

Corporate Policy - PTC	Issue Date: <b>11/17/2021</b>
<b>Diversity, Inclusion, Respect and Anti-Racism</b>	Identification: <b>PTC.022</b>
	Version– <b>03</b>
Issuing area: Board of Directors	Review on <b>08/21/2023</b>
	Classification of information: <b>Public</b>

## 1. PURPOSE

To establish, formalize, promote, respect and educate the Carrefour Brazil Group's relationship audiences on diversity, inclusion of people, respect for human rights, as well as reinforcing tolerance and respect for people, and combating discrimination and prejudice, in particular, but without limiting the commitment to anti-racism and the promotion of equality of people.

## 2. APPLICATION

It applies to the entire the Carrefour Brazil Group and stakeholders.

## 3. ACRONYMS AND DEFINITIONS

**Affirmative Actions:** set of public or private policies for the promotion of equal opportunities, conceived as a way of correcting existing social inequalities in society, in order to promote the fight against racial, gender, national origin, disability, among others.

**Aggression:** attack or act of hostility, provocation or affront to someone's physical and/or moral integrity.

**Moral harassment:** exposure of someone to humiliating or embarrassing situations, causing psychological violence to the victim and exposing him/her to humiliating situations before co-workers, suppliers, customers and before himself/herself.

**Sexual harassment:** embarrassing someone with the intention of obtaining sexual advantages or favors, the agent taking advantage of his/her hierarchical condition inherent to the exercise of employment, position or function. The relationship of hierarchy and subordination does not need to be direct, but there must be some superiority capable of affecting the victim's work relationship.

**Discrimination:** action or omission that generates differential treatment to a specific person or group of people on grounds of race, color, sex, gender, sexual orientation, religion, political opinion, national ancestry and social origin. **Discrimination** can also occur based on factors such as age, disability, migrant status, special health condition, genetic predisposition, among others.

**Vulnerable Group:** Set or subset of people with a specific condition or physical, social, political or economic characteristic that puts them at greater risk of suffering discriminatory acts, whether due to actions or omissions. Examples of vulnerable groups are: children and young people, the elderly, women, black people, LGBTQIA+ people, people with disabilities, people in refugee status, migrants returning to their countries of origin, people with serious illnesses that may give rise to stigma, indigenous peoples, ethnic minorities, among other groups that are in a situation of social vulnerability .

**SDG:** Sustainable Development Goals

**ILO:** International Labor Organization

**UN:** United Nations Organization

**Racism:** discriminatory conduct directed at a certain group or collectivity because of their race or color with the aim of humiliating, belittling, attacking someone.



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**Violence:** The intentional use of force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation.

**Physical violence:** acts that use physical force intentionally and non-accidentally, with the aim of injuring and harming others. It can manifest itself in several ways, such as slaps, pinches, kicks, twists, pushes, throwing objects, strangulations, perforations, mutilations, among others.

**Verbal violence:** use of aggressive language characterized by words, jokes, curses and any other harmful terms and expressions aimed at personal disqualification, public ridicule, humiliation, embarrassment, hostility, contempt or neglect.

**Psychological violence:** abusive conduct, exercised through attitudes or other systematic manifestations that attack the dignity, self-esteem, identity or psychic integrity of others, even if indirectly or apparently subtly.

#### 4. GENERAL GUIDELINES

This Policy is governed by international Human Rights principles, embodied in the UN Universal Declaration of Human Rights and the UN Principles on Business and Human Rights which guarantee the rights of all people, regardless of race, age, gender, sexual orientation, origin, color, physical condition, religion, political opinion, marital status, nationality, gender identity and/or expression or any other identity marker, family situation or any other condition. Respect and promotion of Human Rights are fundamental and non-negotiable commitments of the Carrefour Group in its relationship with all stakeholders, including our value chain.

The Carrefour Brazil Group's guideline is to respect people, in their individuality, as well as to promote actions to raise awareness and strengthen human rights, prevent potential adverse impacts and violations of human rights and, whenever necessary, mitigate and remedy them.

The performance and management of human rights by the Carrefour Brazil Group are based on the United Nations Guiding Principles on Business and Human Rights and on the Sustainable Development Goals. Acting to contribute to the eradication of poverty, quality education, decent work, reduction of inequalities, peace and justice.

