



GPA's Policy on OH&S Management System (SESMT, in Brazil)

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1. PURPOSE

In an effort to ensure the physical and mental health of our employees and meet legal requirements, we will establish and enforce guidelines for continuous improvement of working conditions and environments, aligned with our company's code of conduct and ethics.

2. SCOPE

This document applies to all GPA'S employees and service providers.

3. GLOSSARY

Incident: any unplanned event that results in death, illness, or personal injury; loss and damage to the environment, property, equipment, tools, facilities, or even total or partial stoppage of work or operations.

CIPA: an Internal Committee to prevent Occupational Incidents that aims to prevent accidents and ill health arising from work in order to make work permanently compatible with the maintenance of life and the promotion of employee health.

Management of job leaves: a set of actions developed to monitor and address illness-related absenteeism, analyzing their causes, and determining preventive and corrective measures.



Injuries, health degradations, work-related incidents and illnesses: Negative health impact resulting from exposure at work to physical, chemical, biological, psychosocial, or work-related factors.

Organization: Every company, operation, firm, enterprise, institution, or association, or part thereof, whether a corporation or not, public or private, that has its own functions and administration. For organizations having more than one operating unit, each of these units can be defined as an organization.

Functional rehabilitation: It is a process of limited duration and a specific goal aimed at enabling an individual with a disability to attain functional physical and cognitive abilities that would enable them to continue working. Recommendations are provided for necessary changes in workplace conditions and activities, and if all avenues are explored, a new workplace and/or alternate activities may be suggested. The goal is to prevent exacerbation of the diagnosed health conditions that led to the work limitation, which could be either transitory or permanent.

Professional Rehabilitation: Professional rehabilitation is a mandatory Social Security service provided by INSS in Brazil that assists insured persons who have been disabled by illness or accident, by offering them the means to undergo vocational readjustment or professional rehabilitation, with the ultimate goal of facilitating their reentry into the labor force.



Health: it means "an all-encompassing state of well-being, incorporating physical, mental, and social aspects, rather than just the lack of illness". WHO, 1948.

Occupational Safety: It is a set of technical and educational strategies used to preclude incidents by eliminating unsafe conditions from the work environment or by educating workers on preventive practices.

SESMT: a Brazilian acronym for Specialized Services in Safety Engineering and Occupational Health that is equivalent to OH&S management system, comprised by a multidisciplinary team with at least an Occupational Safety Technician, an Occupational Safety Engineer, an Occupational Physician, an Occupational Nurse, and an Occupational Nursing Technician. The actions developed are based on the Occupational Safety Legislation that consists of Regulatory Standards, complementary laws, such as ordinances and decrees, and also Trade Union Agreements and International Conventions of the International Labor Organization ratified by Brazil.

4. GENERAL GUIDELINES

For the implementation of this policy, the Guidelines of the Occupational Safety and Health Management System of the International Labor Organization - ILO will be adopted, adjusted to the Brazilian reality, the Regulatory Standards, internal procedures and guides and other legislation in force applicable to the specific areas and conditions of GPA.



5. SPECIFIC GUIDELINES

5.1. Assumptions of *SESMT* (OH&S management system): Specialized Services in Safety Engineering and Occupational Medicine

The implementation and development of *SESMT* activities comply with the following premises:

- Identify, manage, assess, and monitor occupational risks and conditions, besides work environments;
- Implement preventive measures to mitigate potential health and safety risks to employees and integrity of facilities;
- Devise procedures, process flows, work instructions, guides, forms, and other regulatory instruments to ensure best practices for preventing work-related incidents and illnesses.
- Implement a communication system to prevent work-derived incidents and diseases;
- Promote the development, implementation, and dissemination of a Safety and Health culture as a core value among employees (across all hierarchies of the Company), with the goal of preventing and managing risks while improving working environments and conditions;
- Create and implement educational processes for promoting safe and healthy work practices among employees and managers, using a training matrix that considers risk exposure, job activity, and current legislation, and delivered with the appropriate frequency for the target audience.
- Implement a strategy by formulating a detailed action plan (complete with objectives and targets) aimed at mitigating risks, preventing incidents and occupational illnesses, and the continuous improvement of work environments and conditions;



