

CODE OF  
**ETHICS**

# MESSAGE FROM THE MANAGEMENT

**At GPA, our fundamental principle has always been to uphold laws and regulations, and a steadfast commitment to ethics and integrity.**

Our belief is that by DOING THE RIGHT THING IN THE RIGHT WAY, we contribute to develop a sustainable business environment and a more just and responsible society. We understand that our success hinges on our reputation and the relationship of trust between us, our employees, our customers, business partners, and shareholders.

This Code, updated and endorsed at a Board of Directors' Meeting, embodies the key GPA guidelines related to the conduct of our business and the expected behavior of all those who have dealings with us, both internally and externally, encompassing our workforce, customers, and partners.

At GPA, we uphold respect towards all individuals and integrate ESG factors in our decision-making and business practices. We also champion inclusivity and diversity in all its manifestations. Our organization places high importance on respecting and valuing individuals, actively working towards eradicating any form of violence or intolerance based on age, gender, sexual orientation, race, disability, religion, marital status, nationality, geographic region of origin (including those in refugee situations), and other identity markers.

It is our conviction that ethical and transparent conduct should govern our interaction with all our stakeholders, which comprise customers, clients, employees, business partners, government, and shareholders. Any interaction of GPA's employees and third-party contractors with the Government must be carried out with exacting compliance with the law, with no tolerance for unjust favoritism.

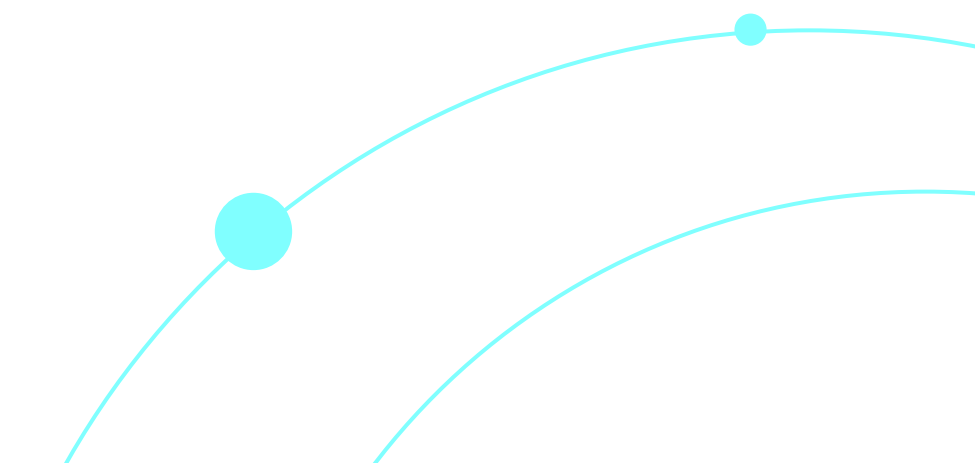
Dear employees and partners, we wish to share this responsibility with all of you. It is the responsibility of each individual, independent of their position or role, to be familiar with this Code's contents and to conform to the values, principles, and guidelines stated herein. We expect you to report any conduct that breaches the guidelines described here to the Whistle-blowing channel, and provide us with your suggestions and concerns, whether anonymously or not, regarding our daily lives and business.

**This embodies the ethos and culture of our Group, and we rely on the cooperation of all!**

**Board of Executive Officers**



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# PRESENTATION

At GPA, our conviction is that our success is contingent on our daily accomplishments. Therefore, we are committed to conducting business with transparency, accountability, loyalty and ethics, and to exert a positive influence on those around us with good practices and principles. Our values are what make us who we are, compelling us to become more and more interwoven into the fabric of society by providing outstanding services and products.

## OUR VALUES:



### **PASSION ABOUT OUR CUSTOMERS**

Customers are our raison d'être; therefore, we are passionate about serving and delighting them every day.



### **MAKE IT SIMPLE AND WELL DONE**

Acknowledging the challenging nature of our business, we must seek simplicity, agility, and excellence in every delivery.



### **ATTITUDE TOWARDS INNOVATION**

We are trailblazers and we relentlessly pursue innovation, driven by delivering increasingly superior experiences for our people, our customers, and society.



### **TOGETHER, FOR TODAY'S AND FUTURE OUTCOMES**

We are result-oriented, and our strength lies in surpassing targets to achieve GPA's sustainable growth.



