

Environmental and Social Review Summary (ESRS) Dr. Consulta Project

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1. General Information of the Project and Overview of Scope of IDB Invest's Review

Dr. Consulta (the "Company") is a Brazilian company founded in 2011 to provide affordable outpatient medical assistance both in person and through telehealth. The Company was founded as a popular clinic to serve a portion of the population without health insurance coverage in Brazil, offering low-cost consultations and medical exams. Dr. Consulta offers medical assistance services in more than 60 specializations; dental care; laboratory tests and imaging (more than 3,500 types); outpatient surgeries (low and medium complexity procedures);¹ and invasive surgeries that require hospitalization and are performed outside its medical centers in partnership with other hospitals.

This operation (the "Project") consists of a direct capital investment to support the Company's development in in-person and telehealth services and partnerships with low-cost health plans and provision of services for third-party health plans.

The Environmental and Social Due Diligence ("ESDD") process included: i) review of Company information and documents; ii) interviews with key Company representatives; iii) visits to two of the Company's outpatient units and one administrative unit in São Paulo.

2. Environmental and Social Categorization and Rationale

In accordance with IDB Invest's Environmental and Social Sustainability Policy, the project was classified as category B as it may generate, among others, the following impacts and risks: i) creation or increase of occupational health and safety risks to employees and contractors; ii) generation of waste, particularly hospital and hazardous waste; and iii) fire and other emergency risks.

The Performance Standards ("PS") triggered by the project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; and iv) PS4: Community Health, Safety, and Security.

3. Environmental and Social Context

3.1 General Characteristics of the Project Site

Dr. Consulta has 28 outpatient units that offer various services, such as medical consultations, dental care, medical exams and sample collection, and outpatient surgeries. They are located in the cities

¹ Outpatient surgeries are non-invasive surgeries that do not require patient hospitalization.

of São Paulo, Diadema, Guarulhos, Osasco, Santo André, São Bernardo do Campo, Taboão da Serra, and Jundiaí, all in the State of São Paulo. The Company also has an administrative unit located in the city of São Paulo.

There are three outpatient unit models: i) Model A, which offers the main basic consultation and medical exams services in all regions; ii) Model B, which focuses on low to medium complexity services that require more complex infrastructure and are provided in all micro-regions; and iii) Model C, which are the units offering the most complex services in the macro-regions. This distribution was established to ensure access to the various services provided in the regions where the Company operates. The units are located in urban areas, close to subway stations, bus stops, and shopping centers.

Generally, the units have a reception and waiting area; examination rooms; exam rooms; test sample collection points; regular and hazardous waste storage areas; a storage room; and, for employees, a kitchen, rest area, and changing room. Model B units may offer vaccine, radiology and ultrasound services, and Model C may also have endoscopy, radiology, ultrasound, and Magnetic Resonance Imaging (“MRI”) facilities.

Dr. Consulta’s operations are regulated by a number of requirements, permits, and licenses issued by authorities. All units have: i) the National Healthcare Establishment Registration (“CNES,” in Portuguese) required by the Ministry of Health, except for the Osasco outpatient unit, which is in the process of obtaining it; ii) the São Paulo Fire Department Inspection Report (“AVCB,” in Portuguese), which certifies that the units’ facilities are in compliance with required fire safety conditions; and iii) the environmental license exemption issued by the State of São Paulo Environmental Company (“CETESB,” in Portuguese).

The units must also have various Health Licenses (“LS,” in Portuguese) issued by the National Health Regulatory Agency (“ANVISA,” in Portuguese) for test sample collection, vaccination, radiology, tomography, MRI, endoscopy, and dental care activities; as well as an LS for the specific X-ray, bone densitometry, mammogram; tomography; and dental care facilities and equipment. Each outpatient unit must obtain a specific LS for each activity or piece of equipment, as applicable. Currently, the Company is in the process of obtaining 25 LSs for nine outpatient units, in addition to the LSs that it already holds.

The units are registered in the regional boards for their various areas of operation, namely the Regional Medical Board (“CRM,” in Portuguese), the Regional Dental Board (“CRO,” in Portuguese) – as applicable – and, for the DIAD unit, the Regional Nursing Board (“COREN,” in Portuguese).

