

PROMOTION OF  
*diversity and  
inclusion*  
FOR OUR PEOPLE



POLICY OF  
**INCLUSIVE**  
**communication**  
OF GPA



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## 1. Purpose

This policy aims **to provide strategic guidance on inclusive communication processes and practices** (considering aspects related to written and spoken verbal communication and non-verbal communication, such as images, photos, videos, and icons), across all areas of the company and its respective service providers, not only those responsible for the official management of communication channels. Regardless of the area in which they operate, GPA employees must also have their professional communication aligned with the Inclusive Communication Policy.

## 2. Scope

**This policy applies to all areas and business units of GPA, in addition to communication-related service providers, such as agencies and advisors.**



### 3. Glossary

**Inclusive Communication:** inclusive communication considers the dimensions of accessibility, the representativeness, and the assertiveness of messages, enabling everyone to benefit from communication that does not reproduce or reinforce stereotypes.

**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 to the freedom of opinion and expression, work, and education, among others. Everyone has such rights guaranteed, without 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 occurs when there is an adverse attitude towards a certain characteristic. A person can be discriminated against because of his/her race, gender, sexual orientation, nationality, religion, social situation, and 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:** denotes document, we will use the word “employees” to designate GPA employees, their 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.

**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. 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, a person 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.

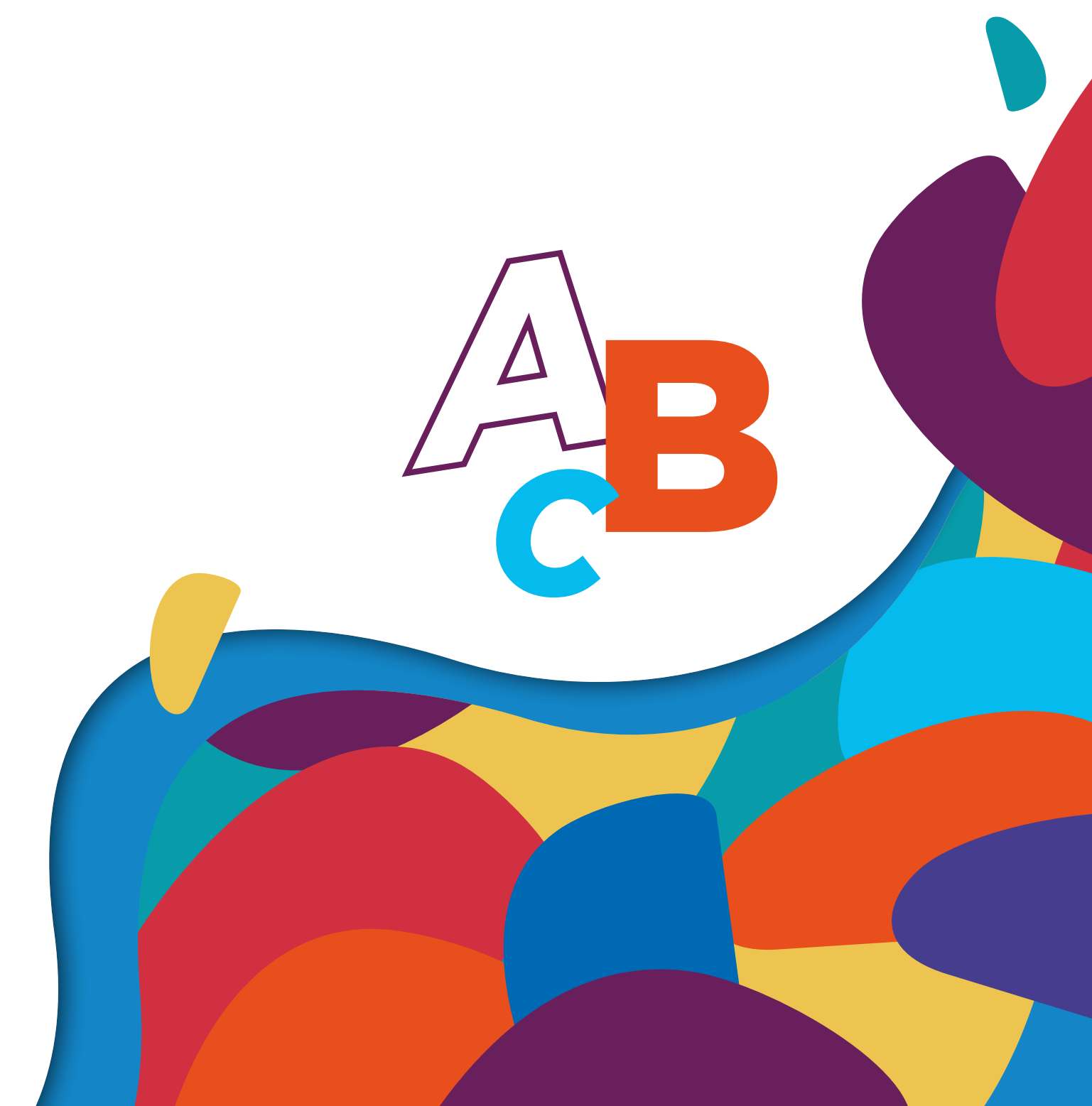
**Paradigm:** the word paradigm derives from the Greek "paradeigm, acts", with the meaning of "model, example"; it is a set of vocabulary forms that serve as a model for a system; an example or pattern to be followed.

