

PROMOTION OF
*diversity and
inclusion*
FOR OUR PEOPLE

POLICY OF
**DIVERSITY,
INCLUSION
& HUMAN RIGHTS**

GPA *for
diversity*



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1. Purpose

GPA'S Diversity, Inclusion, and Human Rights Policy is a document that provides (general and specific) guidelines on Diversity, Inclusion, and Human Rights that correlates with other corporate policies and guidelines. It has as purpose to provide transparency to the Group's positioning and directions for its business units and subsidiaries, aiming at a **discrimination-free environment that promotes and values respect and equal opportunities.**

2. Scope

This document applies to all employees of GPA, its business units, and related companies/institutions, suppliers, service providers, customers, clients, social institutions, partners of the companies, besides reporting to the GPA Sustainability and Diversity Committee - an advisory committee to GPA'S Board of Directors.

3. Governance

Topics on Diversity, inclusion, and Human Rights are constantly reported to the Sustainability and Diversity Committee of GPA, an advisory committee of the Company's Board of Directors. Composed of members of the board of directors and representatives of key areas of GPA to multiply the respective subjects, guided by the five Diversity & Inclusion priority pillars, and considering intersectionalities, it aims to monitor the progress and challenges connected to our indicators, build and validate various actions, thus generating greater interaction and synergy across the different areas of GPA.



4. Glossary

Human Rights: according to the United Nations (UN), human rights are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other condition. They include the right to life and freedom of opinion and speech, work, education, among others. Everyone has such rights guaranteed, with no discrimination.

Discrimination: can be negative or positive (for example, affirmative actions). In this Policy, this term will always be used in the negative sense, that is, the discrimination that takes place when there is an adverse attitude towards a certain characteristic. An individual can be discriminated because of his/her race, gender, sexual orientation, nationality, religion, social status, education level, among other characteristics.

Diversity: denotes the set of cultural, biological, social, and economic characteristics, among others, that make every individual a unique individual. In the business context, it is related to the representativeness of different groups that make up society in the staff of employees.

Employees: in this document, we will use the word “employees” to designate employees of GPA, its business units, and related companies/institutions.

Ethnicity: denotes a group of individuals who share the same sociocultural system, the same language, and/or geographic region.

Gender expression: denotes the individual's social and cultural behavior towards the world; the way a person expresses or presents his/her gender based on his/her roles. That includes ways of dressing, acting, behaviors, and interactions.

Minority or underrepresented groups: these are groups that, for historical and social reasons, face barriers to occupy spaces of decision and power, such as companies, politics, and academia. Minority or underrepresented groups can often be majorities, from the quantitative point of view. This is the case of women and black people in Brazil, for example.

Gender identity: denotes how every individual perceives him/herself, his/her understanding of him/herself and how he/she would like to be recognized. Regardless of his/her biological sex, an individual can have the gender identity of a woman, a man, or other gender identities (such as non-binary or genderless). Gender identity is not subject to third-party approval, because it is about self-identification.

Inclusion: denotes the valuation and inclusion of populations that, for historical and social reasons, face barriers in society and in companies.

Social name: is a name that can be used by transgender people in their daily lives, to identify themselves according to their gender identity, while the formal change in their civil documents is not yet made formally complete. It is how the person identifies and wants to be called, regardless of the name that was assigned to him/her in the birth certificate.

Sexual orientation: denotes the emotional/sexual and involuntary attraction that a person feels towards another.

People with disabilities: those who have limitations, which, in interaction with various attitudes and environmental barriers, can impair their full and effective participation in society with other people. For example: physical, hearing, visual, intellectual, multiple, and psychosocial disabilities.

Trans person: term used to describe people whose gender identity is not directly related to their biological sex.

Race: denotes a category created to legitimate some systems of domination based on phenotype and origin. It is currently understood as a social construct, not a biological one, which defines sociocultural, economic, and political interactions. In Brazil, race is mapped from the self-identification and self-declaration of each person, being grouped into five key terms: white, yellow, indigenous, brown, and black. The brown and black categories are called blacks.

Representativeness: means to represent with effectiveness or quality a certain segment or group of the population. It may be related to the quantitative question—for example, the number of people in a certain group in the company's personnel—or to the matter of legitimacy—a representative person is as if he/she was the voice and image of a social segment, sector, or group.



5. General guidelines

5.1. Contextualization

This Policy is governed by international Human Rights principles covered by the **UN Universal Declaration of Human Rights**, which guarantee the rights of all persons regardless of age, gender, sexual orientation, origin, race, color, physical condition, religion, marital status, nationality, identity and/or gender expression or any other identity marker, family situation, or any other condition. Respect for and promotion of human rights are essential to the sustainability of GPA and our relationship with our stakeholders. We are committed, both in our Company and in our value chain, to a dignified and respectful treatment for all people.

