



ANNUAL REPORT 2024

**Annual ESG and
Sustainability
Indicators**

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With 129 years of history, SulAmérica has established itself as one of the biggest references in the comprehensive healthcare market in Brazil. Our mission is to transform people's lives through solutions that meet their physical, emotional and financial health needs. Our holistic approach encompasses diversified products and services, such as Health, Dental, Life, Pensions and Investments, which benefit more than 6.8 million customers throughout the country.

Since 2022, with the business combination with Rede D'Or, we have become part of an even more robust structure. We maintain our operational autonomy, while benefiting from synergies that strengthen our delivery capacity and efficiency. This integration allows us to expand our operations, implement more efficient processes

innovative and enhance results on all business fronts. In addition, we have more than 4,000 engaged employees and a distribution network made up of more than 37,000 brokers, who directly contribute to ensuring that our vision of comprehensive healthcare reaches more and more people.

This report reflects the evolution of our ESG (Environmental, Social and Governance) journey, highlighting the achievements, challenges and perspectives that shape our commitment to sustainability and innovation. We are determined to continue leading with transparency and accountability, delivering value to our customers, employees, partners and society as a whole.



**MESSAGE FROM
RAQUEL REIS**

CEO OF SULAMÉRICA
SAÚDE E ODONTO

Dear all,

SulAmérica is heading towards its 130th anniversary with a continued commitment to contributing to a healthier, fairer and more resilient society. Sustainability is at the heart of this journey, integrated into our business strategy and our **purpose of improving people's lives**.

Last year's results reflect this consistency: **we surpassed 5.3 million beneficiaries in health and dentistry**, driven by cross-sell initiatives, portfolio expansion, geographic expansion and strengthening of partnerships with providers and customers.

The improvement in claims (80.2%) and control of administrative expenses demonstrate our **focus on efficiency as the foundation for business sustainability** and excellence in healthcare delivery.

Innovation continues to be a strategic vector. We invest in artificial intelligence to combat fraud and support predictive population health management, enabling more personalized and effective interventions. Initiatives such as the Bem+Família program, the advancement of telemedicine and the expansion of the Direto Nacional network aim to facilitate access and generate value for our beneficiaries.

We have also invested in collaborations with brands and platforms that share values with SulAmérica, expanding the benefits and care and well-being experiences offered to our customers.

As a signatory to the UN Sustainable Development Goals, the Global Compact, the Principles for Sustainable Insurance (PSI) and the Principles for Responsible Investment (PRI), SulAmérica reinforces its commitment to acting ethically, transparently and with a commitment to the future.

We assume the responsibility of promoting practices aligned with Human Rights, equity in labor relations and environmental preservation, with special attention to the impacts of climate change on people's health. We will continue firmly on this path, honoring the trust of those who choose us every day and reaffirming our role as an agent of transformation in society.

All this so that we can ensure that the supplementary health sector is increasingly efficient, accessible and sustainable for future generations.



**MESSAGE FROM
MARCELO MELLO**

CEO OF SULAMÉRICA
INVESTIMENTOS, VIDA
E PREVIDÊNCIA

For almost 130 years, SulAmérica has been committed to caring for people in all aspects of life. This commitment translates into solutions that serve more than 7 million Brazilians and into management that goes beyond economic results: we seek to generate value with responsibility, transparency and a vision for the future.

In the Life, Pension and Investment vertical, this mission is expressed in the way we manage more than BRL 80 billion in assets, with discipline and adherence to sustainable practices. We strictly follow the Responsible Investment Policy and the Social, Environmental and Climate Risk Policy — guidelines that guide the integration of ESG criteria into our decisions. This commitment has been recognized by the market, as demonstrated by our prominence in the Valor/FGV ranking for disciplined management.

Our ESG committee meets monthly to strengthen a culture of responsibility and ensure that sustainability and performance go hand in hand.

The publication of the ESG Report reinforces this conviction. This is an initiative that goes beyond transparency: it is an active contribution to the development of a more ethical, resilient capital market that is connected to the challenges of our time.

We remain firm in our purpose of taking full care of people — including through investments that respect the present and build the future.



04.

ABOUT THE REPORT

SulAmérica is once again independently publishing its information related to sustainability management. To create this report, the Sula indicators were reviewed, which seek to consolidate information on different references of sustainability standards and have the GRI as their main driver.

SulAmérica will seek to evolve towards greater alignment with market requirements in the coming years. The chapters are separated according to the material themes identified and the openings of each chapter provide information about their management. This information is complemented by tables with Sula indicators. Enjoy reading and use it as a reference for information about SulAmérica.

This sustainability report portrays the performance of SulAmérica's operations throughout 2024.

SULA INDICATOR

REFERENCE

SULA 01.901

Scope of the report

The report covers all companies in the SulAmérica group, including the health, dental, life and pension businesses. Paraná Clínicas, DocWay and SulAmérica Investimentos are also within the scope of this report. If the information does not cover all organizations, these limitations will be indicated in the indicators. The organization as a whole will be treated as SulAmérica.

Financial information is detailed in the Rede D'Or Group Financial Statements. More details can be found on Rede D'Or's Investor Relations website.

The information collection was carried out through a proprietary and consolidated system. Exception for information where the discrimination of a company would bring more transparency to the reported indicator. In these cases, data from Paraná Clínicas was segregated.

GRI 2-2

SULA INDICATOR

REFERENCE

SULA 01.901

Scope of the report

Companies included in the report:

- Saepar Serviços e Participações S.A.
- Traditio Companhia de Seguros
- Docway Aplicativo para Saúde S.A.
- Sul América Companhia de Seguro Saúde
- Sul América Seguro de Pessoas e Previdência S.A.
- Sul América Holding de Investimentos S.A.
- Sul América Investimentos DTVM S.A.
- Sul América Investimentos Gestora de Recursos S.A.
- Sul América Santa Cruz Participações S.A.
- Rio's Participações S.A.
- Sul América Serviços de Saúde S.A.
- Sharecare Brasil
- Paraná Clínicas - Planos de Saúde S.A.
- Sul América Seguradora de Saúde S.A.
- Sul América Serviços Odontológicos S.A.
- Sul América Odontológico S.A.

GRI 2-2

SULA INDICATOR

REFERENCE

SULA 01.902

Data about the report

SulAmérica's sustainability report will be published annually. The data follow the period reported by the financial data of Grupo Rede D'Or and refer to the period between 01/01/2024 and 31/12/2024.

For clarification on the information reported, please use the email: sustentabilidade@sulamerica.com.br

GRI 2-3

SULA 01.903

Review of previously published information

Information on previous cycles was published in the annex to the Rede D'Or report. If any information has been revised, it is reported in the indicator itself.

GRI 2-4

SULA 01.904

Information about the audit process

Carbon inventory data and reported financial data were audited. The other data were not subject to audit.

GRI 2-5

SULA INDICATOR

REFERENCE

SULA 01.905

Role of the highest governance body in sustainability reporting

The Executive Board of SulAmérica participated in the materiality with the leaders being consulted in its definition process.

To construct the content, they were interviewed by email about the performance of their respective areas. The content has been approved at the board level.

GRI 2-14

SULA 01.801

Definition of materiality

With the support of specialized external consultancy, we conducted a complete review of our materiality, following three macro steps:

1- Context Review:

- We internally analyze documents such as policies, regulations, reports and risk factors, in addition to conducting interviews with top management.
- We seek external references in market benchmarks and guidelines from entities such as CNseg, S&P, MSCI, SASB, PRI, PSI and ANS.
- We evaluated more than 50 documents and consulted 12 members of top management.
- 63 potential or real impacts relevant to this process were identified.
- We mapped 13 stakeholder groups to be consulted.

GRI 3-1; GRI 3-2;

SULA INDICATOR

REFERENCE

SULA 01.801

Definition of materiality**2- Identification and Assessment of Impacts:**

- We classify the impacts raised in the previous stage as real or potential, positive or negative.
- We assess each impact based on its scale, scope and likelihood of occurrence.
- We consolidate for consultation with identified audiences.

3- Definition of Material Topics:

- We prioritize topics through consultations with stakeholders (Clients, Brokers, Service Providers, Employees, etc.) and specialists.
- We received feedback from 553 stakeholders
- We interviewed 5 experts (Representatives from AMBIMA, CNseg, UNEP-FI Abramge and a market expert with a history as an advisor to companies in the sector).
- The results were validated with the presidents of SulAmérica and SulAmérica Investimentos (SAMI).

GRI 3-1; GRI 3-2;

SULA INDICATOR

REFERENCE

SULA 01.801

Definition of materiality

Material topics identified:

- Responsible Value Chain
- Fraud
- Governance, Risks and Compliance
- Responsible Investment
- People Development
- Shared Value Management
- Inclusion and Diversity
- Quality of Service

GRI 3-1; GRI 3-2;

05.

ABOUT **SulAmérica**

SulAmérica is an insurance company that has been operating in the Brazilian market for 129 years and is dedicated to offering products and services in health, dental, life, pension and investments.

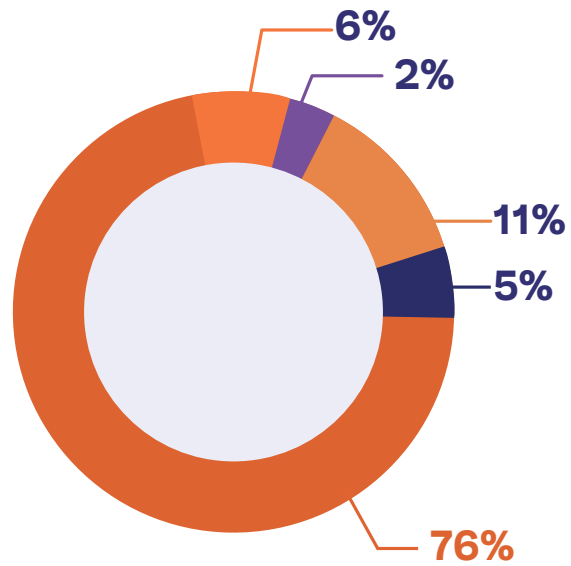
There are more than 4 thousand employees dedicated to

improving the lives of its more than 6.8 million customers. There are more than 37 thousand brokers connected to our value chain.

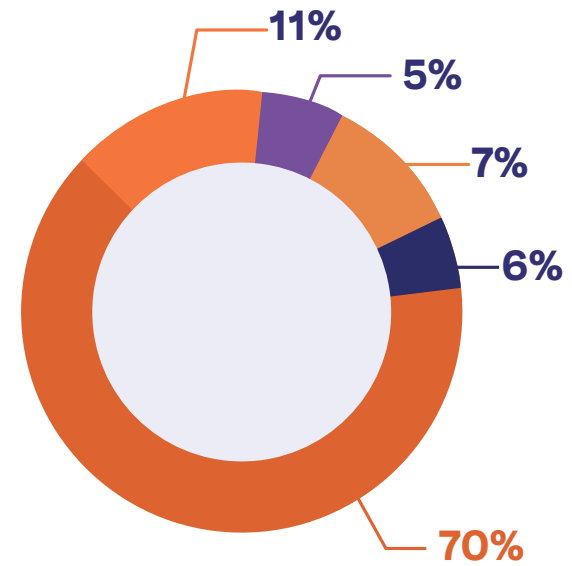
SulAmérica Investimentos continues to grow and has more than BRL 80 billion in assets under management.