**People with disabilities:** those who have limitations, which, in interaction with various attitude 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 main 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.



## 4. General guidelines

### 4.1. GPA Commitments

This **Inclusive Communication Policy** integrates a set of corporate goals and guidelines that make up **the GPA Commitments**. To access this content in full, please go to

Allied to this Policy are the **Code of Ethics** and the **Diversity, Inclusion and Human Rights Policy**, which present the main guidelines connected to the conduct of business and the expected behavior of all those who may have a relationship with GPA, internally and externally. GPA considers itself as part of society. Integrated management and transparency are fundamental pillars in GPA's Sustainability strategy and guide our relationship with customers, investors, suppliers, employees, and partner institutions. We actively participate in entities and organizations that hold collective discussions with other strategic sectors for our business. To learn more, see the link:

<https://www.gpabr.com/en/sustentabilidade/pactos-e-associacoes/>.

### 4.2. Inclusive communication

Inclusive communication does not reproduce stereotypes, breaks paradigms, brings representativeness, is affirmative and reparative, as well as purposeful in relation to constructive dialogue. And yet, it is communication that helps society reflect and eliminate any prejudiced and discriminatory structures that are present in language and in our daily lives. In order to communicate in an inclusive way, attention must be paid to **three basic dimensions**:

- 1 Message:** having **ASSERTIVENESS** means adapting what is said or written to the people who will have access to your communication. Achieving simple communication means it is necessary to adapt the message to the interlocutor. In addition, we do not recommend using, for example, exaggerated words, acronyms or foreignisms because they are factors that can mean barriers to understanding. In the message dimension, the goal is for the person who receives the communication to be able to think, *"I really understand this message!"*
- 2 Channel:** the challenge in this dimension is to ensure **ACCESSIBILITY**. In addition to people with disabilities, it is also necessary to think of mature people, who may occasionally need larger font sizes, for example. There are several accessibility support tools ensure the message will reach everyone.
- 3 Images:** in some communications, we choose images to complement the written message. In this regard, it is important to eye **REPRESENTATIVENESS**, that is, how the chosen images represent the plurality of society. Remember that some groups are recurrently underrepresented in communications, such as: black people, trans people, same-sex couples, people with disabilities, among others. It is also important to pay attention in order not to reinforce stereotypes, such as, for example, always reproducing images of a woman in the kitchen or cleaning, and of a man in the office or driving.

### 4.3. Accessibility

One of the main points to be highlighted in inclusive communication is accessibility, which is the possibility and condition of autonomously understanding the information and communication, including its systems and technologies.

Communicational accessibility is one type of accessibility that enables information to be available to everyone.

Accessibility in communication is a guaranteed right in the **Brazilian Inclusion act** (Law No. 13146, of July 6, 2015). The law aims to “ensure and promote, on equal terms, the exercise of fundamental rights and freedoms by persons with disabilities, aiming at their social inclusion and citizenship”. The document has a chapter specifically dedicated to the access to information and communication. One of its articles provides that “accessibility is required on websites maintained by companies with registered offices or commercial representation in Brazil, for the use of people with disabilities, ensuring access to available information, according to the best accessibility practices and guidelines adopted internationally.”

