



Grupo
NotreDame
Intermédica

COMMUNICATION ON PROGRESS

UN Global Compact
April 2018 to April 2019

CONTENTS

Letter from the President	3
About the Company	4
Human Rights	9
Business	14
Environment	21
Anti-corruption	27



Letter from the president



I am pleased to confirm that the NotreDame Intermedica Group reaffirms its support for the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and the Fight against Corruption.

We acknowledge that a fundamental requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress report (COP) describing efforts to implement the ten principles. Thus, in this COP we describe our actions to continuously improve the integration of the Global Compact and its principles into our business strategy, culture and everyday operations. We reaffirm our intention to support and disseminate the Global Compact Principles and the Sustainable Development Goals (SDG) within our area of influence

Best Regards

Sr. Irlau Machado Filho

President – Grupo NotreDame Intermédica

NotreDame Intermédica Group

Best solutions in health care and dentistry

Founded in 1968 and headquartered in São Paulo (SP), the NotreDame Intermédica Group (GNDI) operates health and dental plans. We employ more than 14,000 employees and have more than 4.6 million beneficiaries.

GNDI is a pioneer in Preventive Medicine and offers the best solutions in health and dentistry.

The Group stands out in offering quality services in Own and Registered Network of Clinical Centers, Hospitals, Emergency units, Maternities, as well as Dental Clinics. One of our main concepts is to promote attendance based on the best reception and safety of our patients.

We encourage the adoption of healthy habits to provide quality of life and general well-being to our beneficiaries

Our Numbers



+50 years of operations
in business segment



14.000 employees*



Pioneer in Preventive
Medicine (1982)



One of the biggest health
care operators in the
country



4,6 millions**
of beneficiaries



More than 14,000
registered dentists



More than 3,000 medical
personnel

* Company data in january/2019

** Referentce number of beneficiaries(including Greenline)

Excellence in attendance

The NotreDame Intermédica Group distinguishes itself by a transparent, ethical and committed relationship with its beneficiaries, Clients and all other public contacts. We provide personalized services at affordable prices.

We have one of the best indices on client service satisfaction according to our own beneficiaries, with reference to ANS (National Agency for Supplementary Health) indicators

Efficiency in cost management

NotreDame Intermédica Group's business model prioritizes an efficient and sustainable management of health and dental care costs, always aiming at affordable prices for our varied public, with products with large coverage, diversity and exclusive advantages.

ABOUT OUR MAIN STRATEGIES:



Sustainability: Based on an economically sound, socially responsible and constantly improving system, we offer the best quality in services and products at affordable costs, contributing to the advancement of the health segment in Brazil.



Quality: we are committed to the continuous improvement of the quality of our services, supported by our excellent medical team. All processes are analyzed to guarantee safety and efficiency for our beneficiaries, seeking excellence in operation.



Assistance: we promote prevention of diseases and comprehensive health care services, with excellent reception, through rapid diagnosis and intelligent treatments. We encourage the adoption of healthy habits at each stage of care and help client companies with a reduction in absenteeism

