

Policy

Diversity and Human Rights

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1. PURPOSE

The purpose of this document is to establish guidelines related to diversity, inclusion and human rights. Our aim is to lend transparency to Assaí's positions and roadmaps for its business units and subsidiaries to ensure an environment free of discrimination that fosters and recognizes respect and equal opportunities.

2. SCOPE

This document covers all Assaí business areas

3. GUIDELINES

3.1. General Guidelines

3.1.1. Contextualization

This Policy is governed by international human rights principles set forth in the UN's Universal Declaration of Human Rights, which guarantee the rights of all people, regardless of race, color, sex, language, religion, political or other opinions, national or social origin, wealth, birth, or any other condition. Respecting and promoting Human Rights is crucial for Assaí's sustainability and our relations with stakeholders. We are committed to dignified and respectful treatment for all people inside our company and across our value chain.

We believe that diversity means considering and respecting diverse characteristics of individuals. Inclusion goes beyond recognizing to also appreciate and foster these differences in a deliberate effort to ensure representativity. We believe that all stakeholders covered by this Policy have a responsibility to become agents for change in this behavior.

Therefore, we promote all forms of diversity and inclusion. We fight and do not tolerate any type of discrimination, whether by age, gender, sexual orientation, gender identity, gender expression, race, color, disability, religion, marital status, nationality, or any other identity marker. Diversity and inclusion are essential values, commitments and levers of performance and social-economic innovation for a customer focused business.

This document also considers all factors that involve Human Rights, including our relations with employees - and this concern extends to all links in our supply chain. Therefore Assaí also weighs the following points:

- Prohibition of child labor and protection of the rights of children and adolescents;
- Prohibition of forced labor and/or modern slavery;
- Adoption of disciplinary measures in cases of harassment and abuse;
- Freedom of association, collective bargaining and grievance mechanisms;
- Respect for hours worked, wages and benefits;
- Ensuring a safe and healthy workplace;
- Safety in the workplace.

In addition to these commitments, our work for Diversity, Inclusion and Human Rights is based on

certain guiding documents:

- United Nations Principles ;
- Universal Declaration of Human Rights (UN);
- International Covenant on Economic, Social and Cultural Rights (ICESCR);
- International Covenant on Civil and Political Rights (ICCPR);
- 17 Sustainable Development Goals (SDGs) (UN);
- International Convention on the Rights of the Child (UN);
- Universal Declaration of the International Labor Organization (ILO);
- Yogyakarta principles;
- The ILO`s fundamental conventions, in particular:

C138 - ILO Convention No. 138 on minimum age for admission to employment and work;

C182 - Convention on the Prohibition of the Worst Forms of Child Labor and Immediate Action for its Elimination;

- Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinationals;
- Responsible Investment Principles (RIP);
- International Standard ISO 26000;
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW);
- LGBT Charter for Equal Rights ;
- Brazilian Textile Retail Association (ABVTEX);
- Bangladesh Accord on Fire and Building Safety ;
- French Initiative for Compliance and Sustainability (ICS);
- The Global Social Compliance Program (GSCP).

3.1.2. Commitment to Diversity, Inclusion and Human Rights

Assaí formalized its commitment to foster Diversity and Inclusion and defined five priority themes for strengthening policies and processes to guarantee rights, respect, appreciation and equity for all:

- Inclusion and development of persons with disabilities;
- Age diversity;
- Gender equity;
- Racial equity;
- Respect for LGBTQIA + rights

Combined with this Policy, our Code of Ethics poses the main guidelines related to business conduct and behavior expected of all those internally and externally relating with Assaí.

3.1.3. Repudiation

Assaí repudiates any act that breaches current legislation and human rights. Considering respect and appreciation of diversity as a fundamental premise for coexistence among stakeholders targeted by this Policy, Assaí repudiates and combats violence, intolerance and discrimination of any nature.

Anti-discrimination is one of the matters Assaí audits. Therefore any use of physical and/or verbal violence is strictly prohibited for all stakeholders involved in this Policy. Any cases involving physical and/or verbal violence will be handled by our Ombudsman and Ethics Committee (see **3.2.10 Ombudsman and Ethics Committee**).

