

LOJAS RENNER S.A.



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Anticorruption Policy

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1 OBJECTIVE

Lojas Renner S.A. is composed by a group of righteous companies, committed to conducting their businesses in an ethical, legal, transparent, and professional manner. Due to that, the adopt good governance practices, including anti-corruption measures. Given that, the goal of this Policy is to reinforce the commitment to the prevention and combat to corruption, guided by the practice adopted by the Company, based on the anti-corruption legislations existing in its countries of operation, aiming to guide collaborators, partners, and outsourced workers on the application and compliance to anti-corruption measures.

2 INVOLVED DEPARTMENTS

Corporate Compliance, Legal Department, and Internal Auditing.

3 TO WHOM IT APPLIES

This Policy applies to all collaborators and managers, partners, and any outsourced worker that acts on the behalf of Lojas Renner S.A.

4 CONCEPT GUIDE

- **Corruption:** Corruption is the act of corrupting something or someone to obtain advantages in relation to others through illegal and illicit means. Bribing, for example, is a corruption practice.
- **Bribe:** Consists of the act of promising, offering, or paying an authority, public government agent or professional of the private initiative with any amount of money or any other gifts and favors in order to have the person cease to act ethically with their professional duties.
- **Public Agent:** A public agent or government employee is any person that works in an official function on the behalf of a government, agency, department, or State.
- **Undue advantage:** Undue advantage is any gain, privilege, profit, or illicit benefit.
- **Facilitating payment:** Refers to low-value payments in cash or to the promise of another advantage for personal benefit of a public agent, mostly in a low hierarchy level, with the goal

of speeding up a certain administrative process, such as the issuance of licenses, authorizations, or official documents of any nature.

5 PROHIBITIONS

The act of practicing corruption is prohibited, be it direct or indirectly, through a promise, authorization, receipt or offer in name of the Company, regardless of involving public agents, private companies, or individuals, regardless of the values and/or benefits involved.

It is prohibited to:

- a. Suggest, promise, offer, or give, direct or indirectly, undue advantage to a physical or legal person, from the public or private segment, or to a third person related to them, be it in the Company's country of operation or abroad, in exchange for the performance or omission of acts inherent to their attributions, operations or activities for the Company or aiming at benefits to oneself or third parties;
- b. Suggest, demand, ask, accept, or receive from a physical or legal person, from the public or private segment, or from a third person related to them, be it in the Company's country of operation or abroad, undue advantage in exchange for the performance or omission of acts inherent to their attributions, operations or activities for the Company or aiming at benefits to oneself or third parties;
- c. Use a third person, be it physical or legal, of a public or private nature, to hide or dissimulate real interests or the identity of the beneficiaries of the performed acts;
- d. Hinder the activity of investigation or inspection by public bodies, entities, or agents;
- e. Make facilitating payments. Facilitating payments can be considered a form of bribing, even though the paid value is considered small and that the public agent works only to speed up the performance of a public service, such as the issuance of licenses, authorizations, or official documents of any nature;
- f. Receive or give gifts that diverge from what is established in the Company's Code of Practice;
- g. Perform donations or social actions in the name of Lojas Renner S.A. without the intervention of the Lojas Renner Institute.

Although private corruption has no legal provision in the Brazilian legal system, Lojas Renner S.A. does not allow the practice of any conduct that constitutes the following actions: to provide, promote, deliver, or pay, direct or indirectly, undue advantage to a partner, director, administrator, representant, or employee of a legal entity of private law. Likewise, the

Administrators, collaborators, partners, and outsourced workers that act on the behalf of Lojas Renner S.A. must not accept undue advantages.

6 ANTI-CORRUPTION TOOLS

The Company's managers must take measures to guarantee that the collaborators under their responsibility comply to the rules and guidelines contained in this Policy. Likewise, partner and outsourced workers must follow the measures.

Collaborators who have any doubts or questions regarding the Policy, laws, or anti-corruption regulations must ask for clarifications to their immediate managers or to the Corporate Compliance department.

For the fulfillment of this Policy, the Company has the following anti-corruption tools:

6.1 Corporate Culture

The Company has a robust corporate culture, its Purpose and Value Proposal are widely disclosed. All collaborators are aware of the need to be in line with the values, policies, and practices defined by Company. This environment provides the commitment with the compliance to current legislations.

6.2 Code of Practice

The Company formalizes and explains, in its Code of Practice, the public commitment to the ethical guidance and sustainable management of its businesses, in a way that the impact of its actions has as a result the inseparable and integrated balance among the social, economic, environmental, and corporate governance aspects along with all its relationship audiences, with the express prohibition of corruption practices. The Code is available on the Lojas Renner website, and it is an obligation of the Company's collaborators to know it, respect it, and comply to the guidance contained in it.

6.3 Audit and Risk Management Committee

The Audit and Risk Management Committee aims to perform consultive functions along with the Administration Board regarding the fulfillment of its supervision responsibilities through the monitoring of the integrity of the processes of Financial Demonstrations and internal systems and controls of the Company, reviewing and evaluating the independence and performance of independent auditors, as well as the internal auditors of the Company. The Committee also reviews the departments of significant risks for the Company, as well as it monitors the

compliance to legal and normative requirements applicable to the Company, besides internal regulations and codes.