In compliance with local legal requirements, the units that have visual communication vehicles in public areas must obtain the Signage Registration (“CADAN,” in Portuguese) from their local governments². In addition, outpatient units (such as Metrô Luz and República), which are located near historical heritage regions, must comply with the requirements established by the Historical, Archaeological, Artistic, and Tourist Heritage Protection Board (“CONDEPHAAT,” in Portuguese). Currently, the Company is in the process of adapting to and obtaining the CADAN at seven

² Registrations establish the requirements and conditions with which these vehicles must comply.

outpatient units, including the República unit. Other units that require a CADAN are already in compliance.

Units with elevators and lifting platforms have the Annual Inspection Report (“RIA,” in Portuguese) in order, as issued by outsourced companies specialized in inspecting these devices. The RIA is a document required by local governments.

All units have a Licensing Exemption Declaration from the Federal Police for the purchase and use of materials containing controlled substances; as well as the Inspection Certificate and Operating License from the State of São Paulo Civil Police for the use of controlled substances.

4. Environmental Risks and Impacts and Proposed Mitigation and Offset Measures

4.1 Assessment and Management of Environmental Risks and Impacts

4.1.a Environmental and Social Assessment and Management System

The Company does not yet have an Integrated Environmental and Social Management System (“ESMS”). It will develop an ESMS that will include current environmental and social management programs and procedures, and will develop and implement: i) procedures to identify environmental and social risks and impacts; ii) corresponding management and mitigation programs; and iii) monitoring and continuous improvement programs.

4.1.b Policy

Dr. Consulta has a Code of Conduct that establishes the Company’s values and rules of conduct with respect to data protection, anticorruption measures, and zero tolerance of discrimination and harassment, among other aspects. The Company does not yet have a Sustainability Policy.

4.1.c Identification of Risks and Impacts

The Company identifies and manages occupational health, safety, and security risks e impacts, emergencies, and regular and hazardous waste management based on the implementation of management programs and standard operating procedures. The Company is developing an Environmental and Social Risks and Impacts Matrix.

4.1.c.i Gender Risks

Dr. Consulta’s Code of Conduct establishes zero tolerance of moral harassment, sexual harassment, and discrimination related to sex and gender, among other aspects. The Company’s Ethics Channel can receive complaints, reports, or suspicions of Code of Conduct violations. The Company will develop a formal internal procedure to establish protocols to receive and respond to grievances and complaints, with specific procedures to receive and respond to discrimination, moral harassment, and sexual harassment cases.

Approximately 83% of the Company's employees are women. The Internal Work Rules recognizes breastfeeding women's rights to two special half-hour breaks during to breastfeed a child until six months of age. In addition, though a formal procedure has not yet been established, the Company favors home-office work for pregnant or breastfeeding employees. The outpatient and administrative units do not have a lactation room.

4.1.c.ii Climate Change Exposure

The Project has an exposure to natural risks related to rain patterns and drought periods, and to natural risks such as seasonal floods. The Project's units have water tanks to ensure supply during periods of drought. In addition, the Project will conduct a climate change risk analysis as part of the process of developing and updating the Environmental and Social Risks and Impacts Matrix in order to identify and assess these potential risks related to their operations, and to develop and implement appropriate prevention and mitigations measures.

In addition, based on an analysis conducted in accordance with the approach established in the IDB Group Paris Alignment Implementation Approach, the Project is considered Paris Agreement aligned.

4.1.d Management Programs

Dr. Consulta currently has a Healthcare Waste Management Plan;³ a Chemical Substance Management Procedure; a Medical Control and Occupational Health Program; an Occupational Risk Management Program; an Emergency Action Plan; a Sharp Material Accident Prevention Plan; a Radiation Service Safety Management Procedure, and others Standard Operating Procedures ("SOP") for incident reporting, job accidents, provision of Personal Protection Equipment ("PPE"), human resources management, among others.

4.1.e Organizational Capacity and Competency

The Company has a Work Safety and Occupational Health ("SESMT," in Portuguese) team consisting of a Work Safety Engineer, three Work Safety technicians, one Occupational Health Nurse, and one Work Safety Assistant, and is in the process of hiring an Occupational Health Doctor.

To review regulatory and licensing or permitting matters involving environmental authorities, the Company has a Legal Department with a Manager, a Coordinator, an Analyst, and a Young Apprentice.