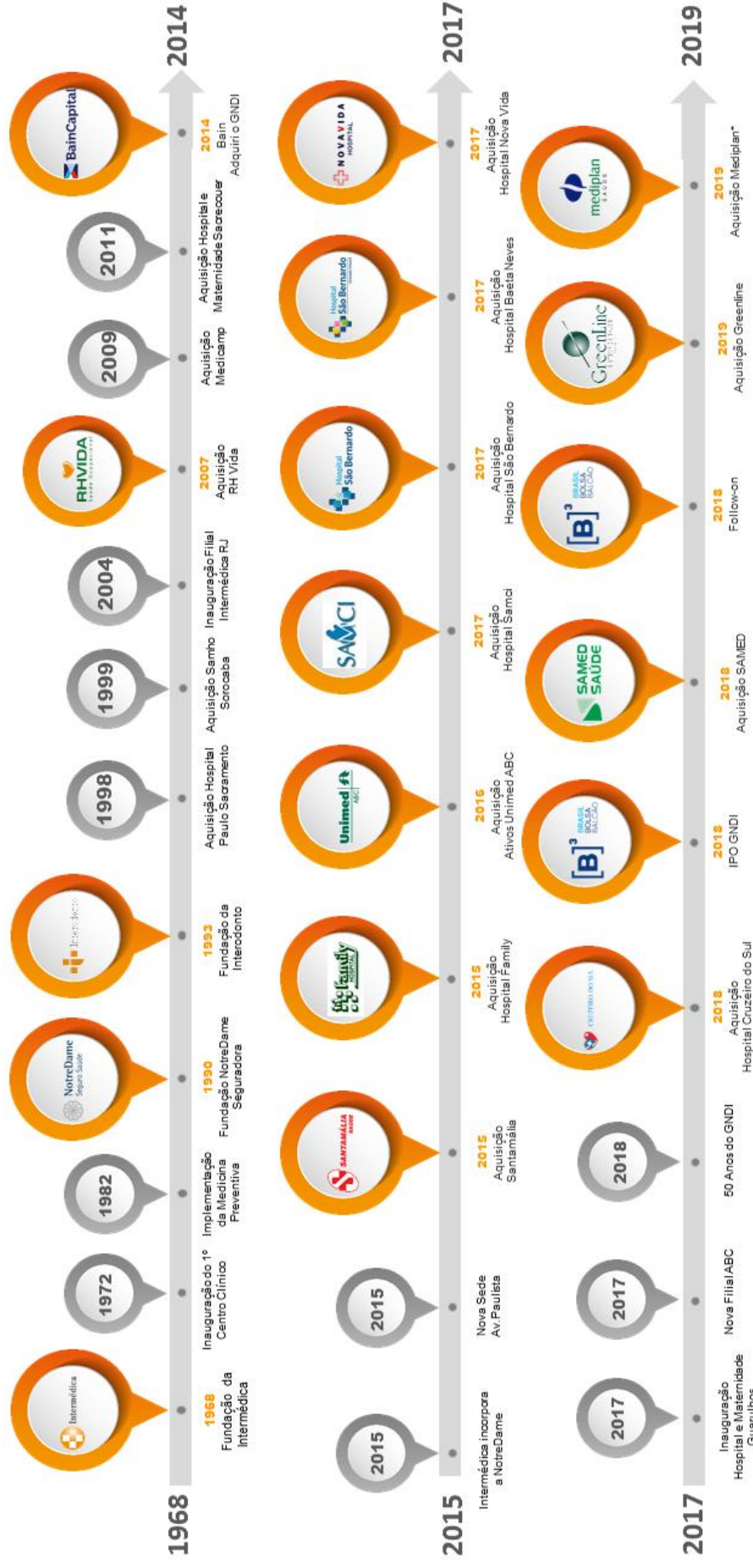


Innovation: We invest in research, technology, innovation and processes that guarantees the confidence and security of our clients



People: We adopt the best personnel management practices and attracts talents aligned with our brand, values and passion to serve with quality.

Time Line



* The transaction conclusion is subject to meeting determined precedent conditions, including approval by Administrative Economic Defense Boar (CADE).

GNDI has the mission of
making quality health
accessible to generations of
Brazilians



UN Global Compact

According to the UN Global Compact website,

"The UN Global Compact is a call for companies to align their strategies and operations to 10 universal principles in the areas of Human Rights, Labor, Environment and Anti-Corruption and to develop actions that contribute to the challenges of the society. Today, it is the largest corporate sustainability initiative in the world, with more than 13,000 members in almost 80 local networks in 160 countries."

Human Rights

1 | Companies should support and respect the protection of internationally recognized human rights.

2 | Ensure our non-participation in violations of these rights.

Environment

7 | Businesses should support a precautionary approach to environmental challenges.

8 | Develop initiatives to promote greater environmental responsibility.

9 | Encourage the development and diffusion of environmentally friendly technologies

Labor

3 | Companies should support freedom of association and the effective recognition of the right to collective bargaining.

4 | The elimination of all forms of forced or compulsory labor.

5 | The effective abolition of child labor.

6 | Eliminate discrimination in employment.

Anti-corruption

10 | Businesses must combat corruption in all its forms, including extortion and bribery.

Human Rights

The Code of Conduct and Ethics of the NotreDame Intermedical Group (GNDI) points out that respect for the protection of internationally recognized human rights must be ensured by all and will be ensured by GNDI.

In all relationships, we must ensure respect, professionalism, safety, dignity and all kinds of harassment-free attitudes.

GNDI has been working continuously to advance on human rights issues.

Preventive Medicine

We believe that health care starts with disease prevention and in the adoption of healthy habits.

In 1982, we pioneered the concept of Comprehensive Health Care. we offer several totally free initiatives that encourage healthy routines, combat sedentary living and treat chronic diseases. GNDI operates at three levels of prevention: Primary, Secondary and Tertiary.

1 PRIMARY PREVENTION

Education for Preventive medicine

- Lecture, support groups and health workshops – multi disciplinary team.

Safe Gestation Program

- Pregnancy and postpartum monitoring through a multidisciplinary team, with preparation courses for childbirth and informational materials;
- Telephone guidelines - prenatal, feeding, habits, vaccination,
- Breastfeeding, family planning, baby care and award-winning preventive practices.

At the primary level, GNDI adopts initiatives aimed at promoting health and stimulating the development of self-care. Health promotion actions are conducted by specialized multidisciplinary teams that serve the beneficiaries in their workplace, in our Preventive Medicine units (conducting lectures, health workshops, support groups) and through our virtual contents such as videos, health blogs, booklets, etc.

459,271 LIVES BENEFITED FROM OUR HEALTH PROMOTION ACTIVITIES IN 2018

The 459.271 mark of lives benefitting from health promotion actions was reached in 2018. Totalling 21.4% of the general population of beneficiaries of the plan, with themes related to maternal and child health, cancer prevention, special care for dengue fever, yellow fever, elderly health, diabetes, hypertension, cardiovascular diseases and nutrition.

At the secondary level, GNDI acts on the development of support programs for the chronic, elderly, oncological and pregnant patients for care, attendance and management of low, medium and high complexity cases. In this way, it seeks assertive resolution in its treatment and quality of life of our beneficiaries with centralized attendance in Preventive Medicine units located in São Paulo, ABC, Campinas, Jundiaí, Sorocaba, Rio de Janeiro and Santos

2 SECONDARY PREVENTION

PAC – Chronic patients support program

- Management of chronic diseases - from low to moderate severity;
- Paramedical telephone monitoring, with medical supervision, integrating preventive, educational and proactive actions;
- Cardiopathy, hypertension, diabetes, obesity, asthma, spine and high risk gestation;

Effective Results

- Improved adherence to treatment and healthy habits;
- Agility in solutions;
- Improvement of satisfaction / quality of life;
- Support for patients and family members, doctors and companies.