6.4 Practice Committee

In cases of doubts regarding the policies and practices of the Code of Practice, collaborators must contact their Management or immediate Director or the Practice Committee, whose function is to advise and assist collaborators in questions related to the interpretation of the Code. The Committee is currently constituted by the President and the Company's Directors. Collaborators and outsourced workers can also use the following channels to context the Practice Committee:

Letter: To the Practice Committee of Lojas Renner S/A
Avenida Joaquim Porto Villanova, 401 – Bairro Jardim do Salso
CEP: 91410-400 – Porto Alegre/RS – Brazil

E-mail: compliance@lojasrenner.com.br

6.5 Corporate Compliance

The Corporate Compliance department has the role of promoting an environment that adheres to the laws, regulations, and norms, be them internal or external ones, minimizing the risks of noncompliance to them and the consequent application of legal or regulatory sanctions.

One of the main tools to ensure compliance is the Compliance Program, which aims to consolidate the main actions and best practices, contributing to strengthening the Company's culture, verifying and encouraging the collaborators' adherence to the program.

Besides that, the Corporate Compliance department is also responsible for periodically performing tests, monitoring, indicator follow-up, such as complaints, among other points, to identify irregularities and/or the need for adaptations and improvements in the combat to corruption.

6.6 Transparency of Financial Statements

It is forbidden to use fake information or documents, inadequate, ambiguous, or fraudulent accounting entries. Any other procedure, technique, or accounting artifice that may occult or, in any form, cover up illegal payments is strictly forbidden.

The Company values keeping accounting registries that reflect the reality of operations in detail, precisely and correctly, given that the elaboration of Financial Statements obeys to current laws,

norms, and regulations. Besides that, an Independent Audit company reviews Financial Demonstrations.

6.7 Whistleblower Channel

The Company, according to the best corporate governance practices, has established procedures for complaints and manifestations by collaborators or people external to the organization, in a confidential and anonymous manner, who have become aware of any improper or questionable situation.

Reports related to corruption acts or suspicion must be forwarded through the following Whistleblower Channels:

Website: <https://contatoseguro.com.br/pt/lojasrennersa>

Phone call: 0800 900 9091

6.8 Trainings

To combat corruption, the Company is always concerned with identifying and mitigating factors that enable criminal practices. For that end, it promotes trainings for its collaborators, informing them about the concept of corruption, characteristics, and prohibitions of illegal practices, and guiding them as to the ethical conduct expected from administrators, collaborators, partners, and outsourced workers.

In relation to the departments that are most exposed to corruption risks, specific trainings are performed with the intention to communicate and clarify internal anti-corruption procedures. The company also provide to collaborators a Practical Guide to Public Relationship, which brings good practices to be observed in this relationship, such as some of the mentioned below:

- Not offering nor accepting undue payments direct and indirectly, be it through a promise, authorization, or offer in name of the Company or to its benefit;
- Not offering nor accepting gifts and hospitalities from public agents or third parties, only giveaways of negligible value and of commercial character, to be used during work;
- Conduct the necessary meetings with public agents in opportune environments for that end, such as within the Company's facilities;
- Interactions with public agents must preferably be conducted by at least two collaborators of the company;
- All interactions with public agents must be documented, through minutes, containing the subject matter, participants, and other relevant points.

6.9 Conduct with Outsourced Workers

It is a premise of the Company to do business with honest and qualified partners and outsourced workers, not allowing corruption practices. Given that, to guide partners and outsourced workers, their contracts have included clauses explaining the commitment to complying to current legislations. Partners and outsourced workers, regardless of the existence of a contract, must sign a Commitment Term in which they state being in accordance with the with the Company's anti-corruption procedures.

There is also the Code of Practice for Suppliers, aiming to formalize and guarantee the compliance to corporate foundations, principles, and values of Lojas Renner S.A.

6.10 Other Tools

Lojas Renner S.A. has other corporate governance Committees and tools, which help management and the adherence to conformity, consolidating and providing a more ethical and sustainable environment for the business. Besides that, the company has signed the global initiative by United Nations (UN), which mobilizes companies and organizations to adopt policies regarding corporate social responsibility and sustainability, among which is the combat to corruption.

7 PROTECTION TO REPORTERS

In line with the best corporate governance practices, the Report Channel guarantees the confidentiality of the reporter, including the non-identification of calls. With the same intention of protecting reporters, the Company establishes that:

- Administrators and collaborators cannot make retaliation acts against those who, in good faith: (i) report or manifest complaints, suspicions, doubts or concerns relating to possible violations of the guidelines of this Policy; and (ii) provide information or assistance to the investigations related to possible violations;
- Administrators and collaborators must preserve the confidentiality of the information related to investigations of possible violations of the guidelines of this Policy; and
- The reporter will have guaranteed anonymity. For this reason, even though it may be chosen to expose the reporter's identity in the moment of reporting, the Company is committed to take all necessary measures to protect the confidentiality of this information.