### 4.4. Representativeness

Representativeness is another important concept when we talk about inclusive communication. **Black people**, for example, are one of the groups that are least represented in communications, such as advertising or social media posts. This concept applies to all underrepresented groups, such as **people with disabilities, LGBTI+, 50+ people, and women, among others.**

In addition to eying representiveness, we also need to think about proportionality, that is, it is not enough to include a few black people in communication. Considering that we live in a country where **the black population represents 56.5% [Continuous PNAD (Nationwide Research per Domicile Sampling ), IBGE, 2023]**, it does not make sense to have representiveness reduced to a few people.

There are situations in which black people are represented in communication pieces, but often reproducing or assuming subordinate or stereotyped social roles. Another common mistake is to represent black people only in specific contexts: as an example we can mention black children benefiting from social actions or black people to illustrate services aimed at low-income people. This approach contributes to perpetuating extremely harmful racial stereotypes.

Attention must also be paid to the **concept of tokenism**. Under this concept, an organization incorporates a minimum number of members from underrepresented groups **only to generate a sense of diversity. However, there is no real effort to include and give them the same rights of the dominant group.** To escape tokenism, avoid representing only one and specific black person in your communication. This communication has to be genuine, continuous and consistent, as well as reflect a real breakthrough in company practices, as an affirmative inclusion policy.



## 4.5. Eliminating stereotypes in communication

Communication has the power to reinforce or refute stereotypes commonly present in society. In the context of gender, for example, the historically expected roles of women and men in their personal and professional lives often hinder their participation and development in society. And communication can reinforce or draw reflection on these social expectations. In addition, choosing long-haired female models who are always thin and young is another way of reinforcing stereotypes. Try to represent different types of bodies, ages, ethnicities and colors and to break stereotypes of beauty, health, or any other prejudiced reference.

Another form of stereotype is representing people with disabilities as heroes or focusing on stories about resilience.

**Making biased connections between genders, sexual orientation and race is, as well.**

**In practice, it is necessary to avoid:**

- Black people represented in subordinate positions, like a black woman as a cleaner and not as the owner of the house;
- Black men represented as manual laborers;
- White, thin woman wearing with a certain type of clothing as “the perfect mother”;
- Representing black women in a sexualized way;
- “Perfect” family composed of young, white, thin, rich, heterosexual couples with children;
- Black women represented as “warriors”;
- Represent only heteronormative couples;
- Conference rooms with white men, aged around 45 years old, as successful executives;
- Represent only thin people with standard body sizes;
- Representing only one black person as “proof” that the company is diverse;
- Representing people with disabilities as proof of resilience or as those who need assistance;
- Among others;
- Elderly people only using a cane, representing them as debilitated people.

*Pão de Açúcar's campaign:  
 I'm a woman, from the retail  
 industry, proud, and happy*





## 4.6. Specificities related to the key D&I pillars

### Gender equality

Using language without gender marking is recommended. It is relatively common to use masculine words to designate a group of people, but the Portuguese Language also offers us a series of possibilities capable of communicating the same meaning without having to identify the gender, which makes communication much more inclusive.

Writing or speaking using words or expressions that do not mark gender is an exercise, which becomes easier over time. **See some examples:**

#### WITH gender marking

- All men and women
- Father and mother
- Wife and husband
- Young men
- The male directors
- Beneficiary men and women
- Sales foreman job
- Men in politics
- The Indians
- The policemen
- The boys and girls

#### WITHOUT gender marking

- All people
- Parents
- Spouse
- Youth
- Board of Executive Officers
- Beneficiaries
- Sales supervisor job
- The political class
- The indigenous population
- The police
- The kids

When there is no form of expression without gender, following the formal Portuguese Language standard and inserting gender inflection is recommended.

Alternatively, for the use of non-binary language, one can use expressions such as “all” in more informal communications, but remember that it is not a formal standard and that screen reading software does not yet perform the correct reading of neutral pronouns.

At the intersection between stereotypes and the theme of gender, we realize that sexism manifests itself in frequent expressions of our daily lives. **You need to review some habits and avoid sentences such as:**

- I don't like working with women because they are very temperamental.
- Women like to talk a lot.
- Women are very emotionally unstable.
- She is stressed, she must have PMS.
- She was promoted, she must be going out with her boss.
- Every woman dreams of being a mother.
- Women have a vocation to be caregivers.
- She is lucky, as her husband helps her with household chores.
- Her husband lets her work outside the home.

