

GPA

Policy of Diversity and Human Rights



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1. PURPOSE

GPA's Diversity, Inclusion and Human Rights Policy is a document that provides guidelines (general and specific) on Diversity, Inclusion and Human Rights matters that correlates with other corporate policies and guidelines. It has as purpose to provide transparency to the Group's positioning and directions for its business units and subsidiaries, aiming at a discrimination-free environment that promotes and values respect and equal opportunities.

2. SCOPE

This document applies to all GPA employees, their business units and related companies/institutions, in addition to suppliers, service providers, customers, clients, social institutions and business partners.



3. GLOSSARY

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, education, among other ones. 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, education level, among other characteristics.

Diversity: it is the set of cultural, biological, social, economic characteristics, among other, that make every individual a unique being. In the business context, it is related to the representativeness of different groups that make up society in the staff of associates and employees.

Employees: in this document, the word “employees” will be used to refer to GPA’s associates, its business units and related companies/institutions.

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

Gender expression: it is 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.

Minority groups: these are groups that, for historical and social reasons, face barriers to hold positions or play roles of decision and power, such as in companies, politics, and academia. Minority 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: it is 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, as it is about self-identification.

Inclusion: it is the valuation and inclusion of populations that, for historical and social reasons, face barriers in society and in companies.

Social name: it is one 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 the way 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: it is the emotional/sexual and involuntary attraction that a person feels towards another.

People with Disabilities (PwD): 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, or transgender: term used to describe people whose gender identity is not directly related to their biological sex.

Race: it is a category created to legitimate some systems of domination based on phenotype and origin. It is currently understood as a social construction, not a biological one, which defines socio-cultural, 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 set of browns and blacks is 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 question 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. Context

This Policy is governed by principles of international human rights set by the UN Universal Declaration of Human Rights, which guarantee the rights of all people, regardless of race, color, sex, language, religion, political or other opinion, nationality or social origin, wealth level, birth origin, or any other condition. Respect for and promotion of human rights are essential to the sustainability of GPA and our relationship with our stakeholders. We are committed, both in our Company and in our value chain, to a dignified and respectful treatment for all people.

We believe that Diversity is considering and respecting the diverse characteristics of individuals. In turn, Inclusion goes beyond recognizing, but also valuing and fostering these differences, being intentional in the effort for representation. Besides, we understand that it is the responsibility of all audiences contained in this Policy to be agents in this change in behavior.

Therefore, we promote Diversity and Inclusion in all their forms. We fight and do not tolerate any type of discrimination, whether by age, gender, sexual orientation, gender identity or expression, race, color, disability, religion, marital status, nationality, or any other identity marker. Diversity and Inclusion are values, commitments, and levers of performance and socioeconomic innovation, being critical in a business that focuses on the customer.



This document also considers all factors that concern human rights, encompassing the working relationships that GPA has with its employees - and this expands to all links in the chain in which it is inserted. Accordingly, we also consider the following topics:

- Prohibition of child labor and protection of the rights of children and teenagers;
- Prohibition of forced labor and/or slave-like labor;
- Adoption of disciplinary measures in case 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 at workplace.

To reinforce our position, we have also undertaken public commitments in favor of Diversity and Inclusion, which can be consulted on the institutional website: <https://www.gpabr.com/en/sustainability/commitments/>



In addition to such commitments, our work in Diversity, Inclusion and Human Rights is based on some guiding documents and standards of partner associations:

- Principles of the United Nations Organization (UN);
- UN Guiding Principles on Business and Human Rights;
- Universal Declaration of Human Rights (UN);
- International Covenant on Economic, Social and Cultural Rights (ICESCR);
- International Covenant on Civil and Political Rights (ICCPR);
- 17 UN Sustainable Development Goals (SDGs);
- International Convention on the Rights of the Child (UN);
- Universal Declaration of ILO (International Labor Organization);
- Yogyakarta principles;
- The fundamental ILO conventions, in particular:
 - >> C138 - ILO Convention No. 138 on the minimum age for admission to employment and work;
 - >> C182 - Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor;
- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises;
- Principles for Responsible Investment (PRI);
- ISO 26000 International Standard;
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW);
- LGBT Charter of Rights Equality;
- Brazilian Association of Textile Retail Industry (Associação Brasileira do Varejo Têxtil) (ABVTEX);
- Bangladesh Fire and Construction Safety Agreement;
- French Initiative for Compliance and Sustainability (ICS);
- The Global Social Compliance Program (GSCP).



