



GPA Private Social Investment Policy (PISP)

1. Purpose

The Private Social Investment Policy ("PISP" and/or "Policy") presents and guides the strategy of any and all social investment intended by GPA and presents the guidelines for action, application of financial, human and material resources, which directly benefit the company with the purpose defined for such purpose and that are aligned with the priorities listed by the Company.

2. Scope

This document applies to all social investment actions of the group and covers guidelines for all GPA employees, its business units, brands and related companies/institutions, as well as suppliers, service providers, customers, social institutions and company partners.

3. Terms and Conditions

Private Social Investment (ISP) – Voluntary transfer of private resources in a planned and monitored manner for social, environmental and cultural programs and projects of public interest.

GPA Institute – the Group's social front which, for the purposes of this policy, is responsible for defining and operating GPA's social investments; strictly following all applicable legislation, as well as other corporate policies, standards and procedures in force.

Funding incentive or arising from tax incentives – resources obtained through an application submitted by the interested part to the incentive body, aiming to obtain the benefits of the tax incentive mechanism provided by the incentive legislation. Projects within the scope of the Culture Incentive Law, must be supported by a “Patronage Notice” and undergo an assessment by the Tax Authority, regarding the tax deductibility limits for income tax.

Relationship audiences, interested parties or Stakeholders – also known as strategic audiences, are all relevant audiences with interests relevant to GPA, or even individuals or entities that assume some type of risk, direct or indirect, in relation to society. Among others, the following stand out: shareholders, employees, community, customers, suppliers, public authorities and non-governmental organizations.



Sustainable Development Goals - The Sustainable Development Goals are a global call to action to end poverty, protect the environment and the climate, and ensure that people everywhere can enjoy peace and prosperity in order to make sure we can achieve the 2030 Agenda.

Materiality - In the context of sustainability, it is the basis for the company to identify priority agendas for its performance, investments and management of externalities, risks and opportunities. It is necessary for an organization to know and manage relevant information on aspects that, due to their impacts (positive or negative), risks or opportunities, are a priority in its activity and, therefore, should be considered essential in strategic decisions as well as in processes management, operation, communication and reporting. Aspects that can significantly impact and/or influence assessments and decisions of the company's managers or its stakeholders are considered material.

4. Principles, Guidelines and Strategies of Private Social Investment (ISP)

PISP is based on the company's core values, such as ethics, transparency and respect for individual and collective rights, in line with our commitment to social transformation and the reduction of inequalities, contributing to the construction of a more inclusive society.

4.1. Contextualization

Our purpose is to be a mobilizing agent in the construction of a new social, environmental and governance agenda for a more responsible and inclusive society.

Based on this objective, one of our commitments is to reduce inequalities and offer opportunities. In this sense, we believe that Private Social Investment (ISP) is essential to strengthen, leverage and create actions that seek to contribute to sustainable development and social impact.

Through ISP and our projects and initiatives, we seek to promote the social, economic and cultural development of our country, especially in the communities surrounding our stores. We do this through the GPA Institute, the Group's social front, which has a team dedicated to the planning, monitoring and operation of the ISP, with institutional actions and in conjunction with our brands and in partnership with our customers, employees, social institutions and suppliers.

In order to fulfill our purpose and to carry out activities and social projects of public interest, voluntary resources are transferred from the Group and/or also from tax incentives. The purpose of this Policy is to guide such transfers and ISP actions in a planned, strategic and monitored manner.



4.2. Performance and Focus

We detect how, where and in what way we will act after defining our operating strategy, which is designed and revised, when necessary, based on the understanding of the context in which we are operating and the challenges of society, in line with the Sustainable Development Goals (ODS), the trends we observe in our materiality processes and company strategy.

We always seek to generate an impact in the medium and long term based on an understanding of the global scenario of sustainability and private social investment, as well as the expectations and interests of our stakeholders through a broad work of engagement involving surveys, interviews and consultations, periodically revisiting the themes priorities for the strategic planning and development of our business.

We emphasize that all the activities of GPA Institute will be carried out in full accordance with the provisions of its Bylaws, observing the principles of ethics, legality, impersonality, morality, publicity, economy, efficiency, social and environmental responsibility and universalization of services.

4.3. Target Audience

The target audience of our social investment actions is Society, in particular, communities in vulnerable situations and other audiences, especially those around our stores.

4.4. Geographic location

We are a multi-format, multi-channel and multi-region company. We operate throughout the national territory, seeking to strengthen and generate value to the entire Brazilian society.

We value the prominence of local actors and the strengthening of civil society, seeking, whenever possible, to concentrate our investments in regions where we have our operations.

4.5. Criteria for the Contribution of Resources

The resources contributed to Private Social Investment initiatives may come from its own resources and/or encouraged and/or from partnerships.

In the event that entities are benefited, they must meet the following eligibility criteria: (i) are located in the city(ies) within the perimeter established as the focus of action; (ii) have been incorporated in Brazil, in accordance with Brazilian law, and have headquarters in the national territory; (iii) are legally constituted; (iv) are in compliance with their tax obligations; (v) are registered with the CNPJ; (vi) are non-profit and non-partisan organizations that carry out social program(s) related to the themes listed as strategic action of the GPA Institute; (vii) have technical capacity; (viii) comply with current labor laws and respect employment relationships; (ix) have an active, transparent and ethical governance structure; (x) respect the rights of all persons, regardless of race, color, sex, language, religion, political or other opinion, national or social origin, wealth, birth or any other condition; and (xi) present the documentation required for registration with the GPA Institute up to date.