3 TERTIARY PREVENTION

CASE- Multi disciplinary follow up for high complexity cases

- Patient health management of high complexity;
- Patient with high level of physical or mental dependence;
- Patients with high cost re-hospitalizations ;
- Patients with multiple and / or complex pathologies;
- Patients with socioeconomic and / or family problems

The tertiary level refers to the management of cases of high complexity, with loss of autonomy. In these cases, GNDI performs centralized service in specialized units, providing a coordinated and comprehensive treatment, with a 'multidisciplinary team, as well as 24-hour Call Center and Home Care.

PAI – Elderly Assistance program

- Comprehensive care for the elderly through a multidisciplinary team, headed by geriatricians;
- Participants receive centralized, specialized treatment, with support from physiotherapists, speech therapists and nutritionists;
- Promotes healthy aging for people of 60 years of age and over.

Support programs

Our secondary level programs include Chronic Patient Support Program, Safe Pregnancy Program and Elderly Care and Oncology Program.

Patients with diabetes, hypertension, heart disease, childhood asthma, obesity, spinal problems, the elderly, oncological and pregnant are eligible for our programs. In the Chronic Patient Support Program we accompany the patients who already have the disease, we indicate reference doctors, give access to our health content, targeted nutrition and centralized phone assistance for questions on all health issues. This patient receives our contact periodically to check for health care, receives physical, mental and nutritional health guidelines.

Cases presenting advanced state of disease or the elderly with fragility and cancer patients are directed to a centralized and multidisciplinary care centre in our 10 exclusive Preventive Medicine units, with specialized staff and adequate infrastructure (physiotherapy, auditoriums, infusion room medicines, Wards, medicine dispensing center, clinics, etc.).

For this profile of patients who need more support to control their disease, we offer medical specialists and multidisciplinary team (nutritionist, psychologist, physical educator, physiotherapist, occupational therapist, social worker) with individual care and support groups.

For pregnant women, we have telephone support, specific groups for pregnant women such as childbirth preparation, newborn care, breastfeeding, nutrition for pregnant women and others. This ensures close relationship with our clinics and maternities, bringing better synergy in the maternal and child care service with special attention to those who are at high risk.

195,373 patients passed through preventive medicine programs in 2018.

Diversity policies

The first step in ensuring the protection of human rights is the creation and implementation of policies that address diversity factors. The table below shows our main resolutions on the subject.

Incentive for hiring interns.

GNDI offers internship opportunities in areas that have specialized professionals (Psychologists, Nutritionists, Nurses, Pharmacists, Engineers, Administrators ...) , focusing on the trainee's development and offering permanent positions when positions are available. The company has an Internship Program with a minimum duration of six months.

Young Apprentice (Recruitment and Selection Policy)

GNDI excels in the professional training of young people, through the young apprentice program, in partnership with external training entities. The Organization complies with the quota established in the legislation regarding the young apprentice and actually invests in these people, who are sent to take a technical course in training institutions recognized by the Ministry of Labor and formally accompanied by the Organizational Development area.

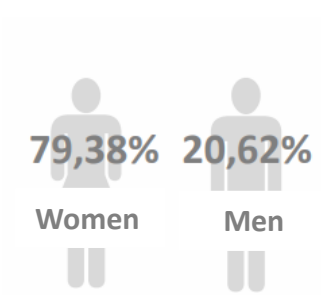
People with disabilities

(Recruitment and Selection Policy)

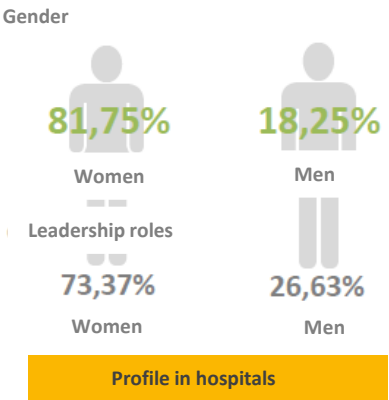
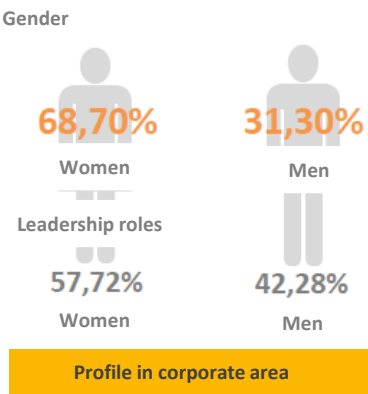
It is GNDI's commitment not only to comply with the legal quota, but also to provide an appropriate and respectful environment and training for people with disabilities employees.

Women in GNDI

According to a survey conducted in January 2019, 79.38% of the workforce is made up of women and 68.37% of the workforce leaders are female .

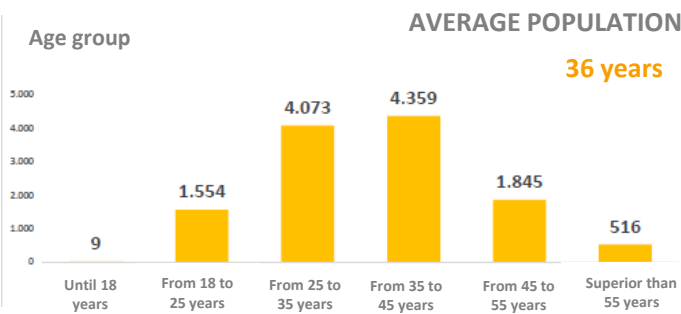


Follow below the composition of GNDI professional profile according to work place.



GNDI professionals Age Group

The chart shows the average age of GNDI professionals, according to a survey conducted in January 2019. The average general population is 36 years.