We believe that **Diversity** is considering and respecting the diverse characteristics of individuals. In turn, **Inclusion** goes beyond recognizing, but also valuing and fostering these differences, being intentional in the effort for representativeness. Besides, we understand that it is the responsibility of all audiences referred to in this Policy to be agents in this change in behavior.

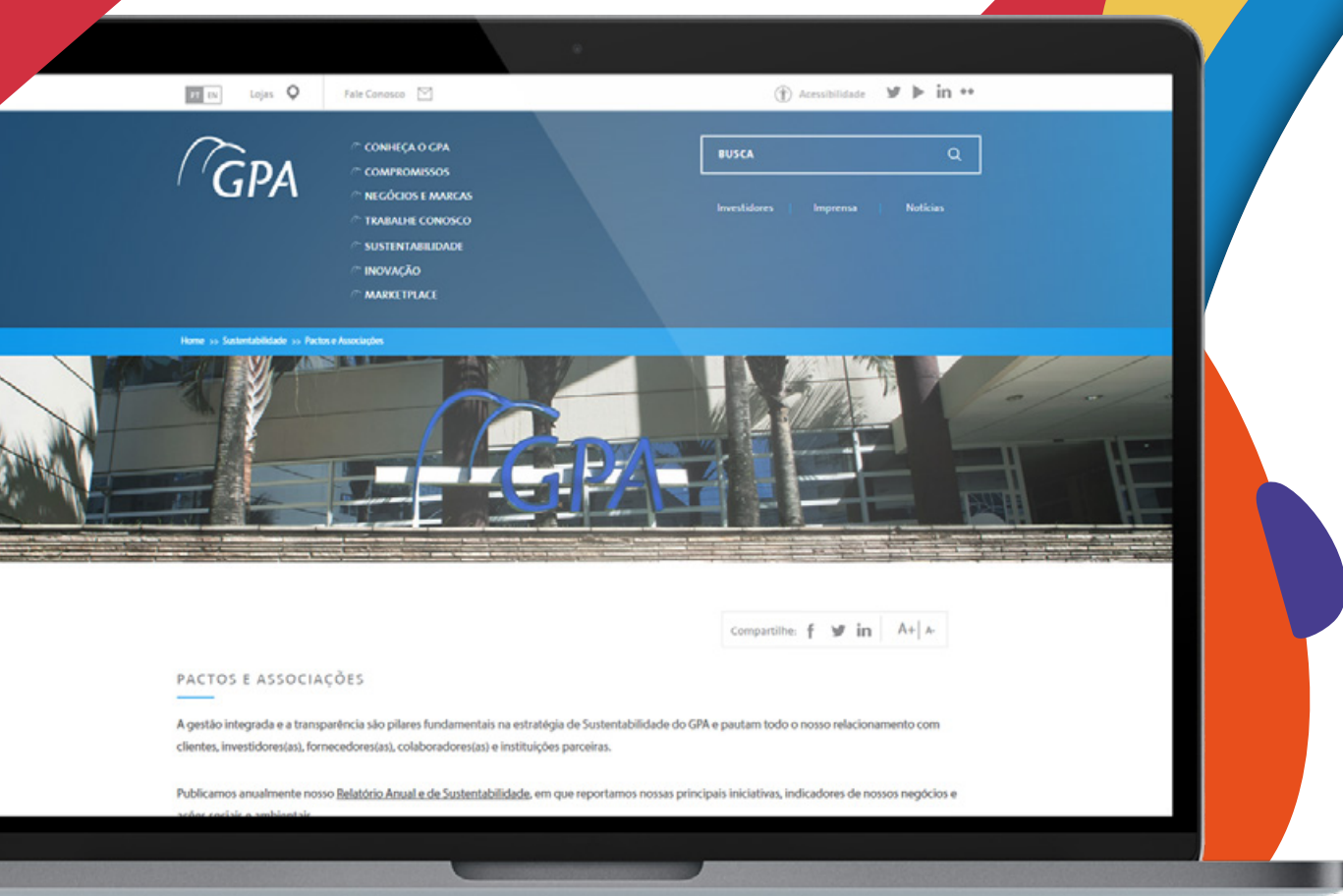
Accordingly, we promote Diversity and Inclusion in all their forms. We strive to eliminate and do not tolerate any type of discrimination, whether by age, gender, sexual orientation, gender identity, gender expression, race, color, disability, religion, marital status, nationality, or any other identity marker. Diversity and Inclusion are values, commitments, and levers of performance and socioeconomic innovation, being critical in a business like GPA that focuses on customers.