### **I GOT THIS**

We are made up of protagonists who make things happen.





The Code of Ethics outlines the fundamental principles and guidelines that govern our work and business decisions, although not addressing every conceivable situation in our daily lives, but delineating parameters to guide us. Thus, this Code outlines the Group's expectations for the conduct of our leaders, administrators, directors, and employees and is equally applicable to our suppliers, business partners, and service providers.

**REMEMBER, WHEN YOU'RE UNSURE ABOUT WHAT TO DO, ASK YOURSELF THE FOLLOWING:**

- DOES IT VIOLATE ANY INTERNAL LAW OR POLICY/PROCEDURE OF GPA?
- DOES IT SEEM LIKE SOMETHING WRONG OR WEIRD?
- WOULD YOU BE UNCOMFORTABLE IF OTHER PEOPLE KNEW IT?
- CAN IT NEGATIVELY IMPACT GPA'S IMAGE?
- DOES IT GENERATE THE RISK OF MEANING LEAKAGE OR EXPOSURE OF SENSITIVE GPA'S DATA AND/OR PERSONAL DATA OF OUR CUSTOMERS?
- DOESN'T IT FIT WITH GOOD PRACTICES OR VALUES OF GPA?

**IF THE ANSWER IS YES TO ANY OF THEM, STOP AND CONSULT YOUR MANAGER OR THE HR, LEGAL, INFORMATION SECURITY, AND/OR COMPLIANCE AREAS.**

Live and multiply our values. This is relevant not only for creating a healthy and mutually respectful environment, but to build together a more just, peaceful, and inclusive society.

**IN 2003, GPA BECAME A SIGNATORY TO THE GLOBAL COMPACT, AN INITIATIVE PROMOTED BY THE UNITED NATIONS THAT ENCOMPASSES 10 UNIVERSAL PRINCIPLES IN THE AREAS OF HUMAN RIGHTS, LABOR, ENVIRONMENT, AND ANTICORRUPTION.**

**GPA COMPLIES WITH VOLUNTARY COMMITMENTS AND SUBSCRIBES TO PRINCIPLES AND PACTS ESTABLISHED BY BOTH LOCAL AND GLOBAL ORGANIZATIONS.**





## ETHICS COMMITTEE

The responsibility of managing this Code is vested in GPA's Ethics Committee, which must ensure its broad dissemination to all employees and relevant stakeholders, besides validating its effectiveness and efficiency.



## RELATIONSHIP WITH OUR CUSTOMERS

Our customers are treated with utmost respect; we are committed to eradicating and have zero tolerance for any kind of violence and/or discrimination, regardless of age, gender and/or their modes of expression, sexual orientation, race, color, disability, religion, marital status, nationality, and/or geographic region of origin (including those in refugee situations) or any other marker of identity. We are always ready to understand our customers' needs and meet their interests, requests, complaints, and suggestions, either in person or through service channels.

In order to uphold our reputation for excellence, we must offer exceptional products and services, delivered with speed and expertise, reflecting the accountability that permeates our retail operations. Ensuring food safety is a topmost priority at GPA, and we do not tolerate any form of mishandling of expired or unsuitable products for consumption or sale. We only provide correct information with agility and transparency, aiming at building a relationship of trust with our customers. In our business practices, we uphold ethical standards and prohibit any unfair advantages to a specific customer at the expense of others.

Every employee of ours must pledge themselves to the protection of consumer rights and adhere to all laws governing their actions. The use of our customers' information is strictly forbidden without their explicit consent or in violation of the law.



## COMPLIANCE WITH LAWS, REGULATIONS, AND INTERNAL STANDARDS

We comply with all domestic and international laws, principles, rules, and regulations pertinent to our business while adhering to the utmost standards of business ethics. We ensure that our standards and procedures are known and complied with by everyone. If any questions come up, we must refer to internal guidelines or the pertinent departments and areas to ensure a proper action.

It is paramount that our leaders consistently lead by example in ethical and impartial conduct, while also establishing effective controls to deter fraud and ensure compliance with both laws and our standards.