LABOR

Attract, empower and make the work environment the best possible is vital to the success of the NotreDame Intermédica Group. Only in this way will we be able to pursue our mission of "Making quality health accessible to generations of Brazilians".

Labor policies

Combating child labor (Code of Conduct and Ethics)

All its members must respect and comply with current legislation in its activities which prohibits labor of children and teenagers under 18 years of age, except as apprentices, from the age of 14, provided that the work does not have unhealthy characteristics and danger.

Discrimination

(Code of Conduct and Ethics)

In a professional environment people should be treated indistinctly and recognized for their attitudes and skills. GNDI does not tolerate any practice of discrimination and / or harassment based on: gender, identity, color, origin, nationality, citizenship, age, religion, philosophical or political conviction, sexual preference, culture, descendance, marital status, deficiency, socioeconomic status, position or function, or any other personal or social characteristic.

Slave Labor

(Code of Conduct and Ethics)

Slave labor, forced or compulsory, creates restrictions on the freedom of the worker and may not offer minimum conditions of dignity. It is a commitment of all to eliminate all forms of slave work, and must denounce offenders if this practice is confirmed.



Education and Development

The NotreDame Intermédica Group considers education and professional development as a legitimate way for people to develop, overcome their challenges and reach their goals, gaining new heights and engaging even better with our mission: Making quality health accessible to generations of Brazilians.

We have an important continuing education tool: The Corporate University (UniGNDI).



UniGNDI is an online and face-to-face content management platform, organized into Learning Trails, structured according to the function and area of activity.



134.38 training hours per employee in 2018



5742 training hours for leaders

In 2018, we obtained an average of 134.38 hours of training per employee. Based on the estimates of the training panorama in Brazil, we surpass the national average of 21 hours of training per employee per year. Our average also surpasses that achieved in the United States of 33 hours.

In addition to the content available on the online platform, we have face-to-face training with which we can highlight our Leadership Development Program (PDL).

We understand that the continued development of our leadership is a fundamental support pillar and growth for the group. As from 2016, our leadership development program has achieved greater prominence by the year. We had a total of 5,742 hours of training for our leaders in 2018.

In 2019, the program will cover an even greater number of participants, with professionals of supervisors, coordinators, managers and even directors to board.

Here are some course topics:

- Code of Conduct and Ethics
- Me and GNDI on Social Networks
- Anti-Corruption Law
- Waste Management
- Environmental Crimes Act
- Civil and Criminal Liability in Work Accidents
- Safety and Health at Work in Health Services - NR32

Bem viver (well-being) program

The GNDI employee has the Bem Viver Program, which aims at preserving employee health and contributing to their well-being.

Conte Comigo



CONTE COMIGO! (Count on me) is a program provided by the company that offers professional and confidential assistance when personal problems affect the personal lives of its employees and their work performance.

A totally free benefit that supports the employees of NotreDame Intermédica Group in different situations.

They have a team of specialized professionals to guide on emotional issues (stress, depression, panic, anxiety, etc.), relationship difficulties (personal or professional), abuse and dependence on alcohol or drugs, family and child problems, legal support (other than labor), tips for solving financial problems, and any other personal issues that may affect employee

Initially, the service is done by telephone 24 hours a day for emergencies and you can call as many times as necessary. If the problem requires a face-to-face service, depending on the situation, the employee or his / her family member will be referred to a professional specialized in Psychology, Psychiatry, Social Work, Law or Financial Consulting

Physical Activity

To encourage the practice of physical activity, employees of the NotreDame Intermédica Group and their spouses can enjoy differentiated prices and payroll discount at the Bio Ritmo and SmartFit academies

Racing and hiking club

Thinking about the well-being of its employees, promoted the practice of running since 2016. For those who are interested in this physical activity, the Company fully funds the value of the registrations for street races, in addition to offering a personalized race shirt.

In three years there were more than 1800 registrations paid for in more than 20 different races. Periodically, "trainings" are also carried out, with the presence of professional instructors.

Bem Viver Olympics

The Bem Viver (Well-being) Olympics has been held at the Sírío Sport Club, in São Paulo since 2016. The Bem Viver Olympics is attended by more than 1000 people, employees and their respective companions. The event provides individual and collective sports.

For children, the NotreDame Intermédica Group has a special surprise: the Kids Space, a recreation area with games, trampoline, ball pool and slides.

Winning athletes in each sport are awarded with gold medals and all participants also receive medals for participation.

Communication

We have internal communication campaigns to reinforce the message of quality of life for our employees throughout the year. Two success examples were the Healthy Eating Month and the Month to Combat Stress.



Remuneration

NotreDame Intermédica Group's principles on remuneration are essential to maintain balance in the company by attracting, motivating and retaining talents in accordance to the company's standards, market trends, employee Individual Performance Evaluation and the organizational economic scenario.

The remuneration criteria practiced by the company are transparent and objective for all positions, covering 100% of the employees considering Position and Salary Policy published on the intranet.

Criteria are established for wage movements and working salary equity, considering the legal requirements and specifications established by the union categories in the regions, in order to ensure uniformity of treatment among all the units of the NotreDame Intermédica Group.

Performance Evaluation

We use pre-defined organizational competencies according to work profile in our competency assessment model (administrative or assistance) and the level of complexity, with the objective of:

- Establishing behaviors to guide employees according to the organization's strategic guidelines.
- Establishing a performance management model that can assess the level of dominance and use of these competencies in a frequent and habitual manner.
- Making the GNDI Performance Assessment process transparent and fair.