We repudiate slave or informal labor, exploitation of children and inhuman and degrading working conditions in Assaí and throughout our supply chain.

3.1.4. Business community's non-violence agenda

Assaí aims to be a promoter of a strategic agenda for Diversity, Inclusion and Human Rights and in particular non-violence in the Wholesale sector. This means we are committed to engaging other companies in favor of affirmative actions and training programs in order to combat violence driven by discrimination.

3.1.5. Preventive measures

As a preventive measure, Assaí runs educational campaigns and actions such as training and sensitization programs in order to eradicate unacceptable behaviors related to gender, racial discrimination and other relevant matters.

In addition, we regularly audit our units for critical issues related to Diversity, Inclusion and Human Rights across suppliers and dealers, as explained in item 3.2.6.1

3.1.6. Disclosing results

Results from our Diversity and Inclusion actions and projects are announced in the Annual and Sustainability Report issued by Assaí and Casino, the economic conglomerate to which our wholesale business Assaí Atacadista belongs. Assaí ensures agility and symmetry in its disclosure, commitment to the capital market and respect for shareholders and investors.

We comply with all rules for listed companies, such as adoption of national standards for accounting records and listed-company registration with Brazil's Securities and Exchange Commission (CVM). In Brazil, all Assaí shares are listed on B3's highest governance level (Novo Mercado).

3.2. Specific Guidelines

3.2.1. Leadership Role

Leadership is one of the essential instances to build an inclusive organizational culture and a psychologically safe environment for everybody, therefore management must be cognizant of this Policy and act as multipliers in this respect. Assaí works on training programs for leaders, so that they do not reproduce stereotypes and discriminatory behaviors.

Leadership is therefore expected of our leadership as a value and practice:

- Positioning when witnessing exclusive behaviors and/or discriminatory attitudes and advise on use of the competent channels;
- Develop active listening and show appreciation for different opinions, regardless of hierarchical relations ;

- Know your own biases and work to minimize them in your everyday decision making ;
- Create a psychological safety environment for your team;
- Communicate in an assertive and inclusive manner;
- Hire and develop different teams;
- Monitor Diversity and Inclusion indicators ;
- Meet Diversity and Inclusion targets;
- Activate the Ombudsman Channel in situations that involve breaches of this Policy or our Code of Ethics.

On flexible remuneration linked to diversity targets, see **item 3.2.4** of this document.

3.2.2. Committees and Working Groups

Assaí maintains a committee for its internal public to encourage dialogue and transform the workplace environment in favor of our Diversity and Inclusion agenda.

To find out how to participate in this initiative, internal stakeholders should contact Assaí's Diversity area by e-mail diversity@assai.com.br.

3.2.3. Rules for respect and coexistence

Assaí's objective is to build an environment based on respect for differences and individualities while "living together" for productive coexistence that will ensure well-being for all those who relate to us. Taking an open-minded and accepting posture to difference is the first step. Some key recommendations:

- It is important to **avoid** stereotyping people, and assume certain ideas are true based only on your own point of view;
- **Do not** assume people's sexual orientation or gender identity based on your observation. Everyone should be treated with the same respect;
- **Do not make jokes** about people's characteristics (physical or otherwise);
- **Argue your position** whenever tackling a discriminatory situation;
- **Be inclusive** in your communication.

Specifically on the matter of gender identity of our employees and all other stakeholders, it is important to mention that this must be respected and considered in documents and negotiations (formal and informal). In practice, respect for gender identity encompasses some of the actions below:

- Use of social name and pronouns in documents, internal systems and verbal communication;
- Recommendation to use social name in all benefit related documents (e.g. health plan and dental plan);
- Use of correct pronoun (he/she) depending on gender identity;
- Clear communication on permission to use toilets depending on the gender the person identifies with, together with sensitization initiatives for employees and other stakeholders.

3.2.4. Diversity and Inclusion Indices

Since 2016, Diversity and Inclusion are some of the strategic themes validated by Assaí's Board of Directors. The item "Valuing our people", which means being a reference company that promotes Diversity, Inclusion and Sustainability among employees, is one of the six priority themes.