The respect and appreciation of the individual include promoting information and education on the rules of conduct and relationship, in addition to systematically collecting, analyzing, investigating and reporting any violation of the Group's principles and the UN Declaration of Human Rights.

The Carrefour Group aims to adopt measures that promote the appreciation and respect for human rights and repudiates and prohibits both in its operation and in its value chain: child labor and violation of the rights of children and adolescents; forced and/or slavery-like labor; harassment and abuse; violation of freedom of union association, collective bargaining or grievance mechanisms; non-compliance or violation of labor regulations; unsafe or unhealthy work, exploitation of vulnerable peoples and communities such as migrants, "quilombolas", indigenous people.



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Principles and commitments to human rights:

- Awareness, promotion of human rights;
- Diversity of people;
- Social inclusion;
- Decent work;
- Combating structural racism;
- Prohibition of child or forced labor;
- Respect for the rights of indigenous populations;
- Responsible purchasing and value chain;
- People's privacy;
- Prevention of discrimination and harassment;
- Combating structural racism and seeking to repair historical damage, with the development of actions for the black audience, with development, empowerment, stimulation of career growth and black entrepreneurship;
- Actions that promote the inclusion of minorities, or less represented audiences in the Group's operations or in governance and management positions;
- Development of diversity and inclusion actions for the group's internal and external audiences.

Thus, the Group promotes actions aimed at protecting and valuing diversity, favoring social dialogue and the relationship with the community, empowering people to refuse any harassment and any discrimination and raising awareness to avoid any conflict of interest, and in case of existence, declare it immediately.

The Carrefour Brazil Group channels its efforts towards promoting an institution capable of managing the internal and external audience through a peaceful and inclusive culture, committed to maintaining peace. It is therefore in line with the 2030 Agenda and the UN Sustainable Development Goals. In particular, SDG 16 which envisions Peace, Justice and Strong Institutions, SDG 5 - achieve gender equality and empower all women and girls, SDG 8 - decent work and economic growth, promote inclusive and sustainable economic growth, the full and productive employment and decent work for all, SDG 10 - reduce inequality within and between countries, SDG 11 - make cities and human settlements inclusive, safe, resilient and sustainable and SDG 17 - strengthen the means implementation and revitalize global partnership for sustainable development. In this context, the Group highlights some key points, while ensuring full development and efforts to achieve other sustainable actions:

- Promote and enforce non-discriminatory laws and policies for sustainable development;
- Strengthen relevant national institutions, including through international cooperation, for capacity building at all levels, particularly in developing countries, for preventing violence and combating terrorism and crime;
- End abuse, exploitation, trafficking and all forms of psychological, physical and sexual violence and torture against children;
- Significantly reduce all forms of violence and related death rates, everywhere;



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- Promote actions for the inclusion of women at all corporate levels and encourage personal and professional development;
- Keep workplaces and customer service spaces that promote respect, free from moral, verbal, physical aggression, harassment of any kind. Behaviors contrary to ethics, integrity and dignity are not tolerated.
- Promote community integration actions, especially those in which the Group's units are located, as a mechanism for engaging, developing and stimulating people's development and, consequently, improving their lives and interacting with the environment.
- Ensure social, physical and psychological safety of people who interact with the Carrefour Brazil Group, not tolerating exclusion, discrimination, racism and disrespect.
- Not tolerate any discrimination based on race, sexual orientation, ableism or any act that compromises human dignity and the full exercise of rights.
- Invest efforts to repair structural racism, with actions to value, empower and access opportunities for black people.

With a view to accelerating adaptations and increasingly encouraging sustainability, with diversity and inclusion, the Carrefour Brazil Group publicly assumed the commitment to internalize the function of inspection agent in all stores in Brazil, with training, especially for these professionals, with an emphasis on racial literacy, anti-racism, the harmony of environments and care for people.

The Company's goal is to represent the Brazilian population in our operations, whether in terms of management or strategy. In addition to having zero tolerance for racism as a guideline, with the development of priority actions to combat it, as well as any discrimination based on race and ethnicity, origin, social status, gender identity, sexual orientation, age, disability and religion.