Likewise, for the respective contributions, characteristics such as: (i) need of the community/entity to be benefited; (ii) social transformation power to be generated; (iii) respect, appreciation and participation of the potential that already exists in the community; (iv) potential for multiplication in other communities; (v) progressive sustainability of the project, avoiding the creation of dependence between the GPA Institute and the Institution/community.

4.6. Financial resources

The amount allocated to the ISP will be defined annually within the scope of GPA's and GPA Institute's Strategic Planning, and approved by the GPA Institute's Deliberative Committee and GPA's Sustainability Committee.

The GPA Institute's Board of Directors will be responsible for the management and governance of these resources, in line with its approved strategic plan.

As mentioned above, the use of Tax Incentives will not be mandatory, but may be used, if applicable. To provide greater transparency, it will make it clear and indicated, when there is the use of incentivized resources, as per regulation.



4.6.1 Encouraged Resources

For social investments of resources arising from tax incentives, the guidelines included in GPA's Donations, Contributions and Sponsorship Policy must also be observed and complied with.

4.7. Resource Application

The GPA Institute, to fulfill its purpose, will act autonomously through the direct execution of projects, programs or action plans, the donation of physical, human and financial resources, the provision of services, including support to other organizations without profit and public sector bodies operating in related areas, among other related activities.

Financial resources will be applied to projects, programs or action plans determined and coordinated by the GPA Institute.

4.8. Approval, Responsibilities and Management

The GPA Institute will be responsible for managing the ISP's resources, through permanent monitoring and evaluation of the projects, programs and supported initiatives.

It will audit financial and non-financial results and provide transparency to its results through its website, Annual Report and annual publications.

4.9. Engagement and Relationship with Stakeholders

We seek constant dialogue and engagement, open and transparent, with our different stakeholders, including employees, shareholders, consumers, suppliers, the community, public authorities and organized civil society. All communication is carried out based on the Corporate Communication and Relationship with Stakeholders Policy.

We maintain open channels of dialogue and communication with all our stakeholders, participating, whenever possible, in forums and groups (Boards, Committees or similar) to discuss issues related to our strategy and about the local development.

We understand that the relationship with these different audiences is fundamental to our performance, enabling the identification of opportunities, definition



of social investment priorities, the search for innovative solutions and possible detection of failures or improvements in our processes, products and projects.

4.9.1. Community relationship

All of our actions are premised on generating value and positively impacting society, especially the communities in which our businesses are located, encouraging the sustainable development of our surroundings.

We identify and assess, whenever possible, the impacts and challenges existing in the communities where our operations are established, with the objective of establishing a relationship that can contribute to avoid, mitigate, minimize and/or remedy these impacts, articulating, when necessary, with other partners, in order to contribute to territorial development, ensuring dialogue channels.

The entire engagement and relationship process is based on the UN Guiding Principles on Business and Human Rights, ensuring that complaints from communities and all interested parties are properly answered and managed through our service channels. In addition, we monitor the effectiveness of all implemented actions as well as the procedures adopted and disclose the results in the Annual Report of GPA and GPA Institute and other relevant publications.

4.10. Results Disclosure

The results will be disclosed through the GPA Institute's Annual Report and GPA's Sustainability Report and other annual publications, as well as through participation in events, seminars, best practices groups, among other forums in which the GPA Institute and GPA participate.

4.11. Evaluation, Indicators and Targets

GPA's private social investment should be periodically managed and monitored by indicators and targets defined in a clear, measurable, tangible and strategic manner.

In this way, the social projects that make up GPA's Private Social Investment portfolio must have monitoring indicators and targets, and their management results must be frequently monitored, evaluated and communicated/disclosed, adopting transparency practices regarding the actions and resources employed.



5. Complaints Channel

Failure to comply with the rules and guidelines set forth in this document may be considered serious misconduct, subject to the application of sanctions based on all GPA's Policies and Code of Ethics.

As a reporting channel and official tool for receiving complaints, dissatisfactions and allegations of violations of non-compliance with this Policy, GPA makes available to its employees, customers, suppliers, subsidiaries, social institutions and external public with commercial relations and institutional with the Group, the **Ombudsman Channel**.

The purpose of this channel is to investigate and correctly deal with all occurrences, ensuring adherence and consistency to the ethical, institutional and universal values of the relationship between GPA and its companies and their stakeholders.

Violations of this Policy, the Company's Code of Ethics or any item in the Supplier's Letter of Ethics can be reported through the channel: ouvidoria@gpabr.com.br. The complaint will be investigated in a confidential manner, even allowing for anonymity.

Contact:

08000 55 57 11 – ouvidoria@gpabr.com

Office hours: Monday to Saturday, from 8 am to 8 pm.

6. References

Our Private Social Investment is used as a reference, among them and not limited to:

- Principles of United Nations Organizations (UN)
- Guiding Principles on Business and Human Rights (UN)
- 17 Sustainable Development Goals (SDG\UN)
- Regulation OSCIP Law - OSCIP Law

Allied to this Policy, there is the Code of Ethics that presents the main guidelines related to the conduct of business and the expected behavior of all those who interact with GPA, internally and externally.

For cases not covered by this Policy, see GPA's other corporate policies on our website www.gpabr.com.



7. Policy Update

This Policy is valid for an indefinite period and without prejudice to the provisions contained therein, GPA reserves the right to revise it, as often as it sees fit.

8. Policy Approval

This Policy was approved by the Sustainability Committee in July 2021.
