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1. OBJECTIVE

Establish guidelines to promote diversity, inclusion and human rights at Assaí Atacadista, guaranteeing rights, equal opportunities and respect for all stakeholders, including: employees, partners, service providers, suppliers, customers and communities where we operate.

2. SCOPE

This document covers all areas of Assaí, partner companies and service providers.

3. GUIDELINES

3.1. General Guidelines

Assaí formalized its commitment to promoting Diversity and Inclusion and defined six priority themes for strengthening policies and processes to guarantee the rights, respect, appreciation and equity of all:

- Inclusion and development of people with disabilities;
- Age diversity;
- Gender equity;
- Racial equity;
- Respect for LGBTQIA+ rights;
- Respect for the rights of Migrants and Refugees.

As an ally to this Policy, there is the Code of Ethics, which presents the main guidelines related to the conduct of business and the behavior expected of all those who interact with Assaí, internally and externally.

3.1.1. This Policy is governed by international principles of Human Rights, covered by the UN Universal Declaration of Human Rights, which guarantee the rights of all people of different ethnicities, races, color, gender identity, sexual orientation, generations, religion, belief, or any other nature, such as nationality, social condition, etc.

3.1.2. Respect for and promotion of Human Rights are fundamental to the sustainability of Assaí and to our relationship with our stakeholders: employees, customers, partners, service providers, suppliers and the communities with which we interact.

3.1.3. We are committed to dignified and respectful treatment in our Company, where everyone can be who they are, with guaranteed rights and equal opportunities.

3.1.4. All actions are based on documents and commitments with Institutions that guide and strengthen our actions and positioning regarding Diversity, Inclusion and Human Rights:

- Universal Declaration of Human Rights (UN)
- 17 Sustainable Development Goals (SDG) (UN)
- Age Friendly
- Alliance Without Stereotypes – UN Women
- Bolsa de Valores de Nova York (NYSE)
- Business Coalition to End Violence Against Women and Girls
- “Yes to Racial Equality” Commitment
- International Convention on the Rights of the Child (UN)
- Universal Declaration of the International Labor Organization (ILO)
- Forum of Companies with Refugees
- Business Forum for LGBT+ Rights
- Global Reporting Initiative (GRI)
- IDIVERSA B3
- IGPTW B3
- Bloomberg Gender Equality Index (Gender-Equality Index – GEI)
- B3 Corporate Sustainability Index
- Business Initiative for Racial Equality
- International Integrated Reporting Council (IIRC)
- Brazilian Laws
- Women 360 Movement
- UN Global Pact
- Principles of the United Nations Organization (UN)
- Yogyakarta Principles
- Business Network for Social Inclusion
- Securities and Exchange Commission (SEC)
- Sustainability Accounting Standard Board (SASB)

- Women on Board
- Women's Empowerment Principles – (UN Women)

3.2. Commitment to Diversity, Inclusion and Human Rights

3.2.1. Diversity: Value and respect for the individual and social characteristics of each person, including ethnicity, race, gender, sexual orientation, generations, culture, religion, among others.

3.2.2. Inclusion: Promote representation and ensure development and equal opportunities for all people, without distinction.

3.2.3. Guarantee of Rights: Ensure and promote respect for the rights of all our employees, customers, partners, service providers, suppliers and communities with which we interact, including, for instance:

- Priority Service for people with disabilities and other groups provided for in the applicable laws;
- Use of social name, pronoun and bathroom according to gender identity;
- Accessibility for people with disabilities;
- Promote an environment where basic human rights are preserved: freedom, food, security, physical integrity, education, among others.

3.2.4. Respectful and Psychologically Safe Environment: Foster a respectful and safe work environment, where everyone feels welcomed, free from prejudices and stereotypes that may generate discrimination, promoting well-being and trust among employees.

3.3. Repudiation

3.3.1. Violation of Human Rights: Reject and stand against any attitude that violates fundamental human rights, as established by Brazilian law and/or the UN Universal Declaration of Human Rights.

3.3.2. Prejudice, Discrimination, Moral and Sexual Harassment: Do not tolerate any form of prejudice, discrimination or harassment, whether moral, sexual, psychological or physical, regardless of age, gender, sexual orientation, gender identity, race, color, disability, religion, marital status, nationality or any other identity marker..

3.3.3. Child and Slave Labor: Strictly prohibit child labor, forced labor, or labor similar to slavery, ensuring the protection of the fundamental rights of all people.

3.4. Business Agenda for Non-Violence

3.4.1. Commitment: Engage Assaí's employees, partner companies and organizations, service providers and suppliers in a joint agenda that promotes respect and combats all forms of violence and discrimination.