4.1.f Emergency Preparedness and Response

The SOP for the Emergency Action Plan ("SOP – EAP") establishes the emergency response procedures and applies to all Dr. Consulta units. According to this procedure, all units must submit an Emergency Action Plan ("EAP") containing: i) a description of the unit's surrounding area; ii) a

³ Developed in accordance with current standards (Law 12,305/10, National Health Regulatory Agency (Anvisa) Board Resolution (RDC, in Portuguese) No. 222/18 and National Environmental Board (Conama, in Portuguese) Resolution No. 358/05.

description of the unit; iii) information regarding hours of operation; iv) a description of firefighting equipment; v) a list of internal extensions; vi) an identification of meeting points; vii) the mandatory nature of EAP and support material dissemination; viii) identification of the Fire Brigade; and ix) identification and location of the hospital closest to the unit.

The SOP – EAP also requires that units have escape route signage and identification of firefighting equipment. All Dr. Consulta units have the São Paulo Fire Department Inspection Report (“AVCB,” in Portuguese), which certifies that unit buildings are in compliance with the required fire safety conditions.

The SOP – PAE establishes that units must conduct, annually, the full emergency drill with all employees. Before the drill, the exercise’s objectives and goals are established, such as evacuation time and level of participation. The drill results are assessed, and a report is prepared identifying improvement opportunities.

The composition of the Fire Brigade is established in accordance with Technical Instruction N^o 17/2014 of the State of São Paulo Military Police Fire Department (“CBPMESP,” in Portuguese). Employees who are members of the Fire Brigade must undergo training and use a Fire Brigade identification.

For units located in shopping centers or commercial buildings, the SEMST team checks the established emergency procedures, the required fire safety conditions, as well as training and drill activities.

4.1.g Monitoring and Review

The Company continuously monitors and reviews occupational health, safety, and security conditions at the units. This monitoring is conducted by the SESMT area, which visits all units on a monthly basis and, based on a checklist, verifies issues of management and use of PPE; management and disposal of sharp materials; management and disposal of regular and hazardous waste; use and management of chemical substances; among others. The Company also monitors, on a monthly basis, the indicators of medical absenteeism, work accidents, Occupational Health Absenteeism Certificate (“ASO,” in Portuguese), and vaccination card.

The Legal Department conducts periodic inspections at the units to verify the status of licenses and permits and other requirements from the authorities.

Dr. Consulta has an internal digital platform that constantly collects, consolidates, and updates data for unit management, including information related to patients’ journeys, waiting time, team’s compliance with service protocols, patient assessment, employee’s engagement and work environment, financial information, demand, etc.

4.1.h External Communication and Grievance Mechanisms

Dr. Consulta’s website indicates a telephone line, e-mail, and WhatsApp number that any external party may use to request information or submit suggestions, grievances or complaints. Grievances

and complaints can also be received through social media and company and service evaluation websites, such as “Reclame Aqui” .⁴ In addition, at the completion of every service, patients receive a link by text to evaluate the service and medical team, which they may also use to submit suggestions, questions, grievances, and complaints.

The Company has a team called “Patient Happiness Center” (“CFP,” in Portuguese), which is responsible for receiving, reviewing, forwarding to the appropriate areas, as applicable, and responding to all requests and complaints from external stakeholders. The CFP is supported by two outside companies, Teleperformance⁵ and Concentrix⁶, to handle complaints and requests received by telephone. These outside companies’ employees, who receive specialized training to provide these services, are capable of handling and resolving routine or less complex requests and complaints. When complaints require specific handling or the involvement of the Company’s operational areas, they are forwarded to the CFP team.

CFP’s service and response time protocols range from 24 to 48 hours, excluding exceptional cases that require more time to resolve the request. The CFP team also conducts weekly visits to the telecommunication centers to provide support and monitor performance.

It prepares monthly monitoring reports with information regarding CFP’s and outside companies’ performance, consolidating information on the number of complaints received; topics addressed; communication channels used; and response time, among others. The monitoring indicators also allow the CFP to identify issues in operations or in the quality of or satisfaction with the services at specific units or medical specializations. These results are forwarded by the CFP to the specific areas for implementation of corrective actions and resolutions.

The CFP is also able to promptly identify the occurrence of operational issues that may be causing a sudden increase in complaints in a certain area, and to act with the internal areas responsible for resolving the issue.

4.2 Labor and Working Conditions

4.2.a Work and Employment Conditions

Dr. Consulta has 852 direct employees, of which 219 are in the administrative unit and 633 in the outpatient units. All direct employees were hired in accordance with Brazil’s Consolidated Labor Laws (“CLT,” in Portuguese). Of the total of direct employees, 83% are women and 17% are men.

