



GRUPO  
CARREFOUR  
BRASIL

# Anti-Corruption and Prevention of Influence Trafficking

# 1. Objective

Establish guidelines and rules relating to preventing and combating corruption, in order to ensure that all operations and businesses of the Carrefour Brasil Group are in accordance with applicable legislation and regulations.

# 2. Application

Applies to the entire Carrefour Brasil Group and interested parties.

# 3. Acronyms and definitions



## Corruption

Consists of the act of promising, offering or giving, directly or indirectly, an undue advantage or anything of value to a public agent or a third party related to them. Corruption occurs even if the corrupting process is rejected or interrupted, or does not have the expected effect, as it is related to the intention. Corruption, whether involving public or private agents, is prohibited.



## Influence Trafficking

Must be understood as the act of making, offering or promising, directly or indirectly, any payments or benefits to a public or private agent in order to incite the abuse of their real or presumed influence in order to obtain a favorable decision from a public agency or authority.



## Public Agent

Any person who performs public functions, on a temporary or permanent basis, whether or not on a public tender, whether paid or not, within the executive, legislative or judicial powers of any federative entity.

# 4. General guidelines

The Carrefour Brasil Group adopts a Zero Tolerance policy towards any and all forms of public, private corruption or Influence Trafficking and we maintain a formal commitment to preventing and combating corrupt practices that are so harmful to our entire society.

This Zero Tolerance Policy is aligned with the principles and commitments of the entire Carrefour Group worldwide, with Laws n. 12.846/2013 and the French Anti-Corruption Law – Sapin II Law, as well as the Sustainable Development Goals of the UN Global Compact and the OECD (Organization for Economic Cooperation and Development) Guidelines, in particular SDG 16 – Peace, Justice and Effective Institutions.

The Carrefour Brasil Group's interaction with Public and Private Agents must be guided by transparency, ethics and in strict obedience to the laws, with any promise, offer or receipt of Undue Advantage being strictly prohibited, with the aim of influencing any decision-making, whether in own benefit or that of the Carrefour Brasil Group.

All those who act on behalf of the Carrefour Brasil Group must refrain from any illicit act, such as corruption, influence peddling, money laundering and must be able to make the correct judgment and ensure that our business is conducted in a transparent and ethical manner.

To support the best choices, the Carrefour Group has had an Anti-Corruption Program since 2017 and adopts the Anti-Bribery Management System structure, made up of mechanisms for preventing, detecting and dealing with Corruption risks.

The Holding's Ethics Committee, assisted by its Compliance Board and the compliance areas of each Business Unit, will promote the Anti-Corruption Program, but it is up to each one of us, individually, to exercise transparent practices in all our activities on a daily basis processes and in our decision-making.

Everyone must assume this responsibility to combat any form of Corruption and we provide a confidential channel to receive complaints, with confidentiality and the guarantee of non-retaliation being guaranteed to the whistleblower in good faith.

Corruption, as defined in this policy, includes, without limitation, bribes, facilitation payments, extortion or undue requests, as well as the attempt to make the result of corrupt practices lawful.

#### 4.1 Importance of fighting corruption

Our success and reputation depend not only on the achievements of our business model and the services provided to our customers, but also on the way we do our business as a Group.

We need to inspire trust and respect through exemplary practices in order to guarantee our partners and shareholders the coherence of our actions with our commitment to ensuring sustainable and responsible growth.

Corruption is a crime, with severe punishments in most countries around the world, based on national legislation and international treaties, and long-arm statutes, such as the US Foreign Corrupt Practices Act (FCPA) [ US Foreign Corruption Act], the UK Bribery Act (UKBA) and the French Criminal Code.