Beneficiários



- Norte
- Centro Oeste
- Sul
- Nordeste
- Sudeste



- Norte
- Centro Oeste
- Sul
- Nordeste
- Sudeste



Health



Dental



Pension



Personal
lives and
accidents



Asset
management

6,8 mi

of customers

54

Number of branches based on
commercial distribution

82%

claims rate

82 bi

Assets under management

4.332

employees

Stakeholder Relationship in 2024

Clients and Companies

We maintained our focus on generating value for our Health and Dental customers, with contract renegotiation, updating co-participation and reimbursement rules, and stricter anti-fraud control actions. This contributed to more sustainable and transparent negotiations with the business segment. We reinforce the integrated offer of dental plans for customers in the SME+, Corporate and Managed segments, promoting more benefits and access to complete healthcare. We also intensify relationship and communication actions, through events, activations, campaigns and structured partnerships, strengthening the bond with decision-makers and leaders of client companies.

Beneficiaries

Care for beneficiaries remains central. In 2024, we further enhance our value proposition focusing in delivering quality and better clinical outcome. The SulAmérica app has established itself as a strategic channel, with new features that have increased user autonomy: appointment scheduling, digital prescriptions, reimbursement with biometrics, access to certificates and examination guides — all in a simple and secure manner.

Services such as LabIn (home exams) have gained more space, offering convenience. We reinforce the use of coordinated care lines, with multidisciplinary monitoring of the patient's journey. Prevention also gained prominence, with increased check-ups and actions aimed at occupational health in partner companies.

Brokers

Our network of more than 37,000 brokers has been strengthened with regional initiatives and customized products. The new Odonto portfolio stood out, with an offer designed to meet the specific needs of each region.

Healthcare Providers and Doctors

In 2024, we will advance in building an integrated agenda with our provider network, made up of more than 10 thousand partners throughout Brazil. We expanded our operations in priority regions, with emphasis on the South and Central-West, adding more than 500 new providers and thousands of specialties. We have intensified communication with doctors and clinics, promoting constant dialogue, engagement actions and initiatives aimed at improving care.

New Products

Seeking to combine economic sustainability with access to quality healthcare, SulAmérica reinforced its commitment to products with co-participation, promoting greater awareness in the use of the plan and a better experience for client companies and beneficiaries.

More than 29 products were launched to strengthen our presence in strategic markets and expand our portfolio of accessible solutions.

SulAmérica Investments

SulAmérica Investimentos maintained its position among the main independent asset managers in Brazil, standing out in the Valor/FGV ranking and recognized for its disciplined management.

Social Projects

In 2024, SulAmérica reaffirmed its commitment to promoting culture, sport and well-being through incentivized projects. We believe that health is a broader concept — involving body, mind and human connections — and our initiatives reflect this comprehensive view of life.

We maintained a long-standing partnership with the Ouro Preto Orchestra, promoting free concerts open to the public in urban parks, such as Av. Paulista, in São Paulo, with great repercussion and popular participation. We also continue to support the Orchestra Academy, a program that accelerates the careers of young musicians, democratizing access to cultural training and encouraging new talent.

In the area of sports and well-being, we sponsor street running circuits in different regions of the country, encouraging healthy habits and positive impact of public spaces. We were present at events such as the Night Run, the Circuito do Sol and the Circuito das Estações, bringing the SulAmérica brand closer to people, with activations that combined encouragement for the practice of sports and care experiences.

These actions make our value proposition tangible, strengthen the bond with beneficiaries and reinforce our purpose of improving people's lives by promoting health in its multiple dimensions.

SULA INDICATOR

REFERENCE

SULA 01.301

**Conduct
commitments**

SULA 01.302

**Integration of
commitments**

SulAmérica's Compliance Program aims to preserve the company's reputation, ensuring Compliance with applicable laws and regulations, as well as the prevention, detection and remediation of torts or irregularities that may be committed by employees or third parties. The program promotes a solid ethical culture and is based on SulAmérica's compliance policies, which establish the conduct guidelines to be followed by all employees, interns and members of senior management.

Regarding policies associated with Human Rights, in addition to the topic being formalized in other policies and in its Code of Ethical Conduct, SulAmérica has a Human Rights, Inclusion & Diversity Policy that, in line with SulAmérica's principles and values, establishes comprehensive and binding guidelines for employees, third parties acting on behalf of SulAmérica and in relationships with all stakeholders - business partners, customers, beneficiaries, brokers, service providers, suppliers, public administration representatives and competitors. The primary objective is to guarantee unrestricted respect for Human Rights in all activities, operations and in the SulAmérica value chain, ensuring a fair, equitable and inclusive work environment for all.

GRI 2.23; PSI I;

SULA INDICATOR

REFERENCE

SULA 01.301

Conduct commitments

The guidelines contained must be followed by all employees, business partners and suppliers, together with SulAmérica's Code of Ethical Conduct, and aim to promote diversity, equity and inclusion in all their forms, combating discrimination, harassment and any form of violation of human rights.

GRI 2.23; PSI I;

SULA 01.302

Integration of commitments

Policies are disclosed internally and are available in the organization's internal standards system, are publicly available on the company's portal and are also communicated through contractual clauses that are present in all company contracts.

Adherence to the Code of Ethical Conduct is mandatory for all employees and executives of the organization. Suppliers and partners also have mandatory membership through a contractual clause.

For more information and to access the mentioned policies:

<https://portal.sulamericaseguros.com.br/institucional/sobre-a-sulamerica/codigo-de-etica/>

SULA INDICATOR

REFERENCE

SULA 01.401

Remediation processes

SulAmérica, a company committed to ethics, has established a Whistleblower Channel as an essential tool for maintaining integrity in its operations. This channel is accessible to everyone - employees, customers, suppliers and the general public - and aims to receive reports on irregularities and violations of commitments made by the company.

GRI 2-25; GRI 2-26;

SULA 01.402

Communication and grievance mechanisms

Reports may cover a wide range of actions, including fraud, corruption, misconduct, moral or sexual harassment and any violation of SulAmérica's Code of Ethics. The channel is available 24 hours a day, 7 days a week, via a toll-free telephone line (0800-512-7713) and an online form on the website

www.canaldedenuncia.com.br/sulamerica

SulAmérica guarantees the anonymity and confidentiality of all whistleblowers, ensuring that there will be no retaliation of any kind against those who use the channel. The company encourages its employees and stakeholders to report any tort, unethical act or act that violates the organization's principles and values.

All reports received are thoroughly analyzed and investigated by Aliant, an independent company specialized in risk management and compliance. Aliant works in collaboration with internal areas of SulAmérica, such as Compliance, Internal Audit and Human Resources, to ensure a complete and impartial investigation.

SULA INDICATOR

REFERENCE

SULA 01.401

**Remediation
processes**

In addition to the Whistleblower Channel, SulAmérica has other mechanisms to deal with ethical, legal and corruption issues. The Customer Service Department (SAC), the Ombudsman and the Compliance department work together to ensure that all issues are handled with due attention and confidentiality.

GRI 2-25; GRI
2-26;

SULA 01.402

**Communication and
grievance
mechanisms**

SulAmérica makes its communication channels publicly available on its portal. The objective is to ensure that the commitments assumed in the Code of Ethical Conduct, in the Anti-Corruption Policy, in the compliance policies, in the Conduct Policy in the Report.

SULA INDICATOR

REFERENCE

SULA 01.601

Participation in associations

SulAmérica demonstrates its commitment to continuous improvement and excellence in its sectors of activity through active engagement in various associations and representative organizations. This strategic participation not only reinforces the company's positioning in the market, but also keeps it at the forefront of discussions and trends that shape the future of the sector.

Among the associations in which SulAmérica actively participates, the following stand out:

- ABRAMGE (Associação Brasileira de Planos de Saúde)
- AMB (Associação Médica Brasileira)
- AMEC (Associação de Investidores no Mercado de Capitais)
- ANBIMA (Associação Brasileira das Entidades dos Mercados Financeiro e de Capitais)
- CNSaúde (Confederação Nacional de Saúde)
- CNseg (Confederação Nacional das Empresas de Seguros Gerais, Previdência Privada e Vida, Saúde Suplementar e Capitalização)

GRI 2-28; PSI III;

SULA INDICATOR

REFERENCE

SULA 01.601

Participation in associations

- ENS (Escola Nacional de Seguros)
- FENAPREVI (Federação Nacional de Previdência Privada e Vida)
- FENASAÚDE (Federação Nacional de Saúde Suplementar)
- IBA (Instituto Brasileiro de Atuária)
- IESS (Instituto de Estudos de Saúde Suplementar)
- ISB (Instituto Superior de Seguros e Benefícios)
- Pacto Global (iniciativa das Nações Unidas)
- PRI (Princípios para Investimentos Responsáveis)
- PSI (Princípios para Sustentabilidade em Seguros)
- SINAMGE (Sindicato Nacional das Empresas de Medicina de Grupo)
- SINOG (Associação Brasileira de Planos Odontológicos).
- Trade Unions

GRI 2-28; PSI III;

SULA INDICATOR

REFERENCE

SULA 01.701

**Stakeholder
engagement**

In the engagement process to define materiality, internal leaders were consulted in order to understand the strategic vision of the business and how sustainability could add value, considering current strategic priorities. Additionally, direct consultations were carried out with strategic external groups, such as Policyholders, Brokers, Healthcare Service Providers and Employees, with the aim of understanding their expectations regarding the company's sustainability strategy. The main objective was to align and improve SulAmérica's communication, providing greater transparency about its operations and its commitment to sustainability. For more information, see indicator SULA 01.801.

In addition to preparing this report, other actions were implemented to strengthen relationships and communication with stakeholders. The chapters that deal with these relationships detail this information.

In this way, SulAmérica seeks to build a solid and transparent relationship with all its stakeholders, based on trust, dialogue and mutual commitment to sustainable development.

GRI 2-29



06.

GOVERNANCE, RISKS AND COMPLIANCE

Implementing a robust and effective Governance, Risk and Compliance (GRC) system goes beyond mere regulatory Compliance, acting as a catalyst for proactive risk mitigation and ensuring adherence to current regulations. This approach contributes beyond the sphere of compliance and risk management. It contributes substantially to optimizing operational efficiency. Furthermore, a well-structured GRC system provides information and analysis, improving the decision-making process within the organization, allowing for more informed and strategic choices.

SulAmérica's GRC structure allows the identification of risks to the fundamental rights of its stakeholders, the development and implementation of comprehensive policies and procedures aligned with international best practices, the performance of due diligence in a diligent and continuous manner and the establishment of mechanisms for effective and accessible complaint and remediation.

Among the remediation mechanisms is the Whistleblower Channel. For its operation, the Compliance, Conduct Risks and Sustainability Superintendence plays a role as the central area responsible for handling complaints that deal with a wide range of irregularities, ranging from violations of internal and external standards to inappropriate conduct and non-Compliance with ethical principles that guide the organization. Reports of fraud specifically related to SulAmérica's business, which are received through the channels provided, are treated with the utmost seriousness and promptly forwarded to the competent internal areas for due investigation, verification of the facts and implementation of the appropriate corrective measures. More information is available in SULA 01.402.

SULA INDICATOR

REFERENCE

SULA 01.101

Governance structure

SULA 01.102

SulAmérica's main governance bodies are: the General Meeting (a body within the parent company that has an impact on SulAmérica's operations), the Executive Committee (formed by representatives of the Board of Directors of the parent company, controlling shareholders of the SulAmérica Group and members of the executive board), the Audit Committee (a body within the parent company that monitors the quality and integrity of accounting and non-accounting information that may have an economic impact) and the Executive Board, members directly connected with the company's activities and who report to the other bodies.