This document also considers all factors that concern human rights, considering the working relationships that GPA has with its employees—and this expands to all links in the chain in which it is inserted. Therefore, GPA also considers the following points:

- 1 Prohibition of child labor and protection of the rights of children and teenagers;
- 2 Prohibition of forced labor and/or slave-like labor;
- 3 Adoption of disciplinary measures in case of harassment and abuse;
- 4 Freedom of association, collective bargaining, and whistleblowing mechanisms;
- 5 Respect for hours worked, wages, and benefits;
- 6 Ensuring a safe and healthy workplace;
- 7 Safety in the workplace;
- 8 Repudiation and non-tolerance of any form of discrimination.



To reinforce our position, we have also undertaken public commitments for Diversity and Inclusion, which can be checked on our **institutional website**.


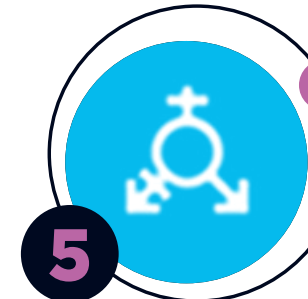


Besides these commitments, our work in Diversity, Inclusion, and Human Rights is based on and commits to some **guiding documents and standards**:

- 1 Principles of the United Nations Organization (UN);
- 2 UN Guiding Principles on Business and Human Rights;
- 3 Universal Declaration of Human Rights (UN);
- 4 International Covenant on Economic, Social and Cultural Rights (ICESCR);
- 5 International Covenant on Civil and Political Rights (ICCPR);
- 6 17 UN Sustainable Development Goals (SDGs);
- 7 International Convention on the Rights of the Child (UN);
- 8 Universal Declaration of ILO (International Labor Organization);
- 9 Yogyakarta principles;
- 10 The fundamental ILO conventions, in particular:
 1. C138 - ILO Convention No. 138 on the minimum age for admission to employment and work;
 2. C182 - Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor;
- 11 OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Companies;
- 12 Principles for Responsible Investment (PRI);
- 13 ISO 26000 International Standard;
- 14 Convention on the Elimination of All Forms of Discrimination against Women (CEDAW);
- 15 LGBT Charter for Rights Equality;
- 16 Brazilian Association of Textile Retail Industry (Associação Brasileira do Varejo Têxtil) (ABVTEX);
- 17 Bangladesh Fire and Construction Safety Agreement;
- 18 French Initiative for Compliance and Sustainability (ICS);
- 19 The Global Social Compliance Program (GSCP).

5.2. Commitment to Diversity, Inclusion, and Human Rights

Since 2015, GPA has formalized its commitment to promoting Diversity, Inclusion, and Human Rights and has set five priority subjects for strengthening policies and procedures to guarantee the rights, respect, appreciation, and equality for everyone:

- 1  Inclusion and development of people with disabilities
- 2  Age diversity
- 3  Gender equality
- 4  Racial equality
- 5  Respect and promotion of LGBTQIA+ rights

5.3 Repudiation

GPA repudiates any action that represents a violation of the laws currently in force and human rights.

Considering the respect and valuation of Diversity as a fundamental premise for good coexistence among the stakeholders that are the target of this Policy, GPA repudiates and strives to eliminate violence, intolerance, and discrimination of any nature whatsoever.

The elimination of discrimination is among the topics audited by GPA. Thus, the use of any type of violence (whether physical, verbal, or psychological), whether aimed at any of the audiences involved in this Policy, is strictly prohibited. Any cases involving physical and/or verbal violence will be handled by GPA'S Whistleblowing and Ethics Committee **(see topic 6.11. Whistleblowing and Ethics Committee).**

We repudiate slave or informal labor, child exploitation, and inhuman and degrading working conditions at GPA and in every link in our value chain, and we commit ourselves to strive to eliminate sexual exploitation of children and adolescents, especially women and girls. We are part of the **Business Coalition for Racial and Gender Equality** and the **Business Coalition for the End of Violence against Women and Girls** as a way to engage private-sector leaders and encourage business policies and practices on these topics. In addition, we have our **Human Rights Policy across the Value Chain**, in which we foster our commitments and criteria to eliminate slave, child, or any degrading working condition.



5.4. Business agenda for non-violence

GPA proposes to be a promoter of a strategic agenda for Diversity, Inclusion, and Human Rights, and particularly for the subject of non-violence in the retail sector. Accordingly, we are committed to engaging other companies to carry out affirmative actions and training aimed at rejecting and discouraging violence motivated by discrimination.