⁴ Reclame Aqui is a Brazilian website for complaints against companies regarding interactions, purchases, sales, products, and services. The website offers free services, both for consumers to post their complaints and for companies to respond.

⁵ Teleperformance is a global company based in France and with operations in 170 countries, offering outsourcing and consumer relations and engagement services.

⁶ Concentrix is a global company based in the United States and with operations in 40 countries, offering outsourcing and consumer relations and engagement services.

Dr. Consulta's direct employees have guaranteed rights and benefits under the CLT. Benefits offered include: vacation; childcare support; maternity, paternity, and adoption leave; meal vouchers; transportation vouchers; and health plan.

The company hires specialized healthcare companies to provide medical, nutrition, dental care, and psychological services, among others. These companies (approximately 800) provide non-exclusive services to Dr. Consulta and have flexibility and independence in scheduling clinical services.

Dr. Consulta has a Young Apprentice program, which hires youth over the age of 18 to work primarily at the outpatient units to support patient services and receiving. These employees receive training and attend monthly gatherings in which they are familiarized with the Company's internal divisions.

4.2.a.i Human Resource Policies and Procedures

Dr. Consulta's Internal Work Regulations, also referred to as Employee Manual, establishes and consolidates all employer and employee rights and obligations, including provisions related to hiring; termination; onboarding and training; work hours; comp time; leaves; compensation; prohibitions; and disciplinary measures, among others.

Dr. Consulta's Code of Conduct also establishes rules of conduct related to romantic and family relationships among employees; relationships with external agents, such as the press and the government; gift acceptance policy; bribery and corruption prevention; conflict of interests; data protection and confidential information handling; and implications of code violations.

The Company has various SOP that establish the different internal processes for human resources management, including but not limited to: "Recruitment and Selection;" "Employee Termination Procedure;" "Employee Training & Development;" "Employee Leave and Return;" "Employee File Management;" "Goals and Bonuses Policy;" and "Warning, Suspension, and Termination of Employment for Just Cause."

4.2.a.ii Worker Unions

Dr. Consulta recognizes employees' right to joining unions pursuant to the CLT and the Brazilian Constitution. All 852 employees are members of unions representing their area of work and region, namely: State of São Paulo Nurses' Union ("SEESP," in Portuguese); Private and Philanthropic Healthcare Workers' Union in the Grande ABC Region ("SINSAUDEABCD," in Portuguese); São Paulo Nurses' Aids and Assistants and Healthcare Institution Workers' Union ("SINSAUDESP," in Portuguese); Guarulhos Healthcare Service Institution Workers Single Union; Osasco and Region Healthcare Service Institution Workers Single Union ("SUEESSOR-Osasco," in Portuguese); and State of São Paulo Job Safety Professionals' Union ("SINTESP," in Portuguese).

4.2.a.iii Nondiscrimination and Equal Opportunities

Dr. Consulta's Code of Conduct establishes the Company's commitment to promote an environment free of harassment, prejudice, intimidation, and favoritism, as well as zero tolerance of moral

harassment, sexual harassment, and discrimination based on color, race, sex, sexual orientation, religion, gender, national origin, political conviction, or other reasons for individual differentiation.

The “Warning, Suspension, and Termination of Employment for Just Cause” SOP establishes what is deemed to be a slight, moderate, and serious violation, as well as the rules for application of corresponding disciplinary measures. According to this procedure, moral harassment, sexual harassment, and racial discrimination cases are deemed to be serious violations, and the employee may be subject to a three-day suspension or termination for cause in the case of a second violation.

The Company has an Ethics Committee responsible for receiving reports of Code of Conduct violations, including cases of harassment and discrimination. The committee is responsible for reviewing and investigating claims, and for determining corresponding disciplinary actions and measures.

Dr. Consulta has a Diversity and Inclusion Committee, which has not yet been formalized with a specific SOP, consisting of four focus areas: women; persons with disabilities; ethnic origin and race; and LGBT, with leaders appointed to each group. The committee drives engagement and awareness-raising and communication activities, participates in new employee onboarding activities, and provides guidance to outpatient units that need support with respect to serving patients from diversity groups. The Company is developing a Diversity and Inclusion Committee Policy.

4.2.a.iv Grievance Mechanism

Dr. Consulta’s Ethics Channel receives employee grievances and complaints, as well as reports or suspicions of Code of Conduct violations. The available channels are a specific Ethics Channel e-mail and an online form for anonymous complaints.