***SIMPLICITY SHOULD NOT EQUATE TO COMPROMISING ETHICS AND INTEGRITY. DO WHAT IS RIGHT, DO NOT TAKE ANY SHORTCUTS!***



# ANTICORRUPTION, PREVENTION OF FRAUD AND MONEY LAUNDERING

GPA has a zero-tolerance policy against any form of corruption, fraud, or bribery, and will impose penalties on those involved in any such acts, regardless of whether they involve public officials or not. Our associates, including suppliers, service providers, and other business partners, must fully understand and comply with the Brazilian Anticorruption Law (Law No. 12,846 of 2013), the *United States Foreign Corrupt Practices Act (FCPA)*, and the *Sapin II* French Anticorruption Law, in addition to complying with the Group's internal standards, policies, and procedures.

GPA commits to updating, disseminating, and providing training, while emphasizing that no financial support or aid will be awarded to individuals involved in criminal activities. Not will GPA provide any assistance in proceedings in which individuals or organizations seek to conceal resources from criminal activities or make them look lawful, in compliance with the Brazilian Law on Money Laundering Crimes (Law No. 9.613/1998).

**OUR STANCE IS THAT ADOPTING A PREEMPTIVE STANCE, WITH THE COOPERATION OF ALL, IS THE MOST EFFECTIVE APPROACH TO TACKLE IRREGULAR BEHAVIORS.**





## INTERNAL CONTROLS AND SOUNDNESS OF ACCOUNTING RECORDS

Our records and controls are designed to ensure transparency and honesty, accurately documenting all financial and business transactions, which are promptly transcribed in GPA's books and records. We guarantee the integrity of such transactions and do not accept in any circumstance that they are carried out for fraudulent purposes or to conceal any misappropriation of the Company's assets.

It is incumbent upon all employees involved to assume responsibility for the Group's accounting and financial information's authenticity and accuracy. They must take measures to ensure their quality, maintain appropriate records, and secure all supporting documents. We fully cooperate with our external and internal auditors and do not tolerate the omission or falsification of our records to achieve goals and results.



## GIFTS, PRESENTS, TRAVEL AND ENTERTAINMENT

We must refrain from giving or receiving gifts, presents, and invitations with the intention of influencing or rewarding business decisions, exchanging favors, or gaining undue advantages. Corporate gifts are acceptable, up to a certain amount and frequency, which must be reported to the manager and the *Compliance* area. Gifts and hospitality above these limits—such as invitations to meals, trips, and events—must be reported to the manager and the *Compliance* area. Moreover, it is expressly forbidden to offer gifts to officials in the public sector.

***IT IS WARNED TO REFRAIN FROM ACCEPTING PRODUCTS OR GIFTS FROM SUPPLIERS. THIS GIVES RISE TO A CONFLICT OF INTEREST.***

For further details, please check the Policy on Gifts, Presents, Travel & Entertainment\*

***\* INTERNAL DOCUMENTS OF THE COMPANY.***



## RELATIONSHIP WITH THE PUBLIC SECTOR

We conduct ourselves with ethics and transparency when interacting with government authorities. We recognize that any payment or offering, directly or indirectly, in cash or anything of value, to Public Agents aiming at influencing their activities or achieve undue advantages for oneself or the Group is against the law. We collaborate with governmental supervisions and investigations.

We actively take part in Class Associations and recognize their importance and legitimacy for our business. We are aware that Class Associations have a duty to advocate for our interests and we trust that their engagements with the Government abide by the law.

For more details, please refer to the [Procedure to deal with supervisions and treatment of official documents\\*](#) and the [Procedure of Relationship and covenants with the Government\\*](#)

*\* INTERNAL DOCUMENTS OF THE COMPANY.*

# IMAGE AND REPUTATION

GPA's reputation and image are crucial to the perception of our customers and society. Our brands are a valuable asset, and we must take care to protect them by ensuring their proper use and respect. We protect our intellectual property and ensure that our trademarks, domains, and industrial designs are duly registered to prevent misuse by third parties. The Group's corporate names, registered trademarks, logos, and other distinctive signs cannot be used or advertised by employees and business partners without the express consent of our responsible areas.

***WE MUST UPHOLD THE CONFIDENTIALITY OF ALL NON-PUBLIC INFORMATION.***

For further details, please check the [Corporate Communication Policy](#)\*

***\*INTERNAL DOCUMENT OF THE COMPANY.***



# INFORMATION SECURITY AND DATA PROTECTION

We must bear in mind that safeguarding the security of our Group's information is of utmost importance to ensure the seamless functioning of our business, prevent fraudulent activities, crimes, unauthorized logical access, information leakage, reputational harm, and liability for the inappropriate and unethical use of information. We must use the Group's tools and resources such as email, computers, Internet access, and cell phones responsibly and carefully.