- Define and coordinate the implementation of individual and collective measures to prevent and improve the working conditions and environments of our employees and service providers;
- Develop and implement programs to promote health and quality of life at work;
- Encourage actions such as physical activity, healthy eating, clean and healthy environments, aimed at preventing chronic-degenerative illnesses and health problems;
- Develop and implement rehabilitation and inclusion programs in the work of employees with temporary and permanent disabilities and people with disabilities;
- Determine and implement indicators for a permanent assessment of work-related risks, environments, and conditions;
- Develop and implement criteria for investigating work-derived incidents and illnesses;
- Encourage all the Company's sectors to join the efforts to improve the quality of life and prevention of risks at work continuously;
- Adopt an assertive stance in disputes or incidents with Social Security, if applicable.
- Join the actions of *SESMT*, social assistance, and health and welfare areas aiming at a full and integrated care to employees, besides optimizing the resources offered by the Company;
- Devise, execute, and maintain fire prevention and firefighting protocols to support unit operations.



5.2. Duties and Responsibilities

According to the ILO Guidelines, employers must have global responsibility for protecting the safety and health of workers and show leadership in OH&S activities in the organization.

GPA's leaders, at every level, bear the responsibility to ensure the Safety and Health of all individuals under their management, thereby requiring the executives to be personally dedicated to protecting the physical integrity and health of both employees and service providers. Based on this concept, the subsequent competencies and responsibilities are outlined:

5.2.1. Top Management

- Ensure a safe work environment by implementing and maintaining health promotion programs aimed at preventing illnesses and incidents, such as:
 - The Accident Prevention Program comprising work at height, work involving high temperatures, work with electricity, and work in confined spaces;
 - The Accident Prevention Program in vehicles, machinery, and equipment;
 - The ergonomics program;
 - Campaigns related to *SESMT*, i.e., OH&S;
 - Fire prevention and firefighting (PCI).
- Approve the Policy, Guidelines, Resources, Structure, and Responsibilities of the *SESMT* (OH&S) Management Model;



- Create a monitoring committee for Occupational Safety and Health Management, under the coordination of the *SESMT* (OH&S) area.

5.2.2 Managers (Managers and leaders of units and DCs).

- Provide education and guarantee compliance with the *SESMT* (OH&S) Management paradigm, focusing on averting mishaps in high-altitude work, hot work, electrical work, confined spaces, vehicular accidents, machinery, equipment, ergonomics, and firefighting;
- Monitor and ensure, through critical analysis of the indicators, the performance of *SESMT* (OH&S) in its area of responsibility;
- Keep an ongoing dialogue with *SESMT* (OH&S) specialists;
- Ensure compliance with safety and health legislation and internal policies;
- Seek technical advice from *SESMT* for defining new activities, work processes, furniture and equipment purchases, layout changes, renovations, and service contracts to preserve business sustainability, minimize risks, and reduce unnecessary costs.
- Establish work processes that comply with the Occupational Safety and Health Standards of the Organization;
- Be responsible for complying with the determinations of the *SESMT* in situations of professional and functional rehabilitation and in situations of inclusion of people with disabilities;
- Take the necessary measures for contractors and/or service providers to develop their activities under the Organization's Occupational Safety and Health Standards, as well as complying with the internal procedure for working with third parties



GPA.PO.17.07.0003 - Occupational Safety in Hiring Service Providers: Third Parties;