8 WARNING SIGNS

Collaborators have the duty of being vigilant in relation to the adhesion of work colleagues, partner companies, or outsourced workers to this Policy and to current legislations, and must be

attentive to suspicious situations, in order to make a timely report in case any situation is identified. Examples of situations that demand a cautious analysis are:

- Outsourced worker or collaborator's refusal to meet the pertinent current legislations;
- Conducting uncommon or suspicious hiring procedures;
- Lack of transparency in the presentation of budgets related to performed services;
- Transactions with third party that has a negative corporate reputation;
- Third party that refuses to reveal the identity of its owners;
- Third party that has history of improper payment practices and
- Third party asks for payment in cash or in bearer bonds.

9 RESPONSIBILITIES PER FUNCTION OR DEPARTMENT

9.1 *Collaborators, Administrators and Company Representatives*

It is the responsibility of all collaborators, administrators, and representatives to know the guidelines of this Policy, to perform due trainings, when applicable to the position, as well as to keep updated on the subject. It is also their duty to report any violations and/or suspected act of corruption. Reports can be made anonymously or in an identified form through the Report Channel (according to item 5.7).

9.2 *Corporate Compliance*

It is the responsibility of the Corporate Compliance department to promote a more righteous environment among collaborators, suppliers, service providers and others, to act on cases of reports that involve corruption or non-compliance to regulations and legislations, as well as to identify compliance risks and to monitor the organization, ensuring the compliance to this Policy. The Corporate Compliance department must be autonomous to make decisions and implement the necessary actions for the correct functioning of the Compliance Program and of the best practices.

9.3 *Internal Audit*

The Internal Audit department makes an independent evaluation of the processes and controls of the Company. All activities performed by the Internal Audit must remain free from any element that may reduce its objectivity, impartiality, and autonomy.

9.4 *Legal Department*

It is the responsibility of the Legal Department to interpret and follow changes in legislations related to this Policy, as well as to design contractual projections referring to the theme, in line

with the Corporate Compliance Department, helping to keep a more righteous environment in the Company.

10 PENALTIES

Failing to comply to any guidelines or principles established by this Policy and in the internal norms of Lojas Renner S.A. about this theme may result on serious penalties for the Company and its collaborators and/or representatives, including the criminal responsibility for the involved physical person, besides other applicable measures according to current legislations.

Among the disciplinary measures, the following penalties may be applied:

- Dismissal/destitution, in line with the legislations, of the collaborators/administrator involved in corruption acts;
- Discontinuation of the commercial relationship of supplier and/or service provider that practice acts of corruption; and
- Disciplinary sanction to administrators or collaborators who attempt to or practice retaliation against those who have refused anonymity in good faith and reported possible violations to the guidelines of this Policy.

The omission of collaborator who are aware of acts that violate this Policy or any other Company norm, as well as current laws, is also considered a conduct liable to penalties.

No collaborator/administrator will be penalized by delays or the loss of businesses resulting from their refusal to pay and receive bribe.

11 REGULATION

This Policy must be read and interpreted in conjunction with the current Anti-corruption legislation of the Company's countries of operation.

This Policy is also based on the North American Law known as Foreign Corrupt Practices Act (FCPA), as well as on other public documents that cover this subject, such as the Global Pact of the United Nations, of which Lojas Renner is signatory since 2013.

12 FREQUENTLY ASKED QUESTIONS

The most frequently asked questions about the "Anti-corruption" subject are listed below:

- **Can the Company do business with public entities?**

Yes, provided that the anti-corruption practices are observed and that there is compliance to the legislation.

- **Can the Company be held accountable for an improper conduct of outsourced workers who act on its behalf?**

Yes. Thus, in case you suspect any violation is performed by an outsourced worker, you must report it through the Report Channel or communicate the Corporate Compliance department.

- **What should I do if I suspect that a Company employee is involved in corruption?**

You must report the suspicion through the Report Channel or communicate the Corporate Compliance department.

- **What should I do if I suspect that there is corruption, but I am not sure of it?**

In case of doubts regarding the situation, report it through the Report Channel or communicate the Corporate Compliance department.

- **What should I do if a Government representant identified an inconformity in my store and threatens to close unless a quantity in cash be given to him?**

Immediately contact the Legal department explaining the situation in order to identify a legal alternative to solve the problem and formalize the situation with the Corporate Compliance area or through the Report Channel.

- **What should I do if a dispatcher, agent, or third party asks for a value additional to the contract in exchange for facilitating the clearance of goods or services before public bodies?**

Immediately contact the Legal department explaining the situation in order to identify a legal alternative to solve the problem and formalize the situation with the Corporate Compliance area or through the Report Channel.

- **What should I do in case I am pressured, extorted or receive any request of payment or facilitation?**

Immediately contact the Corporate Compliance department.

13 FINAL PROVISIONS

This policy shall enter into force on the date of its publication.

In case of doubts, contact the Corporate Compliance department, through the e-mail address compliance@lojasrenner.com.br.