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1. OBJECTIVE/GOAL :

Establish responsibilities, criteria and commitments for establishing integrated safety, sustainability and environmental management in the NotreDame Intermédica Group

2. REFERENCE DOCUMENTS

Backing and supporting documents for this policy are:

- 2.1 NotreDame Intermédica Group Code of Ethical Conduct
- 2.2 Work Safety Procedures

3. COVERAGE


This policy applies to all employees and all units of GNDI (NotreDame Intermedica Group).

4. GENERAL CONSIDERATIONS

4.1 GNDI understands that it is of the utmost importance to establish an integrated management through the adoption of practices that ensure the survey, monitoring and control of the hazards and risks related to the safety of employees, subcontractors, patients and visitors, as well as aspects and environmental impacts related to its processes and the integration of strategies related to sustainable development. For this reason, it critically analyzes performance on safety, sustainability and environmental objectives and targets promoting continuous improvement.

4.2 The function of the MASS (environment, sustainability and workplace safety) area is to contribute to the promotion of safety, sustainability and environment in GNDI through the following activities:

- a) Conducting periodic assessment of compliance with safety, sustainability and environmental requirements applicable to the business;
- b) Implementation and promotion of programs aimed at awareness, education and guidance for the prevention of: injuries, occupational diseases, pollution and environmental degradation;

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- c) Implementation of safety programs and campaigns, mainly to reduce work incidents and improve employees' quality of life;
- d) Ensuring the environmentally friendly disposal of all solid and liquid waste generated in the business processes, as well as the implementation of programs to minimize their generation;
- e) Development and implementation of programs focusing on eco-efficiency;
- f) Implementation of social responsibility actions aligned with the business strategy.

5. COMMITMENTS

5.1 UNITED NATIONS GLOBAL AGREEMENT


GNDI is a signatory to the UN Global Pact Principles, which aims at aligning 10 universal principles in the areas of Human Rights, Labor, Environment and Anti-Corruption in business strategies and operations.

5.2 OBJECTIVES OF SUSTAINABLE DEVELOPMENT

GNDI is also engaged in contributing to the 17 Sustainable Development Goals (SDGs). By adopting a strategic approach, six SDGs were prioritized based on the organization's materiality results.

GNDI focuses on acting on the SDGs below.



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6. WORKPLACE SAFETY

6.1 GNDI believes that its success depends on its employees and, therefore, strives to ensure the necessary protection of those who contribute directly to the Group's results.

6.2 Workplace safety is guided by compliance with legal requirements (Regulatory Standards - Ministry of Labor and Employment, Collegiate Board Resolution - Anvisa, Conama - Ministry of Environment, Technical Standards - Cetesb, Normative Instructions - IBAMA), as well as by the implementation of activities / programs focusing on accident prevention.

6.3 In order to promote a safety culture that effectively prevents accidents, GNDI maintains a specialized team (occupational safety technicians and engineers) that manages its business units through: inspections (waste, radioprotection, hazardous products, works, fire-fighting system and nonconformities), CIPA - Internal Accident Prevention Commission), SIPAT - Internal Accident Prevention Week, committees (waste, radioprotection and sharp cutting edges), investigation and analysis of accidents (methodology Ishikawa Diagram and 5 Whys) preparation of APR - Preliminary Risk Analysis and Work Permit, preparation of work order and PPE sheet, emergency simulations, monitoring of unhealthy and dangerous products.


6.4 GNDI employees and third parties have the right to report any unsafe activities they are aware of, so that competent personnel can take appropriate measures to control any risk.

6.5 It is the responsibility of employees and third parties who work at GNDI facilities to work safely and, therefore, should actively participate in programs aimed at improving safety in the workplace.

7. ENVIRONMENT AND SUSTAINABILITY

GNDI is engaged in sustainability and carries out activities focusing on environmental, social and economic pillars. This policy establishes the following principles contributing to the promotion of sustainable development:

7.1 Align GNDI's strategic and operational decisions with the UN Global Agreement Principles and the Sustainable Development Goals.

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7.2 Operate in accordance with applicable national and international legal requirements and the principles of business ethics.

7.3 Promote awareness and commitment of all company professionals (CLT, PJ and third parties) regarding this policy.

7.4 Ensure partners and suppliers are aligned with the commitments of this policy and GNDI values.

7.6 Manage positive and negative environmental impacts, guaranteeing the current needs and rights of future generations.

7.7 Ensure environmentally correct disposal of all solid and liquid waste generated in the processes, as well as implement programs to minimize their generation.

7.8 Use natural resources consciously, employing environmental technologies as much as possible.

7.9 Provide information regarding sustainability issues to stakeholders in accordance with the material themes of the business.

7.10 Promote disease prevention for employees, patients and the community.

7.11 Implement social responsibility activities aligned with the business strategy.

7.12 Contribute to the development of employees and other stakeholders' citizenship.


8. RESPONSIBILITIES

The prevention and minimization of hazards and risks as well as environmental aspects and impacts are the responsibility of all employees and third parties contracted by GNDI.

The MASS department (Environment, Sustainability and Workplace safety), linked to the Human Resources Department, is the sector responsible for stimulating, assisting and / or executing actions related to the sustainability strategy.

8.1 SENIOR MANAGEMENT RESPONSIBILITIES

8.1.1 Provide the necessary resources to ensure the effectiveness of the MASS Policy.

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- 8.1.2 Contribute to the implementation and support of the MASS Management system.
- 8.1.3 Provide the framework for establishing, reviewing and critically analyzing action plans.
- 8.1.4 Adopt administrative and regulatory measures to prevent incidents while preserving safety and the environment.
- 8.1.5 Comply with current applicable law and other GNDI subscribed requirements.
- 8.1.6 Give priority to the safety of all employees and third parties operating on the premises of GNDI, through investment in processes for continuous improvement of working conditions and awareness of safety standards and the proper use of equipment.
- 8.1.7 Disseminate socially responsible behavior, valuing and promoting the inclusion of diversity.

8.2 MIDDLE MANAGEMENT RESPONSIBILITY (MANAGERS, COORDINATORS, SUPERVISORS, MULTIPROFESSIONAL TEAMS AND SERVICE PROVIDERS):

- 8.2.1 Comply with MASS-related policies and guidelines.
- 8.2.2 Disseminate incident prevention culture and environmental preservation among employees.
- 8.2.3 Ensure the qualification and training of employees in the practices established by the MASS system.
- 8.2.4 Comply with current legislation, standards, norms and procedures related to MASS issues.
- 8.2.5 Stimulate employees' commitment to social responsibility, so that they can develop a patriotic attitude in the corporate environment and in their daily lives.

9. ACQUISITIONS

Acquisitions made by GNDI must be in compliance with legislation and incorporate best environmental, sustainability and occupational safety practices.

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10. CONTINGENCY

10.1 Emergency situations must be anticipated and dealt with swiftly and effectively in order to significantly minimize their effects.

10.2 Accidents and incidents arising from the activities of GNDI shall be analyzed, investigated and documented in order to prevent their recurrence and / or to minimize their effects.

11. CONTINUOUS IMPROVEMENT PROCESS

Continuous improvement in environmental performance, sustainability and work safety must be promoted at all levels, ensuring the advancement in these areas.

12. TENURE AND POLICY REVIEW

This policy takes effect from the date it is signed. Periodic review is every 2 years or whenever necessary.