The Personnel Management area is responsible for receiving, reviewing, investigating, contacting areas involved, as applicable, determining resolution actions, and responding to claimants who choose to identify themselves. The Legal Department also provides support and monitors the case when necessary. However, the Company does not yet have a formal procedure established to receive and handle internal grievances and complaints.

When there are reported or suspected cases of Code of Conduct violations, the Ethics Committee (currently consisting of a member from the Human Resources Department, a member from the Legal Department, and the Company CEO) is responsible for executing the internal review, investigation, and sanction procedures, as applicable. Even without an established internal procedure, the Ethics Committee cares for and ensures the protection of the identity of the involved parties and avoids revictimizing claimants.

Dr. Consulta will develop a formal internal procedure to establish protocols to receive and respond to grievances and complaints, with specific procedures for discrimination, moral harassment, and sexual harassment cases. This procedure will determine who are the persons in charge of internal management, response times, and monitoring and performance indicators, and will also have a non-retaliation commitment.

In addition to the Ethics Channel, Dr. Consulta has some communication and internal engagement channels. The Open Doors (“Portas Abertas”, in Portuguese) program, for example, is a communication initiative for the Company’s upper management, including the Director of Human Resources Management, the Executive Director of Operations and Medical Area, and the operations and healthcare provider teams. There is also the Come With Us (“Vem com a Gente”, in Portuguese) program, in which directors periodically visit different outpatient units, where they interact directly with the teams and may receive suggestions and complaints.

In addition, the Company periodically conducts engagement and climate surveys of employees. Every 15 days, employees use an online platform to answer anonymously to about 10 to 15 questions regarding engagement, motivation, work environment, and opinion of the Company. These survey results are reviewed internally, and Action Plans are developed to respond to and improve the results.

4.2.b Occupational Health and Safety

The SEMST team is responsible for managing the occupational health and safety of direct and outsourced employees who work at Dr. Consulta units, and visits all units monthly to verify and evaluate whether the health and safety procedures e programs are being properly implemented.

For each outpatient unit, the Company engages an outside company specialized in occupational health management to prepare a Risk Hazard Technical Report⁷ and a Health Hazard Technical Report⁸ in order to review work conditions and identify risk⁹ or health hazard¹⁰ conditions.

In accordance with local legislation¹¹, Dr. Consulta, with the support of a specialized outside company, developed the Risk Management Program (“PGR”) for each unit. The PGR identifies and evaluates occupational risks according to the employees’ work environment and activities, as well as their functions and positions; evaluates existing protection controls; and develops an Action Plan based on the results. In accordance with national legislation, the PGR must be updated annually.

The Personal and Collective Protection Equipment Management SOP establishes, among other aspects: i) procedures to provide, use, and record PPE and Collective Protection Equipment (“CPE”); ii) the need for all outpatient units to have PFF2 masks, procedure gloves, safety goggles for employees who use prescription glasses, SPF 30 sunscreen, and raincoats for employees who do outdoor work; iii) the obligation of units that offer endoscopy and colonoscopy services to provide ear protection, safety goggles, and rubber aprons; iv) the need for units that offer services in other medical specializations to provide nitrile or rubber gloves with extended cuffs, PVC aprons with

⁷ In accordance with Regulatory Standard No. 16 under the Ministry of Labor and Social Security Decree No. 3,214/78, which provides for Hazardous Activities and Risk Operations and defines payment procedures for hazard pay.

⁸ In accordance with Regulatory Standard No. 15 under Ministry of Labor and Social Security Decree No. 3.214/78, which provides for Health Hazard Activities e Operations and defines tolerance levels for physical, chemical, and biological agents.

⁹ Eleven outpatient units were identified (Butantã; Ibirapuera; Internacional Shopping Guarulhos; Metrô Luz; Rebouças; Santo André; São Bernardo do Campo; Shopping SP Market; Santa Cruz; Tatuapé II; and Teodoro), linked specifically to the technical radiology professional functions, as their activities involve exposure to ionizing radiation.

¹⁰ Potential exposure to or contact with live infectious microorganisms and parasites and their toxins as a result of employee contact with patients, biological materials or non-sterilized materials.

¹¹ Brazilian Ministry of Labor and Social Security Regulatory Standard No. 01 (“NR-01”) on Occupational Risk Management.

extended cuffs, and eyewash stations; and v) the obligation of units that offers mammogram, tomography, bone densitometry, dental care services and x-ray, to provide lead aprons, and thyroid and gonad protectors.