We uphold the protection of the Group's confidential data, in addition to that of our customers and business associates. We treat our knowledge, trade secrets and negotiations, business strategies, promotions and offers and any financial information, customer data or price of our business with caution and secrecy, to ensure that they are not used to our detriment or to the detriment of the competitive balance of the market.

We are committed to preserving the confidentiality of personal information belonging to our employees, customers, and business partners, and pledge to never use or disclose it without their express consent. Personal data are treated with due caution and under the General Law on the Protection of Personal Data (Law No. 13.709/2018).

**USE OUR TOOLS CONSCIENTIOUSLY. DO NOT VISIT INAPPROPRIATE WEBSITES.**

**PRIVACY BREACHES OR CONDUCT THAT GOES AGAINST THE GENERAL LAW FOR THE PROTECTION OF PERSONAL DATA WILL BE PROHIBITED.**



Any suspicious activity, such as unprotected access to Information, sharing of passwords, data and sensitive information in an unsecured manner, among other situations of risk to the security of GPA's information and/or Personal Data of our employees, customers, and/or partners, must be reported to the Information Security Channel ([seguranca.informacao@gpabr.com](mailto:seguranca.informacao@gpabr.com)) and/or to the Privacy Channel ([dpo@gpabr.com](mailto:dpo@gpabr.com)).

For further details, please check the [Information Cybersecurity Policy\\*](#) and the [Personal Data Governance Policy\\*](#)

**\* INTERNAL DOCUMENTS OF THE COMPANY.**



## PRIVILEGED INFORMATION

Associates are forbidden from disclosing GPA's confidential information to third parties or using it to gain undue advantage for themselves or others. Trading on stock exchanges or other methods using GPA's confidential information to gain an unfair financial advantage is regarded as illegal. The individuals involved may face internal GPA penalties, as well as criminal and/or administrative sanctions imposed by regulatory agencies.

***DO NOT TALK ABOUT WORK TOPICS IN PUBLIC PLACES. AVOID INFORMATION LEAKAGE.***

# USE OF GOODS AND RESOURCES

To develop our activities, we are equipped with financial resources, tools, and equipment that are owned by GPA. As work tools, communication devices and IT resources are subject to control, monitoring, and audit.

These assets and resources are entrusted to us, and we are accountable for their preservation and prudent use, always for the exclusive benefit of GPA.

Manager, you are responsible for validating your budget and for managing your expenses. You should certify that every cost is reasonable, is directly related to the GPA's interests, and count on supporting documentation. Furthermore, it is incumbent upon the manager to guarantee that the Digital Transformation Board and Information Security area are consulted prior to acquiring IT tools or contracting services. All expenses must conform to internal standards and undergo approval from competent levels of authority, followed by appropriate payment procedures.

For further details, please check the [Policy for Using Technology Resources\\*](#) and the [Expenses Policy\\*](#)

*\* INTERNAL DOCUMENTS OF THE COMPANY.*







## **RESPONSIBILITY OF OUR LEADERS AND EMPLOYEES**

We all have a responsibility to embody GPA's values in our daily routine and decision-making process. Leading by example, our leaders should listen attentively to people, observe diverse opinions, reason, and consider new ideas to improve our processes.

Respect for our employees is of utmost importance to us. We promote interaction and cooperation amongst all individuals, with the goal of disseminating knowledge and best practices, raising our standards of quality and productivity.

# COMMITMENT TO DIVERSITY AND INCLUSION

Our commitment to our employees is reflected in our efforts to provide ample opportunities for all to showcase their talents. We strive to maintain an authentic and diverse workplace, where individuality is celebrated, and inclusivity is paramount. We respect the unique values and beliefs of each of our employees. Our company strives for unparalleled shopping experiences for customers, sustainable and ethical relationships with suppliers, customers, and partners, and positive outcomes for communities and all other relevant stakeholders we engage with.

Our priorities lie in the representation and development of our employees. Diversity is a key factor in driving socioeconomic performance and innovation, in addition to being a fundamental value for customer-focused businesses.