To contribute to this agenda, we have made voluntary commitments to:



10 company's commitments to LGBTI+ rights



Alliance without Stereotypes (UN Women)



Pacto Global Rede Brasil

Global Compact



Compact for the Inclusion of People with Disabilities (Business Network for Social Inclusion)



Brazilian Pact for the Eradication of Slave Labor



Global Partnership for LGBTI Equality



Women's Empowerment Principles (WEPS)



Business Coalition for Racial and Gender Equality



Business Coalition to End Violence Against Women and Girls

5.5. Preventive actions

As a preventive measure, GPA carries out educational campaigns and actions such as training and sensitization, aimed at **eradicating unacceptable behaviors** related to gender issues, racial discrimination, and other relevant subjects.

It also carries out regular audits on critical topics related to Diversity, Inclusion, and Human Rights, in resale suppliers, as explained in section **6.6.1.**

5.6. Disclosing results

The results connected to Diversity and Inclusion actions and projects are disclosed to stakeholders through the **Annual and Sustainability Report**. GPA cares about the agility and consistency in the disclosure of information, its commitment to the securities and exchange market, and its respect for shareholders and investors.

The company complies with all standards connected to publicly traded companies, such as the adoption of national rules for accounting records and the maintenance of publicly held company registration with the Brazilian Securities and Exchange Commission (CVM). In Brazil, our shares are listed on **B3's Level 1** (Brazil, Stock Exchange, Over-the-Counter) and we voluntarily adopt practices applicable to the highest level of governance of B3, the so-called **Novo Mercado** (New Market).



6. Specific guidelines

6.1. Leaders' Role

Leaders are one of the critical elements to develop an inclusive organizational culture and an environment of psychological safety for everyone; therefore, it is essential that all leaders are aware of and act as multipliers of this Policy. GPA works to provide its leaders with training so that they do not reproduce discriminatory stereotypes and behaviors.

Thus, our leaders are expected to practice the following values:

- 1 Expressing their opinion when witnessing exclusive behaviors and/or discriminatory attitudes, while directing people to use the competent channels available;
- 2 Developing active listening and value different opinions, regardless of hierarchical relationships;
- 3 Knowing their own biases and working to minimize them in their daily decisions;
- 4 Creating a psychologically-safe environment for their team;
- 5 Communicating in an assertive and inclusive way;
- 6 Hiring and developing teams with diversity;
- 7 Monitoring indicators connected to Diversity and Inclusion;
- 8 Meeting the targets connected to Diversity and Inclusion;
- 9 Filing a claim with the Whistleblowing Channel in situations involving violations to this Policy or the Code of Ethics.

As to variable compensation bound to Diversity targets, please see **section 6.4** of this document.

6.2. Affinity Committees and Groups

GPA maintains **Affinity Committees and Groups** aimed at the internal public to encourage dialogue and the transformation of the work environment in favor of the Diversity and Inclusion agenda. And they are the following ones:



Composed of members of the board of directors and representatives of key areas of GPA to multiply the respective subjects. Guided by the five Diversity and Inclusion priority pillars, and considering intersectionalities, it aims to monitor the progress and challenges connected to our indicators, build and validate various actions, thus generating greater interaction and synergy across the different areas of GPA.



Its name was chosen because it is the nickname given to the South-African leader Nelson Mandela, known for his struggle for racial equality and the end of Apartheid in South Africa. This group is formed by the internal public of all GPA's business units. Its hallmarks of action include initiatives to attract, retain, develop, engage, raise awareness of, and raise everyone's sympathy for this subject.



This is an affinity group formed by the internal public that aims to adopt best practices for a respectful environment towards women, inviting men to be the ones responsible for the gender equality agenda. Its action pillars are composed of initiatives to attract, retain, develop, engage, raise awareness of, and sensitize everyone about this subject.



This group aims at adopting best practices for an environment that respects sexual orientation, sexual or gender identity of every person in the internal public. Its action pillars include initiatives to attract, develop, and retain talent through affirmative actions and internal and external awareness-raising actions for the LGBTQIA+ community.



To ensure that these subjects are also reflected in stores, GPA keeps the Ambassadors of Diversity, composed by the internal public who, after undergoing an exclusive training, become multipliers, with the challenge of sensitizing their colleagues on these subjects.

To take part in these initiatives, the internal public must self-register through the links disclosed periodically on the Internal Communication channels.

6.3. Respect and coexistence rules

GPA has as purpose to build an environment based on respect for differences and individualities and also on the “living together” in a sense of a productive socialization aiming at the well-being of all those who relate to us. The very first step is taking an open and accepting stance towards what is different. **Some important recommendations:**

- | | |
|---|---|
| <p>1 It is important not to stereotype, that is, not to assume truths based only on one’s individual point of view;</p> <p>2 Do not make jokes with people’s characteristics (physical or others);</p> <p>3 Express your opinion whenever faced with a discriminatory situation;</p> <p>4 Be inclusive in your communication;</p> | <p>5 Conduct training provided by GPA on the subject;</p> <p>6 Take part in lectures and sensitization actions promoted by GPA’S Diversity and Inclusion team;</p> <p>7 Be an example of inclusion and act as an ally;</p> <p>8 File a claim with the Whistleblowing channel in any situation that may come to your knowledge and/or you witness attitudes against this Policy.</p> |
|---|---|