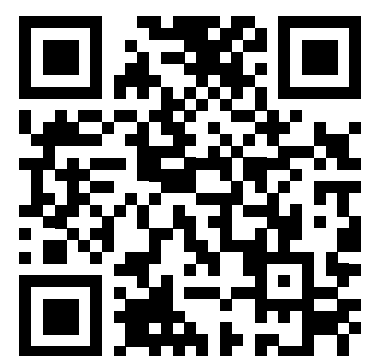
These examples reinforce not only generalizations about the female role, but also materialize in words presented by the structural sexism in our society. If we do not make a critical analysis of their meaning, we may occasionally reproduce expressions or phrases that we do not even agree with.





## Racial diversity

According to IBGE - Instituto Brasileiro de Geografia e Estatística (Brazilian Institute of Geography and Statistics), there are five possibilities for racial self-declaration in Brazil: brown, black, white, yellow and indigenous. The term "black people" refers to brown or black people and is the most suitable word to be used in communications.



Specifically regarding racial diversity, it is advisable to read the Guide to Eliminating Discrimination and Promoting Racial Equity at GPA. Please use the QR Code provided on the opposite side for access. **Link to the QR Code:**

In this document, there are specific guidelines so that communication campaigns do not unintentionally reproduce racism. **It is necessary to have the following points in mind:**

- Using mottoes that are important for the black population randomly, without the presence of blacks and to name a product, for example.
- Campaigns that replicate stereotypes about black people such as those in need of help.
- Products that are named from body parts or characteristics of black people, reinforcing stereotypes. (Ex.: "Krespinha" [Curly] steel sponge)
- Name products created for black people with the term "brunette", in an attempt to soften what is understood as uncomfortable and/or aggressive.

Replacing racist words or expressions is also a necessary exercise and requires the creation of new references and repertoire.

### Let's learn a few possibilities:

#### Racist words or expressions

- Things went dark
- Up to your ears in darkies
- Nappy hair
- Skin-colored pencil
- Black man's work
- Bedside server
- Denigrate
- House servant
- Slaves
- Slave-made
- Dark humor
- Black market
- Mulatto
- Black stench
- Crazy Creole Samba
- Tomorrow is a white man's working day



#### Possibilities to replace them

- Things are tough
- Too much, a lot
- Curly, African style hair
- Beige pencil
- Poorly done work
- Bedside table
- Defame
- Employee
- Enslaved people
- Do badly
- Acid humor
- Clandestine market
- Black person
- Bad smell
- Confusion
- Tomorrow is a business day



## People with disabilities

The correct term to be used is “person with disabilities” (without abbreviation), and not “handicapped”, “disabled person” or “pwd”. The term “person with special needs”, which includes the elderly, pregnant women, and persons with reduced mobility, should not be used. When you mention, in the same sentence, that there are people with disabilities and people without disabilities in a group, never refer to the latter as “normal people”. Additionally, pay attention to the correct use of expressions in specific disabilities, such as: person with Down Syndrome, person in the autistic spectrum or deaf person. Do not use expressions such as “suffers from” or “is disabled”.

To avoid reproducing discriminatory expressions in your daily life, **review the use of words and phrases such as:**

### Do not use

- Aleijadinho [Little Cripple]
- Disabled or invalid
- My team has 5 people and 1 pwd
- Acts disabled
- Acts crippled
- I have no arms and legs to lead this Project
- This vacancy is for the handicapped
- He is a pwd, but he doesn't seem to be
- She's so beautiful. Too bad she's a pwd
- Limp or lame
- Pretend dementia
- Are you blind? or Are you deaf?
- Have crippled legs (it means having financial problems, in Brazil)



### Replace with

- Person with physical disability
- Person with disabilities
- My team has 6 people and one of them is a person with disabilities
- To play dumb
- Lazy person
- I have no resources to lead this project
- I would like to seek a person with disabilities for this vacancy
- He is a person with disabilities and has full autonomy
- We should not oppose disability and beauty
- Make a mistake, or Make a gaffe
- Pretend you don't understand
- Did you pay attention to what I told you or what I showed you?
- Being in trouble / Being in crisis