Certifications and Awards

GNDI is committed to the quality and excellence in the delivery its health services.

we have a management model, policies and governance aligned to the socioeconomic and environmental sustainability. This scenario drives the Group to offering high quality solutions for all our beneficiaries.

The NotreDame Intermédica Group (GNDI) has a Quality Assurance Policy that aims at presenting the GNDI Quality Assurance Management model in an objective manner.

This is in line with the Mission, Vision and Values, norms and guidelines of the NotreDame Intermedica Assistance Management System (SGANDI) adopted in the Hospital Units, Clinical Centers and Emergency Units, addressing the functional, administrative and technical aspects of the care management.

The purpose of this Policy is to serve as a guideline for the operational and support areas in helping GNDI hospitals and emergency units in its daily operational activities within the network. Resulting in work optimization and consequent operational and financial efficiency of the unit.

This guarantees the quality and safety of the assistance provided to our clients, as well as in preparing the units for the Accreditations ONA (National Accreditation Organization) and Canadian International Accreditation - QMENTUM.

ONA Methodology

The National Accreditation Organization (ONA) is a non-governmental entity that certifies the quality of health services in Brazil, with a focus on Patient Safety. The Brazilian Accreditation Manual is the base instrument for this methodology which is used for the evaluation of health institutions that seek to improve their services and achieve excellence.

Qmentum Methodology

The innovation of "QMentum International™ methodology is for the use of new and innovative tools that allow the evaluation and restructuring of work processes. Evaluations are carried out by highly qualified and experienced staff who are committed to making the process accessible, relevant and transformative for organizations. The entire methodology is aligned with the principles of Clinical Governance, being used in more than 50 countries around the world, including North America, Europe, Asia and Latin America.

NotreDame Intermédica Group has been participating in the qualification of its units in the ONA methodology since 2004, with the first Group's Hospital to be Certified in Sorocaba (SP) – Modelo Hospital. Currently, NotreDame Intermédica Group has 21 ONA certified units , which are:



Level 1, 2 and 3

ONA Level 1 Certificate (Accredited)

Hospital Family (São Paulo – SP)
Unidade Avançada (São Paulo – SP)
Hospital e Maternidade Intermédica ABC (São Paulo – SP)
Centro Clínico Zona Sul (São Paulo – SP)
Centro Clínico Diadema (Diadema – SP)
Centro Clínico Ribeirão Pires (Ribeirão Pires – SP)
Centro Clínico Santo André 1 (Santo André – SP)
Centro Clínico Zona Oeste (Rio de Janeiro – RJ)

ONA level 2 certificate (full Accreditation)

Hospital Bosque da Saúde (São Paulo - SP)
Hospital Frei Galvão (Santos - SP)
Hospital e Maternidade Guarulhos (Guarulhos - SP)
Hospital e Maternidade Nsa. Sra. do Rosário (São Paulo)
Pronto-Socorro Barueri (São Paulo – SP)
Pronto-Socorro ABC (São Bernardo do Campo – SP)

ONA level 3 (Accredited with excellence)

Hospital Renascença Campinas (Campinas - SP)
Hospital Modelo (Sorocaba - SP)
Hospital e Maternidade SacreCoeur (São Paulo)
Hospital Paulo Sacramento (Jundiaí - SP)
Hospital Santa Cecília (São Paulo - SP)
Centro Médico Itavuvu (Sorocaba - SP)
Centro Médico de Pediatria (Jundiaí - SP)

There is currently an accredited unit with QMENTUM International. Other units are being prepared for QMENTUM methodology.



ACCREDITATION
CANADA

Qmentum accredited
Hospital Modelo
(Sorocaba - SP)

Other certifications



unite for children

Baby Friendly Hospital Initiative (Breastfeeding)

Hospital Paulo Sacramento (Jundiaí-SP) and Hospital Modelo (Sorocaba-SP)



Exam
Best & Greatest 2018



New Market Segment

B3 segment that requires high levels of governance.