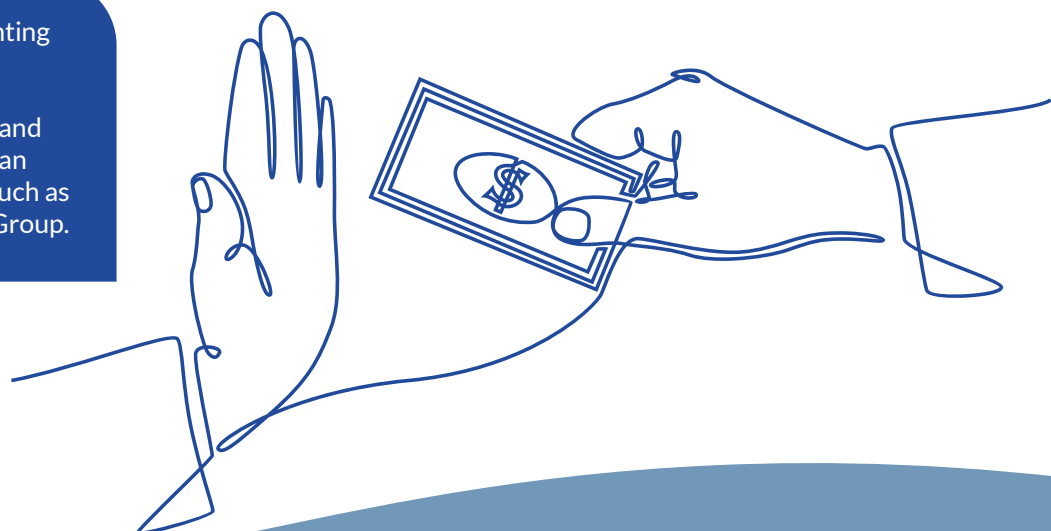
In recent years, there has been a substantial strengthening of anti-corruption legislation, and prosecution of numerous cases on a national and international scale with heightened investigative and punitive powers by supervisory authorities.

Convictions of companies and individuals (officers and employees) have multiplied since 2010 with financial, legal and reputational consequences, generating the payment of fines, lawsuits, imprisonment among other sanctions.

The French Law "Sapin 2", approved on December 9, 2016, significantly strengthened French anti-corruption methods. This law requires large companies to establish anti-corruption measures and created a French Anti-Corruption Agency, responsible for monitoring effective implementation and with punitive powers.



Consequently, preventing corruption and other crimes is essential in conducting business, and especially those with an international scope, such as the Carrefour Brasil Group.



Corruption consists of the act of promising, offering or giving, directly or indirectly, an undue advantage or anything of value to a public agent or a third party related to them. Corruption occurs even if the corrupting process is rejected or interrupted, or does not have the expected effect, as it is related to the intention.

Corruption, whether of public or private agents, is prohibited.

For the purposes of this Policy, Influence Trafficking must be understood as the act of making, offering or promising, directly or indirectly, any payments or benefits to a public or private agent in order to incite the abuse of their real or presumed influence in order to obtain a favorable decision from a public agency or authority.

Any person who performs public functions, on a temporary or permanent basis, whether or not on a public tender, whether paid or not, within the Executive, Legislative or Judiciary branches of any federative entity must be considered a Public Agent.

## 4.2 Commitment of the Carrefour Brasil Group

The Carrefour Brasil Group has always been committed to fostering a culture of trust, ethics and integrity, based on legality in all commercial relationships.

The principles of Ethics define the terms of reference and are mandatory for each employee to perform their duties on a daily basis.

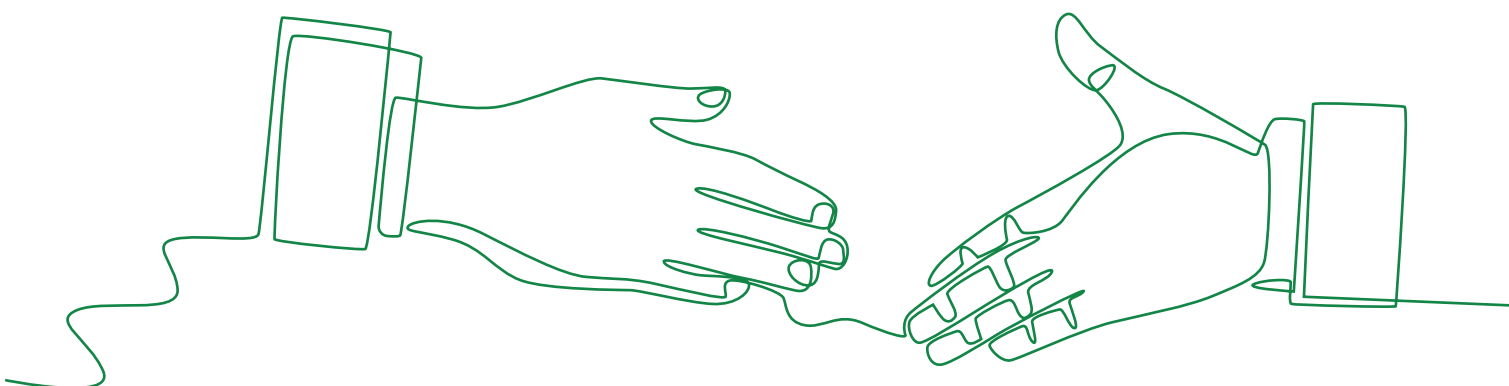
The Carrefour Brasil Group is committed to promoting its business in compliance with the legislation that governs its activities. Therefore, any form of corruption is not tolerated, whether involving Public and/or Private Agents, and complies with applicable anti-corruption laws.