The Carrefour Group prohibits any form of violence, whether by physical or verbal act, aggressive, brutal, oppressive, intimidating, harsh or any other form of disrespect for life, physical and mental integrity;

There are also affirmative actions that are essential in practices that value diversity, as they express not only the commitment to respect all people, but the desire to bring the organization closer to groups or segments in situations of exclusion and vulnerability in society; thus contributing to generate positive impacts for the Group's operations and for human development.

All commercial relations of the Carrefour Brazil Group and all written contracts and agreements must contain clauses that guarantee the commitment of all Carrefour Group partners and suppliers to unconditional and absolute respect for human dignity and human rights.

#### 4.1 Human rights and valuing people

Unconditional respect for human rights is assured to all our employees and to all individuals who participate in the Carrefour ecosystem. Situations of violations of human rights are not tolerated, as well as any form of forced, slave, servile or child labor, sexual exploitation, especially of children and adolescents, discrimination, harassment, racism, racial slurs, bullying, physical or psychological abuse.



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Our processes are designed to ensure compliance with the law so that the rights of all our employees and partners working in our establishments are respected.

We ensure respectful, safe and inclusive locations and relationships, and we expect our suppliers and partners to also ensure these conditions for their own workers and contractors.

Any comments, jokes, gestures, intimidation, exposure to ridicule, hostility and embarrassment are not tolerated in our work environment and in our stores.

In this sense, everyone must make efforts, take measures and initiatives so that these Golden Rules of unconditional respect for people are complied with in all environments.

- We repudiate any violation of human rights, including throughout our supply chain and in our relationship with our customers.
- The Carrefour Group is committed to a work environment that is fair, respectful and free from any form of moral or sexual harassment.
- All people must be treated in a dignified, peaceful and respectful manner. At the Carrefour Brazil Group, people come first and everyone must be welcomed and respected.
- Not to practice or respond to any action by another with any form of physical violence.
- Not to practice, engage in, or respond to any action of another with any form of verbal aggression.
- Not to practice, get involved or accept any form of prejudice, discrimination and racism.
- Not to practice, get involved or respond to any action of others with any form of gestural aggression.
- Not to practice, get involved or respond to any action of another with any form of psychological violence or use of intimidation.

We expect our employees to propagate and live the ethical culture in its broadest sense, including in the private sphere. In this sense, we expect employees and third parties who act on behalf of the Carrefour Brazil Group to behave with integrity inside and outside our establishments and act in accordance with the standards of behavior expected of each collaborator of the Group. In the sphere of private life, including on social networks, we expect our collaborators to be respectful and avoid offensive, violent or discriminatory conduct.

#### 4.2 Equity, diversity, inclusion and anti-racist stance

At the Carrefour Brazil Group, we value and celebrate diversity, as each person is unique and individually makes up our strength and our brands.

Our internal processes are designed to promote and ensure equal opportunities without distinction as to any characteristics, history or identity of individuals. We are committed to hiring, including and unconditionally



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respecting all people, especially women, black people, LGBTQIA+, people in refugee situations, immigrants and people with disabilities.

Our concerns and commitments revolve around fighting racism, fighting violence against women and fighting discrimination in any of its forms.

Our values of promoting diversity and inclusion must always be present in our journey and, for this, all employees are encouraged to engage in the participation of affirmative actions and to integrate the culture of inclusion in their daily lives, as a fundamental instrument to contribute to a more tolerant, respectful and sustainable environment and world.

Acts of discrimination of any kind, mistreatment, constraints, or any form of physical or moral violence, based on gender, race, religion, sexual orientation, political opinion, origin, class or social status, nationality, place of birth, age, pregnancy, illness, disability, health condition, genetic predisposition, lifestyle, or any other individual characteristics are not tolerated, and if confirmed, are subject to disciplinary action, in addition to criminal, civil and labor lawsuits.

All collaborators, as well as those who interact with our ecosystem, must act ethically and transparently and comply with laws, rules, regulations, policies and internal procedures. Nothing, absolutely nothing, can justify an attitude contrary to the law.