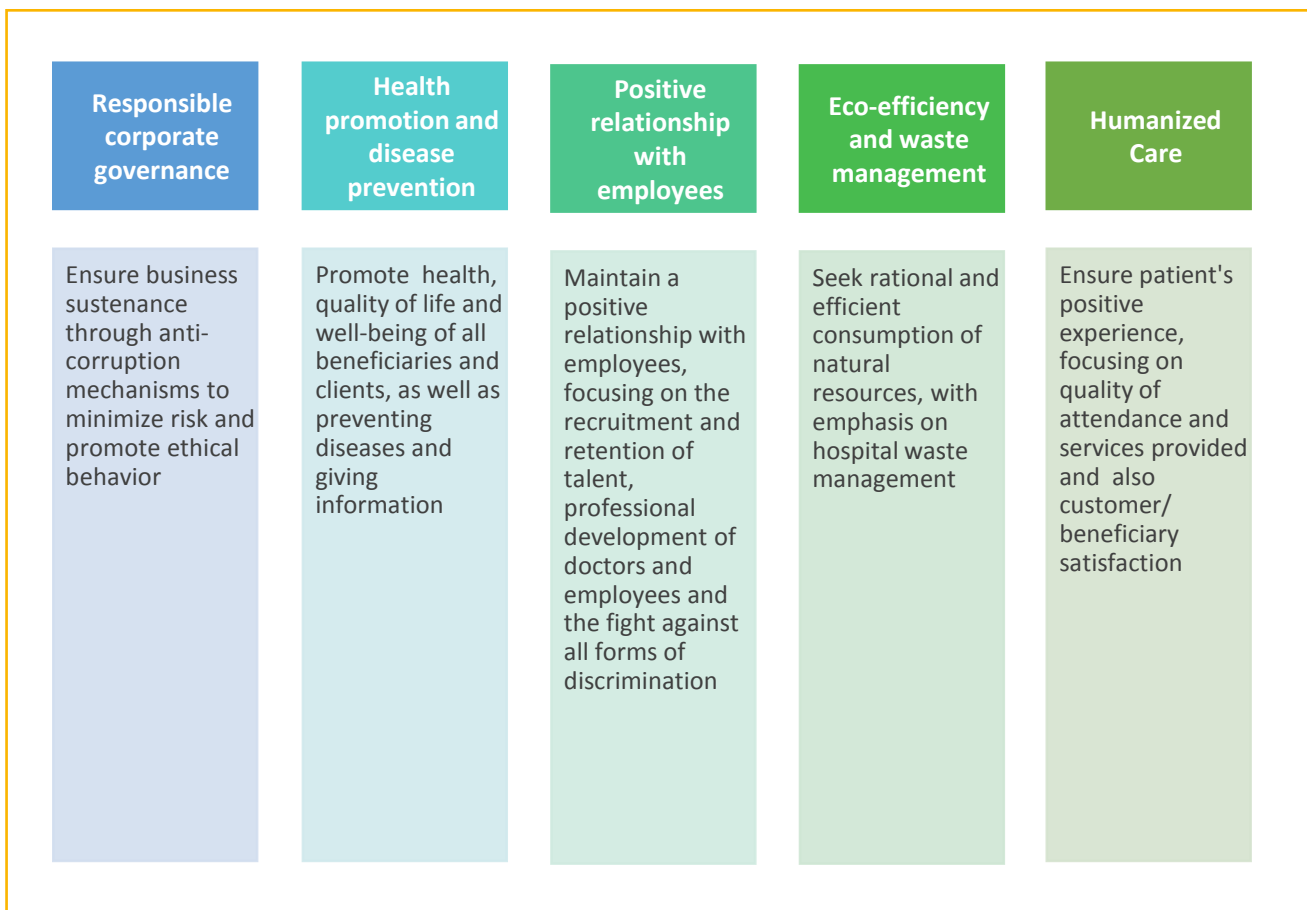


ENVIRONMENT

NotreDame Intermédica Group has been continuously working on minimizing its environmental impacts and advance on sustainability issues

Sustainability Strategy

GNDI evaluated relevance of sustainability issues with the company's business activities. This evaluation was carried out by a structured stakeholder consultation process. The result is summarized in the image below.



Sustainable Development Goals

The Sustainable Development Goals (SDG) define the priorities and aspirations for global sustainable development by 2030, and look at mobilizing global efforts around a common set of goals and targets. GNDI wants to contribute to these Goals within its sphere of influence.

Thus, the six main SDG of the Group's Activities were defined.

Furthermore, at the end of 2018, GNDI started to participate in the thematic groups of Sustainable Development Objectives (SDG) . Participation in this groups is important to gain knowledge on the subject and to improve the performance of S

Sustainability Report

The first GNDI Sustainability Report will be published in GRI Standards in 2020.



Eco-efficiency at our units

Eco-efficient actions were implemented in GNDI Administrative Headquarters building and in the Hospital Units with the objective of reducing the consumption of water and energy

Economy in water consumption

Bathroom Faucets

Studies identified that with each activation of lavatory faucet, approximately 900 ml of water were consumed.

Flow regulators and aerators were installed in all faucets of the headquarter's building reducing consumption to 150 ml, that is, an 83% reduction in water consumption per use.

Taps with reducers and aerators were also installed in hospital units.

Toilet

A standard enclosed toilet bowl consumes approximately 6 liters of water per flush. In all the toilet bowls of the building, we have installed a mechanism with double activation allowing the user the option of discharges of 3 or 6 liters depending on type of waste. This was also carried out in some of the Group's hospitals.

Recyclable Water

All rainwater collected in the area covered by the headquarters building is sent to a 26 m³ water reservoir. After treatment in a water treatment plant, it is sent for storage in another treated water reservoir with a capacity of 26 m³. This treated water is used for the irrigation system of green areas and floor washing of the external area and maintenance and water supply for the mirror pool.

Medical gasses generating system

The use of water medical gases generation systems (compressed air and medical vacuum) has been eliminated in our hospital units. "Dry" inputs are currently being used for generation.



Economy in the consumption of electricity

Lighting

In the headquarters building, the 25W fluorescent lamps in the entire parking lot were replaced by 18W LED tubes. In addition, support areas such as engine rooms, elevator halls and the basement had their 20, 26 and 35w electronic bulbs substituted for 9W LED. This brought a reduction of approximately 1,380KW/hr.

Switches have also been installed in all meeting rooms so that local lighting can be turned off at the end of activities.

GNDI has been carrying out continuous replacement of ordinary bulbs to LED bulbs in old buildings in our hospital units. The new units are already being built with the use of this type of lamp.

Elevators

The main elevators in the headquarters building are equipped with regenerative power system, allowing the bidirectional control of energy flow between the utility network and the elevator engine. It reuses the energy returned by the engine instead of wasting it in the form of heat, thus generating a reduction in energy consumption.

Air conditioning system

Hospitals have been replacing the conventional air conditioning systems with more modern systems with frequency variation (VRF's), which allows the reduction in the consumption of electric energy



Waste management

Correct waste management is an important issue for companies in the health sector. Given the importance of properly managing health care waste, we are continually working to advance on this issue.