Assaí monitors the following indicators as targets:

- Percentage of women in leadership positions (managers or higher);
- Percentage of persons with disabilities in the workforce.

Management's flexible remuneration is geared to the abovementioned indicators (Sustainability and Diversity Index - SDI). Our Sustainability area is tasked with setting and monitoring these targets.

Other indicators monitored include:

- Age diversity;
- Racial equity;
- Apprentices;

3.2.5. Equal opportunities

In order to ensure equal opportunities for all, in particular minority groups, Assaí has determined strategic priorities, namely:

- **Workplace environment:** educational campaigns and initiatives to combat discrimination and eradicate unacceptable behavior.

Accessibility for persons with disabilities: Assaí assures equal access to training, development and career opportunities. All units must work to allow constant adaptation and accessibility, in order to integrate and retain employees in appropriate conditions for the full exercise of their activities. Each area is responsible for identifying the needs of applicants or employees and ordering the material resources and/or adaptations for the competent areas. Needs may be identified both on admission and throughout an employee's process of developing with the company.

- **Attraction and selection:** review processes to reduce unconscious bias ;
- **Development and succession:** strengthening specific initiatives for minority groups in leadership positions;
- **Training programs:** include content on diversity and management of different professional profiles in all Assaí University's training programs.

Recruitment & Selection procedures should:

- Avoid repeating prejudices, stereotypes and discriminatory attitudes, especially in relation to minority groups; avoid asking certain persons questions specifically due to their characteristics;
- Avoid repeating normative discourse in relation to sexual orientation;
- Adopting a social name in the case of trans people. (regardless of whether their identity document has been officially altered).

Interviews must be conducted with HR's guidance and follow a script to assess the knowledge, skills and abilities required for the position in question. Before each new selection procedure, the managers involved should liaise with HR to analyze the demographics of their business unit or area, to focus on persons who will make for more diverse teams. If in doubt, see our **Recruitment and Selection**

Procedure.

Training programs are offered for all employees with specific content for each hierarchical level. Employees must be referred for training programs based on objective criteria rather than any of their characteristics. For more information, see our **Training and Development Procedure**.

In relation to **Compensation and Benefits**, prejudice or distinction based on gender, race, sexual orientation, social-economic origin, age or of any other nature will not be tolerated.

In relation to our **Succession Plan**, at least one woman should be nominated among those applying for management positions. For more details of maternity and paternity benefits, see our **Benefits Policy**.

3.2.6. External environment

3.2.6.1. Relations with Resale Suppliers

All resale suppliers must comply with the laws and regulations, be cognizant of our values and respect the ethical principles set forth in our **Code of Ethics**. Our **Supplier Ethics Charter** requires suppliers to follow the established standards in all circumstances, in the supply chains of Assaí, its subsidiaries and subcontractors, in order to ensure that:

- Employees are treated with respect and dignity in safe and healthy workplaces and conditions;
- Appropriate mechanisms are in place for the preventive management of risks related to their respective operating segment;
- Our occupational health and safety culture is spread through educational processes promoting the theme;
- Production or service provision processes are carried out in the most environmentally friendly manner possible;
- Commercial relationships established by suppliers

are developed in an ethical and exemplary manner while strictly obeying the law, regulations and the conglomerate's internal rules, and are free of any kind of undue favoritism, active or passive corruption of government officials, extortion or fraud.

3.2.6.2. Registering and checking public lists

All Assaí resale suppliers are submitted to a thorough analysis that includes checking lists of employers of slave labor and those embargoed by Brazil's Institute for the Environment and Renewable Natural Resources (IBAMA). The lists are updated as soon as competent entities disclose new data. Any supplier found on one of these lists will be suspended and have payments blocked.

3.2.6.3. Resale Supplier Contracts

A copy of our Ethics Charter is annexed to all contracts with our resale suppliers, and these contracts expressly state that resale suppliers will be bound by our Code of Ethics and/or the supplier's own Code of Ethics, provided the latter is compatible with Assaí's. We will only work with suppliers who sign contracts that include these annexes.

3.2.6.4. Monitoring working conditions in our supply chains

Assaí's social auditing program carries out frequent audits of suppliers in critical chains to ensure that they are complying with relevant laws and regulations in relation to decent working conditions and

combatting 'modern slavery' conditions.