We want to ensure a work environment based on respect for differences, aiming at the well-being and personal fulfillment of each employee. We have a zero-tolerance policy towards any kind of discrimination, violence, or harassment, regardless of the cause. We guarantee access to employment and career growth across diverse teams, assessing individuals solely on their competency using transparent criteria, encouraging equal opportunities, and facilitating personalized training.





## SOCIAL ORGANIZATIONS AND MOVEMENTS

We encourage a productive and respectful dialogue with the labor unions and employee organizations representing GPA, with the aim of advancing the common interests of the Group and its employees. We comply with the regulations in force and provide employees' representatives and unions with reliable information in a timely manner.

We are not affiliated with any political groups or organizations, but we acknowledge their legitimacy. We respect the freedom of choice of our employees to join parties, unions and social movements, as long as they do not use the image or speak on behalf of companies making part of GPA Group.

***GPA ENSURES COMPLIANCE WITH AGREEMENTS AND COLLECTIVE BARGAINING WITH UNIONS AND EMPLOYEE REPRESENTATION GROUPS AND ENSURES THAT THEIR EXERCISE DOES NOT RESULT IN NEGATIVE CONSEQUENCES.***

# CONFLICTS OF INTEREST

Our employees are expected to exhibit unwavering ethics, integrity, and adherence to laws and internal regulations, placing the best interests of our companies and customers at the forefront of their actions. GPA upholds a fair and impartial approach towards family members and acquaintances, anticipating employees' loyalty towards the Group and non-interference in business for personal benefits. The company requires transparency and loyalty during conflicting interests. In the event of a conflict of interest, employees (i) must declare their conflict and report the situation to their manager; and (ii) do not take part in the corresponding decision-making or negotiations.

**Attention: always talk to your manager and report to the *Compliance* area should any of these situations arise:**

- Any personal investments or employment that could potentially create a conflict of interest or hinder the role as a GPA employee.
- Relationships of kinship or friendship that may result or appear to be undue favors.

***NEVER BREAK INTERNAL LAWS AND RULES TO ACHIEVE GOALS OR BENEFIT IMPROPERLY. FAILING TO DO SO WOULD RESULT IN HARMING THE REPUTATION OF BOTH YOURSELF AND OUR COMPANY.***

For further details, please visit the [Conflict of Interest Policy](#)\*

***\* INTERNAL DOCUMENT OF THE COMPANY.***





# HEALTH, SAFETY, AND WORK ENVIRONMENT

Our goal is to create a safe and healthy work environment, and employees are expected to take part in all required training related to health, safety, diversity and inclusion, *compliance*, and the environment. We comply with standards, procedures, and laws related to physical and mental health, besides occupational health and safety; we follow specific technical training for our job, use the appropriate safety equipment, and avoid risk situations.

We encourage leaders and their teams to take inclusive actions and we do not accept inappropriate behavior at the workplace, which should be rebuked and immediately reported to the Whistle-blowing Channels. It is imperative that you focus your attention on:

- Abuses of power and harassment (moral and sexual).
- Any type of violence and intolerance, whether by age, gender and/or their forms of expression, sexual orientation, race, color, disability, religion, marital status, nationality and/or any other identity marker.
- Grossness or jokes about the conditions, whether aesthetic, physical and/or emotional of others; as well as lies or defamation related to colleagues.
- Carrying any type of weapon.
- Smoking in a prohibited place; as well as use of alcohol, medicines, or illicit substances during working hours.
- Activities related to gambling.

For more details, please visit [the Occupational Health and Safety Guideline\\*](#)

*\* INTERNAL DOCUMENT OF THE COMPANY.*

# RELATIONSHIP WITH THE PRESS AND SOCIAL MEDIA

Our relationship is based on trust and credibility with our customers, investors, employees, and business partners. Hence, we handle our connection with the press and social media in such a way that our institutional information is presented and revealed impartially and suitably, with no chance of any undue favors, and only by GPA's authorized spokespersons.

We acknowledge the importance of social media in communication and stand for freedom of expression. The disclosure of public information about the Group's activities must always be done with judgment and responsibility by our employees.

For a correct assessment, the Corporate Communication area—which comprises Press Relations, External Communication, and Corporate Marketing—must be involved in all external communication processes of GPA, ensuring alignment and sharing of communication guidelines. This includes interviews, official positioning about issues, sharing of GPA's data or any other materials, and taking part in lectures and events as representative of the Company.