Despite not being considered an act of corruption, money laundering is often linked to corruption, as it can be used to cover up the illicit origin of a value, and give it a legal character. It generally occurs shortly after the act of corruption. Money laundering, in addition to being a crime, is also a practice prohibited by the Carrefour Brasil Group.

The principles of action and behavior are aligned with the Carrefour Brasil Group's commitments to the observance and promotion of fundamental principles, including especially the OECD Guidelines and the ten principles of the UN Global Compact.

The Carrefour Brasil Group provides all its employees with training and regulations with appropriate guidelines to identify and deal with any corruption risks.

The Carrefour Brasil Group is committed to offering its employees conditions to report any non-compliance with laws, under absolute confidentiality. All employees are encouraged to report any violation or suspected violation of laws or internal guidelines established in this document through one of our ethics channels.



### 4.3. Scope of this policy

The purpose of this Policy is to establish guidelines and rules relating to preventing and combating corruption, in order to ensure that all operations and businesses of the Carrefour Brasil Group are in accordance with applicable laws and regulations, minimizing risks by acting as a guide for its identification and mitigation.

In relation to the operation of the Carrefour Brasil Group, it is possible that any act of corruption may occur, mainly in relation to commercial negotiations with our suppliers, but also in contact with public agents, especially in relation to our expansion and development of our locations or during inspections and inspections at our units.

Although some employees, due to their duties, are exposed more frequently than others to corruption risks, anyone can be subject to an inappropriate approach at some point, or at least a suspicious situation. It is essential that it is possible to identify such situations, suppress them and report them to Compliance.

This Policy may not cover and contemplate all situations and applicable laws where the Carrefour Brasil Group operates. Therefore, if the Employee witnesses any unforeseen situation, they must report it.

In business with certain countries, stricter regulations may apply, which may prevail over this Policy.

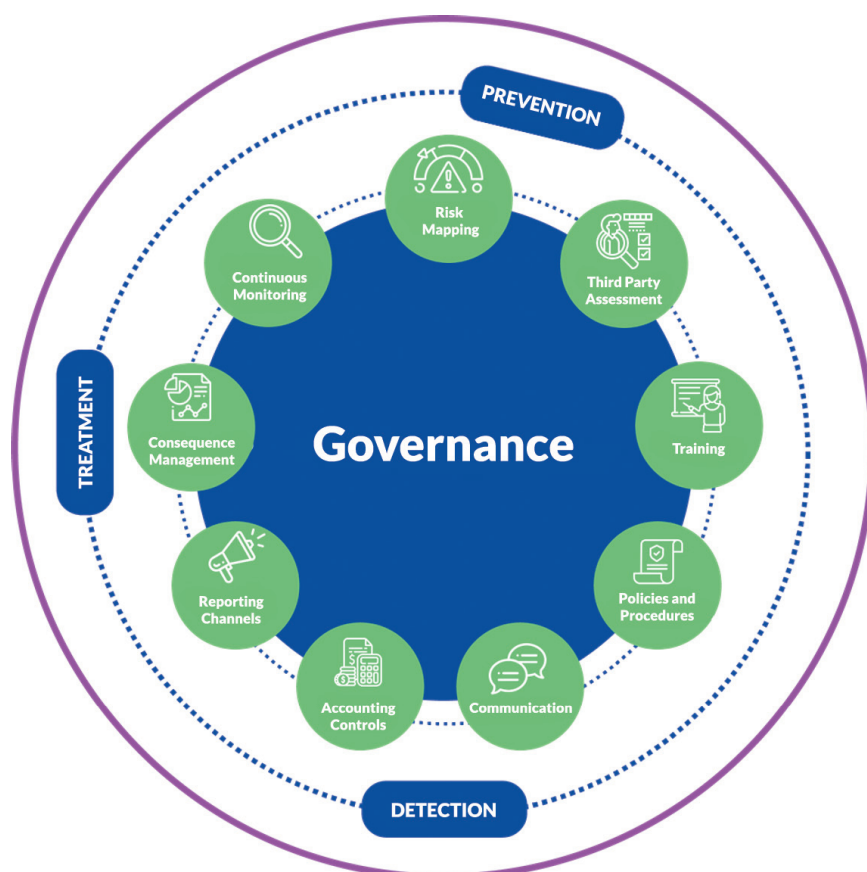
The policy annex presents information and hypothetical situations of corruption and influence peddling to help employees identify warning signs on this issue.