Particularly on the matter of gender identity of our employees and all other audiences with whom we relate, it is worth mentioning that it must be respected and considered in documents and negotiations (both formal and informal ones). In practice, respect for gender identity encompasses some of the actions below:

- | | |
|--|---|
| <p>1 Use of the social name and pronouns in documents, internal systems, and oral dealings;</p> <p>2 Recommendation to use the social name in all documents of Company’s benefits (e.g., health plan and dental plan);</p> | <p>3 Use of the correct pronoun (he/she), according to the corresponding gender identity;</p> <p>4 Clear communication on permission to use toilets according to the gender identity of every person, accompanied by awareness-raising actions for employees, associates, and other stakeholders.</p> |
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6.4. Diversity and Inclusion Indicators

Since 2015, Diversity and Inclusion are among the strategic subjects validated by the Board of Directors. The topic known as "Valuing our people", which means being a reference company that promotes Diversity, Inclusion and Sustainability with employees, is one of our six priority subjects.

GPA has a Manifest of High Male Leaders for Gender Equality, besides the Sustainability and Diversity Committee. Such initiatives reinforce the focus on ensuring an increased number of female leaders.

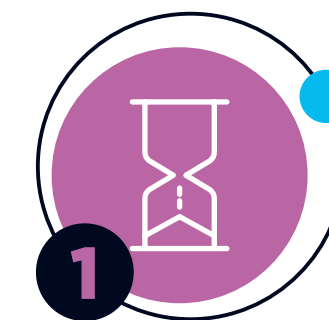
GPA follows, as targets, the following indicators:



Percentage of women in leadership positions (managers and above);



Percentage of black people in the staff.



Age diversity;



Racial equality in leadership positions;



Young apprentices;



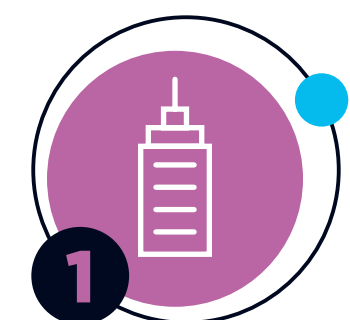
Length of time in the company of women returning from maternity leave.

The variable compensation of managers is bound to the abovementioned indicators (Sustainability and Diversity Indicator - ISD). The Sustainability area is responsible for determining and monitoring such targets.

Other indicators are also monitored, such as:

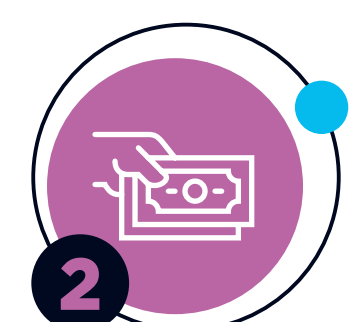
6.5. Equal opportunities

Aiming at fostering an environment of equal opportunities for everyone, with attention to minority groups, GPA set strategic priorities, namely:



1 Work environment: promotion of a culture of Diversity and Inclusion by providing affinity groups and the Diversity Ambassador Program with support, campaigns and educational actions to eliminate discrimination and unacceptable behaviors.

Accessibility for people with disabilities: GPA guarantees to people with disabilities the same access to training, development, and career opportunities. All units must work for constant adaptation and accessibility in order to integrate and maintain employees in appropriate conditions for the full exercise of their activities. Each area is responsible for identifying the needs of every candidate or employee and requesting material resources and/or adaptations to the competent areas. Needs can be identified both on the admission phase and throughout the employee's development process in the company.



2 Salary: improvement of policies and processes to ensure equal pay for all;



3 Attraction and selection: review of processes to reduce the incidence of unconscious biases and encourage hiring through affirmative vacancies;



4 Development and succession: strengthening specific actions for minority groups in leadership positions;



5 Training programs: adding contents on diversity and management of different professional profiles in all training programs at GPA'S Retail University (*Universidade do Varejo GPA*).

In **Recruitment & Selection** processes, the following behaviors should be adopted:



The non-reproduction of prejudices, stereotypes, and discriminatory attitudes, especially those connected to minority groups, avoiding specific questions for a certain person because of any characteristics;



The non-reproduction of any standard speech regarding sexual orientation;



The adoption of a social name for trans people (regardless of whether there is a formal change in their official identity document);



The hiring of people through affirmative vacancies, aiming to encourage the admission of diverse people, focusing on minority groups.