4.2. Commitment to Diversity, Inclusion, and Human Rights

Since 2015, GPA has formalized its commitment to promoting Diversity and Inclusion and has set five priority subjects for strengthening policies and procedures to guarantee the rights, respect, appreciation, and equality of everyone:



- Inclusion and development of people with disabilities (PwD);
- Age diversity;
- Gender equality;
- Racial equality;
- Respect for LGBTQIA+ rights.

As an ally to this Policy, there is our *Code of Ethics* that presents the key guidelines connected to the conduct of business and the expected behavior of all those who may have a relationship with GPA, both internally and externally.



diversidade



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COMO TODO MUNDO.



4.3. Repudiation

GPA repudiates any action that represents a violation of the laws currently in force and human rights. Considering the respect and valuation of Diversity as a fundamental premise for good coexistence among the stakeholders that are the target of this Policy, GPA repudiates and implements actions to reject and discourage violence, intolerance, and discrimination of any nature whatsoever.

The fight against discrimination is among the topics audited by GPA. Thus, the use of physical and/or verbal violence is strictly prohibited, whether it is aimed at any of the audiences involved in this Policy. Such cases will be handled by both *GPA's Ombudsman and Ethics Committee* (see *section 5.10 - Ombudsman and Ethics Committee*).

We repudiate slave or informal labor, child exploitation, and inhuman and degrading working conditions at GPA and in every link in our value chain, and **we are committed to combat sexual exploitation of children and teenagers.**



4.4. Business agenda for non-violence

GPA proposes to be a promoter of a strategic agenda for Diversity, Inclusion, and Human Rights, and particularly for the subject of non-violence in the Retail sector. Accordingly, we are committed to engaging other companies to carry out affirmative actions and training aimed at rejecting and discouraging violence motivated by discrimination.

4.5. Preventive actions

As a preventive measure, GPA carries out educational campaigns and actions such as training and sensitization, with the purpose of eradicating unacceptable behaviors related to gender issues, racial discrimination and other relevant matters.

In addition, it carries out regular audits on critical issues connected to Diversity, Inclusion, and Human Rights with resale suppliers, as explained in [section 5.6.4](#).



4.6. Disclosing the results of our actions

The results connected to Diversity and Inclusion actions and projects are disclosed to stakeholders through the **Annual and Sustainability Report**. GPA cares about the agility and consistency in the disclosure of information, its commitment to the securities and exchange market and its respect to shareholders and investors.

The Company complies with all standards connected to publicly-traded companies, such as the adoption of national rules for accounting records and the maintenance of publicly-held company registration with the Brazilian Securities and Exchange Commission (CVM). We adopt practices and guidelines at the highest level of governance, following the guidelines of the Novo Mercado of the Sao Paulo Stock Exchange (B3), of which we are a part.



5. SPECIFIC GUIDELINES

5.1. Role of Leaders

Leaders are one of the critical elements to develop an inclusive organizational culture and an environment of psychological safety for everyone; therefore, it is essential that all leaders are aware of and act as multipliers of this Policy. GPA works to provide its leaders with training so that they do not reproduce discriminatory stereotypes and behaviors

Thus, our leaders are expected to practice the following values:

- **Expressing their opinion when witnessing exclusive behaviors and/or discriminatory attitudes, while directing people to use the competent channels available;**
- **Developing active listening and value different opinions, regardless of hierarchical relationships;**
- **Knowing their own biases and working to minimize them in their daily decisions;**
- **Creating a psychologically-safe environment for their team;**
- **Communicating in an assertive and inclusive way;**
- **Hiring and developing teams with diversity;**
- **Monitoring indicators connected to Diversity and Inclusion;**
- **Meeting the goals connected to Diversity and Inclusion;**
- **Filing a claim with the Ombudsman Channel in situations involving violations to this Policy or the Code of Ethics.**

On variable remuneration bound to Diversity targets, please see [section 5.4](#) of this document.