Decisions related to the company's activities are taken by the Executive Committee and distributed throughout the organization by the Executive Board, which is responsible for reporting on the company's performance.

To select executive members, the company seeks diversity and complementarity of knowledge, experiences, profiles and academic training compatible with the duties, so that SulAmérica benefits from the plurality of skills and abilities to optimize its decision-making process.

This process includes an in-depth understanding of the specific needs of the position to be filled, taking into account the business context and the challenges faced by teams in building the expected results. The technical skills required to perform the role are assessed, as well as the behaviors expected from SulAmérica leaders - Focus on results, adaptability, collaboration, customer centricity and impactful leadership -, experience in people management and delivering results and alignment with the company's corporate culture.

GRI 2-10; PSI I

SULA INDICATOR

REFERENCE

SULA 01.101

Governance structure

SULA 01.102

The company always evaluates the possibility of internal recruitment and promotion, maintaining the mapping of internal talents, based on corporate programs (Assessment and Talent Review). The process as a whole includes conversations with the Human Resources department, with immediate leadership and with the company's president.

GRI 2-10; PSI I

SULA 01.110

Governance bodies remuneration policy

The governance bodies linked to the controlling group follow the policies defined by Rede D'Or. These policies are available on Rede D'Or's IR website.

The SulAmérica companies defined, through a Remuneration Policy, the guidelines to be observed regarding the remuneration of their directors.

The Policy's main function is to align the interests of administrators and SulAmérica's objectives, based on the best practices adopted by the market. The overall remuneration provided for in the Policy consists of: (i) fixed remuneration; (ii) variable remuneration; (iii) post-employment benefits; and (iv) benefits motivated by the termination of the position.

Furthermore, it provides for the non-incentive of behavior that increases SulAmérica's exposure to risks above levels considered prudent for the short, medium and long-term strategy. Finally, changes to the current policy must be approved by SulAmérica's governance bodies, with the remuneration area being responsible for their review, control and operationalization.

GRI 2-19;
GRI 2-20

SULA INDICATOR

REFERENCE

SULA 01.103

Responsible for the highest governance body

The General Meeting, linked to SulAmérica shareholders, is the company's highest governance body. Conflicts of interest that may arise are detailed in Law 6,404/76 and include, for example, votes intended to harm the company or other shareholders, or votes aimed at obtaining undue advantages, resulting in harm to the company or other shareholders. The company has a policy structure that prevents these violations.

GRI 2-11

SULA 01.106

Conflict of interests

To prevent possible conflicts of interest, the company adopts and disseminates policies and practices that aim to raise awareness and inform about the possibilities of these conflicts occurring and that may affect SulAmérica's ability to make objective and ethical decisions. Transactions that may constitute a conflict of interest are also monitored.

GRI 2-11;
GRI 2-15;

SULA INDICATOR

REFERENCE

SULA 01.105

Delegation of responsibility for impact management

Information and strategic decisions that impact the economy, the environment and people are transmitted to managers according to their respective areas of responsibility. The Executive Committee, in turn, is the highest responsible governance body where responsible executives share relevant information on the topics.

GRI 2-13

SULA 01.107

Critical issues and reporting to governance

Communicating critical aspects of company governance is a dynamic and essential process that occurs in two ways: Immediate Communication, which occurs at the moment the critical fact is identified, requiring an agile and timely response due to its relevance and potential impact. The urgent nature of this communication aims to quickly mobilize the resources needed to resolve the problem, minimizing damage and losses; Communication by Reports, which is more analytical and strategic in nature, consists of preparing and presenting reports that expose potential risk situations, their implications and the mitigating measures available. This type of communication provides the company's governance with the necessary elements for informed decision-making, allowing for the anticipation of problems and the optimization of risk management.

GRI 2-16

SULA INDICATOR

REFERENCE

SULA 01.108

**Sustainability
knowledge of
governance bodies**

To ensure a comprehensive and up-to-date perspective on sustainability, there are regular meetings between the area manager and the governance bodies. In these meetings, scenarios, trends and challenges relevant to the sector are discussed, in addition to strategies and actions that the Company can adopt to strengthen its performance on the topic and generate long-term value.

GRI 2-17

SULA 01.109

**Assessment by the
highest
governance body**

The assessments of the highest governance body are carried out annually and internally by the Corporate Governance area with criteria of impartiality and confidentiality.

Aspects of the organization's impact management are assessed within the scope of the Governance, Risks and Compliance area and are carried out annually by the Audit Committee.

GRI 2-18;
PSI I;

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of how the board of directors, executive board, director responsible for internal controls and risk committee act to oversee sustainability risks

SulAmérica incorporates sustainability risks into its risk management process, which is part of the Internal Control System. This system includes policies, processes, people and organizational structure, with the aim of continuously improving risk management.

The Governance, Risk and Compliance (GRC) Model aims to create value through managing uncertainties, taking advantage of opportunities, optimizing decisions < promoting the GRC culture.

Companies have distinct governance to manage risks, with functions and responsibilities defined in accordance with applicable regulations (BACEN, ANS, SUSEP). In companies regulated by Susep, the Executive Board and the Audit Committee supervise risks. In companies supervised by ANS, the Shareholders' Meeting is responsible for supervision, while in companies regulated by Bacen, the Board of Directors assumes this role.

PSI I; Susep GVR - a; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of the role of the board of directors, management, director responsible for internal controls and risk committee act to oversee sustainability risks

These bodies are responsible for ensuring the effectiveness of processes and the alignment of activities with the interests of stakeholders and the application of SulAmérica's Risk Policy.

PSI I; Susep GVR - b; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of the bodies at the strategic, tactical and operational levels and their responsibilities in supporting the board of directors, management, director responsible for internal controls and risk committee in the management and supervision of sustainability risks

SulAmérica's Risk Policy is structured around a model of three lines of action, each with specific responsibilities in risk management.

- **First Line:** It is the front line, which deals directly with the delivery of products and services, and the management of risks inherent to the operation. It is made up of business managers, who have in-depth knowledge of the risks in their areas; the Financial Directorate, which manages corporate investments and associated financial risks; and all areas that deal with operational risks that directly impact their operations.
- **Second Line:** It acts as specialized support, focusing on areas such as Compliance, Internal Control, Information Security, Sustainability and Quality. In addition to providing information and expertise to improve risk management, this line is responsible for disseminating the culture of Governance, Risks and Compliance, monitoring risks, quantifying them, testing controls and generating reports.
- **Third Line:** Responsible for auditing processes and verifying the effectiveness of the risk management program as a whole.

These lines report to the executive board according to their attributions.

PSI I; Susep GVR - c; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of sustainability risks with the potential to generate significant losses in the short, medium and long term.

SulAmérica conducted a comprehensive analysis of sustainability risks, including climate risks. The conclusion of this analysis was that climate risks are currently under control, mitigated by measures already implemented. The assessment indicates that these risks should not impact insurance operations in the short term.

With regard to the personal portfolio, which includes life and travel insurance, the review indicated the path for recording losses associated with climate risks and related to open claims. This measure will support the review of exposure to these risks over different time horizons: short, medium and long term.

On the other hand, in the health portfolio, no specific actions were implemented.

In terms of investments, SulAmérica, in its role as owner and asset manager, strictly follows the Responsible Investment Policy and the Social, Environmental and Climate Risk Policy. These policies guide the inclusion of ESG and climate risks in the assessment of investments in variable income and private credit portfolios. Additionally, the company monitors the temperature of its portfolio and collaborates with other organizations to promote the engagement of its investees in climate issues.

Environmental and social risks were subjected to the same assessment process as climate risks. However, with regard to the engagement of investments, no specific actions related to the themes were carried out.

More details about the investment process in the Responsible Investment chapter.

PSI I; Susep EST - a; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of the methodology used to assess the possibility of losses generated by sustainability risks

An external consultancy was engaged to conduct a comprehensive risk assessment. To identify and map the risk factors inherent in the company's operations, the consultancy used a combination of internal documentation, such as financial reports, strategic plans and internal policies, and external information sources, such as industry reports, market analyses and relevant regulations. Furthermore, the consultancy sought to understand how these risks are perceived by the company's various stakeholders, including customers, shareholders, employees, suppliers and the community in general.

Based on this analysis, the consultancy assigned a degree of materiality to each identified risk factor, considering the probability of occurrence and the potential impact on each of the relationship audiences. To assess the potential impact of each risk factor on the business, the consultancy used a study published by UNEP-FI (United Nations Environment Programme Finance Initiative) within the scope of the PSI (Principles for Sustainability in Insurance), which provides a framework for assessing environmental and social risks in life and health insurance businesses. The nature of the impact was classified into four main categories: mortality, longevity, morbidity and hospitalization.

This classification was then related to the materiality perceived by the different audiences, allowing the consultancy to identify the risks that are considered most important by each group. The consultancy defined it as materials the risks classified in the third quartile, considering a relative assessment for this definition.

PSI I; Susep EST - b; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of the methodology used to assess the possibility of losses generated by sustainability risks

For the material risks identified, the consultancy evaluated the mitigators, or the measures and controls implemented by the company to reduce the likelihood of occurrence and the impact of these risks. Based on this assessment, the consultancy concluded that existing mitigators were sufficient to address the material risks identified. However, it recommended that the company maintain detailed and up-to-date records relating to these risks and their mitigators, so that they can be reviewed and adjusted as necessary in future assessments.

PSI I; Susep EST - b; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of how the impacts of climate, environmental and social risks are considered in the institution's business and strategies, detailing the time horizon considered and the criteria.

SulAmérica is committed to managing climate, environmental and social risks, incorporating this perspective into the organization. The company has established a comprehensive set of policies that guide its actions: Sustainability Policy, Socio-environmental Risk Policy, Human Rights, Inclusion and Diversity Policy, Responsible Investment Policy and Code of Ethical Conduct. Furthermore, specifically SulAmérica investimentos, implemented the Social, Environmental and Climate Risk Policy (PR SAC), addressing the issue in investment management.

These policies and governance framework provide the foundation for the company's risk management processes. A full review of Human Rights risks across operations was undertaken in 2022, with plans for a further review in 2025, ensuring the company remains aligned with best practices and developments in this area. The sustainability area plays an active role in reviewing operational risks.

In the personal insurance segment, the assessment of risk factors was conducted with a focus on the short term (2 years), considering the perception of stakeholders and the mitigation measures implemented. These risks are continually monitored as part of a review process scheduled for 2026, allowing for adjustments and improvements over time.

In the investment area, SulAmérica analysts and managers adopt a proactive approach, incorporating the impacts of social, environmental and climate risks into their investment models. The ESG Committee, which meets monthly, plays a fundamental role in discussing these assessments and other relevant topics, promoting a culture of responsibility and sustainability in all investment decisions.

PSI I;

Susep EST - c;
GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of the resilience of the organization's strategy considering its ability to adapt to changes in climate patterns and the transition to a low-carbon economy.

No significant vulnerabilities were identified for the company's operations.

PSI I; Susep EST - d; GRI 201-2

SULA 03.501

Sustainability risk management

Description of the processes used to identify, assess, classify and measure sustainability risks.

A consultancy was hired to carry out a risk study and assess the materiality of social, environmental and climate risks for life businesses, based on a study published by the UNEP-FI PSI, which lists the relevant risks for life and health insurance businesses.

The consultancy assessed the risks and concluded that the measures adopted by the company were already sufficient to manage them. No risk was considered material enough to affect the business after the mitigators, dispensing with additional measures as provided for in subitem I of paragraph 2 of article 3 of Susep Circular 666.