3.2.6.5. Education and Sensitization

We hold regular training programs for commercial areas to raise awareness of risks related to employment rights in the value chain and explain their responsibility for ensuring compliance with our commitments.

3.2.7. Relations with service providers and commercial partners

All Assaí providers are submitted to thorough initial risk analysis, which includes checking “blacklists” for use of slave labor and other public lists mentioned below. Monitoring is undertaken by Social Audit Programs, which are carried out periodically. Transparency and disclosure of results permeate the entire process.

All service providers and commercial or business partners must comply with laws and regulations, be cognizant of values set forth in our Code of Ethics and respect our ethical principles.

3.2.7.1. Registering and checking public lists

All Assaí service providers and non-commercial suppliers are submitted to through risk analysis, which includes checking consultation lists of employers who are using slave labor issued by the Ministry of Labor and Employment or are embargoed by Brazil's Institute of the Environment and Renewable Natural Resources (IBAMA) and we consult the national register of punished or sanctioned companies (local acronyms CNEP and CEIS respectively). These lists are updated when data are made available by the competent entities.

If a provider is found on one of these lists, they will be subject to being suspended and having their commercial relationship blocked, which may occur by the end of the contractual relationship or the search for another service provider/supplier.

3.2.8. Customer relations

Customer relations are crucial to consolidate an inclusive culture for Assaí. Through this communication, we get an opportunity to strengthen our position on Diversity and Inclusion and show that we practice it too.

This matter is subject to society's monitoring and requirements, particularly when companies are involved in discriminatory acts. The unwanted repercussions of an incident involving discriminatory acts may be extremely negative for Assaí and may affect its reputation with different segments and demographics. On the other hand, communication based on Diversity and Inclusion strengthens bonds, dialogue and validation for the different segments that interact with our brands.

Our approach to customer relations, teams and our communication pieces must reflect the Diversity of our customers.

3.2.8.1. Inclusive language and communication

All those involved in our communication initiatives (internal and external) must ensure that the content they produce, validate and disseminate is free of discrimination and stereotypes and that content complies with the principles shown below:

- **Accessibility:** communication must be accessible to persons with disabilities;
- **Representativity:** layouts and photos must show the plurality of society and must not reiterate

stereotypes when showing black people, women and other demographics;

- **Clear language - no barriers:** communication must be assertive and comprehensible for all hierarchical levels as well as those coming from low levels of education.

Questions that may help develop inclusive communication:

- For whom is this communication accessible?
- Does this messaging repeat stereotypes?
- Does this messaging use expressions or media that act as barriers for anybody?
- Does this messaging use terminologies correctly?
- Does this messaging respect and appreciate demographic plurality?
- Does this messaging allow a voice for demographic plurality ?

3.2.8.2. Employee-customer relations

Our customers are a sample of society, so it is especially important to remember that they are diverse, like Brazil. Employee -customer relations must be based on mutual respect without stereotypes or any type of discrimination.

3.2.8.3. Non-discriminatory treatment, methods or forms of address and security

Stores must follow procedures for treatment, methods or forms of address and security as required by our Property Security and Loss Prevention area. Forms of address that make any value judgment about sexual orientation, race, gender or any other characteristics will not be tolerated.

Any actions other than those in procedures issued by our Property Security and Loss Prevention areas and those motivated by discrimination, will be handled by our Ombudsman and our Ethics Committee and will be susceptible to appropriate sanctions.

3.2.9. Engagement with society

3.2.9.1. Projects we support and their relation to Diversity and Inclusion

Assaí's Diversity and Inclusion agenda includes commemorative dates and seeks to raise awareness among employees and other participants, mobilizing external guests from other companies, civil society organizations, consultancies and educational institutions.

We recommend that programs and projects of any social institution supported by Assaí, as well as voluntary initiatives, should include Diversity and Inclusion criteria to define those benefited and should help strengthen vulnerable groups.