Dr. Consulta's "Safety Management for Services with Radiation" SOP establishes the following requirements: (i) for radiology procedure room conditions, including the structure of physical barriers to protect employees from radiation exposure; (ii) protection equipment; and (iii) access restrictions and signage for procedure areas. Employees who execute or provide support to radiation services also use a personal dosimeter that monitors monthly individual exposure to ionizing radiation.

Employees and contractors who work in MRI testing services receive periodic training on: i) ban on use of metal ornaments or any other metal objects; ii) procedure in the case of accidents; iii) procedures to minimize medical and occupational exposures; and iv) procedures for operating equipment. The MRI and radiation service rooms have restricted access and proper signage.

The "Sharp Material Accident Prevention Plan" SOP establishes guidelines for developing, implementing, and monitoring measures to prevent accidents with sharps. For these procedures, the Company has a Multidisciplinary Managing Commission consisting of employees from the procurement, quality, nursing processes, SEMST, CIPA, operations, and medical assistance areas. The commission is responsible for establishing the procedures required for each outpatient unit, as well as reviewing risk situations and executing accident investigation procedures and corrective and prevention measures. The SOP also establishes sharp disposal measures in accordance with Brazilian legislation.¹²

The "Work accident – Notification and Response Conduct" SOP establishes the procedures to handle, report, and record work accidents according to the type of accident, including commuting accidents; typical or common accidents; accidents with biological material from an unknown source; accidents with biological material from a known source; biological sample spill or leak; vaccine vial spill or rupture; and accidents with service providers. The procedures established in this SOP are consolidated in a Work Accident Flow poster that is displayed at all units. The SEMST team reviews accidents and establishes corrective, control, and prevention measures based on these reviews.

Dr. Consulta also has "Golden Rules" for occupational health, safety, and security, the goal of which is to promote and strengthen health, safety, and security behaviors and procedures at for all direct employees and contractors. The Golden Rules are shared periodically with employees and contractors.

The Company has an SOP for "Training Need Assessments and Training Requests" and an SOP for "Employee Training & Development," which determines and establishes employee training guidelines according to job responsibilities, and includes specific technical training on occupational health, safety, and security. These activities are consolidated in an Annual Training Calendar and recorded in an SEMST Training Record.

¹² ANVISA RDC Resolution No. 306/2004 and Brazilian Ministry of Labor and Social Security Regulatory Standard No. 32 ("NR-32")

With the support of a specialized outside company, Dr. Consulta develops and periodically updates, as applicable, the Occupational Health Medical Control Program (“PCMSO,” in Portuguese) for all units, establishing the requirements for exams upon admission, periodically, upon return to work, when responsibilities change, and upon termination, based on occupational health, safety, and security risks identified, for the purpose of prevention and early identification of potential damages to employee health while at work.

4.2.c Provisions for persons with disabilities

In compliance with local legislation requirements,¹³ the Company has a Conduct Adjustment Agreement (“TAC,” in Portuguese) with the Ministry of Labor and Social Security, under which it committed to reserve at least 4% of vacancies from total employees to persons with disabilities.

In addition, 21 outpatient units have various facilities for persons with disabilities, such as access ramps and internal lift platforms, to ensure accessibility for patients at units with more than two floors.

4.2.d Workers Engaged by Third Parties

Dr. Consulta has the support of outside companies specialized in telemarketing; cleaning and maintenance; specialized professionals for radiation services; sample collection professionals; property security, and information technology.

Most contractors work in telemarketing service, with approximately 300 personnel from Teleperformance and Concentrix. In selecting and contracting these companies, the Company reviewed compliance with labor legislation, as well as human resources management in general, among other aspects. The contracts for both companies include clauses that required compliance with labor laws with respect to their employees. In addition, both companies have their own internal Ethics Channels to receive complaints from their employees, and periodically conduct engagement and work environment surveys.

For contractors in cleaning and radiation and RMI services, the Company verifies the health, safety, and security management of employees who work directly at outpatient units, establishes the procedures to be followed by these employees, and provides guidance and required PPE (as applicable). The SEMST team also monitors, on a regular basis, exposure of radiation service professionals to ionizing radiation using a personal dosimeter.