The attachment to this policy presents information and hypothetical situations of corruption and influence peddling to help employees identify warning signs on this subject.

### 4.4 Anti-corruption mechanisms

The Carrefour Brasil Group's Anti-Corruption Program and Anti-Bribery Management System, in compliance with Brazilian and French Anti-Corruption Laws, ISO 37001 standards, Carrefour Group's Anti-Corruption standards and best national and international practices, is composed of a set of mechanisms prevention, detection and treatment of Corruption risks.

**The mechanisms, from governance and Senior Leadership commitment, are divided into 9 pillars:**



## 4.5 Generals principles

All those who act on behalf of the Carrefour Brasil Group must refrain from any illicit act, be it corruption, influence peddling, money laundering, among others provided for by law.



No personal benefit of any nature may be obtained from relationships with Public or Private Agents, such as suppliers, partners or service providers.

Each employee must be alert against any situation that may place them, directly or indirectly, under an obligation towards those who wish to establish or maintain commercial relationships with the Group.

It is strictly prohibited to accept, offer or promise directly or indirectly, whether through third parties, any undue benefit or advantage in commercial relationships.

During the performance of your duties, if you identify any illegal act, which is not in compliance with the laws and guidelines set forth herein, it must be promptly reported to superiors and the Compliance Department or use the channels made available by the Carrefour Brasil Group.

Any questions related to the application of this Policy should be addressed to the Compliance area.

## 4.6 Guideline for relationships with public agents and private agents

Our possible interactions with Public Agents are mapped and have specific protocols to be observed by our Employees and Suppliers, as described in the Interaction with Public Agents Manuals.

Only people previously authorized and duly prepared and trained may carry out any activity on behalf of the Carrefour Brasil Group before Public Agents. It is recommended that these contacts be, whenever possible, carried out with the participation of at least two company employees.

In case of requests, notifications, assessments by public agents, the employee must forward and report to the responsible areas, which will have support from the Legal and Compliance area.

In the case of a relationship with a Private Agent, it may occur in the following circumstances: competition process, negotiation, contracting of services and products, among others. All hiring must be based on objective and technical criteria and be free from conflicts of interest.

The Carrefour Brasil Group's relationship with both Public Agents and Private Agents must be guided by transparency, ethics and obedience to the laws applicable to business, preventing any conduct from being misinterpreted and considered corruption.

No benefit of any nature may be offered or granted to any person holding a public or private position, with the aim of influencing them to obtain a favorable decision.

The same rules apply to family members, advisors and/or people directly related to Public and Private Agents.

It is essential that all the rules set out to be followed are followed by all employees and those who act on behalf of the company. If you have any questions, contact the Compliance area of your business.

## 4.6.1 Souvenirs, gifts and invitations

On certain commemorative dates, and in commercial relationships, souvenirs, gifts and entertainment invitations may be offered as an act of cordiality. However, this action may interfere with commercial decisions or even generate conflicts between personal interests and professional duties (or even constitute corruption).

Therefore, employees must not accept or offer incentives, rewards, gifts, gifts or entertainment invitations from Suppliers or Business Partners, real or potential.

### 4.6.1.1 Public agents

Offering or receiving souvenirs, gifts and entertainment invitations to/from public officials, their families and advisors is prohibited.