PSI I;
Susep GER - a;
GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of sustainability risk management processes, highlighting their treatment, monitoring and report

Although no material risks were identified, continuous monitoring of the most relevant risks was recommended to support the materiality review process. Thus, for life insurance businesses, a process was implemented to record claims associated with social, environmental and climate risks. Due to the low volume of occurrences recorded to date, we do not

PSI I; Susep GER - b; GRI 201-2

SULA 01.103

Sustainability risk management

No limits were established, as materiality for the company's business was not identified.

PSI I; Susep GER - c; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of how the processes used to identify, assess, classify, treat, monitor and report sustainability risks are integrated into the management of underwriting, credit, market, liquidity and operational risks.

These are the main risk definitions adopted:

- **Underwriting Risk:** This is the risk that the company will incur losses due to inadequate technical bases for calculating premiums and provisions. In other words, if SulAmérica underestimates the risks involved in an insurance policy, it may end up paying more in claims than it received in premiums.
- **Credit Risk:** This is the risk that the company will suffer losses due to the failure of policyholders or counterparties to meet financial obligations. If a policyholder fails to pay its premiums, or if a counterparty fails to fulfill its contractual obligations, SulAmérica may incur losses.
- **Market Risk:** This is the risk that the company will suffer losses due to fluctuations in economic and financial indicators, such as interest rates, exchange rates and stock prices. Changes in these indicators may affect the value of SulAmérica's assets and liabilities, as well as its revenues and expenses.
- **Liquidity Risk:** This is the risk that the company will not be able to meet its financial obligations in a timely manner without harming its operations. If SulAmérica does not have enough cash to pay its debts or claims, it may have to sell assets quickly, which could lead to losses.
- **Operational Risk:** This is the risk that the company will suffer losses due to failures in internal processes, people, systems or external events. Human errors, system failures, fraud, natural disasters and other events may cause operational losses for SulAmérica.

PSI I; Susep GER - d; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

Sustainability risk management

Description of how the processes used to identify, assess, classify, treat, monitor and report sustainability risks are integrated into the management of underwriting, credit, market, liquidity and operational risks.

Although social, environmental and climate risks are not currently considered material to SulAmérica's insurance operations - that is, they do not pose a significant threat to the company's business at this time - SulAmérica recognizes the importance of monitoring these risks and reassessing its posture in the future.

- **Subscription:** Currently, these risks are not explicitly integrated into SulAmérica's underwriting process. However, the company monitors losses related to social, environmental and climate events, which can provide information for future reviews of the underwriting process.
- **Counterparty Credit:** In the context of insurance operations, these risks are not taken into account. However, in the context of investment, SulAmérica considers the counterparty as an issuer of financial products and assesses the counterparty's social, environmental and climate risks as part of its Responsible Investment Policy. More information in the Responsible Investment chapter.
- **Market:** SulAmérica assesses these risks in the general context of market indices, but does not have a specific detailed analysis for social, environmental and climate risks.
- **Liquidity:** Currently, social, environmental and climate risk is not considered in SulAmérica's liquidity risk.
- **Operational:** SulAmérica's sustainability specialist monitors and classifies social, environmental and climate risks in the company's operational processes, in an annual review process. A SulAmérica demonstra um

PSI I; Susep GER - d; GRI 201-2

SULA INDICATOR

REFERENCE

SULA 03.501

**Management
sustainability risks**

SulAmérica demonstrates a commitment to continuously monitoring and assessing social, environmental and climate risks, even if they are not currently considered material to its insurance operations.

PSI I; Susep
GER - d; GRI
201-2

SULA 03.401

Customer Privacy

SulAmérica aligns its privacy practices with the universal principles of Human Rights, recognizing privacy as a fundamental and inalienable right of every individual. The company is committed to treating personal data with respect, dignity and transparency, following the best international data protection practices and ensuring compliance with all legal and ethical obligations. SulAmérica believes that privacy is a fundamental right and strives to protect the personal data of its stakeholders in all its interactions.

Considering the main regulatory and market requirements, it maintains a commitment to privacy and data protection. To this end, it relies on a robust governance structure, designed to ensure compliance with regulations, such as the General Data Protection Law (LGPD). SulAmérica's stance on privacy is not limited to managing potential legal and reputational risks, it strengthens the trust of its customers, business partners and society as a whole.

GRI 418-1; SASB
HC-MC-230.a.3

SULA INDICATOR

REFERENCE

SULA 03.401

Customer Privacy

The company takes a holistic and comprehensive approach to data protection, recognizing that privacy is a fundamental right of its stakeholders, including customers, employees, brokers and suppliers. This protection extends to all interaction channels, from internal systems to digital environments, ensuring the security and confidentiality of information at each point of contact. Through transparent policies, a dedicated privacy portal and ongoing training programs, SulAmérica promotes a safe and conscious digital environment, where privacy is valued and respected by all. The company continually invests in technologies and practices to ensure the protection of its stakeholders' personal data, demonstrating its commitment to privacy and information security.

An important part of the Privacy process is the adoption of the Privacy by Design concept, a methodology that integrates Privacy from the conception of new products and services. This proactive approach minimizes the use of unnecessary personal data and optimizes the IT infrastructure used for information processing purposes.

Internally, SulAmérica has established detailed and comprehensive policies and standards for the processing of personal data, which cover everything from collection and storage to the use and sharing of information. The company maintains a dedicated privacy governance structure that is responsible for monitoring compliance, promoting awareness, and ensuring continuous improvement of privacy practices.

GRI 418-1; SASB
HC-MC-230.a.3

SULA INDICATOR

REFERENCE

SULA 03.401

Customer Privacy

To protect personal data against unauthorized access, loss or improper changes, SulAmérica has implemented security measures such as encryption and access control. The company conducts regular security audits to identify vulnerabilities and ensure the effectiveness of protective measures. SulAmérica continually invests in information security to protect the personal data of its stakeholders against internal and external threats.

SulAmérica has well-defined procedures to promptly respond to privacy breaches, which include immediate notification of those affected, transparent communication with the competent authorities and the implementation of corrective measures to mitigate damages and prevent the recurrence of similar incidents. SulAmérica takes privacy violations seriously and is committed to responding promptly and effectively to such incidents.

SulAmérica communicates its privacy practices transparently, highlighting the benefits of data protection for its stakeholders and providing accessible and easy-to-understand information on the Privacy Portal, an exclusive communication channel for data subjects. The company promotes awareness of the importance of privacy and encourages its customers, employees, brokers and suppliers to adopt safe data protection practices in their daily lives.

SulAmérica carries out a periodic and comprehensive monitoring process to assess the compliance and effectiveness of its security and privacy measures. This process includes performing penetration testing, analyzing

GRI 418-1; SASB
HC-MC-230.a.3

SULA INDICATOR

REFERENCE

SULA 03.401

Customer Privacy

audit logs, reviewing policies and procedures, and collecting stakeholder feedback. The company uses the monitoring results to identify areas for improvement and to implement corrective and preventive actions. SulAmérica is committed to continually monitoring its privacy and security practices to ensure they are aligned with market best practices.

SulAmérica sets goals for effective privacy management, including establishing deadlines for responding to requests to exercise data subject rights, deadlines for analyzing and resolving privacy incidents, and defining a percentage of employees trained in privacy and data protection.

In 2024, SulAmérica did not identify any cases of privacy violations.

GRI 418-1; SASB
HC-MC-230.a.3

SULA 01.501

Fines and sanctions

SulAmérica had 89 cases of non-compliance with laws and regulations of ANS and Susep that led to fines. During the year, BRL 26.7 million were paid in fines related to the period and previous periods.

GRI 2-27



07.

SHARED VALUE MANAGEMENT

SulAmérica generates value for its shareholders by promoting people's financial, emotional and physical health through high-quality products and services that seek to improve people's lives. This mission is carried out through a network of partners - brokers, providers and distributors - who collaborate to deliver the best results to beneficiaries.

SulAmérica's performance has a positive economic impact, mainly in maintaining the population's health. By offering health services and disease prevention, the company contributes to reducing absenteeism in the contracting companies, increasing productivity and economic efficiency.

Furthermore, the search for better clinical results also has a positive impact on resource management in the healthcare sector. By investing in prevention and treatment, SulAmérica contributes to saving on costs related to treatments for more serious illnesses.

SulAmérica's referenced network also benefits from the partnership with the company. Predictability of patient flow and revenue allows for more efficient planning and optimization of services offered. A Sales intermediation of SulAmérica products also generates income for brokers, contributing to the dynamism of the economy.

SulAmérica also exerts a positive influence on society, promoting good health practices and encouraging the maintenance of a healthy population.

The company supports human rights, guaranteeing access to health and well-being for beneficiaries and ensuring that no violations occur in their relationships.

The increase in costs for innovative treatments is a challenge for SulAmérica, impacting the inflation of the company's medical costs. To maintain the quality of services, it is necessary to adjust the premiums paid, which may impact the budget of some contractors.

To mitigate these impacts, SulAmérica adopts strategies to control claims, such as combating fraud and promoting health actions. These initiatives aim to ensure the company's financial sustainability and the continuity of high-quality services offered to beneficiaries.

SULA INDICATOR

REFERENCE

SULA 04.101
Statement of Value
Added

SulAmérica	2024 - kBRL
1 incomes	27,172,679
1.1 - revenues from insurance	26,767,171
1.2 - others	410,953
1.3 - provisions for uncollectible account - reversal/constitution	(5,445)
2 expenses	21,241,475
2.1 - expenses with insurance and reinsurance operations issued	21,241,475
3 inputs	2,659,582
3.1 - materials, energy and others	48,744
3.2 - third party services, net commisions	2,658,466
3.3 - marketing expenses	(47,628)
4 gross added value (1 + 2 + 3)	3,271,622
5 depreciation, amortization and depletion	158,420

GRI 201-1; SASB
HC-MC-240a.1

SULA INDICATOR

REFERENCE

SULA 04.101
Statement of Value
Added

SulAmérica	2024 - kBRL
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6 net added value produced by the entity (4-5)	3,113,202
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7 added value received/transferred in transfer	650,093
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7.1 - financial income	473,823
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7.2 - equity result	21,391
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7.3 - result from reinsurance operations maintained	8,934
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7.4 - other incoming transfers	145,945
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8 total added value to be transferred (6+7)	3,763,295
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GRI 201-1; SASB
HC-MC-240a.1

SULA INDICATOR

REFERENCE

SULA 04.101

Statement of Value
Added

SulAmérica

2024 - kBRL

9 distribution of added value 3,763,295**9.1 - personnel**

748,426

9.1.1 - direct remuneration

589,160

9.1.2 - benefits

145,791

9.1.3 - FGTS

13,475

9.2 - taxes, fees and contributions

1,055,268

9.2.1 - federal

1,036,966

9.2.2 - state

0

9.2.3 - municipal

18,302

**9.3 - remuneration of third-party
capital**

114,112

9.3.1 - interest

109,164

9.3.2 - rentals

(31,541)

9.3.3 - others

36,489

GRI 201-1; SASB
HC-MC-240a.1

SULA INDICATOR

REFERENCE

SULA 04.101
Statement of Value Added

GRI 201-1; SASB HC-MC-240a.1

SulAmérica	2024 - kBRL
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9.4 - remuneration of equity	1,845,489
9.4.1 - interest on equity	0
9.4.2 - dividends	0
9.4.3 - retained earnings/loss for the year	1,845,478
9.4.4 - non-controlling interest in retained earnings	11

	2023	2024
Claims rate	86.4%	82.0%

For more details on the financial information of the SulAmérica group, please check [Rede D'Or investor relations page](#).