In addition to being concerned about the environment, the Carrefour Brazil Group is also actively engaged in social causes, which is expressed in various ways in our social responsibility actions aimed at fighting hunger, creating jobs and developing opportunities for career and support to vulnerable groups.

We do not tolerate any type of violation of human rights or workers' rights in our value chain, and we are committed to the eradication of forced, slave or analogous, servile or compulsory labor, as well as the eradication of exploitation of children's work.

We respect diversity and do not tolerate any practices of discrimination or harassment, so we expect our suppliers to do the same.

Any confirmed case of negligence or non-compliance with these values and principles must be reported to the Compliance area or directly to the whistleblowing channel – *Conexão Ética*, according to the case.

The participation and engagement of all employees in these initiatives are strongly encouraged, after all, it is with combined efforts that relevant causes will gain the desired reach.

### 4.3 Diversity

Promoting a culture of respect is at the heart of the management of the Carrefour Brazil Group and permeates the organizational structure across the board.

Everyday, the Company values the quality of relationships, diversity and coexistence with all individuals and their singularities, which includes not only employees, but also customers, service providers, representatives or third parties and civil society.



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The Diversity and Inclusion Platform provides for affirmative actions in four approaches to foster a culture of respect among the Company's stakeholders: gender, race, LGBTQIA+ and people with disabilities.

These topics are the focus of the Affinity Groups, made up of employees and active in all regions of the country to intensify engagement. Even with this direction, the Company does not fail to look at other aspects of diversity and consider its internal and external intersectionality.

Internal recruitment and selection processes were improved in order to eliminate hiring barriers. In the training grid, at all stages of development, from internship to senior leadership, several courses emphasize inclusion and valuation practices free of unconscious bias.

Integrity presupposes unconditional respect for people and the planet. We are part of an ecosystem and it is the duty of all of us, Carrefour Group's employees, to honor the position of our company and meet the commitments and values we disclose, making a positive contribution to collective well-being.

The Integrity System establishes rules and assumptions that aim to provide an upstanding organizational environment, which guarantees unconditional respect for human rights and labor relations, the environment and all applicable laws, including those relating to data protection and to the fight against corruption. The Carrefour Group's Integrity System also aims to promote compliance with our commitments to diversity, inclusion and sustainable development, with a genuine interest in generating value for all stakeholders with whom we relate.

#### 4.4 Anti-racism actions

The fight against racism and discrimination, for the Carrefour Brazil Group, requires stimulating awareness and actions that reach in depth the origins of these issues.

The Company opted for large-scale support for the education, employability, career building and entrepreneurship of black people in its operating strategy.

The "Não Vamos Esquecer" program aims at institutional strengthening of entities with long experience in the subject of black entrepreneurship and in the fight against racism. The initiative represents an example of the series of actions in the eight public commitments undertaken by the Company to participate in the fight against structural racism in Brazil, in addition to other commitments publicly undertaken to fight racism and promote equity, which are being put into practice with a focus on diversity, inclusion, dignity and respect for people. Among them:

- The promotion of education, professional qualification, the promotion of entrepreneurship among black people and the development of social and cultural projects.
- Strengthening reporting channels for receiving and verifying records on racism;
- Continuous training on racial literacy for 100% of collaborators;
- Financing of scholarships for higher education, postgraduate studies, languages, innovation and technology



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- Career acceleration for Company employees;
- Internship and trainee programs as affirmative action;
- Entrepreneurship incentive programs with consultancy services;
- Encouraging Afro-entrepreneurs;
- Promotion of events to promote the fight against racism and discrimination;
- Proposal for the creation of the Museum of the History of Slavery in Rio de Janeiro;
- Projects aimed at “quilombola” communities.

The Carrefour Brazil Group recognizes its responsibility to combat structural racism and we seek to promote zero tolerance policies for violence and discrimination, with the education of our employees through racial literacy, with investment in education, with incentives for entrepreneurship and, above all, with the mobilization of our partners, service providers and suppliers. Our actions unfold on four fronts: entrepreneurship, employability, education and the fight against discrimination.

#### 4.4.1 Actions to promote racial equity and combat racism in the country

In partnership with the Zumbi dos Palmares University, the Carrefour Brazil Group aims to expand actions and deliveries to combat racism, including an unprecedented higher education course designed for private security professionals and the insertion of the company in the “Racismo Zero” movement.