- Send *SESMT* a report in cases of outsourced services to approve activities under the applicable legal Occupational Safety and Health requirements;
- Allocate resources in the budget to meet the Safety and Health requirements of the team under its management and in contracts with third parties;
- Ensure that their subordinates attend training and capacity building, be it in-person or virtually, Safety and Health courses, and regular health check-ups, as required;
- Ensure the participation and performance of employees at the CIPA (Internal Committee to prevent Occupational Incidents) of their unit and in GPA's health and safety programs;
- Carry out and guarantee the Safety Dialogue with their subordinates, reinforcing actions and campaigns to prevent incidents and occupational illnesses;
- Maintain and ensure the availability of equipment and operational systems for preventing fires and firefighting, as well as escape routes and emergency exits;
- Supply employees with appropriate personal protective equipment according to the risk of each activity, mandate their use, promptly replace any damaged or lost equipment, take responsibility for their cleaning and regular maintenance, and maintain a record of their distribution to employees.



5.2.3. SESMT (OH&S) staff

- Coordinate the implementation of the Occupational Health & Safety Management System;
- Advise the Top Management and Managers on the formulation of Health and Safety policy, principles, guidelines, and programs;
- Monitor SESMT indicators to assess the efficiency of the management model;
- Develop tailored internal regulations and procedures for *SESMT* and ensure the management policy and model are kept up to date.
- Conduct an audit of the work environment to pinpoint health and safety non-compliances and provide the required recommendations;
- Provide CIPA staff, as well as other employees, with training and support to become active as multipliers of occupational health and safety actions;
- Support and assist in actions related to occupational health and safety campaigns;
- Prepare legal documentation according to current legislation;

5.2.4. Employees

- Acquaint themselves with the Company and *SESMT* (OH&S) Management Standards and comply with their stipulations;
- Maintain safe behaviors and healthy life habits, preserving the integrity of other professionals, the environment, and the areas where they operate;
- Take part in health campaigns and undergo routine health evaluations, as required;
- Be present at all training sessions and engage actively in the Company's health campaigns, as well as its programs for preventing illnesses;



- Use and ensure appropriate use of the Company's health and safety equipment and devices;
- Act as a multiplier of the information disclosed by *SESMT* (OH&S);
- Comply with the Golden Rules regarding *SESMT* (OH&S).

5.2.5. Miscellaneous

It must be deemed as priority the prevention of occupational risks that may generate illness, permanent disability, and the death of employees caused by:

- Vehicles, machinery, and equipment;
- Work at height, hot work, work with electricity, work in confined space, fire prevention and firefighting.

6. PENALTIES

Every employee must report any violation of the aforementioned standards to either the Ombudsman or the Whistle-blowing Channel. Furthermore, any non-compliance with the standards and guidelines outlined in this document will be deemed as severe misconduct, and will be subject to disciplinary penalties in accordance with *the Management Policy of the Ethics Committee, GPA's Code of Ethics, and the Policies (Consequences and Disciplinary Sanctions, Actions for Disciplinary Measures related to Occupational Safety)*.

7. REFERENCES

- GPA.PO.17.07.0003 - Occupational Safety in Hiring Service Providers: Third Parties



- GPA.PO.17.07.0005 - Disciplinary Measures related to Occupational Safety
- International Standard ISO 45001 “Occupational Health and Safety Management Systems”

8. EXHIBITS:

Not applicable.

9. REVISION HISTORY

| Revision number | Date of publication | Description of changes | Approver (name/ position) | Responsible alternate (name/ position) |
|-----------------|---------------------|---|---|---|
| 02 | Aug. 31, 2021 | Renewal of effectiveness; Update of the standard title | Mirella Basolli Gomiero Chief HR Officer | Fred Lopes Chief HR Officer |
| 01 | May 21, 2019 | Renewal of effectiveness; Update of the standard title | Miguel de Paula Chief HR Officer | José Eduardo Luan dos Santos, HR Manager |
| 00 | Mar. 8, 2016 | First version of the document | Services Exec. Officer People Management | Occupational Health & Safety Manager |