SULA INDICATOR

REFERENCE

SULA 04.401

Financial benefits received from the government

In 2024, SulAmérica received a total of BRL54.6 million in financial incentives.

These incentives are linked to the laws:

- Cultural Incentive Law
- Sports Law
- Municipal Fund for Children and Adolescents
- National Fund for the Elderly
- Benefits associated with Corporate Citizenship
- Worker Food Program
- Law of Good

GRI 201-4;

SULA 03.201

Anti-competitive practices

SulAmérica has policies to prevent anti-competitive practices. The topic is also covered in its Code of Conduct, where all employees commit to the conduct expected by the business.

There were no related cases identified throughout 2024.

GRI 206-1;

SULA INDICATOR

REFERENCE

SULA 04.201

**Comprehensive
health management**

The mission of the company's health programs is to promote comprehensive care, through various initiatives, with the aim of providing a better experience and quality of life for the individual. Thus, value is generated for a health system through different fronts of action, such as women's health, elderly health, children's health and chronic diseases.

To this end, we seek to offer complete and efficient care to patients through:

- Accredited network: Extensive network of accredited doctors and clinics, which act as a gateway to the healthcare system, carrying out consultations, examinations and referrals to specialists, when necessary.
- Primary Health Care (PHC): Care model focused on disease prevention, health promotion and continuous monitoring of patients, avoiding unnecessary visits to hospitals and specialists.
- Prevention and well-being programs: Chronic disease prevention programs, such as diabetes, hypertension and obesity, which may include educational activities, medical monitoring and incentives for healthy habits.
- Telemedicine: Tool that allows consultations with doctors and other professionals via video call, facilitating access to healthcare, especially for those who live in remote areas or have difficulty getting around.
- Care coordination: Actions that coordinate patient care, ensuring they receive the right treatment at the right time - essential for patients with chronic diseases.

SASB HC-MC-260a.1; SASB HC-MC-260a.4

SULA INDICATOR

REFERENCE

SULA 04.201

Comprehensive health management

Health programs	Number of participants
Mental health	1,290
Support for pregnant women	2,766
Oncology	1,371
Attention to the elderly	6,289
Primary Health Care	15,085
Osteoarticular rehabilitation	8,313
Literacy in autoimmune diseases	1,007

SASB HC-MC-260a.1; HC-MC-260a.4

SULA 04.301

Pension plans

SulAmérica offers its employees PrevsAS+, a Private Pension plan with competitive conditions, so that they can have a peaceful future and a more secure financial life. The PrevsAS+ plan offers freedom of choice so that the employee can decide what to worry about in the future.

GRI 201-3

SULA INDICATOR

REFERENCE

SULA 04.201

Comprehensive health management**Benefits of PrevSAS+:**

- The company's contribution varies according to the employee's salary range, with 100% investment matching up to 6% of the salary in the highest ranges. By the end of 2024, 31% of employees were participating in the program.
- More attractive account maintenance fees: PrevSAS+ offers competitive maintenance rates, maximizing contribution yields and providing a greater financial return.
- Possibility to choose between PGBL and VGBL plans: The employee can choose the plan that best suits their needs and financial objectives, whether it be the PGBL, with tax advantages for those who declare Income Tax using the full model, or the VGBL, with simplified taxation.
- Option to continue with the plan even after leaving the company: Private pension plans do not end when the employment relationship ends. The employee can continue contributing and enjoying the benefits of the plan even after leaving the company.
- Right to withdraw investment in case of serious illness: In cases of serious illness, employees have the right to withdraw part or all of the amount invested, ensuring financial support in times of need.
- Responsible Investments: The plans offered provide employees with the option of investing in labeled assets, following our Responsible Investment policy.

GRI 201-3



08.

QUALITY OF SERVICE

QUALITY OF SERVICE

SulAmérica recognizes excellence in service as fundamental, intrinsically linked to the customer experience and satisfaction.

Aware of the importance of a complete analysis of our clients' needs, we have implemented weekly committees, in which representatives from different business areas meet. The main purpose of these committees is to examine and resolve demands presented by customers and prevent new similar demands from arising, in addition to minimizing the risks inherent in existing processes.

Additionally, we seek to identify opportunities for improvement in our services and processes. When we identify actions or suggestions that

can optimize the customer experience, we communicate with the areas responsible for implementation. We continuously monitor the notes made, ensuring that improvements are implemented.

To ensure the quality and efficiency of our service, we closely monitor the volume of requests received, as well as resolution rates. This analysis allows us to identify areas of opportunity and adjust our strategies to offer an increasingly better and more agile service to our customers.

SULA INDICATOR

REFERENCE

SULA 07.101
Product impact assessment

To assess the impacts of SulAmérica products, the company relies on PARP - Product Assessment and Review Procedure. PARP is a multidisciplinary procedure where the support and business areas contribute their respective technical knowledge in the feasibility analysis to identify opportunities for improvement and better manage risks and impacts. All new products or products that are changed go through this process and ensure less risk for the company.

GRI - 416-1; GRI

SULA 07.301
Complaint indicators

The volume of demands reflects the claims management model adopted in recent years.

GRI - 416-1; GRI

	2022	2023	2024
Ombudsman	8,841	15,068	14,186
ANS	17,609	30,654	27,586
Procon	1,683	3,183	5,198
Other Channels	2,233	3,013	4,353

The data does not include Paraná Clínicas



09.

FIGHTING FRAUD

The supplementary health sector in Brazil covers a portion of the population corresponding to 26%, which translates into more than 50 million individuals benefiting from health plans. At the same time, the dental insurance market has a lower penetration, reaching 16% of the population, with a total of 30 million beneficiaries who have coverage for dental care.

According to a study published by IESS (Institute of Supplementary Health Studies) in 2023, forecasts related to financial losses resulting from fraud and waste in the supplementary health sector range between BRL 30 billion and BRL 34 billion. This magnitude of losses represents a share of the total revenues of health plan operators, estimated at between 11% and 13%. It is important to highlight that these amounts, unduly subtracted from the system, end up being diluted and passed on to all beneficiaries, impacting the value of the plans and the sustainability of the sector.

The occurrence of fraud in the context of Supplementary health is characterized by the deliberate action of beneficiaries, health service providers or brokers, who, with the

intention of obtaining illicit advantages, violate the laws, rules and regulations established for the functioning of the system. This unethical and illegal conduct impacts the integrity of the sector and harms the user community.

SulAmérica has adopted a commitment to combat fraud. This active confrontation translates into a specialized audit team, continuous investments in the design and implementation of a robust and dynamic system, composed of prevention and communication strategies and tools, early detection and immediate response to fraudulent activities.

Among the projects developed, SulAmérica uses Artificial Intelligence for constant monitoring of advertisements published by healthcare service providers. This application allows the identification of advertising campaigns that, in some way, may target or encourage beneficiaries to use health plans inappropriately or fraudulently.

In this sense, SulAmérica also relies on Artificial Intelligence tools to detect refund requests with signs of fraud, which are promptly analyzed by a team specialized in preventing and combating fraud.

Furthermore, the introduction and implementation of Facial Biometrics represents an additional advancement and an additional layer of protection within the App and SulAmérica's security system. This biometric technology constitutes a fraud prevention mechanism, as it ensures verification of the user's identity when accessing services, preventing the improper use of plans by unauthorized individuals, who specifically aim to commit fraud in refund requests.

In situations where fraud is identified and proven, SulAmérica adopts a firm stance in seeking compensation for the financial and image damages suffered.

This reparation is actively sought through the proposal of appropriate judicial and extrajudicial measures, aiming to hold those involved accountable and recover the misappropriated amounts. Acting within the legal framework demonstrates the company's commitment to not tolerating fraudulent activities and to protecting its interests and those of its beneficiaries.

Additionally, SulAmérica recognizes the vital importance of Communication and Education as highly effective preventive instruments in combating fraud. To this end, the company develops and implements several guidance actions aimed at its beneficiaries, with the aim of informing them about the correct and conscious ways to use the products and services offered. At the same time, SulAmérica works tirelessly to disseminate information about preventing and combating fraud in partnership with entities that represent the health sector. By promoting awareness and knowledge about the consequences of fraud, SulAmérica seeks to engage its beneficiaries as allies in preventing these practices.

Recognition of these initiatives to combat fraud was materialized in the award for Innovation in Insurance, Open Pensions, Supplementary Health and Capitalization, granted by the National Confederation of Insurers. SulAmérica was awarded in the Fraud Prevention and Combat category with the project entitled "Health education in the fight against fraud: from communication to action".



10.

RESPONSIBLE VALUE CHAIN

SulAmérica adopts a comprehensive approach that includes ethical, environmental and human rights criteria in its relationship with its suppliers. This stance is reflected in its relationship standards with suppliers, based on its Code of Conduct for Suppliers and Service Providers and the Social and Environmental Responsibility Clause, present in all contracts. Furthermore, the company has Sustainability, Environmental and Socio-environmental Risk Policies that guide its actions and provide incentives to encourage its suppliers to adopt appropriate environmental management practices. This concern extends to the management of human rights aspects, including the protection of personal data, in accordance with the Privacy and Personal Data Protection Policy for third parties.

Aware of the potential impact of its operations, SulAmérica seeks to mitigate the risks associated with its supply chain. For example, in the healthcare sector, where there are direct purchases of medicines and hospital supplies, the company closely monitors the supply chain, which can be more critical in relation to environmental aspects. SulAmérica and the Rede D'Or group have implemented a robust framework of policies, procedures and monitoring to ensure supplier compliance and act in the event of deviations. In other areas, digitalization has been an important tool to mitigate environmental impact, especially in relation to transport emissions. The company also

assesses the risk of human rights violations during the hiring process and supplier contract review, through a questionnaire that addresses relevant aspects of human rights applied to 100% of suppliers.

SulAmérica recognizes that, due to its size, relationships with smaller suppliers may be unequal and impact the ability of these companies to maintain their operations. Therefore, the company adopts measures to ensure a fair and balanced relationship with all its suppliers.

The company has a series of policies and standards that formalize and standardize the process of acquiring goods and services, including the Purchasing Policy, the Contracts Policy, the Third Party Due Diligence Procedures Standards, the the Goods and Services Purchasing and Contracting Standards, the Purchasing Supplier Management Standard and the Code of Conduct for Suppliers and Service Providers. Furthermore, the topic of sustainability and social responsibility is addressed in the Sustainability Policy, the Environmental Policy, the Privacy and Personal Data Protection Policy for third parties and the Human Rights, Inclusion and Diversity Policy.

SulAmérica seeks to identify potential negative impacts that may arise from the relationship with suppliers, carrying out assessments according to the type of service offered. These assessments include verifying adherence to the Privacy and Personal Data Protection Policy, conducting compliance surveys to assess the third party's reputation and the possible existence of relationships with Public Agents, and applying a sustainability questionnaire to understand the risks to which the company is exposed.

In the event of identifying any critical aspect, SulAmérica carries out a resolution aimed at the hiring decision and the measures necessary for the continuity of the relationship. All contracts include the Social and Environmental Responsibility Clause and adherence to the Code of Ethical Conduct for Suppliers and Service Providers.

The company aims to maintain the assessment of 100% of indirect purchasing contracts, integrating the risk assessments of relationships with suppliers on the same platform, allowing a holistic view of the risk of each supplier. The assessments were incorporated into SulAmérica's processes and integrated into the same process, allowing

managers and decision-makers to access data on the same platform and reducing friction in the relationship with the supplier.