Actions also include an open innovation project involving startups led by black people, the granting of English scholarships and an internal professional development program designed by black leaders for black employees

The “PODER” program is aimed at all employees who declare themselves to be black people, with the objective of promoting development, professional growth and creating a powerful connection network with 500 collaborators of the Group. Made by collaborators and for collaborators, in each module the leaders will share about their journey, experience, lessons learned and show tools that help develop skills.

“Afro Impacto Digital” is an open and affirmative innovation program that focuses on solutions developed by startups with black founders to solve the challenges faced by the Carrefour Brazil Group. The program, developed by the company's Innovation team in partnership with UP Lab, will prioritize start-up companies, whose founders will also have access to a mentoring and business design process.

In addition to scholarships, professional development of collaborators and digital acceleration.

#### 4.4.2 Zero tolerance rules

The Carrefour Brazil Group does not tolerate practices of discrimination, and all incidents of discrimination will be recorded, investigated, and disciplinary measures must be applied to all those who have provenly



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been involved, regardless of position, function, type of contract or position in the organization, in the relationship between collaborators and its entire ecosystem.

Any and all acts involving any form of discrimination must be reported to the Compliance area, which will carry out the investigation and recommend the application of disciplinary measures in accordance with the Investigation and Consequences Management Policies.

Without prejudice to the verification of facts by the Compliance area, the initial negotiations may be through dialogue and intermediation of the hierarchical superior, Human Resources and Diversity.

Once the facts are confirmed, the employee or group of people involved in the incident, in addition to being subject to disciplinary measures, will be subject to human rights, anti-discrimination or anti-racism literacy sessions.

The Carrefour Group will also ensure an assessment of the negative impact of the incident on the victim and the organizational environment.

## 5. **RESPONSIBILITIES**

All employees and third parties acting on behalf of the Carrefour Brazil Group must:

- Comply with the guidelines, principles and protocols mentioned in this Policy;
- Support internal relationship and with all audiences, including employees, customers, consumers, suppliers, partners, communities surrounding the stores and civil society;
- Participate and ensure the participation of its teams in mandatory training and qualifications regarding this Policy and its performance protocols.
- Strictly respect the guidelines of this Policy in the conduct of its behavior towards other collaborators, customers, suppliers and any member of society;
- Promote an environment free of any form of discrimination, guaranteeing absolute respect for human rights and promoting the human dignity of all collaborators), customers, suppliers and members of society;
- Strongly repudiate any act of discrimination and immediately report acts of discrimination witnessed to the Reporting Channels in accordance with this Policy;
- Report any suspected act of discrimination to the Reporting Channels;
- Participate in all mandatory training related to diversity and Human Rights;
- Be a multiplier of the concepts of this Policy.

Managers are responsible for:



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- Promoting a diverse and respectful environment, guaranteeing absolute respect for human rights and promoting the human dignity of all collaborators, customers, suppliers and members of society and repudiating any act of discrimination;
- Conducting regular diagnosis of the situation of your team, effectively seeking to ensure greater diversity at all levels of the organization, with special attention to people from the Vulnerable Group, as well as other segments or situations guided by the organization or in compliance with the legislation of the country;
- Welcoming people from vulnerable groups and take all necessary measures for their effective inclusion;
- Carrying out practices to promote equal opportunities for everyone, respecting the uniqueness and characteristics of each person;
- Welcoming anyone who reports discrimination and taking the necessary measures to stop the act and investigate the facts, reporting, if necessary, to the Diversity, Human Resources and/or Ethics areas, depending on the specificity of the case;
- Ensuring that contracts under its management respect dignity and human rights clauses and that these clauses are observed by third parties, suppliers and partners of the Carrefour Brazil Group;
- Multiplying and promoting diversity and inclusion actions, adding value to the company and generating positive impacts on society;
- Completing all training related to diversity and inclusion, whether mandatory or optional;
- Encouraging male and female collaborators to complete all training related to diversity and inclusion, whether mandatory or optional;
- Applying inclusive leadership skills;
- Increasing the representation of people from vulnerable groups in the team and in leadership positions/functions, in partnership with the human resources area, based on pre-established criteria for advertising job positions, recruitment, interviews and other attraction and selection practices.