5.2. Committees and Working Groups

GPA maintains Committees and Affinity Groups aimed at the internal public to encourage dialogue and the transformation of the work environment in favor of the Diversity and Inclusion agenda. And they are the following:

- **GPA Pela Equidade de Gêneros:** GPA for Gender Equality: committee created to catalyze the rise of women to leadership positions. Responsible for monitoring and proposing actions aimed at engaging the Company's top management. Making women to take part in leadership positions (managers and above) is a continuous effort of GPA's management.
- **GPA Madiba:** his name was chosen because it is the nickname given to the South-African leader Nelson Mandela, known for his fight for racial equality and the end of apartheid in South Africa. This group is formed by the internal public of all GPA's business units. Its hallmarks of action include initiatives to attract, retain, develop, engage, raise awareness of, and raise everyone's sympathy about this subject.
- **LGBTQIA+ GPA pride:** it aims at adopting best practices for an environment that respects sexual orientation, sexual or gender identity of every person in the internal public. Its hallmarks of action include initiatives to attract, develop, and retain talent through affirmative actions and internal and external awareness in favor of the LGBTQIA+ community.

In order to ensure that these subjects and actions are also reflected in stores, GPA keeps the **Ambassadors of Diversity**, formed by the internal public that, after going through a selection process, becomes a multiplier, with the challenge of raising their colleagues' more sensitive and sympathetic to the subject of Diversity and Inclusion.

To learn how to take part in such initiatives, the internal public should look for the **Corporate Diversity area of GPA** (diversity@gpabr.com).



5.3. Rules of respect when socializing

GPA has as purpose to build an environment based on respect for differences and individualities and, at the same time, on “living together” in a sense of a productive socialization, aiming at the well-being of all those who relate to us. The very first step is taking an open and accepting stance towards what is different. Some important recommendations:

- It is important **not to stereotype**, that is, not to assume truths based only on your individual point of view;
- **Do not assume people’s sexual orientation or gender identity** based on your observation. Everyone should be treated with equal respect;
- **Do not make jokes** with people’s characteristics (physical or otherwise);
- **Express your opinion** whenever faced with a discriminatory situation;
- **Be inclusive** in your communication.

Particularly on the matter of gender identity of our employees and all other audiences with whom we relate, it is worth mentioning that it must be respected and considered in documents and negotiations (formal and informal ones).



In practice, respect for gender identity encompasses some of the actions below:

- Use of the social name and pronouns in documents, internal systems, and oral dealings;
- Recommendation to use the social name in all documents of Company's benefits (e.g., health plan and dental plan);
- Use of the correct pronoun (he/she), according to gender identity;
- Clear communication on permission to use toilets according to the gender identity of every person, accompanied by awareness raising actions for employees, associates, and other stakeholders.

5.4. Diversity and Inclusion Indicators

Since 2016, Diversity and Inclusion are among the strategic subjects validated by the Board of Directors. The subject "Valuing our people", which means being a benchmark company that promotes Diversity, Inclusion and Sustainability among its associates, is one of the Company's six priority matters.

GPA has a **Manifesto of High Male Leaders for Gender Equality**, in addition to the Gender Equality Committee. Such initiatives reinforce the focus on ensuring an increased number of female leaders.



GPA follows, as targets, the following indicators:

- **Percentage of women in leadership positions (management and above);**
- **Percentage of people with disabilities in the workforce.**

The variable remuneration of managers is bound to the above mentioned indicators (Sustainability and Diversity Indicator - ISD). The Sustainability area is responsible for determining and monitoring such targets.