### 4.6.1.2 Private agents

The offering or receiving of souvenirs, gifts and entertainment invitations is prohibited under any circumstances. If it is impossible to refuse a gift, gift or entertainment invitation, due to receipt by mail or at home address, the employee must inform the Compliance area of their business, which will evaluate and define the destination of the objects received.

The acceptance of invitations to participate in professional events, such as lectures, workshops, courses, seminars, congresses and webinars is only permitted for the purpose of enriching knowledge, exchanging best practices or when there is a connection with the commercial activities carried out by the Carrefour Brasil Group, as long as it is preceded by formal approval from the responsible Director, the External Communication area and the Compliance area of the Business Unit.

Employees must not accept invitations to seminars and conferences during the period of negotiation or approval of the supplier with the Carrefour Brasil Group, or whenever it may constitute any form of conflict of interest, real or potential.

In cases of approved exceptions, the payment of hospitality expenses, such as accommodation and air tickets, must be carried out by the Carrefour Brasil Group business unit and the invitation to the professional event cannot be extended to family members and directly related people.

## 4.6.2 Travel and accommodation

The offering and/or receipt of travel and hospitality from Public Agents (as well as related people, such as advisors and family members) and Private Agents is strictly prohibited. Such practices can influence the decision to benefit the company, and, therefore, constitute corruption.

Exceptions can be approved by the Compliance area in conjunction with the area Director, and in case of divergence, by the Ethics Committee of the respective business.

If approved by the competent authority, the following conditions must be followed:

The offer of travel and hospitality to Public Agents may only occur after proof of real need, and as long as they are provided for by law, guaranteeing the transparency and ethics of operations.

The offer of travel and hospitality to Private Agents may occur as long as it is provided for in the contract and complies with applicable legislation and internal guidelines of the Carrefour Brasil Group.

In case of receiving travel and hospitality, these cannot be extended to family members and people directly related to the benefiting employee.



### 4.6.3 Business Meals

Payment for meals to public or private employees is strictly prohibited, with each party having to bear their own expenses. Business meals can be held, as long as they do not exceed a reasonable value and frequency. Furthermore, it is important to highlight that they must not occur in such a way as to generate any type of undue favoritism, direct or indirect.

Business meals with public employees should preferably be avoided, but if they occur, each party must bear their own expense, if this is not possible, the employee must report the fact to their Board of Directors and the Compliance area of their respective business unit.

The offering of meals to Public Agents in our canteens is permitted as long as it does not represent an exchange of favors or undue favoritism, direct or indirect.

### 4.7 Philanthropic donations and sponsorships

The Carrefour Brasil Group encourages and carries out actions for the benefit of society, such as cultural, social, educational and sporting activities, among others. All these actions must be in accordance with the following provisions:



All donations and sponsorships must be duly formalized in a legal contract, with clear specifications on the contract period, amounts allocated, responsibilities of each party, as well as accountability processes. All donations and sponsorships must contribute to the good reputation of the Carrefour Brasil Group.

Every donation and Sponsorship must be previously submitted to validation by the Donations and Sponsorship Committee, and the beneficiaries of the contribution, together with their representatives, must undergo an integrity assessment in accordance with the scope and criteria established in the Third Party Integrity Assessment Policy.

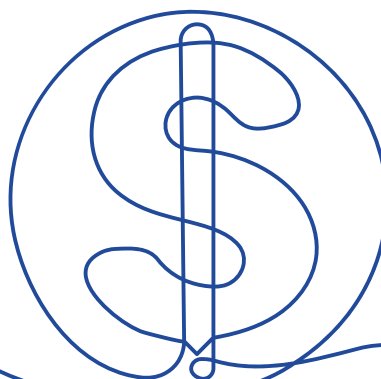
At the end of the contribution, verification of the use of the amounts contributed in accounting must be carried out, in accordance with the internal guidelines of the Carrefour Brasil Group.

#### 4.7.1 Public donations

The Carrefour Brasil Group does not make any type of donation or sponsorship to individuals, candidates for public office, political parties, political campaigns or entities of a political nature. Furthermore, no employee is authorized to carry out any action on behalf of the company.

All employees and third parties acting on behalf of the Carrefour Brasil Group are free and have the right to make donations to candidates and/or political parties through individual and private actions.

The use of Carrefour Brasil Group's resources and facilities for political and partisan purposes is not permitted.