3.4.2. Strategic Actions: Act as a facilitator in the implementation of strategic actions in partnership with various areas, with the objective of promoting non-violence in the Commerce sector, contributing to social transformation and ensuring that respect for diversity and human rights are a reality for all people.

3.5. Preventive Actions

3.5.1. Strategic Planning: Develop and implement actions aligned with Assaí's strategy and purpose, focusing on governance, brand positioning, promoting an inclusive culture, and affirmative actions.

3.5.2. Risk Management: Consider the topic in the company's Risk Analysis and implement actions to mitigate business risks.

3.5.3. Value Chain: Develop specific training and qualification actions for partners, service providers and suppliers, with a focus on promoting diversity, inclusion, combating all forms of prejudice and discrimination, and respecting human rights.

3.6. Role of Leadership

3.6.1. Inclusive Leadership

- Commit to self-development by actively participating in training and initiatives promoted by the Diversity department, in collaboration with Assaí University.
- Communicate assertively and inclusively;

3.6.2. Lead by Example: To be an ally in the Diversity, Inclusion and Human Rights agendas, ensuring the implementation of the guidelines established in this Policy.

3.6.3. Inclusion Actions

- Develop active listening and value diverse opinions, regardless of hierarchical relationships;
- Commit to building a team that reflects local diversity, developing its leaders, and implementing inclusion monitoring rates.

3.6.4. No Omission: Be agents of transformation, taking a stand against exclusionary and/or discriminatory behavior.

3.6.5. Guarantee of Rights: Ensure that all people, with or without a commercial relationship with Assaí, have their rights respected, including, but not limited to: priority service, use of social name and pronoun, access to the bathroom according to gender identity, guarantee of accessibility and preservation of human rights, such as freedom, security, physical, emotional and psychological integrity and professional development, among others.

3.6.7. Respectful Environment: Promote actions that create an environment of respect, psychological safety, and opportunities for all. Refuse to tolerate and actively oppose practices that reproduce stereotypes and discrimination.

3.6.8. Support: Offer support to all people (employees, partners, service providers or customers) so that they can exercise their right to seek internal or external reporting channels in situations provided for by law, such as crimes of racism, LGBTphobia, moral and sexual harassment, religious intolerance, among others.

Keep an empathetic and active listening posture, removing the person from the situation and supporting the activation of the Practice, Assaí's social service.

3.6.9. Zero Tolerance for Discrimination, Moral and Sexual Harassment: Adopt a respectful attitude and ensure an environment free from any form of discrimination, moral or sexual harassment. Report any practice that violates these principles to the Ethics Channel, ensuring a fair and impartial investigation.

3.7. Relationship with Suppliers and Partners

3.7.1. Supplier approval: All resale suppliers, service providers and partners of Assaí must undergo a thorough analysis, including verification against public lists related to slave labor and the embargo term of the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), in addition to consulting

3.7.2. Monitoring: Conduct audits of eligible suppliers to verify working conditions and combat the exploitation of illegal labor practices.

3.7.3. Legal Compliance: Require all suppliers to fully comply with applicable laws and regulations, in addition to adhering to the principles established in this Policy, the Code of Ethics and other Assaí guidelines.

3.8. Duties and obligations of suppliers, service providers and partners:

3.8.1. Fully comply with applicable laws and regulations. Adhere to the principles established in this Policy, the Code of Ethics, the Charter of Ethics, and other Assaí guidelines, promoting engagement and adherence to contractual obligations. These obligations include:

- **Fighting Abuse and Discrimination:** Do not practice, nor allow your employees or contractors to practice acts of abuse or discrimination.
- **Prohibition of Child Labor:** Do not employ children under 16 years of age, except as apprentices, from the age of 14.
- **Prohibition of Labor Similar to Slavery:** Do not use forced, compulsory, or labor similar to slavery.
- **Respect for Freedom of Association:** Guarantee employees' freedom of association.
- **Occupational Health and Safety:** Maintaining a safe and healthy work environment.
- **Third Party Compliance:** Do not hire or maintain legal ties with third parties that are not aligned with the position adopted by the CONTRACTING PARTY.
- **Anti-Discrimination Practices:** Implement effective measures to combat racism, homophobia, and any form of discrimination, promoting awareness-raising and training for employees and contractors.

3.9. Customer Relationship

3.9.1. Inclusive Communication and Non-Discriminatory Treatment: Adopt accessible and representative language, using non-violent communication and free from stereotypes related to racism, sexism, ageism, ableism, xenophobia, LGBTphobia, among other prejudices.