Waste	2018
Non dangerous (kg)	2.257.173
Non recyclable	1.966.682
Recyclable	290.490
Dangerous (kg)	1.317.431
Infectious	1.244.617
Chemical	72.814

Elimination of cards



As from October 2018, beneficiaries of the NotreDame Intermédica plan no longer need to use physical cards and can use the GNDI easy application. This action entails less use of natural resources and waste generation.

Papa Card (Papa Cartão®) machines were installed in the Administrative Headquarters building in São Paulo, Rio de Janeiro and six Hospital Units at the same time. GNDI safely and correctly disposed 3,400 post-consumer plastic cards with this action.

The collecting company carried out a complete reuse of this material for new cards or new products with this plastic material.

In addition, a cultural contest was held with our employees to make them aware of reusing materials and performing the correct disposal and reuse. The 15 best photos that had a creative use of the plastic cards of NotreDame Intermédica were chosen and awarded.



Key holder created by GNDI employee from its plastic cards

Greenhouse gases emissions

For the first time, GNDI began to collect data from the Administrative Headquarters to carry out its calculations on greenhouse gas emissions.

In order to comply with the principle of transparency, the first inventory on greenhouse gas emissions for the year 2018 will be published in the Public Registry of Emissions of the Brazilian GHG Protocol Program.



ANTI-CORRUPTION

NotreDame Intermédica Group values excellence and quality in all its activities. We have a policy of compliance with legal and regulatory rules that govern the entire set of values of the Group.

Based on this concept, we have been able to relate ethically and honestly with all our stakeholders: clients, shareholders, brokers, employees, registered companies, service providers, the press and the community as a whole.

Compliance Program

GNDI Compliance Program preaches ethical and integrity culture within and outside the company, curbing the practice of unlawful acts and thus combating corruption, fraud and money laundering.

GNDI adheres to local and international regulations on anti-corruption and fraud prevention. The offer, acceptance, payment or authorization of bribes and any other form of corruption is prohibited, regardless of whether from the public or private sector.

In view of the GNDI Compliance Program, it is important to note that all contracts with suppliers have the "compliance clause". Therefore, the GNDI Compliance Program, with its principles and values, is an integral part of the agreements entered into with third parties.

In this way, GNDI requests adherence to the Compliance Program by all those with whom it has a business relationship. We ensure that our partners share the same principles and values as GNDI on this issue.

Anexo

Programa de Compliance

Grupo Notre Dame Intermédica Saúde S/A – "GNDI"

1.1. As PARTES declaram por si, por seus empregados, sócios, colaboradores, terceiros contratados e fornecedores, adotar e apoiar, dentro de sua esfera de atuação e influência, um conjunto de valores relativos ao combate à prática de lavagem de dinheiro, corrupção em todas as suas formas, inclusive extorsão e propina, cuja tarefa pode e deve ser desempenhada por toda a sociedade, endossando todas as leis normas e regulamentos relacionados ao combate à corrupção com as leis e regulamentos anticorrupção, e, incluindo, mas não se limitando a: (a) legislação nacional especial, Lei n.º 12.846/2013 (Lei Anticorrupção), o Decreto 8.420/2015 que a regulamentou; (b) Convenções e Pactos Internacionais dos quais o Brasil seja signatário, (c) Código(s) de Conduta Ética da(s) **PARTE(S)**, que, por este motivo, acordam e obrigam-se mutuamente conforme o disposto a seguir:

1.1.1. A absterem-se de quaisquer atividades ou atos que constituam violação às referidas disposições acima, bem como daquelas as quais as **PARTES** sejam signatárias.

1.1.2. A conduzirem suas práticas comerciais durante toda a vigência deste instrumento, de forma ética e em conformidade com as normas aplicáveis.

1.1.3. Direta ou indiretamente não, darem, oferecerem, pagarem, prometerem pagar ou autorizarem o pagamento de qualquer importância em dinheiro ou mesmo qualquer coisa de valor, benefícios, doações ou vantagens a qualquer autoridade governamental, consultores, representantes, parceiros ou quaisquer terceiros, com a finalidade de influenciar qualquer ato ou decisão do agente ou do governo, ou para assegurar qualquer vantagem indevida, ou direcionarem negócios para qualquer pessoa, que violem ou comprometam as diretrizes das leis nacionais e internacionais de anticorrupção.

1.1.4. Qualquer prática de corrupção e/ou fraude que envolva omissão ou prática intencional e irresponsável em benefício indevido pessoal, institucional ou de funcionário ou agentes da administração pública, quer seja financeiro ou não, direto ou indireto é considerada ilegal e gera graves penalizações de natureza criminal, civil e administrativa.

Anexo Programa de Compliance GNDI

Above is a print of the Compliance Program Contract with our suppliers.

Ethics channel

GNDI has an independent reporting channel for reporting suspected violations to internal and external standards, which is managed by a specialized external auditing firm

The channel can be accessed by e-mail (canaldeetica.gndi@denuncias.com.br) by telephone (0800 717 7789), by the GNDI website (<http://www.gndi.com.br>) or by the intranet (<http://intranet.gndi.com.br>). They are available to individuals or legal entities, public or private, internal or external.

In addition, the anonymity of the complainant is always guaranteed, since GNDI does not allow and does not tolerate retaliation



Above is a print of the Ethics Channel website.