Other indicators are also monitored, such as:

- **Age diversity;**
- **Racial equality;**
- **Young apprentices;**
- **Length of time in the company of women returning from maternity leave.**



5.5. Equal opportunities

Aiming at fostering an environment of equal opportunities for everyone, with attention to minority groups, GPA set strategic priorities, namely:

- **Work environment:** promotion of educational campaigns and actions to combat discrimination and eradicate unacceptable behavior;
Accessibility for people with disabilities: GPA guarantees to people with disabilities the same access to training, development and career opportunities. All units must work for constant adaptation and accessibility, in order to integrate and maintain employees in appropriate conditions for the full exercise of their activities. Each area is responsible for identifying the needs of the candidate or employee and requesting material resources and/or adaptations to the competent areas. Needs can be identified both on admission and throughout the employee's development process in the company.
- **Salary:** evolution of policies and processes to ensure equal pay for all;
- **Attraction and selection:** review of processes to reduce incidence of unconscious biases;
- **Development and succession:** strengthening specific actions for minority groups in leadership positions;
- **Training:** adding contents on Diversity and management of different professional profiles in all training programs at GPA's Retail University (Universidade do Varejo GPA).



In **Recruitment & Selection processes**, the following behaviors should be adopted:

- The non-reproduction of prejudices, stereotypes and discriminatory attitudes, especially those connected to minority groups, avoiding specific questions for a certain person due to any characteristics;
- The non-reproduction of any standard speech regarding sexual orientation;
- The adoption of a social name, in the case of trans people (regardless of whether there is a formal change in their official identity document).

Interviews must be assisted by the HR area and follow a script that assesses the competencies, skills, and knowledge required for the position at issue. In every each new selection, it is recommended that the manager review, together with the HR department, the demographics of its area, looking for people who would mean more diversity to the team. In case of any questions, please read the **Attractiveness and Selection Policy**.

Training offered are intended for all employees, respecting specific content for each hierarchical level. The nomination of employees for Training must be carried out based on objective criteria, regardless of any of their characteristics. For more information, please read the **Training Management Policy**.

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With regard to **Compensation and Benefits**, the **Job and Salary Management Policy** shall be strictly complied with, as it will not be tolerated any prejudice or differentiation by gender, race, sexual orientation, socioeconomic origin, age, or any other.

Regarding the **Succession Plan**, at least one woman is expected to be nominated among candidates for management positions.

Particularly as regards the subject of maternity, it is determined that the employee's dismissal before 12 months of her return from maternity leave can only happen after a flow of governance and approval by the board of executive officers of the corresponding business unit and the Human Resources area. For more information, please read the **Guidance for Mothers, Pregnant Women and Managers**.

For other information and benefits connected to maternity and paternity, please read the **Benefits Management Policy**.



5.6. External stakeholders

5.6.1. Relationship with Resale Suppliers

All resale suppliers must comply with laws and regulations, know the values, and respect the ethical principles set forth in the *Code of Ethics*.

According to the *Ethics Charter for Suppliers*, they must follow the standards provide for therein, under any circumstances, within the Group's supply chain, its subsidiaries and subcontractors, in order to ensure that:

- Employees are treated with respect and dignity in an environment that provides safe and healthy working conditions;
- Appropriate mechanisms are set for the preventive management of risks connected to their corresponding operating segment;
- The culture of safety and health at work should be disseminated, establishing educational processes to promote such subjects;
- Production or service provision processes are carried out in the most environmentally-friendly manner possible;
- Business relations performed by the supplier shall be developed in an ethical and exemplary manner, within the most strict compliance with the law, regulations and internal standards of the Group, as well as being free from any kind of undue favoring, active or passive corruption of public agents, extortion, or fraud of any kind.



5.6.2. Registration and checking of public lists

All GPA suppliers undergo a thorough process of checking, which includes consulting the slave labor and embargo lists of the Brazilian Institute for the Environment and Renewable Natural Resources (IBAMA). Such lists are regularly updated and made available by the competent authorities.

If any supplier is found in one of such lists, such supplier is subject to the suspension and blocking of payments.

5.6.3. Agreements with Suppliers

The Ethics Charter is part of the attachments to every contract executed with our resale suppliers, and such contracts have an express provision for the supplier to be bound by the GPA's Code of Ethics and/or the Supplier's Code of Ethics, as long as such provisions are not conflicting with those of GPA. We work exclusively with suppliers who execute the contract with such attachment thereto.



