

RD Saúde	Corporate Policy	Code:	VGC-DSU-POL001
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	Vice President	Target audience:	Audience
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## **1. OBJECTIVE**

This policy seeks to reaffirm RD Saúde's commitment to respecting internationally recognized human rights by establishing guidelines for their incorporation into the company's activities and business relationships.

## **2. REACH**

This document has a corporate nature and is applicable to the company as a whole, including Pharmacies, Distribution Centers and RD Saúde Campus, besides the supply chain. All suppliers (business partners that work for or on behalf of RD Saúde) and other stakeholders are equally expected to respect human rights.

## **3. REFERENCES**

- People Code - Ethics and Conduct in RD Saúde
- *Canal Conversa Ética* (anonymous ethics hotline) Policy
- Raia Drogasil Integrity Program Policy
- RD Saúde Supplier Code of Ethics & Conduct
- Ingredient Safety Policy
- Risk Management Policy
- ISO 31000 - Risk Management
- Brazilian Federal Constitution
- Consolidation of Labor Laws
- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct
- The Corporate Responsibility to Respect Human Rights: An Interpretive Guide (UNGCI)
- Dow Jones Sustainability Index (DJSI)
- The World Benchmarking Alliance (WBA) Methodology for the 2022-2023 Corporate Human Rights Benchmark

## **4. ACRONYMS AND DEFINITIONS**

- UN Guiding Principles on Business and Human Rights (Guiding Principles)
- OECD Due Diligence Guidance for Responsible Business Conduct (OECD)

## **5. GUIDELINES**

RD Saúde recognizes the possibility of human rights risks and adverse impacts resulting from its activities and value chain, and undertakes to identify them and establish measures and controls to prevent, mitigate and remediate impacts that it may have caused or contributed to, in accordance with the United Nations Guiding Principles on Business and Human Rights.

RD Saúde is committed to respecting internationally recognized human rights, minimally understood as those set out in the following documents:

- International Bill of Human Rights, comprised of the Universal Declaration of Human Rights, the

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International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;

- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its eight Fundamental Conventions;
- Convention no. 169, 'Indigenous and Tribal Peoples Convention', 1989.
- RD Saúde also bases its actions on international commitments, guidelines and best practices, such as:
- 10 Principles of the UN Global Compact;
- International Finance Corporation's (IFC) Performance Standards;
- UN Sustainable Development Goals (SDGs);
- ISO 45001 - Occupational Health and Safety Management Systems;
- ISO 14001 - Environmental Management Systems;
- Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct;
- Global Reporting Initiative (GRI);
- Sustainability Accounting Standards Board (SASB).

In addition, through its philanthropy initiatives, donations, contributions and incentives, RD Saúde seeks to promote human rights and social development, creating a positive impact from the company's activities.

### **5.1. Human Rights Due Diligence**

In order to fulfil its commitment to respecting human rights, RD Saúde has established an ongoing due diligence process to identify, prevent, mitigate, monitor and report on human rights impacts in its operations and value chain:

- Identify the impacts on human rights arising from its activities, as well as its business relationships, based on the Guiding Principles methodology;
- Assess risks to human rights by adopting the Guiding Principles methodology, which considers severity and probability criteria, in addition to RD Saúde's Risk Management methodology;
- Consider the results of risk assessments in the company's processes, policies, operations and activities;
- Monitor the effectiveness of prevention and mitigation measures adopted;
- Constantly strive to incorporate international standards and best human rights practices into its operations and activities;

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- Communicate annually on how the impacts on human rights identified in its Annual and Sustainability Report are being addressed;
- Carry out regular training and awareness-raising for its team, covering different hierarchical levels, so that they are committed to and engaged with the promotion of human rights in the company;
- Rely on the support of internal and external experts to constantly improve due diligence processes and practices.
- RD Saúde pays special attention to human rights that are relevant to the pharmaceutical retail sector, as well as to previously mapped risks specific to its operations. Therefore, RD Saúde:
- Adopts management and continuous improvement and development processes to ensure safe working environments that are free from harassment and discrimination and that protect and promote the integral health of its own employees;
- Seeks to promote diversity and inclusion in all operational units - Pharmacies, Distribution Centers and RD Saúde Campus;
- Does not tolerate any form of child labor, forced or coerced labor, indecent labor conditions or restrictions on freedom of movement of workers, and repudiates human trafficking for any purpose;
- Does not tolerate any form of sexual exploitation of children and adolescents and takes practical steps to train its own employees and contractors to promote respect for children and adolescents;
- Respects the rights to personal freedom and integrity, as well as freedom of expression and association and collective bargaining, and commits to involving the union in situations where a significant percentage of the workforce is laid off and/or an activity is outsourced;
- Respects the right to privacy of personal data in compliance with the General Data Protection Law;
- Respects the ways of life, as well as the territorial, cultural and social rights of indigenous communities and peoples with whom its activities may interface;
- Adopts practices to ensure the quality, safety and efficacy of private label products, in accordance with the Ingredient Safety Policy;
- In order to respect the right to a healthy environment and access to water, RD Saúde has waste management processes in place to prevent, mitigate and, where necessary, remediate environmental damage and;
- With the aim of contributing to a just transition to a low-carbon economy, RD Saúde is committed to reducing its greenhouse gas emissions by achieving science-based targets.