The Ethics Channel was created in December 2016 and has been consolidated over the years, reporting on employees, suppliers and customers. There is an increase in the number of complaints when comparing the years 2017 and 2018, which indicates that this channel became accessible and effective after a wide publicity and awareness campaign. Another factor contributing to the increase in complaints was the constant process of acquisition of new companies by GNDI, which led to a substantial increase in the number of employees.

▲ Source of complaint



▲ Average complaint per 1,000 employee



CANAL DE ÉTICA DO GNDI

O Grupo NotreDame Intermédica possui um canal de comunicação pelo qual colaboradores, clientes, parceiros, fornecedores e a sociedade em geral podem reportar, de forma anônima, atividades contrárias aos seus princípios éticos, diretrizes e valores, bem como atividades ilícitas e casos de corrupção, fraude e lavagem de dinheiro.

O Canal de Ética do GNDI garante a total proteção e confidencialidade das informações recebidas, bem como o anonimato do denunciante.

Você pode acessá-lo pelos seguintes canais:



Site do GNDI
(www.gndi.com.br)



Telefone
(0800 717 7789)



Intranet/Extranet GNDI
(intranet.gndi.com.br)



E-mail
(canaldeetica.gndi@e-denuncias.com.br)

É importante esclarecer que o GNDI não admite nenhum tipo de retaliação ou repreensão aos denunciantes.

Para saber mais, clique aqui e consulte os documentos da área de Compliance ou envie um e-mail para compliance@intermedica.com.br

AMS nº 359017

www.gndi.com.br

Por favor, não responda este e-mail. Em caso de dúvida em relação às informações aqui contidas ou sobre a autenticidade desta mensagem, entre em contato por meio do e-mail canaldeetica.compliance@intermedica.com.br. Esta mensagem é reservada e sua divulgação, distribuição ou qualquer outra forma de uso é restrita e permitida apenas aos colaboradores do Grupo NotreDame Intermédica.

This is an example of email message about the Ethic Channel that is sent to all GNDI employees.

Ethical code of conduct

GNDI has a Code of Ethical Conduct, which is governed by a set company values, enabling the relationship with all its stakeholders (clients, shareholders, brokers, employees, service providers, the society and the government) is done in an ethical way thus, contributing to integrity and honest work.

The Code of Ethical Conduct of the NotreDame Intermedical Group establishes standards of Integrity that go beyond those required by law, using as an example professional practices that demonstrate the moral dedication of GNDI. The Group's values are present in decision-making in business and corporate governance. It is important to mention that all GNDI employees are aware of the Code of Ethical Conduct and its contents during the process of integration into the company.



Gifts receiving policy

GNDI Code of Ethical Conduct , Anti-Corruption and Anti-Bribery Policy establish the guidelines for the delivery, offering, promise and receipt of gifts, entertainment, travel, and other hospitality by NotreDame Intermedical Group employees or third parties acting in the interest or benefit of the Company.

In accordance with the GNDI Code of Ethical Conduct and other internal policies and procedures, the receipt and offering of small gifts, gifts and entertainment is permitted provided that a limit of R \$ 50.00 is observed. At the end of 2018 a communication campaign on the subject was made available to all employees, as shown below.



BRINDES NO NATAL



O Código de Conduta Ética do Grupo NotreDame Intermédica proíbe a solicitação e recebimento de lembranças, presentes ou qualquer outra vantagem proveniente de fornecedores e prestadores de serviços, públicos ou privados, que mantenham ou venham manter relação, direta ou indireta com o GNDI.

Apenas é tolerado o recebimento de brindes institucionais, sem valor comercial ou com valor de até R\$ 50,00.

Caso algum fornecedor ofereça qualquer presente com valor superior a R\$ 50,00, agradeça e recuse de forma respeitosa informando sobre as regras do nosso Código de Conduta Ética.

Em caso de dúvidas, encaminhe um e-mail para compliance@intermedica.com.br

Supplier integrity evaluation policy

In November 2018, GNDI published the Due Diligence Policy to ensure that the Group establishes business relationships with reputable and ethical suppliers contracted on technical and transparent criteria. The Due Diligence procedure is done prior to contracting the supplier.

To assess the reputational risk involved in contracting suppliers, GNDI relies on the market tool used by banks and insurance companies.

In accordance with this Policy, a potential GNDI supplier must complete a Due Diligence Questionnaire, which will be sent to the Compliance area, that will analyze it with the requested supporting documentation and indicate any risk related to fraud, corruption and / or money laundering.

GNDI once again shows its commitment to ethics and integrity in all its business relationships!

Ethics and Anti-Corruption Training

The GNDI Corporate University (UniGNDI) makes an online course on the Anti-Corruption Law and code of GNDI ethical conduct available to all its employees.

It is important to point out that all employees have access to the online training platform, thus enabling the interaction and knowledge of all the issues, policies and regulations adopted by GNDI.

12.179 trainings on anti-corruption law

12.701 trainings on ethical code of conduct

As of February 2019, 12,179 employees have already been trained on the Anti-Corruption Law and 12,701 employees have completed the online training on the GNDI Code of Ethical Conduct. Such courses are compulsory for all employees and must be carried out at the beginning of the employee path within the GNDI University platform.

It is necessary to highlight that since January 2019, the Compliance area has participated in face-to-face integration training of all new employees, presenting the content "Compliance, Ethics and Integrity", addressing the following subjects: Compliance, GNDI Compliance Program, Code of Ethical Conduct, Ethics Channel, Conflict of interests, Gifts and Fight Against Corruption.

Finally, it is important mentioned that GNDI conducted face-to-face training through its Compliance area regarding Combating Moral Harassment in 2018. This course was taught to all GNDI managers and directors.