5.6.4. Monitoring of working conditions in our chains

GPA maintains a social auditing program, conducting audits on a regular basis with suppliers of critical chains to check whether they or are complying with the relevant laws and regulations regarding suppressing slavery-like labor and allowing only decent and adequate working conditions.

FOR THE DOMESTIC TEXTILE MANUFACTURING CHAIN

In 2011, GPA executed the Term of Commitment for the Certification of the Textile Manufacturing Chain with the Brazilian Textile Retail Association (ABVTEX). Since then, the Group has implemented the certification program, asking its suppliers of textile products, footwear, and accessories to become certified. Such certification process makes it possible to verify compliance with Brazilian legislation and implement good management practices in the textile manufacturing chain.

In addition, we are part of the Executive Council of such Association and we actively take part in the discussions of its Management Committee and Suppliers Working Group, which monitor and bring improvements to the Program.





FOR THE BRAZILIAN AND FOREIGN CHAIN OF EXCLUSIVE BRANDS

As of 2015, the Company began implementing the Social Compliance Program (SCOP) for all factories of Exclusive and generic brands in risky countries, a list which is updated by the Casino Group. We work with the methods known as Initiative for Compliance and Sustainability (ICS) and Business Social Compliance Initiative (Amphora/BSCI). They verify compliance with international standards of working conditions and local labor requirements in force at suppliers' factories.

In case of a material noncompliance found in such audits, the partner factory is suspended for new purchases. The Company monitors the corrective action plans to ensure the process of continuous improvement by partner factories.

Transparency and the dissemination of results permeate the entire process.

More information on this subject can be read in the ***Ethics Charter for Suppliers*** available at **Workplace** ("GPA Equals" group).

5.6.5. Education and Increased Sympathy

We provide regular training to business areas to raise awareness of the risks connected to labor rights in the value chain and to explain the responsibilities they have to ensure the fulfillment of our commitments.

5.7. Relationship with suppliers, service providers, and business partners

All GPA service providers undergo a thorough initial checking process, which includes consulting the “ban list” of slave labor. Monitoring is carried out by Social Audit Programs, which are carried out periodically. Transparency and the dissemination of results permeate the entire process.

All service providers and business partners must comply with laws and regulations, know the values and respect the ethical principles set for in the Code of Ethics, as provided for in the standard clauses of the agreements executed with GPA.





5.7.1 Registration and checking of public lists

All GPA service providers undergo a thorough checking process, which includes consulting the lists of slave labor. Such lists are updated as made available by the competent bodies.

If any service provider is found in one of such lists, such provider is subject to the suspension and blocking of the business relationship.

5.8. Customer relationship

The relationship with customers is an essential dimension to consolidate an inclusive culture in GPA, as through such a communication we have the opportunity to strengthen and show, in practice, our positioning on Diversity and Inclusion.

Such matter is subject to monitoring and demands by society, particularly when companies incur discrimination actions. An unwanted repercussion of an event involving discrimination actions can be extremely negative for GPA, affecting its reputation with different audiences. On the other hand, communication based on Diversity and Inclusion strengthens the bond, dialogue, and validation with the most varied audiences that interact with our brands.

Our way of conducting relationships, our teams and communication messages must reflect the diversity of our customers



5.8.1. Inclusive language and communication

It is the responsibility of all those involved with communication actions (internal and external) to ensure the production, validation and dissemination of discrimination-free contents, without any stereotypes and which comply with the following principles:

- **Accessibility:** communication must be accessible to people with disabilities;
- **Representativeness:** any layout and photos that may be chosen must represent the plurality of society and they cannot reproduce stereotypes when referring to black people, women and other audiences;
- **Clear and barrier-free language:** communication must be assertive and understandable for all hierarchical levels, including to people with a low level of education

Questions that can help developing an inclusive communication:

- Who is this communication accessible to?
- Does this communication reproduce stereotypes?
- Does this communication use expressions or means that represent barriers for someone?
- Does this communication use appropriate words?
- Does this communication respect and value the plurality of the population?
- Does this communication give voice to the plurality of the population?

To learn more about how to make a more diverse and inclusive communication, please access the **Inclusive Communication Guideline** available at **Workplace** (“GPA Equals” group).