3.2.10. Ombudsman and Ethics Committee

Assaí's Ombudsman Channel is available for our employees, suppliers, service providers, customers, social institutions and partners. The Ombudsman Channel is the official means of receiving complaints, dissatisfactions and reports of violating or not following Diversity, Inclusion and Human Rights guidelines. Any conduct that is discriminatory and/or goes against our Code of Ethics must be reported to the Ombudsman's Channel regardless of the position or situation of those who have practiced it. Through its respective areas, Assaí promises to investigate all situations reported, ensure impartiality and total confidentiality, and adopt the appropriate disciplinary measures. Contact is free of charge and reports may be filed anonymously. Any employee witnessing a breach of any current Assaí

rule has a duty to report it to the Ombudsman Channel.

Our Ethics Committee is a collective entity responsible for managing the Code of Ethics while also ensuring its efficacy and effectiveness. The Committee also decides and reports preventive, corrective or improvement actions or measures to be taken.

Telephone	E-mail
0800 777 3377	ouvidoria@assai.com.br

4. PENALTIES

Any employee witnessing a breach of any of the above rules has a duty to report it to our Ombudsman Channel. In addition, in accordance with our Code of Ethics, failing to follow the latter's rules and instructions may be deemed a severe fault and be subjected to appropriate disciplinary sanctions.

5. ATTACHMENTS

N/A

6. REFERENCES

6.1 The following are part of this Policy:

6.1.1. Code of Ethics

6.1.2. Training and Development Procedure

6.1.3. Benefits Policy

6.1.4. Recruitment and Selection Procedure

7. DEFINITIONS

7.1. Human Rights: according to the United Nations (UN), human rights are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other condition. They include the right to life and freedom, opinion and expression, work, and education. Everybody is assured these rights without discrimination.

7.2. Discrimination: can be negative or positive (for example, affirmative actions). As used in this Policy, the term 'discrimination' will always be used in its negative sense, i.e. discrimination is when there is an adverse attitude towards a certain characteristic. A person may be discriminated against due to their race, gender, sexual orientation, nationality, religion, social situation, educational level or other characteristics.

7.3. Diversity: set of cultural, biological, social and economic characteristics, among others, that make each individual a unique human being. In the business context, it is related to the representativeness of different groups that comprise society as found among our employees.

7.4. Employees): This document will use the word “employee(s)” to designate Assaí employees.

7.5. Gender expression: the individual's social and cultural behavior; how someone expresses gender based on their roles, including their ways of dressing, acting, behaving and interacting.

7.6. Minority groups: for historical and social reasons, these are groups that come up against barriers to occupy spaces of decision and power, such as companies, politics and academia. Minority groups may be quantitatively majorities in many cases. This is the case of black women and people in Brazil, for example.

7.7. Gender identity: how an individual sees himself, his understanding of himself and how he would like to be recognized. Regardless of their biological sex, a person may have the gender identity of a woman, a man or other gender identities (such as non-binary or gender). Gender identity is not subject to approval from third parties, as it is about self-identification.

7.8. Inclusion: valorization and insertion of populations that come up against barriers in society and companies for historical and social reasons.

7.9. Name: the name that trans persons may use for their everyday requirements to be identified in accordance with their gender identity, until their identity documents have been officially altered. It is how a person identifies and the name they wish to be called, regardless of their birth registry name.

7.10. Sexual orientation: the affective/sexual involuntary attraction between one person and another.

7.11. Persons with disabilities: those whose impediments interacting with various attitudinal and environmental barriers, may obstruct their full and effective participation with other people in society. For example: multiple physical, auditory, visual, intellectual, and psychosocial disabilities.

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

7.13. Race: a category created to legitimize systems of domination based on phenotype and origin. Race is now seen as a social construction rather than a biological term and it is used to define social-cultural, economic and political interactions. In Brazil, race is self-declared and mapped from each person's self-identification to be grouped into five main terms: white, yellow, indigenous, brown and black. Browns and blacks together are called "*negros*", which is the Portuguese word for blacks.

7.14. Ethnicity: a group of individuals who share the same social-cultural system, language and/or geographic region.

7.15. Representativeness: means effective or high-quality representation for a given segment or group of the population. It may be related to quantitative aspects e.g. the number of people from a certain group in a company's workforce - or the question of legitimacy - a representative person acts as if they were the voice and image of a segment, sector or social group.

P.