The HR area, in line with the manager, should consider the dissemination of affirmative vacancies, as well as criteria for eliminating biases for analyzing resumes, such as the candidate's origin, gender, age, among other markers. Interviews should follow an analysis parameter to assess the knowledge, skills, and abilities required for the position at issue, considering intentionally the inclusion of diverse people in the teams. If any questions may arise, please read **the Attractiveness and Selection Policy***.

All trainings offered are made available for all employees, respecting specific content for each hierarchical level. The nomination of employees for **training sessions** must be carried out based on objective criteria, regardless of any of their characteristics. For more information, please read **the Training Management Policy***.

With regard to **Compensation and Benefits**, the **Job and Salary Management Policy*** shall be strictly complied with, as it will not be tolerated any prejudice or differentiation by gender, race, sexual orientation, socioeconomic origin, age, or any other.

Regarding the **Succession Plan**, at least one woman is expected to be nominated among candidates for leadership positions (managers and above).

Particularly as regards the subject of maternity, it is determined that the employee's dismissal before 12 months of her return from maternity leave can only happen after a flow of governance and approval by the board of executive officers of the corresponding business unit and the Human Resources area. For more information, please refer to the **Guide for Mothers and Fathers - Pregnancy and Adoption***.

For other information and benefits connected to maternity and paternity, please read the **Benefits Management Policy***.

6.6. External environment

6.6.1. Relationship with Resale Suppliers

Respecting Human Rights across the supply chains of all products we buy and resell are key aspects of GPA'S sustainability strategy.

Our commitments to Human Rights and Protection of the Environment are based on key documents of the International Labor Organization (ILO) and other UN covenants such as the Global Compact (GC), Sustainable Development Goals (SDGs), and Guiding Principles on Business and Human Rights (UNGP).

GPA has a **Policy of Human Rights across the Value Chain** that sets forth general and specific guidelines regarding the respect for Human Rights and the working conditions that our suppliers and business partners in our chain must comply with. Respecting and complying with the guidelines of this Policy is mandatory for all suppliers and is a condition precedent for providing goods to GPA and maintaining long-term relationships with the Group's business units.

In addition, GPA has commitments and complementary guidelines in the **Ethics Charter for Suppliers** and in other policies that are correlated with this Policy, where specific guidelines on Animal Welfare, Environmental Management and/or value chains and specific products are approached.

Besides, all resale suppliers must comply with laws and regulations, know the values and respect the ethical principles provided for in the Code of Ethics.

According to the Ethics Charter for Suppliers, suppliers must follow the standards provided for therein, under any circumstances, within the supply chain of the Group, its subsidiaries and subcontractors, in order to ensure that:

- 1 Employees are treated with respect and dignity in an environment that provides safe and healthy working conditions;
- 2 Appropriate mechanisms are set for the preventive management of risks connected to the corresponding industry in which they operate;
- 3 The culture of safety and health at work should be disseminated, establishing educational processes to promote such subjects;
- 4 Production or service provision processes are carried out in the most environmentally-friendly manner possible;
- 5 Business relations performed by every supplier shall be developed in an ethical and exemplary manner, within the most strict compliance with the law, regulations and internal standards of the Group, as well as being free from any kind of undue favoring, active or passive corruption of public agents, extortion, or fraud of any kind.

* Internal document of the Company of exclusive access to employees

6.6.2. Registration and checking of public lists

All GPA suppliers undergo a thorough process of checking, which includes consulting the slave labor and embargo lists of the Brazilian Agency for the Environment and Renewable Natural Resources (IBAMA). Such lists are regularly updated as soon as they are made available by the competent authorities.

If any supplier is found in one of such lists, such supplier is subject to the suspension and blocking of payments.

6.6.3. Contracts with Suppliers

The Ethics Charter is part of the attachments to every agreement executed with our resale suppliers, and such agreements have an express provision for every supplier to be bound by GPA's Code of Ethics and/or the Supplier's Code of Ethics, as long as such provisions are not conflicting with those of GPA. We work exclusively with suppliers who execute the agreement with such exhibit thereto.

6.6.4. Monitoring of working conditions in our chains

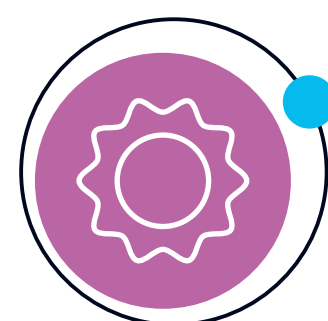
GPA maintains a social auditing program, conducting audits regularly with suppliers of critical chains to check whether they are complying with the relevant laws and regulations regarding suppressing slavery-like labor and allowing only decent and appropriate working conditions.