5.8.2. Employee-customer relationship

Our customers are a sample of society, so it is very important to always keep in mind they are diverse, just like the Brazilian population. The employee-customer relationship must be established based on mutual respect, without stereotypes and any type of discrimination.

5.8.3. Non-discriminatory treatment, approach, and security

In stores, treatment, approach, and security must follow the procedures of the Retail Property Security and Loss Prevention area. Approaches that make any judgment about sexual orientation, race, gender, or any other similar characteristics are not tolerated.

Any actions that are outside the protocol of the Retail Property Security and Loss Prevention areas and that are motivated by a discrimination nature will be dealt with by the Ombudsman and the Ethics Committee and will be subject to the applicable penalties.

More information on this subject can be found in the **MV.IT document.10.07.0001 - Suspected signs of theft (Stores, Gas Stations, and Drugstores)**.

(*) All materials (except policies) mentioned in this document can be found in the “GPA Equals” group at Workplace, under the “Files” tab.





5.9. Engagement with society

5.9.1. Supported projects and their connection with Diversity and Inclusion

GPA has a Diversity and Inclusion agenda that includes commemorative dates and aims at raising awareness and sense of sympathy among employees and other participants, mobilizing external guests from other companies, civil society organizations, consultants, and educational institutions.

It is recommended that the programs and projects of GPA Institute or any other social institution supported by the Group's companies, as well as voluntary initiatives, consider Diversity and Inclusion criteria to determine the benefited public, seeking to strengthen vulnerable groups.

5.10. Ombudsman and Ethics Committee

GPA provides its Ombudsman Channel to its employees, suppliers, service providers, customers, clients, social institutions and partners. It is the official tool for receiving complaints, dissatisfaction claims, and reports of violations for noncompliance with the guidelines for valuing Diversity, Inclusion and Human Rights over all GPA companies.

Any conduct that is discriminatory and/or not in compliance with the GPA Code of Ethics must also be reported to the Ombudsman's Channel, regardless of the position or situation of those who have practiced it. GPA, through its responsible areas, is committed to investigate all reported situations in an unbiased way and under total confidentiality, as well as to adopt the applicable disciplinary measures. Contact is free, and reports can be made anonymously. Any employee or associate who witnesses a breach of any GPA rule in force has the duty to report such violation to the Ombudsman Channel.

The Ethics Committee is a collegial body responsible for managing the GPA Code of Ethics, as well as for ensuring that it is efficient and effective. Such Committee also determines and informs the preventive, corrective, or improvement actions to be taken.

Ombudsman (Monday to Saturday, from 8 am – 8 pm)

GPA	0800 055 5711	ouvidoria@gpabr.com
GPA Malls	0800 055 5711	ouvidoria@gpamalls.com





6. PENALTIES

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

(*) All materials (except policies) mentioned in this document can be found in the "GPA Equals" group at Workplace, under the "Files" tab.

7. REFERENCES

For cases not covered by this Policy, please read the following specific Policies:

- Code of Ethics
- Ethics Charter for Suppliers
- Guidelines for Inclusive Communication
- Guide for Mothers, Pregnant Women, and Managers
- Manifesto of High Male Leaders for Gender Equality
- CO.PL.17.01.0001- Internship Program
- CO.PL.17.01.0003 - Attractiveness and Selection
- CO.PL.17.01.0004 - Admission of Associates
- CO.PL.17.04.0001 - Unpaid work leave
- CO.PL.17.04.0002 - Transfer Allowance for Associates
- CO.PL.17.04.0003 - Vacation granted
- CO.PL.17.04.0004 - Management of Positions and Salaries
- CO.PL.17.04.0008 - Benefits Management
- CO.PL.17.02.0001 - Training Management - GPA's Retail University (Universidade do Varejo)
- CO.PL.17.04.0009 - Work Flexibility Programs
- CO.PL.17.04.0010 - Termination of Associates
- CO.PL.17.04.0011 - Incentive Campaigns
- CO.PL.17.06.0001 - Working Time
- CO.PL.17.07.0002 - SESMT Policy

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