

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

Responsible Marketing Policy

1. Objective

This document formalizes guidelines and principles for marketing, sales, communication and advertising, in accordance with the YDUQS Code of Ethics and Conduct and current Brazilian legislation, consolidating a high standard of corporate governance.

Finally, it ratifies the YDUQS Group's commitment to promote true, non-deceptive, accurate and balanced marketing and sales practices, committing itself to establishing responsible relationships with customers and consumers in all its operations and those of its subsidiaries.

2. Reference documents

The Responsible Marketing Policy is based on Brazilian regulations and YDUQS Group internal policies already in force, namely:

External Reference documents and commitments

- Brazilian Advertising Self-Regulation Code
- Brazilian General Data Protection Law (LGPD).

Internal Reference documents

- YDUQS Code of Ethics and Conduct - Link
- POL.05.040 - Internal Privacy And Personal Data Protection Policy
- POL.06.008 - Human Rights Policy
- PGE.05.194 - DISCIPLINARY MEASURES

3. Application field

This Policy applies to the entire YDUQS Group, hereinafter referred to as the "Company" or simply "YDUQS," its subsidiaries, officers and employees, regardless of hierarchical level, as well as shareholders, service providers, suppliers, third parties and other business partners, in addition to any other persons representing YDUQS before third parties. Everyone must be committed to the rules set forth in this Policy, being responsible for disseminating and practicing the guidelines contained herein.

3.1 Target audience

Consumers, clients and potential consumers of the educational services offered. In this scenario, it should be noted that the YDUQS group does not advertise with a focus on children.

4. Descriptions

4.1 General guidelines

The Responsible Marketing Policy is aligned with the principles of CONAR, the Brazilian Constitution, other national legislation, as well as the Company's internal documents, whose references are described above.

In this regard, the guidelines contained in this Policy cover different communication channels, including voice, print and digital. They also extend to external partnerships, as the Company prioritizes relationships with partners and suppliers that have policies, practices and values aligned with the Company's standards.

For this purpose, YDUQS values dialogue with external and internal stakeholders, in addition to implementing ethical and responsible practices throughout the value chain, thus reaffirming the Company's commitment to human dignity, transparency, intellectual property and conscious consumption.

4.2 Clarity, respect and access to information

The YDUQS Group values clarity in its marketing and advertising communications, providing maximum information about products, services and conditions in each medium and point of contact. The Company maintains its focus on its differentiating features, highlighting them in its content and advertising campaigns. It does not make comparisons with competitors, since respect for competitors is a fundamental premise. In this context, YDUQS avoids creating communications that could diminish or devalue peer attributes.

Additionally, it makes available in full the conditions regarding its products and services, allowing people to understand this information in depth and make well-founded decisions. The Company works to promote social mobility and the integral development of each client, directing efforts to broaden and democratize access to higher and vocational education. This requires building mutual trust between YDUQS and its clients and partners.

4.3 Transparency, relevance and differentiation of information

YDUQS uses clear language in its marketing communications to convey relevant information to consumers. The Company's focus is to ensure that customers understand its services, differentials, prices and conditions.

Eventually, YDUQS adopts the colloquial language of its audiences, but always ensures that the message is accurate, complete and facilitates understanding its products, services, offers and conditions. In addition, the Company takes care to clearly differentiate informational content from other marketing practices, such as commercial promotions and sponsorships.

4.4 Commitment to diversity, equity, inclusion and human rights

YDUQS is committed to promoting diversity, inclusion and Human Rights. For this reason, the Company represents all profiles of people in its communications, taking care to also reflect the diversity present in its own student base, valuing diversity as an essential resource for innovation and success.

Therefore, it is committed to promoting inclusive marketing, where all people, regardless of race, color, gender, age, sexual orientation, religion, disability or any other personal characteristic are respected and represented.

4.5 Commitment to health and safety

YDUQS is committed to promoting a safe and healthy education ecosystem for all its consumers, customers, consumers and partners. Strict quality standards are adopted, in accordance with current legislation, to foster high quality educational services.

In this regard, it is emphasized that the company is committed to disclosing possible negative consequences with respect to its products or services, although no event or risk of this nature has been identified or recognized, as it is an education company.

4.6 Ensuring digital security and data privacy

YDUQS works to comply with all applicable laws and regulations in the markets where it operates, ensuring the protection of its students' and clients' data. The Company respects its Privacy and Personal Data Protection Policy, ensuring that the collection, storage and use of information is carried out in an ethical, transparent and secure manner.