6.6.4.1. For the domestic chain of textile industry

In 2011, GPA executed the Term of Commitment for the Certification of the Textile Manufacturing Chain with the Brazilian Textile Retail Association (ABVTEX). Since then, the Group has been implementing the certification program, asking its suppliers of textile products, footwear, and accessories to get certified too. Such certification process makes it possible to verify compliance with Brazilian legislation and implement good management practices in the Brazilian textile manufacturing chain. Our commitments and guidelines with the textile chain can be found in the **Policy of Human Rights across the Value Chain** of GPA.

Besides, the company is part of the Executive Board of such Association and take part actively in the discussions of its Management Committee and Suppliers Working Group that monitor and bring improvements to the Program.



6.6.4.2. For the domestic and foreign chain of Private Labels

As of 2015, the Company began implementing the *Social Compliance Program* (SCOP) for all factories of Private Labels and generic brands in risky countries. The list of risk countries is updated by the Casino Group. The Company works with the methods known as Initiative for Compliance and Sustainability (ICS) and Business Social Compliance Initiative (Amphora/BSCI). These methodologies check compliance with international standards of working conditions and local labor requirements in force at suppliers' factories. Our commitments and guidelines with the domestic and foreign supply chain can be found in the **Policy of Human Rights across the Value Chain** of GPA.



6.7. Education and Sensitization

We provide regular training to business areas to raise awareness of the risks connected to labor rights in the value chain and to explain the responsibilities they have to ensure the fulfillment of our commitments.

6.8. Relationship with service providers and business partners

All GPA'S providers undergo a thorough initial checking process, which includes consulting the "ban list" of slave labor. Monitoring is carried out by Social Audit Programs, which are carried out periodically. Transparency and the dissemination of results permeate the entire process.

All service providers and business partners must comply with laws and regulations, know the values, and respect the ethical principles provided for in the Code of Ethics, as provided for in the standard clauses of the agreements executed with GPA.

6.8.1. Registration and checking of public lists

All service providers and non-commercial suppliers of GPA undergo a thorough risk analysis process that includes consulting the lists of slave labor by the Ministry of Labor and Employment, embargo term of the Brazilian Agency of Environment and Renewable Natural Resources (IBAMA), and consulting the national register of punished and sanctioned companies (CNEP and CEIS).

The lists are regularly updated as soon as they are made available by the corresponding authorities.

If any provider is registered on one of these lists, such provider will be subject to suspension, blocking of the business relationship, and the agreement may even be terminated, or another provider / supplier can be sought to replace it.



6.9. Relationship with customers

The relationship with customers is an essential dimension to reinforce an inclusive culture in GPA, as through such a communication we have the chance to strengthen and show, in practice, our positioning on Diversity and Inclusion.

Such matter is subject to monitoring and demand by society, particularly when companies incur discrimination actions. An unwanted repercussion of an event involving discrimination actions can be extremely negative for GPA, affecting its reputation with different audiences. On the other hand, communication based on Diversity and Inclusion strengthens the bond, dialogue, and validation with the most varied audiences that interact with our brands.

Our way of conducting relationships, our teams, and our communication messages must reflect the Diversity of our customers.

6.9.1. Inclusive language and communication

It is the responsibility of all those involved with communication actions (internal and external) to ensure the production, validation and dissemination of discrimination-free contents, with no stereotypes.

To learn more about how to carry out a more diverse and inclusive communication, please access the **Inclusive Communication Guideline*** available at GPA'S Retail University, and the **Inclusive Communication Policy**.

6.9.2. Employee-customer relationship

Our customers are a sample of society, and that is why it is so important to always keep in mind they are as diverse as the Brazilian population. The employee-customer relationship must be established based on mutual respect, with no stereotypes or any type of discrimination.

6.9.3. Non-discriminatory treatment, approach, and security

In stores, treatment, approach, and security must follow the procedures of the Retail Property Security and Loss Prevention area. Approaches that make any judgment about sexual orientation, race, gender, or any other similar characteristics are not tolerated.

Any actions that do not comply with the protocol of the Retail Property Security and Loss Prevention areas and that are motivated by a discrimination nature will be dealt with by the Whistleblowing area and the Ethics Committee and will be subject to the applicable penalties.

More information on this subject can be found in the document known as **GPA.IT.10.07.0001—Suspected signs of theft (Stores, Gas Stations, and Drugstores)***.

6.10. Engagement with society

6.10.1. Supported projects and their connection with Diversity and Inclusion

GPA has a Diversity and Inclusion agenda that includes commemorative dates and aims at raising awareness and sense of sympathy among employees and other participants, mobilizing external guests from other companies, civil society organizations, consultants, and educational institutions.

It is recommended that the programs and projects of GPA Institute or any other social institution supported by the Group's companies, as well as voluntary initiatives, consider Diversity and Inclusion criteria to determine the benefited audience, seeking to strengthen vulnerable groups.