Ableism arises from discriminatory actions and the mistaken perception that a person with disabilities is in a position of inferiority in relation to the others. It is a mistaken belief that people with disabilities are not able to carry out their activities. **And ableism is also reinforced by language.**

### Do not use

- Deaf-mute: because it represents a generalization and is a mistaken expression.
- Libras Language
- PwD, handicapped person with special needs
- Dwarf
- Mental retard



### Replace with

- Non-speaking deaf person. There are also speaking deaf people.
- Libras – Brazilian Sign Language
- People with disabilities
- Person with dwarfism
- Person with intellectual disability



## LGBTI+ people

The acronym LGBTI+ encompasses lesbians, gays, bisexuals, trans people, transvestite, intersex and the “+”, which symbolizes all other aspects of human sexuality. More than an acronym, it represents the different types of sexual orientation and gender identity, as well as the struggle of an entire community to ensure that their rights and lives are respected.

The use of the acronym in this format is a recommendation of the **LGBTI+ Communication Manual**, developed by the **LGBTI+ National Alliance** and **GayLatino Network**. This format of the acronym is also aligned with the guidelines of **the United Nations, the UN**.

In Brazil, LGBTphobia is present in our society and covers many situations, from discriminatory expressions commonly used in our vocabulary, including communications that stereotype same-sex couples and even hate crimes.

### LGBTphobia is commonly in our daily lives in sentences such as:

- I have nothing against it, I even have friends who are gay.
- He’s gay, but he doesn’t seem to be.
- It’s okay to be gay, but you don’t have to show it off.
- You don’t have to tell everyone you’re gay.
- You may be a lesbian, but you don’t have to dress like a man.
- Kissing at home is okay, but in the street?
- How will I explain this to my children?
- Bisexuals are people who are confused.
- Tranny’s voice.

### Do not use

- Expressions such as “sexual option” or “sexual choice”: a homosexual person has not chosen to be homosexual. Like heterosexual people, their sexual orientation is part of them as an individual, and it was not chosen
- The word “Homosexuality”: the suffix “ism” denotes disease and dates back to the time when homosexuality was considered a disease by the World Health Organization, the WHO.
- The expression “Sex change” to refer to trans people.
- The term “Hermaphrodite”
- Gay Parade
- The transvestite [using “he” as form of address]
- Pejorative words to refer to trans people
- To ask if the person has had surgery or takes hormones.
- Do not suggest a third restroom or agree with people who “bothered” with the use of the restroom by trans people
- Questions about “what was the person’s name before gender affirmation” or refer to it as “their real name”

### Use

- Sexual orientation
- Homosexuality
- Gender Transition. Remember that gender is a social concept, unlike sex, which is biological
- Intersex person
- LGBTI+ Parade
- The transvestite [using “she” as form of address]
- “Trans person” or specifically “trans man” or “trans woman”
- Respect the person’s gender identity regardless of surgery or hormonization process
- Respect the right of the trans person to use the restroom according to their gender identity. It is in the Law and has to be communicated appropriately to the whole company
- Respect the social name and use the pronouns to identify the persons’s gender pronouns for the person’s gender identity.



## Age diversity

Age diversity must be represented as company asset, not as a source of generational conflict.

Avoid reinforcing age-related stereotypes in your oral communication or in character definition processes for communication pieces. An example of this is representing 60+ people always as “grandparents”, as if this is the only possible role for mature people. Ageism or agism is age-related prejudice, whether against very young people or mature people.

### Examples of age-related stereotypes are:

- He/she is very young, has no experience.
- He/she is already 50 years old, you'd better hire someone younger, more vigorous.
- Young people have no commitment to work.
- There is no point in hiring a 40-year-old for this vacancy.
- Isn't he/she too old to be an intern?

#### Do not use



- Old person, best age
- You don't look that age
- You must have been beautiful when you were young
- You are no longer young to do this

#### Consider



- Person 60+, mature person, elderly
- Do not make age-related compliments
- Don't associate beauty with youth only
- Judging that there is a right age for certain activities is ageism



## 5. Specific guidelines

### 5.1. Internal Communication

**Internal Communication** must represent the internal demographics, as well as hold the country's demographics as a parameter. Additionally, it is important to consider the representativeness of hierarchical levels and areas.

All accessibility guidelines presented in this Policy must be followed for internal communication.

### 5.2. Advertising

Team representativeness is an important aspect in the development of inclusive campaigns. In addition to the internal team, it is important to encourage representativeness in the teams at agencies and suppliers.