4.2.e Supply Chain

Dr. Consulta’s operations require a regular flow of clinical and pharmaceutical products and materials and other medical supplies. The Company is in the process of developing a procedure to verify their vendors’ compliance with technical requirements, as well as authorizations and licenses from the proper authorities, as applicable.

¹³ Law No. 8.213/1991, which establishes the minimum number of persons with disabilities who must be hired by a company.

Under the leadership of the Procurement and Services team and with the support of the Legal Department and the SESMT area, Dr. Consulta is developing a procedure to establish the requirements for the process of selecting and managing vendors and outside companies. This procedure will determine the requirements by type of product or service with respect to labor legislation matters; licenses and permits requested by the proper authorities; occupational health, safety, and security; among others. This procedure will also establish the required training by type of product or service.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

Dr. Consulta's operations use a monthly average of 216,690 kWh of power. In 2022, total annual consumption was 2,600,289 kWh. The Company buys part of the energy from clean sources.¹⁴

All six outpatient units that offer imaging diagnostic services, with radiology and MRI procedures, and therefore a higher power demand, obtain power from mixed sources of renewable energy. In general, 40% comes from hydroelectric power, and 60% from wind, solar, and biomass.

Total average monthly water consumption in Dr. Consulta's operations is 1,566 m³. In 2023, the Company hired a company to install water-meter monitoring equipment at units. This procedure will allow the prompt identification of consumption change cases and suspected leaks, thus allowing for the quick resolution of potential problems and reducing water waste.

Dr. Consulta will develop an Efficient Water and Energy Use Program that will establish the procedures for resource use and management, as well as guidelines for efficient use measures.

4.3.a.i Waste

The Company has a Healthcare Service Waste Management Program ("PGRSS," in Portuguese), developed in accordance with local requirements¹⁵ to establish the procedures for waste segregation, packaging, identification, internal transportation, storage, and final disposal, by waste type (regular waste; batteries; fluorescent light bulbs; infectious waste; chemical waste; sharp waste; and radioactive rejects), as well as methods to identify the type of waste and its handling (types of collection vehicles, storage locations, and containers, etc.).

Biological waste is stored and transported in plastic containers that can contain spills in case of breakage. Chemical waste is temporarily stored in a specific cabinet with restricted access until it is sent to a specialized outside company. Batteries are stored in marked see-through boxes and fluorescent light bulbs in their original packaging in cabinets with restricted access. Sharp waste is

¹⁴ In 2022, 22.8% of total power consumption were acquired from clean sources such as wind, solar, and biomass.

¹⁵ Law No. 12.305/10, which establishes the National Solid Waste Policy; RDC Resolution No. 222/2018, which regulates ANVISA's Good Healthcare Service Waste Management Practices; and National Environmental Board ("Conama") Resolution No. 358/2005, which provides for treatment and final disposal of healthcare service waste.

disposed of in containers located in medical care rooms, with proper dimension and rigidity specifications and in accordance with parameters established under local legislation.¹⁶

Final disposal of regular waste is done by local government, which collects is daily from the units. Batteries are collected on a quarterly basis, and fluorescent light bulbs every two months, both by specialized outside companies. Infectious waste (biopsy) and chemical waste are logged and quantified and are collected on a quarterly basis by specialized outside companies. On a weekly basis, sharp and infectious waste is collected by local government or an outside company, as applicable. The collection and final disposal cycle is monitored through origin, transportation, and final disposal records.

Dr. Consulta issues a Waste Transportation Manifest (“MTR,” in Portuguese), which reports the generation and collection of chemical and infectious waste to the National Solid Waste Management Information System.

4.4 Community Health, Safety and Security

4.4.a Community Health, Safety and Security

Dr. Consulta’s outpatient units must have health certificates issued by ANVISA for its activities and equipment, as well as the facilities. The purpose of these licenses is to verify and ensure the protection of the population’s health through health controls.

As a response to the onset of the COVID-19 pandemic, Dr. Consulta established and implemented guidelines to reduce risks for employees, contractors, and patients, including mandatory practices for employees, such as washing hands with water and soap frequently; avoiding crowds; respecting the maximum number of persons allowed in a room; refraining from sharing personal use products; using and replacing masks every three hours, etc. The guidelines also include mandatory practices for the Employer, such as sanitizing and disinfecting all environments; providing spaces for employees to comply with social distancing requirements; implementing and adopting a Home Office Policy; establishing flexible lunch hours; distributing 70% alcohol gel; among others. The guidelines also established the mandatory use of masks and compliance with social distancing requirements in Dr. Consulta facilities.