6.11. Whistleblowing and Ethics Committee

GPA makes the Whistleblowing Channel available to its employees, suppliers, service providers, customers, social institutions, and partners. It is the official tool for receiving complaints, dissatisfaction claims, and reports of violations for noncompliance with the guidelines for valuing Diversity, Inclusion and Human Rights over all GPA business units.

Any conduct that is discriminatory and/or not in compliance with GPA'S Code of Ethics must also be reported to the **Whistleblowing Channel**, regardless of the position or situation of those who have practiced it. GPA, through its responsible areas, is committed to investigate all reported situations in an unbiased way and under total confidentiality, as well as to adopt the applicable disciplinary measures. Contact is free, and complaints can be made anonymously. Any employee who witnesses a breach of any rule of GPA in force has the duty to report such violation to the Whistleblowing Channel.

The Ethics Committee is a collegial body responsible for managing GPA'S Code of Ethics, as well as for ensuring that it is efficient and effective. Such Committee also determines and informs all preventive, corrective, or improvement actions to be taken.

**GPA'S
Whistleblowing Office**

<https://www.gpabr.com/en/ouvidoria>

08000 55 57 11

ouvidoria@gpabr.com



Monday - Saturday,
8 am - 8 pm

8. References

All materials referred to in this Policy can be found on the Our People Portal (*Portal Nossa Gente*) Policies and Processes (*Políticas e Processos*) group and at GPA'S Retail University (*Universidade do Varejo GPA*).

For cases not covered by this Policy, please read the following specific Policies:

- **Code of Ethics**
- **Ethics Charter for Suppliers**
- Inclusive Communication Guideline*
- Guide for Mothers and Fathers—Pregnancy and Adoption*
- Manifest of High Male Leaders for Gender Equality*
- GPA.PL.17.01.0001- Internship Program*
- GPA.PL.17.01.0003 - Attractiveness and Selection*
- GPA.PL.17.01.0004 - Admission of Employees*
- GPA.PL.17.04.0001 - Unpaid work leave*
- GPA.PL.17.04.0002 - Transfer Allowance for Employees*
- GPA.PL.17.04.0003 - Vacation granted*
- GPA.PL.17.04.0004 - Management of Positions and Salaries*
- GPA.PL.17.04.0008 - Benefits Management*
- GPA.PL.17.02.0001 - Training Management - GPA'S Retail University (*Universidade do Varejo*)*
- GPA.PL.17.04.0009 - Work Flexibility Programs*
- GPA.PL.17.04.0010 - Termination of Employees*
- GPA.PL.17.04.0011 - Incentive Campaigns*
- GPA.PL.01.04.0003 - Policy of Reporting to the Whistleblowing Channel, and Ascertainment of Facts*
- GPA.PL.17.06.0001 - Working Time*
- **GPA.PL.17.07.0002 - SESMT Policy***
- **Inclusive Communication Policy**

* Internal document of the Company of exclusive access to employees

7. Penalties

Any employee who witnesses a breach of any of the above rules has the duty to report such violation to the **Whistleblowing Channel**. Besides, any failure to comply with the standards and guidelines provided for in this document may be considered a serious misconduct subject to disciplinary penalties based on **the Ethics Committee's Management Policy***, **GPA'S Code of Ethics**, and the **Policy on Consequences and Disciplinary Sanctions**.



9. Attachments

Not applicable.

10. Revision History

Revision number	Date of publication	Description of changes	Responsible for the approval (Name/position)	Alternate responsible (Name/position)
06	Nov. 21, 2022	General revision of the document, specially in the items 2.1; 4.3; 4.4; 5.2; 5.5 and 5.6	Mirella Basolli Gomiero Chief HR / Sustainability Officer	Camila Morales Zanchim Diversity Manager
05	Sep. 21, 2021	Section 5.7.1 amended under the SCB policy, to add the SCB company	Mirella Basolli Gomiero Chief HR/ Sustainability Officer	Camila Morales Zanchim Diversity Manager
04	Sep. 8, 2020	Changes made in section 3- Ethnicity and Race; section 4.1- Context; Section 4.3 Repudiation.	Mirella Basolli Gomiero Chief HR/ Sustainability Officer	Camila Morales Zanchim Diversity Manager
03	Mar. 25, 2020	General revision of the document	Mirella Basolli Gomiero Chief HR/ Sustainability Officer	Camila Morales Zanchim Diversity Manager
02	Jan. 28, 2020	General revision of the document	Mirella Basolli Gomiero Chief HR/ Sustainability Officer	-
01	Sep. 13, 2017	Template update and document recoding	-	-
00	Oct. 11, 2016	First version of the document	Officer - Attractiveness & Selection and Diversity	Manager - Attractiveness & Selection and Diversity