Supplier registration begins with an assessment of compliance, sustainability and business continuity. due diligence is carried out and, depending on the business, there is an information security assessment. In the event of an identified risk, alternative suppliers are evaluated with the involvement of the requesting area. There is no audit for indirect purchases, but the reassessment process occurs when contracts are renewed.

The insurance sector plays a fundamental role in the Brazilian economy, representing 6.2% of GDP in 2024, with revenue exceeding 600 billion reais. For 2025, the sector projects growth of 10%, with the aim of reaching more than 10% of GDP share by 2030. In this context, the relationship between insurers, such as SulAmérica, and insurance brokers is crucial to driving this growth.

Insurance brokers are the main distribution channel in the sector and are directly involved in the technological evolution and digitalization of the sales journey, from the quote to the issuance of the policy. Furthermore, brokers play an essential role in financial education and raising awareness among clients about personal and family financial planning, in addition to encouraging access to healthcare, offering products suited to each client's profile. The broker's role in managing and mitigating fraud also contributes for the sustainability of the sector.

In terms of protecting beneficiary and policyholder data, SulAmérica bases its processes on good market practices and compliance with regulatory requirements, such as the General Data Protection Law (LGPD) and the confidentiality of medical data. Brokers are subject to company rules to ensure proper use

of beneficiary and policyholder information.

Also, the broker ends up representing the company's brand in society. The broker's association with the SulAmérica brand is directly linked to his/her conduct. The registration of new brokers goes through a rigorous due diligence process, including the assessment of the legal entity's situation and the survey of histories with SulAmérica. Any issues, such as fraud, may lead to the broker being deactivated.

The company monitors stakeholder satisfaction indicators and its fraud management processes, broker registration and acceptance of new clients undergo rigorous controls, aligned with the best market practices. Points of attention are discussed in management committees and monitoring and reporting occur within the existing governance.

SulAmérica bases its relationship with brokers on transparency. Brokers are paid for sales made and can receive bonuses for results. The expectation is to stimulate the growth of brokers and the retention of clients at SulAmérica.

11.

DEVELOPMENT OF PEOPLE

SulAmérica is made up of people and we recognize the value of our orange-blooded team. In order to deliver the greatest value to our customers and beneficiaries, SulAmérica has a strategy for training and developing its employees. Within this strategy, the following fronts stand out: Career and Succession, Training and Development Management, Behavior Management (SulaVoz) and Engagement Research.

The Career and Succession front seeks to plan and execute the Talent Review process, which aims to evaluate leadership (from managers), mapping potential successors internally who will contribute to the continuity and sustainability of the business. Training and Development Management aims to analyze, prioritize, plan, disseminate and execute internal and external training and development actions linked to corporate guidelines, resulting from internal management processes, regulatory demands and other needs of SulAmérica. Behavior Management (SulaVoz) is the process of evaluating employees' level of adherence to SulAmérica behaviors, to support them in their self-knowledge and development and help the manager in the feedback and development stage of their teams. Finally, the Engagement Survey aims to assess and

manage the level of annual engagement of employees and SulAmérica.

Additionally, the management of regulatory content is carried out through the corporate learning platform, called Escola de Excelência. This platform offers courses and materials on critical business topics such as Data Privacy, Business Continuity Management, Ethical Conduct, Governance, Risks and Compliance, Prevention and Combating Corruption, Prevention of Money Laundering, Fraud Prevention and Cybersecurity. The aim is to ensure that all employees are up to date on the rules and regulations applicable to their work and that the company complies with current laws and regulations.

The effectiveness of training actions is measured through reaction/satisfaction reports to assess participants' perception of the quality of training. Attendance lists are used to monitor employee participation in activities. Furthermore, the Training and Development factor is closely monitored in the Engagement Survey, allowing the impact of actions on employee engagement to be assessed and opportunities for improvement to be identified. More information about training actions is described in SULA 05.401.

SULA INDICATOR

REFERENCE

SULA 05.401 - Average training hours by functional category and gender

[GRI 404-1]

	2023		2024	
	W	M	W	M
Operational	125.4	137.0	0.7	0.8
Administrative	5.80	5.4	2.4	1.6
Expert	4.7	3.3	2.5	1.5
Middle Management	3.5	3.4	3.9	2.6
Top Management	0.0	3.1	1.7	1.1
TOTAL	27.3	12.7	1.9	1.6

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.401 - Average training hours by functional category, gender and generation

[GRI 404-1]

	Babyboomers:		Geração X:		Geração Y/ Millenials:		Geração Z:	
	before de 1963		1964 a 1983		1984 a 1994		1995 a 2009	
	W	M	W	M	W	M	W	M
Operational	1.3	0.0	0.7	1.2	0.7	0.8	0.6	0.6
Administrative	2.3	0.9	2.4	1.7	2.6	1.7	2.2	1.5
Expert	1.4	1.2	2.8	1.7	2.4	1.5	1.5	0.5
Middle Management	3.7	3.5	3.9	2.4	3.0	2.5	2.5	1.0
Top Management	1.0	-	1.8	1.4	-	0.5	-	-
TOTAL	1.9	1.2	1.7	1.7	1.9	1.6	1.4	1.2

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.401 - Average training hours by functional category, gender and region

[GRI 404-1]

	North		Northeast		Central-West		Southeast		South	
	W	M	W	M	W	M	W	M	W	M
Operational	-	-	2.1	6.0	1.1	3.7	0.7	0.7	3.3	4.0
Administrative	0.4	0.0	3.3	2.6	4.0	-	2.4	1.5	2.8	1.0
Expert	0.0	-	2.6	2.1	5.5	5.0	2.6	1.4	2.1	2.2
Middle Management	0.0	-	3.9	3.0	4.0	6.0	4.0	2.8	5.2	2.0
Top Management	-	-	-	-	-	-	1.7	1.1	-	-
TOTAL	0.3	0.0	3.1	2.7	3.6	4.8	1.8	1.5	3.0	2.0

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.401 - Average training hours by functional category, gender and disability

[GRI 404-1]

	People		People	
	with disabilities		without disabilities	
	W	M	W	M
Operational	1.4	1.4	0.6	0.7
Administrative	0.6	5.1	2.4	1.5
Expert	0.7	4.5	2.6	1.4
Middle Management	-	-	4.0	2.8
Top Management	-	-	1.7	1.1
TOTAL	1.1	2.7	1.9	1.5

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.401

Training and development

For the training and development of its employees, SulAmérica relies on the SulAmérica School of Excellence, which was created in 2024. Its creation reflects SulAmérica's commitment to the continuous development of its talents and the pursuit of excellence at all levels of the organization. The School's primary objective is to comprehensively meet the development needs of employees and their leaders.

The School of Excellence platform offers a diverse range of improvement actions, built and managed by different areas of SulAmérica. This collaborative approach ensures that learning initiatives are relevant, aligned with the specific needs of each target audience, and adapted to market changes. The topics covered cover both technical and behavioral aspects, from specialized knowledge in specific areas to interpersonal skills essential for success in the workplace. The School uses a variety of formats to deliver content, including live broadcasts, lectures, workshops, and e-learning.

In 2024, the School addressed topics such as SulAmérica Products and Services; Sales; Combating Fraud; Legislation in Supplementary Health; Leadership; Psychological Safety; Feedback; SulAmérica Behaviors; SulAmérica Processes and Policies; Inclusion and Diversity; among others.

SulAmérica Trainee Program

The SulAmérica Trainee Program was designed with the objective of training

GRI 404-2;

SULA INDICATOR

REFERENCE

SULA 05.401

Training and development

professionals to fill consultant-level positions in strategic areas of the company.

Furthermore, the program aims to nurture SulAmérica's future succession pipeline, identifying and developing talent with the potential to assume leadership roles in the future. Lasting 12 months, the program is structured in four main stages.

The first stage, Onboarding, aims to introduce the company to trainees and integrate them into the organizational culture. During this phase, trainees have the opportunity to interact with leaders from the main areas of SulAmérica, learn about the company's structure, its values and its business strategy.

The second stage, Training Track, is focused on developing behavioral and technical skills essential for success at SulAmérica. In partnership with a specialized external consultancy, trainees participate in learning activities that aim to improve their skills.

The third stage, Immersion in the Areas, provides trainees with the opportunity to experience the day-to-day life of different areas of SulAmérica. Through a rotation system, trainees have the chance to develop a systemic vision of the business, build an internal relationship network and prepare for the final project.

The fourth and Final stage, Project in the Final Area, marks the allocation of trainees to their definitive areas of activity. At this stage, trainees develop a practical project that aims to solve a specific problem or implement an improvement in their area of responsibility.

GRI 404-2;

SULA INDICATOR

REFERENCE

SULA 05.401

Training and development

Throughout the program, trainees receive support and guidance from SulAmérica's Training and Development team. Additionally, they participate in coaching and mentoring sessions with experienced professionals from the company. The first two classes of the program are currently underway, with completion scheduled for September and December 2025.

Carreira.SulA

Carreira.SulA is SulAmérica's internal recruitment program, created to offer each employee the opportunity to lead their career path. Carreira.SulA offers employees the opportunity to apply for open positions in different areas of the company, according to their interests and qualifications. Eligible employees can apply for open positions through an internal company portal. The program encourages employees to seek new opportunities for learning and growth, whether through courses, training, projects or other development initiatives.

SulAmérica is committed to providing its employees with the tools and resources they need to achieve their career goals and build a successful future within the company.

In 2024, employees received on average fewer hours of training, totaling 7.616 hours. The reduction is due to the development of the newly implemented "SulAmérica School of Excellence" platform, which impacted both the implementation and control of training actions.

GRI 404-2;

SULA INDICATOR

REFERENCE

SULA 05.105

Freedom of association

SulAmérica guarantees freedom of association for its employees in its [Code of Ethical Conduct](#). No risk of violation of these rights was identified in the Company's operations.

To induce best practices in its value chain, it also includes the topic in its [Code of Conduct for Suppliers and Service Providers](#) and in all contracts signed through the [Sustainability and Socio-environmental Responsibility Clause](#).

GRI 407-1

SULA 05.202

Benefits offered to employees

SulAmérica offers benefits in accordance with contracts signed with employees. The benefits offered are: food vouchers, meal vouchers, transportation vouchers, personal insurance, platform for access to gyms, health plan, dental insurance, pension, daycare/nanny assistance and profit sharing.

Interns have access to meal vouchers, health insurance, transportation vouchers, personal insurance and a platform for access to gyms.

Call center employees who work 180 hours have access to other benefits. These include food vouchers, transportation vouchers, personal insurance, a platform for accessing gyms, health insurance, dental insurance, pension plans and profit sharing. Those who work full-time also have access to meal vouchers.

GRI 401-2

SULA INDICATOR

REFERENCE

SULA 05.301

Health and safety

SulAmérica is committed to the safety and well-being of its employees, prioritizing the creation and maintenance of a safe and healthy work environment. To ensure this commitment, we rely on the company's Occupational Health and Safety Policy, aligned with the Regulatory Standards (NRs) established by the Ministry of Labor and Employment (MTE).

Our approach focuses on risk prevention and health promotion, implemented through the Risk Management Program (PGR), the Occupational Health Medical Control Program (PCMSO) and Ergonomic Analyses of workstations. These initiatives allow us to identify, assess and mitigate potential risks, ensuring a safer and more comfortable work environment for everyone.