***IF YOU RECEIVE AN INVITATION TO SPEAK ON BEHALF OF THE GROUP, PLEASE SEEK GUIDANCE FROM THE CORPORATE COMMUNICATION SECTOR.***

For further details, please access the [Social Media Conduct Policy\\*](#) and the [Corporate Communication Policy\\*](#)

***\* INTERNAL DOCUMENTS OF THE COMPANY.***



# RELATIONSHIP WITH SUPPLIERS, SERVICE PROVIDERS, AND BUSINESS PARTNERS

All transactions and business must align with the goals and values of GPA. We are committed to implementing fair, impartial, and transparent negotiations and practices in business relations with our suppliers and partners. We require that partners be chosen based on objective criteria that serve GPA's best interest, without any preferential treatment.

We actively repudiate and oppose any and all types of slave-like work across the entire production chain, as well as informal labor, child exploitation, and inhuman and degrading working conditions in our organization and in all links of our chain.

Our suppliers, service providers, and business partners are required to comply with laws and regulations, understand our values, and uphold the ethical principles of this Code. It is our expectation that partners act responsibly in the handling of confidential information they have access to during our business relationship and also disseminate good practices throughout their value chain.

***WE MUST ALWAYS BE UNBIASED AND TRANSPARENT IN CHOOSING OUR BUSINESS PARTNERS.***

***WE ARE AWARE OF THE SOCIAL AND ENVIRONMENTAL CHALLENGES OF OUR SUPPLY CHAINS AND SEEK TO HELP MITIGATE THEIR IMPACTS.***

***\* INTERNAL DOCUMENT OF THE COMPANY.***





## RELATIONSHIP WITH THE COMPETITION

We respect our competitors and are committed to promoting fair and loyal competition, pursuant to the Competition Defense Law, the guidelines of the Economic and Financial Order listed by the Constitution of the Federative Republic of Brazil, and the guidelines of the Brazilian Antitrust Agency (CADE). We forbid any anticompetitive behavior, such as the abuse of market power or arbitrary business practices, such as price collusion or territorial allocation.

All information that GPA, through its leaders and associates, wishes to obtain from its competitors must be achieved by lawful, honest, ethical means and under the applicable laws.

Please check the [Antitrust Policy](#)\*

*\* INTERNAL DOCUMENT OF THE COMPANY.*





## RELATIONSHIP WITH SHAREHOLDERS AND INVESTORS

We strive to provide growth and financial return to our shareholders, hence we give utmost importance to taking good care of their investments.

We practice the principle of transparency and adopt the best Sustainability and Corporate Governance practices. Our Financial, Social, and Environmental Statements are carefully crafted to ensure their accuracy, integrity, and relevance to our investors and other stakeholders.

**Warning:** business relationships between shareholders and Group companies are allowed, either as individuals or through other companies, provided that they follow the Policy on Transactions with Related Parties, with impartiality, transparency, ethics, competitiveness, and no conflict of interest.



## CORPORATE ENVIRONMENTAL RESPONSIBILITY

GPA understands the importance of environmental sustainability and is constantly striving to improve and innovate its environmental management practices, while also encouraging its suppliers to do the same.

We are committed to the responsible and conscious use of natural resources, as well as their management, aiming at reducing the environmental impact caused by our activities. We work and guide our daily behavior to adopt best practices for environmental protection and compliance with environmental laws. We encourage efficiency in water and energy consumption, reduction of our greenhouse gas emissions, proper waste management, and strategies to prevent food and material waste. We also promote conscious consumption for our customers through environmentally-friendly goods and services.



## ENGAGEMENT WITH SOCIETY

We strive to boost social, economic, and cultural development. We achieve this through the GPA Institute, with actions that cover topics such as healthy eating, training for work, and social engagement. In our commitment to the communities around us, we involve our customers, employees, and suppliers in addition to local social organizations.

***WE STRIVE TO CONTRIBUTE AND CREATE A MEANINGFUL IMPACT IN COMMUNITIES FACING SOCIAL CHALLENGES, LEADING TO REAL TRANSFORMATION.***

# DONATIONS, CONTRIBUTIONS, AND SPONSORSHIP

The GPA and the GPA Institute ensure their donations and sponsorships are transparent and responsible. To ensure transparency, all donations or sponsorships must be recorded in the accounting books of GPA and/or the GPA Institute and the beneficiary entities. Furthermore, GPA's Responsible Department and Internal Audit have the right to review and audit these records at any given time. Donations and sponsorships must be made respecting the Donations and Sponsorships Policy and only for social organizations registered with GPA.

It is forbidden to make any donation or sponsorship in exchange for undue favor or advantage, or for the purpose of bribery or of obtaining preferential treatment, which may generate conflict of interest, or seeking to influence the decision of a Public Agent that could in any way breach the provisions of Brazilian Law No. 12,846/13 or, specifically, the standards set forth in this Code of Ethics and the Anticorruption Policy of GPA. It is also not acceptable to donate to and/or sponsor specific individuals, but rather only to beneficiary organizations, except as provided in the standards governing campaigns as approved by the Board of Executive Officers or approved by the Ethics Committee.

***GPA DOES NOT ENGAGE IN MAKING DONATIONS TO POLITICAL CAMPAIGNS, PARTIES, OR CANDIDATES.***

For further details, please check the [Donations and Sponsorships Policy](#)\*

***\* INTERNAL DOCUMENT OF THE COMPANY.***





## OMBUDSMAN AND COMPLAINTS/ WHISTLE-BLOWING

Any behavior that violates the law or ethical standards is not in compliance with this Code. Any suspicious activity should be reported to the Ombudsman/whistle-blowing Channel, no matter who the perpetrator is or what their situation is. As per the Policy on Consequences and Disciplinary Sanctions, GPA is committed to conducting impartial and confidential investigations of all reported incidents and to consistently applying the appropriate measures and penalties. GPA guarantees that all whistle-blowers who report will remain anonymous.

**08000 55 5711**

Service hours: **Monday to Saturday, from 8 am to 8 pm**

**ouvidoria@gpabr.com**

We will take a strong stance against any retaliation directed towards whistleblowers or individuals who raise concerns. Our goal is to construct a work environment where everyone feels at ease in pointing out issues, having questions resolved, and sharing concerns. To this purpose, apart from providing a platform that ensures anonymity for whistleblowers, we treat all complaints as confidential under the supervision of a group of individuals tasked with maintaining confidentiality and preventing any form of retaliation or discrimination.

For further details, please check the [Whistleblowing Triggering and Investigation Policy\\*](#)

*\* INTERNAL DOCUMENT OF THE COMPANY.*

# ABOUT THIS CODE

This Code of Ethics is not intended to be comprehensive and inclusive of all topics and scenarios discussed herein, and is meant to serve as a guide and resource for the standards, policies, and internal procedures of GPA. If you have queries regarding the content of this Code, consult your manager or the departments of Human Resources, Legal, and *Compliance* that can also provide assistance.

To learn more about our Code of Ethics and our internal standards and procedures, please consult your unit's intranet or visit the institutional website.

References to GPA and our Group include all GPA's Business Units, their branches and subsidiaries. All references to employees include executives officers, directors, management members, and employees of GPA.

Individuals who engage in behaviors that contravene GPA's Code of Ethics or its core values will be subjected to pertinent legal and administrative sanctions, as stipulated by civil, criminal, and labor laws.

Under the Policy on Consequences and Disciplinary Sanctions, the penalties applicable for GPA's employees who violate the principles of the GPA Code of Ethics will be measured on a case by case basis, taking into consideration: (i) the nature and seriousness of the breach; (ii) the history of the offender, as well as his/her responsibilities; (iii) circumstances mitigating or aggravating the offense committed; (iv) the means used and the intended purposes; (v) the risks involved; and (vi) the potential consequences of the sanction. The applicable sanctions may be warning, suspension and even dismissal for cause of those employees involved, as well as may impact the variable compensation of such employees.

Should suppliers or service providers violate the terms, consequences can include warnings, suspensions, and even contract termination.



The Code does not create a work relationship or contractual claim between GPA and its employees, third-party entities, or business partners. This document does not ensure particular treatment in specific circumstances.

The guidelines established in this Code will be applicable for each individual case. The Ethics Committee of GPA should deliberate on exceptions.

All questions or suggestions regarding this Code should be addressed to [compliance@gpabr.com](mailto:compliance@gpabr.com).



 **GPA** *Feeding  
dreams and lives*