## 4.8 Hiring former public agents, private, agents and their families

All hiring, whether of a public agent, private agent or related people, must follow the internal policies of the Carrefour Brasil Group. The hiring process must be based on transparency, ethics and integrity.

It is important that all hiring observe the following guidelines:

Decisions and hiring must always be based on technical, ethical and objective criteria.

It should never be carried out with the intention of influencing, directing action or obtaining any type of advantage or benefit, whether for the individual or for the Carrefour Brasil Group.

The candidates in question must go through the entire recruitment and selection process, without benefit or favoritism of any nature.

Hiring will only occur in the face of a real need for a pre-existing vacancy. However, the hiring process must always be impartial and the hired employee must report all possible conflicts of interest. In the case of hiring a former public agent, care must be taken to comply with the rules and laws that limit such hiring.

## 4.9 Hiring suppliers, service providers and intermediary agents

The Carrefour Brasil Group may use intermediaries and consultants to carry out some of its activities.

Hiring suppliers and interviewing services may occur if there is a specific need for the services provided, justified and formalized in a contract analyzed by the Legal Department, with clear objectives, and for a fully defined and limited assignment in terms of specificity, location and duration.

Any supplier or service provider that may have contact with public agents and/or initiate government processes on behalf of Carrefour Brasil Group companies must be requested to require prior validation from the Compliance area or, if necessary, from the Ethics Committee of the respective unit of business.

Hiring service providers and reporting requires due diligence especially before they are hired or commences any assignment in order to assess their integrity in accordance with the scope and criteria defined in the Third Party Integrity Assessment Policy.

Remuneration must be consistent with the work performed or the objectives specified in the contract, and consistent with market values.

Payments will be made upon presentation of invoices, in accordance with the terms of the contract validated in accordance with the delegations of authority and retention procedures. Payments will also follow the provisions of the law, the Carrefour Brasil Group's internal policies for payments, the duly signed contractual provisions and the following guidelines:





No payments will be made in cash or via bearer document;



Payments will only be made to a bank account in the name of the hired Legal Entity or, exceptionally, in the case of hiring an Individual, to a current account held by them;



Payments will not be made to a bank account in a country other than the one in which the service was provided, or in a country in which the contracted company does not have a headquarters or branch;



Proof of the actual value of the service provided and other information necessary for the proper registration of the transaction will be required.

It will be strictly prohibited to work with suppliers, intermediaries or consultants whose past activities, reputation or references create legitimate suspicion of dubious or unethical business practices.

Any contract with suppliers, intermediaries, service providers or consultants will contain appropriate ethical clauses, especially regarding the prevention of corruption.

The Carrefour Brasil Group does not admit, under any circumstances, the practice of improper and illicit acts by those who act on behalf of the company. Furthermore, it is strictly prohibited to exercise any type of influence over any person, whether a Public or Private Agent, in order to obtain an undue advantage.

#### **4.10 Prohibition of facilitation payments**

The Carrefour Brasil Group does not authorize facilitation payments, under any circumstances, by any employee or third party acting on behalf of the company.

#### **4.11 Tenders and administrative contracts**

The Carrefour Brasil Group does not participate in tenders and administrative contracts. However, it recognizes the importance of complying with the laws, the bidding notice and the contractual clauses established by the public agency.

#### **4.12 Joint ventures, consortiums, franchises, mergers and acquisitions**

The law provides that companies are responsible for the harmful acts of companies acquired as part of acquisitions and mergers.

Therefore, all operations are joint ventures, consortiums, franchises, mergers and acquisitions, and will only be carried out by carrying out prior due diligence, which will assess the other party regarding the risk of corruption and compliance with applicable legislation, such as labor, tax, between others.

## 4.13 Registration of financial and accounting operations

The Carrefour Brasil Group is committed to recording and classifying all its financial and accounting operations in a way that accurately reflects their nature, is transparent and complete for its shareholders and other interested parties.

To avoid acts of corruption or fraud, it is important that all transactions are transparent, fully documented and recorded in accounts accurately, reflecting their real nature.