There is active participation by employees through periodic meetings of the Internal Accident Prevention Committee (CIPA) to discuss topics relevant to safety, analyze incidents, propose improvements and monitor the implementation of preventive actions. We keep all employees informed through regular corporate communications on internal communication channels and spaces dedicated to employees, promoting a culture of safety.

Our integrated Occupational Health and Safety system covers all employees and extends to third parties working in our facilities, in accordance with the company's internal policy.

GRI 403-1; GRI 403-2;

SULA INDICATOR

REFERENCE

SULA 05.302

Hazard and risk identification and accident investigation

The company is committed to controlling risks in the workplace. To this end, when applicable, Personal Protective Equipment (PPE) and Collective Protective Equipment (CPE) are provided, appropriate to each function and identified risk. In addition to supplying equipment, the company provides training and guidance to employees, aiming at the correct use of equipment and raising awareness of the risks inherent to their activities.

To report hazards identified in the work environment, the employee has the duty to immediately inform his/her direct manager and the GEGSA - Occupational Health and Safety department.

Accident investigation is a process that begins with a detailed interview with the employee involved in the event. Additionally, the RIAT - Work Accident Investigation Report is completed, a document for analyzing the causes of the accident and proposing corrective measures. The RIAT is then forwarded to Occupational Medicine, where an analysis is carried out to verify the need to open the CAT - Communication of Work Accident, a legal document that formalizes the occurrence of the accident with the competent bodies.

GRI 403-2;

SULA INDICATOR

REFERENCE

SULA 05.303

Attention to the health of employees

In 2024, SulAmérica reaffirmed its commitment to the health of its employees and dependents, implementing a multidisciplinary health approach. The company has a team made up of occupational doctors, nurses and massage therapists, who promote actions focused on physical and mental well-being.

SulAmérica's work covers several fronts, offering support for autism spectrum disorders and monitoring programs for a healthy pregnancy. The company also encourages physical activity and provides telepsychology and orthopedic monitoring services. To guarantee access to healthcare at all times, SulAmérica offers health, dental and travel insurance plans, including during vacations, for employees and their families at all units in Brazil.

Additionally, SulAmérica offers a mental health support system. All employees who require support are assessed and referred to specialized health plan programs, such as "Psychologist on screen" and/or "Single". Recognizing the importance of leadership in supporting mental health, SulAmérica's School of Excellence also offered, in 2024, mental health courses for managers, enabling them to identify and deal with situations in which employees need support.

Psychological support is provided through health plan programs, as well as through clinical support offered by the occupational physician and the SulAmérica team, ensuring complete and personalized monitoring for each patient.

GRI 401-3;

SULA INDICATOR

REFERENCE

SULA 05.303

Attention to the health of employees

We emphasize that the privacy and security of employees' health information are priorities. Access to medical records, which contain occupational examination data, is strictly restricted to health professionals in the area.

GRI 401-3;

SULA 05.304

Employee participation in health and safety systems

SulAmérica values the active participation of its employees in initiatives that promote a safe and healthy work environment. This participation is manifested through the CIPA (Internal Committee for Accident and Harassment Prevention) and engagement in the voluntary Fire Brigade.

GRI 403-4

The CIPA is made up of members elected by the employees themselves and representatives appointed by the organization. This composition ensures a balanced approach to identifying and mitigating risks. CIPA's responsibilities include conducting safety inspections, investigating accidents and incidents, proposing preventive and corrective measures, and promoting training and awareness campaigns. The volunteer Fire Brigade, in turn, is made up of employees from different hierarchical levels and areas of activity.

The work of the CIPA and the volunteer Fire Brigade, together, contributes to the creation of a culture of health and safety in the SulAmérica work environment.

SULA INDICATOR

REFERENCE

SULA 05.306

Employee health promotion

Employee health and safety training is associated with CIPA and the Fire Brigade. In total, 95 employees received training in 2024.

GRI 403-5

SULA 05.307

Health and safety indicators - deaths

In 2024, we had one reportable accident representing a rate of 0.0919 accidents per 1 million hours worked. The accident occurred on the employee's route and did not result in time off work.

GRI 403-9;

SULA 05.308

Health and safety indicators - critical accidents

There were no deaths or critical accidents related to work-related accidents in the reporting period.

SULA 05.309 -
Health and safety indicators -Number of reportable accidents

SULA INDICATOR

REFERENCE

SULA 05.315

Work-related hazards and risks

The main hazards and risks related to SulAmérica's activities, identified in the execution of the PGR (Risk Management Program), include factors of an ergonomic and accident nature. Ergonomic risks can include poor posture, repetitive movements, inadequate furniture and environmental conditions, which in the long term can lead to musculoskeletal disorders and other health problems. Accident risks mainly include situations such as falls and trips and other unexpected events that can result in injuries.

The treatment of these identified risks is carried out continuously through regular inspections of the workplace, aiming to identify and correct unsafe conditions, as well as the dissemination of guidelines for employees, with the objective of promoting awareness of existing dangers and preventive measures to be adopted.

GRI 403-9;

SULA INDICATOR

REFERENCE

SULA 05.309 - Health and safety indicators - Number of reportable accidents

[GRI 403-9]

	White		Black		Browns		Yellows		Not informed		Total	
	W	M	W	M	W	M	W	M	W	M	W	M
Operational	0	0	0	0	0	0	0	0	0	0	0	0
Administrative	0	1	0	0	0	0	0	0	0	0	0	1
Expert	0	0	0	0	0	0	0	0	0	0	0	0
Middle Management	0	0	0	0	0	0	0	0	0	0	0	0
Top Management	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0.3	1	0	0	0	0	0	0	0	0	0	1

SULA INDICATOR

REFERENCE

SULA 05.309 - Health and safety indicators - Reportable accident rate¹

[GRI 403-9]

	White		Blacks		Browns		Yellows		Not informed		Total	
	M	H	M	H	M	H	M	H	M	H	M	H
Operational	0	0	0	0	0	0	0	0	0	0	0	0
Administrative	0	0.8666	0	0	0	0	0	0	0	0	0	0.5000
Expert	0	0	0	0	0	0	0	0	0	0	0	0
Middle Management	0	0	0	0	0	0	0	0	0	0	0	0
Top Management	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0.4410	0	0	0	0	0	0	0	0	0	0.2683

¹ For every 1,000,000 hours worked. Total Reportable Accident Rate was 0.0919.

12.

INCLUSION AND DIVERSITY

Inclusion and diversity are catalysts for transformation with positive impacts in multiple dimensions. For SulAmérica, fostering an organizational culture that values the plurality of perspectives, experiences and identities brings benefits both in terms of social justice and competitive advantages. The ability to understand and meet the needs of a diverse population, with different health conditions, socioeconomic backgrounds and cultural, is essential to guarantee equity in access to services and the promotion of comprehensive health. Multiple views drive innovation and creativity. A diverse team, with different backgrounds and world views, is better able to identify opportunities, develop innovative solutions and meet to the demands of a heterogeneous public. The ability to understand and connect with customers from different backgrounds and cultures translates into the possibility of meeting the needs of a greater number of companies and individuals. Valuing diversity also encourages employee engagement in social causes, encouraging them to contribute to a better world. By promoting equal opportunities and combating discrimination, companies contribute to reducing inequalities and strengthening social cohesion.

SulAmérica formalizes its commitment to the Human Rights, Diversity and Inclusion Policy. This policy directs how SulAmérica deals with the issue and seeks to address the demands of its audiences.

The company also joined the *Elas Lideram* (Women Lead) movement, committing to have 50% women in top management positions by 2030. Monitoring of associated metrics is carried out by a consultant specifically dedicated to the topic and the perception of employees through the annual Engagement Survey. SulAmérica is an organization with a female majority in all positions up to middle management. In executive positions (Board of Directors and above), there is a majority of men, but still with good numbers compared to the market. As one of the most feminine companies in the sector, SulAmérica is better prepared to think about differentiated products, services and programs for this audience. The representation and proportionality of LGBTI+ people in almost all layers of the company (from the base to middle management) enables positive responses to latent demands, such as *Nome Social* and *Programa Bem Mais Família*, including this population in the proposed solutions. The biggest challenge lies in the company's top management (Board of Directors and above), which lacks representation from black people, LGBTI+ people and people with disabilities.

SULA INDICATOR

REFERENCE

SULA 01.201 - Demographic Data

[GRI 2-7]

	Whites		Blacks		Browns		Yellows		Not informed		TOTAL	
	W	M	W	M	W	M	W	M	W	M	W	M
Operational	565	103	138	32	367	73	9	1	7	1	1086	210
Administrative	762	446	108	55	374	238	15	10	15	15	1274	764
Expert	265	195	14	20	71	71	9	8	4	3	363	297
Middle Management	131	115	5	0	28	28	3	4	1	0	168	147
Top Management	8	13	0	0	1	1	0	0	0	0	9	14
TOTAL	1731	872	265	107	841	411	36	23	27	19	2900	1432

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 01.201 - Demographic Data

[GRI 2-7]

	Babyboomers:		Geração X:		Geração Y/ Millenials:		Geração Z:		TOTAL	
	before de 1963		1964 a 1983		1984 a 1994		1995 a 2009		W	M
	W	M	W	M	W	M	W	M		
Operational	9	3	421	53	417	83	239	71	1086	210
Administrative	12	19	504	246	535	308	223	191	1274	764
Expert	5	10	173	122	165	141	20	24	363	297
Middle Management	3	4	107	84	56	58	2	1	168	147
Top Management	1	0	8	10	0	4	0	0	9	14
TOTAL	30	36	1213	515	1173	594	484	287	2900	1432

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 01.201 - Demographic Data

[GRI 2-7]

	People		People		TOTAL	
	with disabilities		without disabilities			
	W	M	W	M	W	M
Operational	83	42	1.016	169	1.099	211
Administrative	37	20	1.243	750	1.280	770
Expert	3	4	350	302	353	306
Middle Management	0	0	159	131	159	131
Top Management	0	0	9	14	9	14
TOTAL	123	66	2.777	1.366	2.900	1.432

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 01.201 - Demographic Data

[GRI 2-7]

	North		Northeast		Central-West		Southeast		South		Sul	
	W	M	W	M	W	M	W	M	W	M	W	M
Permanent employees	15	3	66	26	39	6	2.734	1.386	46	11	2.900	1.432
Temporary employees	0	0	0	0	0	0	28	5	0	0	28	5
TOTAL	15	3	66	26	39	6	2.762	1.391	46	11	2.928	1.437

The data does not include Paraná Clínicas employees.

¹ Data about temporary employees are not considered in the other tables.