Dr. Consulta developed an algorithm to predict service demand. This algorithm’s results are updated on a weekly basis and are available to the unit’s employees and managers. With this tool, unit managers can set schedules and work hours for employee and doctors, and reduce patient waiting and visiting time at units.

In addition, in recent years, the Company has significantly increased service through telehealth, thus reducing the circulation of potentially ill persons at the units. The Company offers a wide range of services via telehealth, including general clinical, pediatric, nutrition, psychological, and psychiatric services. The patient receives their service forms, prescriptions, and sick leave online, as applicable.

¹⁶ Brazilian Technical Standard Association (“ABNT”) Technical Standard No. 13853/97

The Company continues to improve its service via telehealth, which is offered on its own digital platform.

4.4.a.i Infrastructure and Equipment Preparation and Safety

Some of Dr. Consulta's outpatient units offer radiology and MRI services. These examination rooms have restricted access and proper signage.

The structure of radiology examination rooms must comply with health, safety, and security requirements, including physical barriers, such as properly sized and reinforced walls. Examination rooms provide PPE to patients and companions, including lead aprons and thyroid protectors.

MRI examination rooms have steel FE-36 fire extinguishers, as well as instruments and furniture without magnetic materials. Before examinations are conducted, the absence of metals is verified, and patients are instructed on health, safety, and security measures and conditions.

4.4.a.ii Management and safety of Hazardous Materials

Dr. Consulta's operations require the purchase, use, and handling of controlled substances; chemical substances; and substances with biological agents. All outpatient units have a storage space and/or secure cabinets with locks and signage on the doors to store these products and substances. Access to controlled substances is restricted to unit leadership. All products and materials are logged coming in and going out, and inventory is updated on a monthly basis.

Next to the test sample collection rooms (where biological samples are packaged), are the medical instrument sterilization and handling rooms. In some units, these rooms are connected by an internal window, which allows instruments to be transferred directly to the sterilization room, thus avoiding flow contamination.

The rooms and employees have the appropriate equipment and training to handle and store samples in a safe manner, including gloves, safety goggles, aprons, and eyewash stations. The rooms have a control log to verify that the eyewash station is working and cleaned on a weekly basis.

All units have a Licensing Exemption Declaration from the Federal Police for the purchase and use of materials containing controlled substances; as well as the Inspection Certificate and Operating License from the State of São Paulo Civil Police for the use of controlled substances.

4.4.a.iii Emergency Preparedness and Response

All Dr. Consulta units have an Emergency Action Plan that establishes the emergency response guidelines and consolidates unit information related to emergencies, such as a description of firefighting equipment, identification of meeting points, lists of internal phone extensions, and description of the unit's surrounding areas.

All units have signage for escape routes, meeting points, and identification of firefighting equipment. In addition, fire brigade employees are identified as such on their badges. The units conduct emergency drills annually.

For units located in shopping centers or commercial buildings, the SEMST team checks the established emergency procedures, the required fire safety conditions, as well as training and drill activities.

All units have the AVCB, which certifies that unit buildings are in compliance with the required fire safety conditions.

4.4.b Security Personnel

At some outpatient units, the Company currently has unarmed security guards provided by a duly authorized specialized company. Some of the other units are located in shopping centers or commercial buildings that have their own property security system.

4.5 Acquisition of Land and Involuntary Resettlement

The Company's operations are located in urban areas and do not foresee any kind of involuntary physical or economic displacement.

4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The Company's operations are located in urban areas and, therefore, do not carry any risks for biodiversity conservation nor living natural resources.

4.7 Indigenous Peoples

The Company's operations are located in urban areas and do not have any kind of impact on indigenous peoples.

4.8 Cultural Heritage

Dr. Consulta has two outpatient units, Metrô Luz and República, which are located in historical downtown areas in the city of São Paulo, close to urban historical heritage areas. The buildings where these units are located are not protected historic heritage buildings. However, due to their location, they must comply with requirements related to the building's façade and external area, which are established and verified by the State of São Paulo Cultural Department's CONDEPHAAT. Currently, the Company has completed the requirements (protocols) for the Metrô Luz unit, and is

adapting the façade to the logo of the República unit, in compliance with requirements established by CONDEPHAAT.

5. Local Access to Project Documentation

Documentation related to the project may be found at the following link: <https://drconsulta.com>.