Therefore, below are some guidelines that must be observed:

- The use of Company resources or other assets for illicit or inappropriate purposes, as well as keeping hidden or unregistered cash resources, will be strictly prohibited.
- Erroneous, false, incomplete or inaccurate entries, and unregistered bank accounts, regardless of the reason, whether relating to sales, acquisitions or other company activities, will be strictly prohibited.
- No account may be administered in a “parallel” manner in order to facilitate or omit inappropriate payments.
- No transaction, asset, liability or other financial information may be omitted from the management or internal or external auditors of Grupo Carrefour Brasil.
- All accounts, invoices and other documents and records relating to negotiations with third parties, including, without limitation, suppliers, service providers and other commercial contacts, will be prepared and maintained with the utmost accuracy and completeness.
- To ensure the reliability and transparency of accounting and financial operations, it is the duty of all employees to act in compliance with current laws, standards, and internal policies. All transactions must be evaluated and approved by those responsible, as established in the Authority Policy.

The use of expense accounts to cover illegal acts or payments will be strictly prohibited. Therefore, all employees and third parties who act on behalf of the Carrefour Brasil Group must pay attention to the rules established in current regulations. For more information, access the Carrefour Brasil Group Accounting Control Records Policy.



#### 4.14 Combating money laundering

Money laundering is considered a crime under Brazilian law. This is the process of hiding the origin of the resource obtained illegally and giving it a legitimate appearance, for example: A corrupt businessman uses his fictitious companies to “launder” money from trafficking, extortion and terrorism, converting it into apparently legitimate investments.

In view of this, the Carrefour Brasil Group adopts control mechanisms and reinforces its commitment to preventing and combating money laundering crimes.

If you identify, or have any suspicion of such a practice, it is the employee’s duty to immediately report it to the Compliance area, using the available means of communication.

#### 4.15 Reporting channels

All employees are encouraged to report any practice or act that they consider inconsistent or incompatible with any of the principles stated in this policy, both to their direct or indirect supervisors, and to the Compliance area of their business.

The Carrefour Brasil Group provides a confidential channel, Conexão Ética, for free access by employees and third parties for identified and anonymous complaints.

The channel is managed by an external and independent company, with the purpose of accepting any and all reports of facts that may be in non-compliance with the Anti-Corruption Program and Anti-Bribery Management System, with the complainant in good faith being guaranteed absolute confidentiality and no retaliation.

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The confidentiality of information is guaranteed at all stages of the reporting procedure.

The Carrefour Brasil Group will ensure adequate communication in order to provide its employees with sufficient awareness of the irregularity reporting system.

No employee will suffer demotion, sanctions or other unfavorable consequences for refusing to pay or accept bribes, even if this refusal results in a loss of opportunities for the Carrefour Brasil Group.

No sanction may be adopted against an employee for having reported in good faith a violation of these principles.



Everyone must avoid disclosing untrue information that could harm colleagues or the business.

In case of doubts, or difficulties in evaluation, understanding or application, the Compliance area, supervisors or the Legal Department must be consulted. Their opinions or decisions must be observed.

## 5. Responsibilities

Therefore, it is part of the duty and responsibility of all Carrefour Brasil Group employees to observe and enforce all provisions, so that in case of non-compliance, they will be subject to the application of the prescribed sanctions.

The implementation of this Policy and the implementation of the Anti-Corruption Program and the Anti-Bribery Management System will be coordinated by the Carrefour Group Compliance Department with the authority, autonomy and resources necessary to carry out its design activities, with reporting and supervision by the Carrefour Ethics Committee. Holding and the Audit Committee of the Board of Directors.

Each Group Business Unit, through and under the supervision of their respective Ethics Committees, will take the necessary measures to effectively implement anti-corruption and anti-bribery mechanisms in all their processes.

Group and subsidiary executives and directors must incorporate and foster a culture of integrity. They must serve as an example to all employees. Regardless of the commercial and financial issues involved, each corporate officer or director will undertake to specifically ensure that the Group's resources and assets are not used for corrupt purposes. Consequently, Executive Managers will be responsible and accountable for the implementation of this Policy under their jurisdiction.

Therefore, each Group entity must take the necessary measures to inform its employees, affiliates, parties managed on its behalf and third parties about their respective obligations and responsibilities, and about infractions relating to applicable rules and regulations.

Anyone in a supervisory role must ensure that this Policy is disseminated among their team, ensure that it is understood and implemented, and provide employees with the means to achieve established goals in a completely ethical manner. Each manager, responsible for applying this Policy, must also be receptive to information from their employees regarding any situations that may require a company decision and, if appropriate, forward it to their superiors.