In the event RD Saúde causes or contributes to the occurrence of negative impacts on human rights, the company will seek to implement measures to mitigate or remediate these impacts, either directly or through partnerships, seeking to involve the participation of affected rights holders.

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## 5.2. Stakeholder engagement

The company acknowledges the importance of maintaining effective relationships and engagement with stakeholders, especially potentially impacted individuals and groups. In order to ensure respect for the rights of its stakeholders, RD Saúde has established communication and dialogue channels with employees, contractors, customers, investors, suppliers, business partners, governmental and non-governmental organizations, trade unions, trade associations, the media, society in general and the communities in which it operates.

## 5.3. Supply chain

All suppliers (business partners that work for or on behalf of RD Saúde) and other stakeholders are expected to respect human rights in their business operations. In addition to the guidelines set out in this Policy, RD Saúde Supplier Code of Ethics & Conduct is communicated externally to any business partners and establishes the standards of conduct expected from suppliers and business partners.

## 5.4. Listening and wrongdoing reporting mechanisms

In order to remediate the adverse impacts that RD Saúde's activities may cause, there is an open, direct and confidential channel for receiving, registering, handling, responding to and managing claims (such as complaints, grievances and wrongdoing reporting). The channel is open to internal and external stakeholders (such as employees and contractors, former employees, customers, service providers and suppliers).

The purpose of *Canal Conversa Ética* (anonymous ethics hotline) is to address any behavior that is not compliant with RD's Ethics & Conduct (Our Code), policies and best practices, as well as those related to corruption, fraud and other wrongdoings provided for in national laws in force, including moral and sexual harassment, discrimination or other human rights violations. Wrongdoing reporting can be done anonymously or non-anonymously:

**Toll-free number:** 0800 778 9009

**Email:** contato@conversaetica.com.br

**Website:** www.conversaetica.com.br

*Canal Conversa Ética* (anonymous ethics hotline) is operated by an independent contractor, who is managed by RD Saúde's Ethics and Compliance area. It is available to employees and other stakeholders every day, including Saturdays, Sundays and public holidays. Wrongdoing reporting investigations are carried out by RD Saúde's Ethics and Compliance team or by external consultants. The conclusion of the investigation is reported to the Ethical Affairs Commission, ensuring the confidentiality of the case and non-retaliation.

RD Saúde's Ethics and Compliance area will take the necessary measures to put an end to any violations found, and will make every effort to remediate any damage caused.

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RD Saúde does not tolerate any practices or attempted practices of retaliation or punishment against employees or contractors who report violations of this Policy in good faith. Acts of retaliation must be immediately reported to the Ethics and Compliance area and will give rise to the application of appropriate disciplinary measures. It is also forbidden to retaliate against any employee or contractor who provides information for investigations into violations of this and other company policies.

In addition to the Ethical Affairs Commission, cases reported in *Canal Conversa Ética* (anonymous ethics hotline) are also regularly reported to the applicable bodies, including the Ethics and Compliance Committee (CEC), with the participation of the CEO and members of the Executive Board and the Audit Committee.

## **6. RESPONSIBILITIES**

### **6.1. Sustainability Officer**

- Ensure enforcement of the guidelines and commitments of this policy

### **6.2. Legal Officer - Ethics and Compliance area**

- Ensure compliance with the guidelines and commitments of this policy

### **6.3. Controllershship Officer - Risk Management area**

- Ensure enforcement of the guidelines and commitments of this policy

### **6.4. CEO**

- Approve the guidelines and commitments of this policy.

### **6.5. Other Managers and Officers**

- Ensure compliance with the guidelines and commitments of this policy

## **7. PEOPLE IN CHARGE OF THIS DOCUMENT**

Person in charge	Version	Area	Position
Mariana Mausbach	1	Sustainability	Manager
Giuliana Ortega	1	Sustainability	Officer
Elton de Oliveira	1	Legal	Officer

## **8. RECORD OF UPDATES**

Version	Date of Creation	Date of Approval	Access	Maintenance and Update	Storage	Changes
001	July 1, 2024	Aug 13, 2024	Audience	Sustainability Officer	Workplace	N/A