3.9.2. Guarantee of Rights: Ensure compliance with the rights provided for in legislation, including:

- Use of toilet, social name and treatment according to the presented gender identity;
- Priority service for people with invisible disabilities (such as autism, Down syndrome, among others), with or without visible identification;
- Preferential service for elderly people, pregnant women and other categories provided for by law;
- Parking spaces reserved for people with disabilities, pregnant women and elderly.

3.9.3. Non-discriminatory treatment, approach and safety

Follow the procedures of the Property Security and Loss Prevention area in the treatment, approach and security in stores. The company does not tolerate approaches that make any value judgments regarding sexual orientation, race, gender or any other characteristics.

Any actions that are outside the protocol of the Asset Security and Loss Prevention areas and with a discriminatory motivation will be handled by the Ethics Channel and will be subject to the applicable sanctions.

3.10. Engagement with Society

3.10.1. Inclusion Projects: Consider Diversity and Inclusion criteria to define the target audience, by evaluating support and sponsorship for socio-environmental projects that promote diversity and inclusion, contributing to social transformation and generating a positive impact on vulnerable groups.

3.10.2. Transparency and Disclosure of Actions

Assaí is committed to transparency and disclosure of results related to Diversity and Inclusion initiatives and projects, as well as respect for Human Rights. Disclosures are made through Assaí's Annual and Sustainability Report. The company ensures agility and symmetry in the disclosure of information, commitment to the capital markets and respect for shareholders and investors.

4. PENALTIES

Internal disciplinary measures for non-compliance.

5. ATTACHMENTS

Not applicable

6. REFERENCES

This Policy includes:

6.1. Code of Ethics and Conduct;

7. DEFINITIONS

7.1. Yogyakarta Principles: a set of international guidelines on the application of human rights standards in relation to sexual orientation and gender identity.

7.2. Global Reporting Initiative (GRI): an independent organization that develops standards for sustainability reporting.

7.3. International Integrated Reporting Council (IIRC): a global organization that promotes the concept of Integrated Reporting. The objective is to help companies and other organizations communicate clearly and cohesively.

7.4. Sustainability Accounting Standards Board (SASB): an independent organization that develops sustainability disclosure standards.

7.5. Bloomberg's Gender Equality Index (Gender-Equality Index – GEI): a tool developed by Bloomberg to measure and promote transparency in equality practices

7.6. Corporate Sustainability Index (ISE B3): an initiative of the Brazilian Stock Exchange (B3) that evaluates the performance of companies in aspects related to corporate sustainability.

7.7. IDIVERSA B3: the index of the Brazilian Stock Exchange (B3)

7.8. Securities and Exchange Commission (SEC): the regulatory body for the financial and securities markets of the United States.

7.9. IGPTW B3: (B3 People and Labor Governance Index) is an index of the Brazilian Stock Exchange (B3).

7.10. Women on Board: a global initiative and a metric that assesses the female presence on company boards of directors.

7.11. Age Friendly: refers to an approach that aims to create environments and communities that respect and meet the needs of people of different age groups.

7.12. Alliance Without Stereotypes: a global initiative led by UN Women with the aim of combating gender stereotypes and promoting a fairer and more equitable representation of women in the media.

7.13. LGBTphobia refers to any type of attitude, behavior or speech that targets lesbian, gay, bisexual, transgender people and other people with sexual orientations or gender identities outside the heterosexual and cisgender norm.

7.14. Human Rights: Rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other condition.

7.15. Discrimination: Adverse attitude towards a certain characteristic, such as race, gender, sexual orientation, nationality, religion, social status, educational level, among others.

7.16. Diversity: Set of cultural, biological, social, economic, and other characteristics that make each individual unique.

7.17. Employed People: Assaí's supporters.

7.18. Gender Expression: Social and cultural behavior of the person towards the world.

7.19. Minority Groups: Groups that face barriers to occupying decision-making and power spaces.

7.20. Gender Identity: How the person perceives themselves and would like to be recognized.

7.21. Inclusion: Valuing and integrating populations that face barriers in society and companies.

7.22. Social Name: Name used by trans people to identify themselves according to their gender identity.

7.23. Sexual Orientation: Involuntary affective/sexual attraction that a person manifests towards others.

7.24. People with Disabilities: People who have impairments that may obstruct their full and effective participation in society.

7.25. Trans people: People whose gender identity does not directly relate to their biological sex.

7.26. Race: Social construction that defines sociocultural, economic and political interactions.

7.27. Ethnicity: Group of individuals who share the same sociocultural system, language and/or geographic region.

7.28. Representativity: Effectively or qualitatively represent a specific segment or group of the population.

8. REVIEWS AND APPROVALS

Internal revision log.