**Pay attention to stereotypes and “jokes” that may offend certain social groups and reinforce stereotypes and prejudices.**

Finally, diversity is considered a brand attribute, which must be intentionally reinforced in advertising. This intentionality must essentially speak to all audiences, represent the plurality of society, without stereotyping people. Advertising can contribute to creating new ways for society to see diversity.

When we talk about inclusive advertising, we are not only referring to the representativeness of the characters/actors/actresses and the lines, but also to the group/team hired to prepare the content, vehicles chosen to disseminate the message, amounts paid/fees, among others.

### 5.3. Press relations

**The press seeks:** good cases, good spokespersons and good characters. Be ready to provide this information.

According to the Corporate Communication Policy, spokespersons may only speak on behalf of the Company **with the express authorization of the Press department.**

It is important to train spokespersons to talk about the subject, in addition to having a questions & answers document that formalizes the company's position, in addition to updated data in relation to D&I. **The Sustainability, Diversity and Inclusion department can offer support with this information.**

Additionally, it is important for there to be clarity regarding the points of differentiation, in comparing the industry and the market in general.

Also reinforced here is the care and commitment to transparent communication, without superlatives or appropriations of concepts, subject to the interpretation of ***diversity washing***. This happens when brands use guidelines of diversity and inclusion only for reputation or return, without real concern for these topics.

## 5.4. Social media

The management of corporate social media is the responsibility of the **Corporate Communication** area, which should establish clear governance on the approval of topics related to diversity and inclusion.

In the case of private social media of GPA employees, GPA employees should not produce or replicate messages, which are subject to investigation by the **Whistleblowing** area in cases of:

- Discriminatory messages in general
- Messages reinforcing stereotypes
- Racist messages
- LGBTIphobic messages
- Sexist messages
- Ableist messages
- Ageist messages
- Fat shaming messages
- Hate messages
- Any content that violates the law

**For more information, GPA employees can access the Social Media Policy, an internal document of the Company.**

## 5.5. Websites

When developing websites, whether internal or external, remember to consider accessibility-related aspects.

Follow other **good practices related to accessibility**, such as:

- Images, charts and photos must always be accompanied by a textual description;
- Avoid, in the description of images, adjectives that represent value judgment. Stick to describing the elements that the image presents;
- All video content must have captions;
- Videos must also have a window with Libras - Brazilian Sign Language interpretation;
- Audio content (such as podcasts) must be accompanied by text transcription;
- Consider having a digital avatar for Libras - Brazilian Sign Language interpretation;
- Include the possibility of increasing the font size;
- Charts must have other forms of reading, in addition to colors. One possibility is to include dashed or geometric shapes. Thus, people who do not differentiate shades can also access information;
- Pay attention to the contrast of shades between the colors of the font and the background. If the colors have low contrast, it may create a barrier for people with impaired vision;
- It is customary in social media posts to employ the hashtag **#PraTodosVerem**, followed by a written explanation of the images presented;



## 5.6. Events

In the case of events, it is necessary to consider some differences related to proprietary events or third-party events, to which GPA receives an invitation to send a speaker.

### In the case of proprietary events, consider the following precautions:

- Provide a confirmation link where there is the possibility of the participants informing if they need any adaptation/accessibility;
- Avoid materials in other languages or situations where something is assumed in relation to the audience;
- If needed it, hire a Libras Brazilian sign interpreter;
- Guide the speakers to give a self-description, when starting their speech;
- All videos must be subtitled;
- Avoid jokes, nicknames or “icebreaker” behavior that may have a disrespectful connotation;
- In the technical visit, observe aspects related to architectural accessibility considering: transportation, enrollment, reserved space, food, and restrooms;
- Avoid stereotypes in the definition of gifts;
- Avoid stereotypes in the definition of support functions;
- Guide the support team on the use of the restroom by trans people;
- Guide the master of ceremony on any “jokes” of a discriminatory nature.

The participation of employees in third-party events must be always authorized in advance by the Communication Department.

### In this case, it is important to have the following information:

- Who are the people who will compose the program and the specific panel on which GPA is being invited to participate. Make an analysis considering the representativeness and place of speech\* of the person invited. Example: if the panel is called “Women in Retail” and you notice that most speakers are men, it is worth recommending a female executive to occupy this space;
- It is also important to analyze the representativeness. A panel composed entirely of white people, for example, is not suitable.