SULA INDICATOR

REFERENCE

SULA 05.102 - Hiring by color/race and gender

[GRI 401-1]

	Whites		Blacks		Browns		Yellows		Not informed		TOTAL	
	W	M	W	M	W	M	W	M	W	M	W	M
Operational	339	61	97	18	170	32	12	1	1	1	619	113
Administrative	119	85	20	10	45	39	2	2	0	0	186	136
Expert	59	77	4	10	9	17	1	2	0	0	73	106
Middle Management	19	16	0	0	6	3	0	0	0	0	25	19
Top Management	1	1	0	0	0	0	0	0	0	0	1	1
TOTAL	537	240	121	38	230	91	15	5	1	1	904	375

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.102 - Hiring by generation and gender

[GRI 401-1]

	Babyboomers:		Geração X:		Geração Y/ Millenials:		Geração Z:		TOTAL	
	before de 1963		1964 a 1983		1984 a 1994		1995 a 2009		M	H
	M	H	M	H	M	H	M	H	M	H
Operational	2	1	231	26	237	47	149	39	619	113
Administrative	0	1	55	24	71	01	60	50	186	136
Expert	0	0	25	24	34	57	11	18	73	106
Middle Management	0	0	12	0	12	10	1	0	25	19
Top Management	0	0	1	0	0	1	0	0	1	1
TOTAL	2	2	324	90	354	176	224	107	904	375

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.102 - Voluntary dismissals - by color/race and gender

[GRI 401-1]

	Whites		Blacks		Browns		Yellows		Not Informed		TOTAL	
	M	H	M	H	M	H	M	H	M	H	M	H
Operational	82	18	15	4	42	16	3	0	3	2	145	40
Administrative	57	51	6	6	26	23	0	1	5	7	94	88
Expert	24	24	1	2	15	9	0	0	0	0	12	7
Middle Management	8	5	0	0	4	2	0	0	0	0	12	7
Top Management	0	0	0	0	0	0	0	0	0	0	1	1
TOTAL	171	98	22	12	87	50	3	1	8	9	291	170

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.102 - Recruitment - people with disabilities by gender

[GRI 401-1]

	People		People		TOTAL	
	with disabilities		without disabilities			
	W	M	W	M	W	M
Operational	33	23	590	94	623	117
Administrative	4	2	124	110	128	112
Expert	0	0	78	108	78	109
Middle Management	0	0	74	36	74	36
Top Management	0	0	1	1	1	1
TOTAL	37	25	897	350	904	375

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.102 - Voluntary layoffs - by generation and gender

[GRI 401-1]

	Babyboomers:		Geração X:		Geração Y/ Millenials:		Geração Z:		TOTAL	
	before de 1963		1964 a 1983		1984 a 1994		1995 a 2009		W	M
	W	M	W	M	W	M	W	M		
Operational	0	0	58	12	58	15	30	13	145	40
Administrative	0	1	27	12	45	46	22	29	04	88
Expert	0	0	20	8	19	19	1	8	40	35
Middle Management	0	0	9	2	3	5	0	0	12	7
Top Management	0	0	0	0	0	0	0	0	0	0
TOTAL	0	1	112	34	128	85	53	50	291	170

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.102 - Involuntary dismissals - by color/race and gender

[GRI 401-1]

	Whites		Blacks		Browns		Yellows		Not Informed		TOTAL	
	W	M	W	M	W	M	W	M	W	M	W	M
Operational	144	24	31	9	97	23	1	0	5	2	278	58
Administrative	75	40	4	4	20	15	3	0	2	1	104	60
Expert	17	19	1	1	9	3	0	0	2	0	29	23
Middle Management	19	20	1	0	5	4	0	1	0	0	25	25
Top Management	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	255	103	37	14	131	45	4	1	9	3	436	166

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.102 - Voluntary layoffs - by generation and gender

[GRI 401-1]

	Babyboomers:		Geração X:		Geração Y/ Millenials:		Geração Z:		TOTAL	
	before de 1963		1964 a 1983		1984 a 1994		1995 a 2009		W	M
	W	M	W	M	W	M	W	M		
Operational	0	1	112	8	108	32	58	17	278	58
Administrative	3	1	44	31	45	21	12	7	104	60
Expert	0	0	15	11	13	10	1	2	29	23
Middle Management	2	3	13	15	10	6	0	1	25	25
Top Management	0	0	0	0	0	0	0	0	0	0
TOTAL	5	5	184	65	176	69	71	27	436	166

The data does not include Paraná Clínicas employees.

SULA INDICATOR

REFERENCE

SULA 05.103 - Voluntary dismissals - people with disabilities by gender

[GRI 401-1]

	People		People		TOTAL	
	with disabilities		without disabilities			
	W	M	W	M	W	M
Operational	16	11	262	47	278	58
Administrative	0	0	57	48	57	48
Expert	0	1	29	24	29	25
Middle Management	0	0	42	35	42	35
Top Management	0	0	0	0	0	0
TOTAL	16	12	390	154	406	166

The data does not include Paraná Clínicas employees.

SULA 06.601

Action in cases of discrimination

Four cases associated with discrimination were received and identified through the Reporting Channel. After analysis, disciplinary measures were applied according to the criticality of each case and ranged from guidance to dismissal of the responsible person.

GRI 406-1;

SULA INDICATOR

REFERENCE

SULA 06.301 - Ratio between the median remuneration of men and women by color/race

[GRI 405-2]

	Whites	Blacks	Browns	Yellows	Not Informed	TOTAL
Operational	-9.1%	-31.0%	-11.9%	-13.7%	-30.2%	-13.4%
Administrative	-22.3%	-23.3%	-12.2%	-54.8%	42.2%	-22.4%
Expert	-32.4%	-5.8%	-12.8%	-42.0%	-68%	-30.1%
Middle Management	-10.6%	n/a ¹	-14.5%	38.2%	n/a ¹	-9.6%
TOTAL	-	-	-	-	-	-46.6%

The data does not include Paraná Clínicas employees.

1 - No men were employed during this period.



13.

RESPONSIBLE INVESTMENT

SulAmérica's investments are managed by SulAmérica Investimentos, the group's investment company. Sustainability is a fundamental principle that guides all our investment decisions. As a signatory to the Principles for Responsible Investment (PRI), we are committed to integrating ESG issues into our investment process. This process is formalized in the one that defines the guidelines for investments, strengthening the incorporation of ESG aspects in business and in transparency with stakeholders.

By regularly monitoring the companies we invest in, actively engaging with them, and planning to divest when necessary, we seek to promote sound ESG practices and generate a positive long-term impact. The process relies on the ESG Committee, made up of the company's executive leaders and which plays a fundamental role in evaluating and monitoring ESG performance of the companies in our portfolio. Furthermore, all of our managers and analysts, with the support of specialized consultancy, incorporate ESG issues into

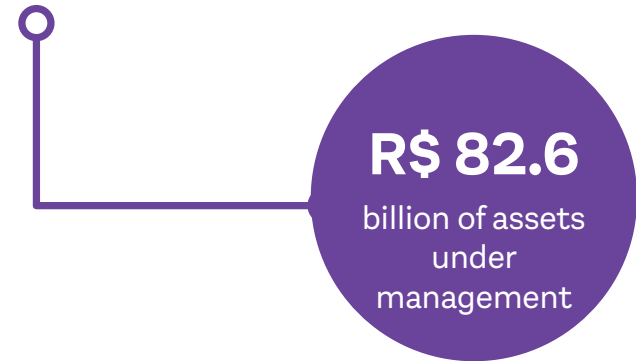
their analyses. They also have a contract of targets related to the topic and are evaluated annually.

SulAmérica Investimento is recognized by the market and for the 15th consecutive year received the highest score, "AMP-1-Very Strong" in the evaluation of investment fund managers by Standard & Poor's. It was also elected Best of the Year in the Specialist Assets Group according to the FGV Fund Guide 2024. At the end of 2024, SulAmérica Investimentos had more than 130 thousand shareholders managing BRL 82.6 billion in assets under management.

We understand that investing in companies with good ESG practices is not only an ethically correct decision, but also a financially intelligent one. By allocating capital to companies that prioritize these

aspects, channel resources to companies committed to financial development and a more complete view of the risks to which they are exposed. Similarly, these investments are actively contributing to a more sustainable and equitable future. They are reducing their carbon footprint, conserving natural resources, promoting diversity and inclusion, and supporting the communities where they operate. By investing in these companies, investors are helping to fund these important initiatives and drive a positive impact on the environment and society.

Companies that neglect ESG issues are exposing themselves to a range of risks, including financial, reputational and regulatory risks. For investors, supporting these companies can lead to significant financial losses. Furthermore, failure to address ESG issues can have far-reaching negative impacts on the economy and society as a whole.



SULA INDICATOR

REFERENCE

SULA 09.101

Ownership of sustainable assets

SULA 09.401

Labeled products

SulAmérica Investimentos has 8 funds labeled as sustainable in its portfolio. Products are launched according to the demand of target audiences. To define these investments, the methodology provided for in the [Responsible Investment Policy](#) is used and the use of the resource for sustainable purposes is confirmed by a third party. The total amount invested in these assets was BRL 6,6 billion, representing 8% of the portfolio.

The products follow CVM Resolution 175 and ANBIMA's Third Party Resource Administration and Management Code. The funds use best-in-class methodology, positive asset contribution, thematic titles and quantitative, qualitative, reputation and image risk analyses. SulAmérica's Socioenvironmental Risk Policy also provides for a negative list, included in labeled products.

SulAmérica Prev Crédito ESG was considered the Best Fixed Income Private Credit Pension Fund of 2024 and SulAmérica Crédito ESG was the 3rd Best Fixed Income Private Credit Fund of 2024 by the InfoMoney Outliers Award.

SULA INDICATOR

REFERENCE

SULA 09.201

Sectorial Exposure

Considering private credit.

Sector	Allocation (%)
Financial Institution	69%
Electric Utilities	6%
Structured	4%
Vehicle Rental	3%
Oil and gas	3%
Water utilities	2%
Retail	2%
Pharmaceutical Industry	2%
Infrastructure and Logistics	2%
Roads	2%
Health and Education	2%
Telecommunications	2%
Civil Construction and Real Estate	1%
Mining and Steel	1%
Pulp and Paper	0.4%
Petrochemical	0.3%
Automotive and Vehicles	0.3%
Insurance	0.1%

SASB FN-IN-410c.2

SULA INDICATOR

REFERENCE

SULA 09.201

Sectoral Exposure

Sector	Allocation (%)
Capital Goods	0.03%
ETF*	0.01%
Agriculture	<0.01%

SASB FN-IN-410c.2

SULA 09.301

Engagement actions carried out with the invested companies

SulAmérica's Responsible Investment Policy includes engagement actions with monitored companies or companies in which it invests, seeking to share sustainability objectives and influence their management. In 2024, three individual engagements were carried out with companies that, during monitoring, presented an evaluation below the sector averages.

Two engagements were with companies in which SulAmérica has credit exposure (one in gas and the other in finance), seeking more information on ESG issues. The other was with a sanitation company, still without exposure, but with a score below the sector average. All were formally contacted by letter, and two showed an improvement in their grade.

SASB FN-IN-410c.2



14.

MANAGEMENT OF CLIMATE ASPECTS

SulAmérica’s materiality process did not identify any environmental issue as material. Below, we have added emissions inventory information as a way to increase transparency on this topic.

The company’s emissions have increased significantly in the last year. This occurred mainly due to the inclusion of information related to gases used in the operation of Paraná Clínicas hospitals. The main offender was the use of Nitrous Oxide. The company is evaluating changes to the protocols for using these anesthetics to make it possible to reduce emissions.

There was also an increase in business trips, impacting scope 3 emissions. Still on scope 3, we are improving the accounting of emissions related to investments (category 15). These emissions, for now, will continue to be reported only in the CDP.

The scope 3 categories included are: 4, 5 e 6 - serviços de transporte contratados, resíduos gerados nas operações e viagens a negócios.

The inventory data was audited as part of the Rede D’Or inventory. The assurance letter is available in the [Rede D’Or Sustainability Report](#).

Emissions inventory

Emissions Inventory	2021	2022	2023	2024
Scope 1 - tCO2eq	189.9	209.46	77.265	204.671
Scope 2 - tCO2eq	301.12	159.197	170.024	104.292
Scope 3 - tCO2eq	501.5	904.99	497.425	610.06



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