In accordance with the General Data Protection Law (LGPD) and other regulations in force, measures are taken to protect information and ensure confidentiality, respecting consumer, client, supplier and partner rights.

The commitment to digital security is reflected in the dedication to privacy and data protection across all its operations. It is also expressed in the proactive and reactive measures the Company adopts in the event of cyberattacks, ensuring transparency and communication when such events occur, if they ensue, in accordance with applicable legal standards and internal policies.

4.7 Commitment to responsible relationships with clients and consumers

The Company is committed to providing high-quality service, guided by responsible relationships, to all its clients and consumers. It always acts with transparency, as set out in the Responsible Marketing Policy guidelines.

By remaining available for dialogue and remediation, YDUQS consistently keeps its communication channels open with its clients and consumers, implementing satisfaction surveys, forums and advisory councils. The information collected is analyzed to identify opportunities for improvement, reinforcing the quality of the products and services provided to meet consumer needs.

Additionally, the Company undertakes to monitor response times, enabling flexible and personalized services and working systematically to continuously improve its processes.

4.8 Remediation and deviations

YDUQS provides a Confidential Channel to address deviations from the practices set forth in this Policy.

This is an anonymous reporting channel open to all stakeholders, including employees, third parties, suppliers, clients and communities, available in the local language 24 hours a day. It is used to register and investigate reports of misconduct, human rights violations and unethical practices when committed by employees, suppliers and partners.

The Channel can be accessed through the Link: <https://www.canalconfidencial.com.br/yduqs/> and by calling: 0800 770 0782. The outsourced Third-Party company undertakes to receive and forward the reports to the Compliance area for due examination and treatment.

If the report investigation concludes that there was an ethical or conduct violation, the disciplinary measure will be decided by the Conduct Committee, composed of members from the Compliance, Labor Legal, and Labor and Union Relations departments. These members vote on applying a measure that corresponds to the conduct

in question, as established in the Consequences Management Policy.

In cases where infractions related to Fraud, Corruption, Discrimination or Harassment are discovered, within the framework of a Serious disciplinary measure, the Ethics Committee is also involved.

This committee is composed of members representing senior leadership, including the CEO, CFO, People and Management VP and the Chief Legal Counsel, who shall judge the case. It is important to note that in all cases the responsibility for applying disciplinary measures, defined by the committees, lies with the immediate manager of the employee involved.

In addition, YDUQS operates other service channels where, in line with best governance and transparency practices, it undertakes to disclose annually in the Integrated Report objective indicators regarding demand resolution. These include the percentage of complaints compared with total consumer and client service interactions through channels dedicated to this audience, and how many in the past year were resolved within five business days.

4.9 Implementation and training

This policy takes effect from the date of its approval by the YDUQS group, thus formalizing the Company's commitment to promoting and respecting responsible market practices.

The Company undertakes to provide responsible marketing training to all new marketing, sales and advertising team members, instructing employees regarding product and service quality. It also equips its professionals with the tools and knowledge needed to identify and address situations involving violations of client and consumer rights, promoting conduct guided by ethics and respect for the law.

It furthermore recognizes that continuous training is essential to ensure this Policy's effectiveness and to promote a marketing culture based on respect for legal provisions, consumers and clients, partners and suppliers, as well as human rights.

4.10 Accessibility

This Policy is accessible externally on our corporate website and for our employees in our repository of normative documents (SGP - Process Management System), at the following link: <https://estacio.sharepoint.com/sites/PortaldeDocumentosNormativos/SitePages/Home.aspx>.

5. Updating and Review

This policy will be reviewed periodically every 2 years or whenever deemed necessary.

6. Conclusion

The YDUQS Group reaffirms its commitment to Responsible Marketing as a core mission value. For these reasons, it is committed to marketing, selling and advertising practices governed by a high ethical and governance standard, with a focus on accurate, informative, transparent and balanced communication.

7. Penalties

Non-compliance with any item described in this policy is prohibited. Any non-compliance, risk behavior for YDUQS, or any type of fraud must be reported through the Confidential Channel by calling 0800 770 0782 or via the link: <https://www.canalconfidencial.com.br/yduqs> and will be subject to review by the Compliance area. It may result in the application of disciplinary measures set out in the Code of Ethics and Conduct and PGE.05.194 – DISCIPLINARY MEASURES, as well as all penalties provided for by law and other applicable internal regulations.