### What is place of speech?

According to philosopher, writer, and scholar **Djamila Ribeiro**, in her book *O que é lugar de fala [What is place of speech]* (2017), “the social place does not determine a discursive awareness about this place. However, the place we occupy socially makes us have different experiences and other perspectives”.

The expression place of speech represents the search for the end of mediation, that is, the person who suffers a certain prejudice speaks for themselves, as the protagonist of their own struggle and movement. It is a mechanism that emerged as a counterpoint to the silencing of the voice of underrepresented groups by privileged groups in spaces of public debate. It is used by groups that historically have less speech space. Thus, blacks have the place of speech—that is, legitimacy—to talk about racism; women about feminism; trans people about transphobia, and so on.





## 5.7. Employer brand

The entire Company is committed to strengthening the employer brand with the support of the Communication and Human Resources departments. Reinforcing aspects such as representativeness, accessibility and assertiveness in communication pieces related to the disclosure of positions, talent and development programs is a way of positioning the company on the diversity and inclusion agenda.

**For communication of affirmative actions, three strategies can be adopted:**

- **Disclosure of a standard paragraph**, for all open positions, reinforcing that diversity is a brand attribute and that GPA wishes to receive applications from people who are part of underrepresented groups.
- **Priority for a given group:** another way of strengthening affirmative actions is to disclose open positions and include the following phrase “We represent Diversity and Inclusion”, demonstrating that the company is conducting an intentional selection process.
- **Exclusivity for a given group:** there is also the possibility of disclosing vacancies or exclusive programs for a given underrepresented group.

## 5.8. Image crisis management

The Company Communication department is responsible, together with related areas, for managing image crises. In this case, no employee must position themselves on behalf of the company on any channel without prior authorization from the respective area. In these situations, strategic coordination of the dissemination of information and organization of the situation is important. Thus, the correct behavior is to await official company positioning.

In cases of image crisis, a Crisis Committee, formed for that matter, will be involved, which is formed from the topic in question.

## 5.9. Relationship channels

GPA provides the **Whistleblowing Channel** for its employees, suppliers, service providers, customers, social institutions, and partners. It is the official tool for receiving complaints, dissatisfaction claims, and reports of noncompliance with the guidelines for valuing Diversity, Inclusion and Human Rights at all GPA companies. The **Customer's Home**, as our main channel of communication with customers, must have inclusive communications and discussions. **To ensure that the approach will be free of bias, remember:**

- Always call the customer by their social name, if they have completed this field;
- Try to learn about racist, sexist, ableist, LGBTIphobic or ageist words and expressions to stop using them;
- Do not make any distinction related to the customer's socioeconomic level;
- Always be cordial;
- Refer to the list of words and expressions to be replaced mentioned throughout this material.



## 6.10. Face-to-face communication

Face-to-face communication is a central aspect of the diversity and inclusion strategy. All people who wish to be allies of the various pillars of diversity and inclusion can (and should) position themselves when witnessing speech or attitudes that are misaligned with the Diversity, Inclusion, and Human Rights Policy or the GPA Inclusive Communication Policy.

The elimination of discrimination is among the topics audited by GPA. Thus, the use of physical and/or verbal violence is strictly prohibited, whether or not is aimed at any of the audiences involved in this Policy. These cases must be reported to the **Whistleblowing**, in charge of taking the due measures with the **Ethics Committee**.

## 6.11. Guidelines for spokespersons

In order to improve the relationship with strategic audiences, spokespersons are appointed to represent GPA. That professional assumes the responsibility of being a representative.

Any situation in which the company is required to take a position, — to convey the GPA opinion or vision — spokespersons are responsible for the official pronouncement on a given subject.

**The Communication department must provide the following to spokespersons:**

- Information on the business and social context on D&I;
- Training on the correct use of nomenclatures;
- Company positioning on the topic to be discussed;
- Document with key messages;
- Q&A document.

## 6. Penalties

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

## 7. References

- Diversity, Inclusion and Human Rights Policy
- GPA Annual Reports
- Human Rights Policy in The GPA Value Chain
- Pacts and Associations

### Internal Policies:

- Social Media Conduct Policy
- Corporative Communication Policy

### Guides: