, and this may result in disciplinary measures as set out in the Code of Ethics and Conduct and in POL.05.038 - Disciplinary Measures Policy of YDUQS, as well as incur all penalties stipulated under law and applicable internal regulations.

7. Updating and Review

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