The Diversity area is responsible for:

- Promoting awareness-raising, education and mobilization actions to tackle stereotypes and prejudices, which must be permanently carried out in order to prevent practices of discrimination and maintain a work and relationship environment — with all audiences — that is respectful, inclusive, safe, accessible and open to the diversity that exists in society;
- Supporting the construction of mandatory training on human rights and valuing diversity;
- Supporting the development of internal or external communications, to avoid practices of discrimination, offenses and humiliation, whatever they may be;



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- Supporting the areas responsible for accessibility, reasonable accommodation, assistive technologies and other practices that may include and allow equal conditions for all audiences, especially people with disabilities and people with reduced, temporary or permanent mobility; and
- Supporting the Compliance, Ethics, Human Resources and Legal areas in evaluating and clarifying complaints related to Diversity.

## 6. **ASSOCIATED DOCUMENTS**

Carrefour Brazil Group Code of Ethical Conduct, available at:

<https://ri.grupocarrefourbrasil.com.br/governanca-corporativa/estatutos-politicas-e-codigos/>

Ethics and Social Code for Our Suppliers; available at:

[https://conexaoeticacarrefour.com.br/files/AF2\\_Digital\\_CodigoConduta\\_Fornecedores\\_PT\\_v2.pdf](https://conexaoeticacarrefour.com.br/files/AF2_Digital_CodigoConduta_Fornecedores_PT_v2.pdf)

Carrefour Brazil Group Corporate Policies, available at:

<https://ri.grupocarrefourbrasil.com.br/governanca-corporativa/estatutos-politicas-e-codigos/>

United Nations (UN) Universal Declaration of Human Rights;

Convention No. 155 of the International Labor Organization (ILO);

UN International Covenant on Civil and Political Rights;

UN Guiding Principles on Business and Human Rights;

UN Voluntary Principles on Security and Human Rights;

Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universal Human Rights and Fundamental Freedoms, UN General Assembly Resolution;

Constitution of the Federative Republic of Brazil of 1988;

Ordinary Legislation (Statute of Persons with Disabilities - No. 13146/2015, Statute of Racial Equality - Law No. 12288/2010, Statute of Children and Adolescents - Law No. 8069/1990, Statute of the Elderly - Law No. 10741/2003, among others);

International Code of Conduct for Private Security Service Providers (ICoC);

Sustainable Development Goals of the United Nations Organization (SDG) and GRI Standards - Global Sustainability Standards Board (GSSB).

Decree No. 9571/2018 - Establishes the National Guidelines on Business and Human Rights.

## 7. **DOCUMENT REVIEW AND UPDATE**

This regulation must be reviewed every three years regarding adherence to Policies, Rules, Procedures or whenever significant changes in processes are identified.

## 8. **CONSEQUENCE RULES**



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Deviations from regulations may lead to appropriate disciplinary measures, permitted under current legislation and the internal rules of the Carrefour Brazil Group.

In cases of non-compliance with these guidelines, reports can be made at: CONEXÃO ÉTICA: Website: [conexaoeticacarrefour.com.br](http://conexaoeticacarrefour.com.br) or Telephone: 0800 772 2975

The confidential channel - *Conexão Ética* is managed by an external and independent company, guaranteeing the whistleblower in good faith absolute secrecy and non-retaliation. All communication, to the extent permitted by law, will be treated confidentially, with all forms of retaliation against whistleblowers in good faith being prohibited.

## 9. REVISION HISTORY

DATE	VERSION	DESCRIPTION	AUTHOR
3/28/2021	01	Elaboration of the Policy	Internal Controls
3/10/2022	02	Policy Update - No content change. Gender-neutral language adjustment	Diversity
8/21/2023	03	Review, expansion with a focus on diversity, inclusion and anti-racism	Inclusive Management, Racial Equity and Institutional Relations

## 10. RESPONSIBLE FOR THE DOCUMENT

RESPONSIBLE	VERSION	NAME	AREA	POSITION
Approval	03	-----	Board of Directors	-----



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