Every employee must be aware of this Policy and observe its principles in the daily performance of their duties. Everyone must also be aware and sufficiently informed of the risks, and be able to identify warning signs and extract the respective consequences in terms of information sharing before acting.

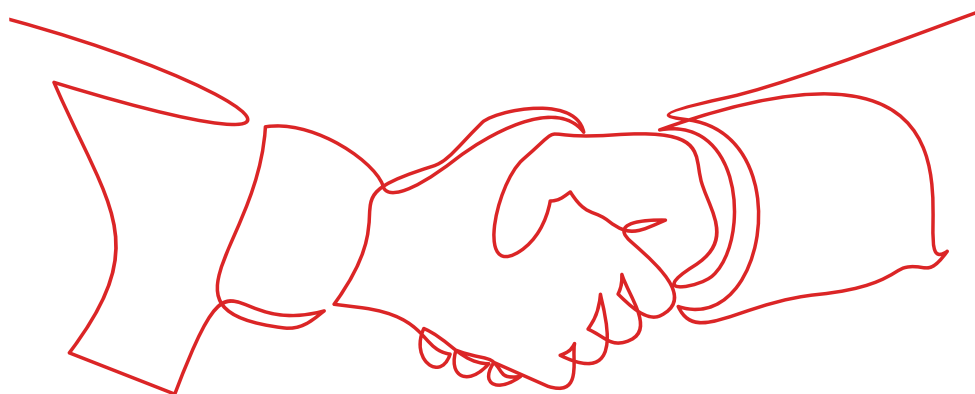
Participation in training courses offered on this subject will be mandatory.

Everyone is encouraged to report in good faith any situation inconsistent with these principles, without fear of reprisal.

Our approach to prevention involves sharing this Policy with our suppliers and service providers in accordance with the Code of Ethics for our Suppliers, so that they are also obliged to comply with the guidelines of this policy.

The organization and internal audit team will participate in risk control by establishing planned procedures and audits to ensure compliance with statutes and regulations, application of instructions and guidelines defined by Executive Management, proper operation of internal processes and the reliability of financial information.

The Internal Audit Department will provide independent assurance of the effectiveness of risk control processes within the Group. The Internal Audit work program is risk-based. He must ensure the effective application of the instructions issued by the Executive Administration and prove the proper operation of the company's internal processes.



# 6. Document Review and Update

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

## Attachment

### How to recognize corruption - Warning signs

In addition to direct approaches, there are many situations that, associated with offers, agreements or contracts of any nature, may constitute corruption.

Identifying warning signs helps to avoid suspicious situations, and above all in taking appropriate action before being involved in a corruption scenario.

Below are some examples of warning signs:



Excessive or abnormally high fees, costs, remuneration or commissions;



Promise of strangely fast results;



Repeated and/or disproportionate entertainment (leisure, meals, travel);



Justification for a service not documented or insufficiently documented;



Reluctance to establish the relationship in a formal contract;



A third party linked to a public agent or person holding a public position;



A specific intermediary required or recommended by a public or private counterparty;



Unusual payment terms, or payment required in cash;



Apparent lack of qualifications or experience for the task;



Third parties about whom very little information is available.



In connection with dealings with intermediaries, consultants or suppliers, certain common statements should also be red flags, such as:

“Let me handle this, the less you know the better”

“We do things differently here”

“Never dispute my fees, just let me help you close the deal”

“I know the right person...”

“The intermediary with whom you do business must be paid through a bank located in another country”

“These public officials negotiate only with their own intermediaries”

“Don’t worry, I always get what I want”

“We always negotiate with the same service provider”

## How to stay safe



Know and strictly comply with legislation and internal rules, especially those relating to your position.



Ensure that processes are not delayed due to a lack of vigilance or responsiveness.



Stay informed of the obligations, documents and time required.



Establish good relationships with authorities and ensure that any inspection is prepared so as not to give the inspector any grounds for reporting.



Be exemplary in accordance with Ethical Principles, and receptive to comments from your collaborators and/or colleagues.



Develop a solid understanding of the regulatory agency structure in order to be able to call on a high-ranking public official to resolve any difficulties.



Subject partners and service providers to integrity due diligence carried out by the Compliance department.



Promote the company’s anti-corruption approach.



Anticipate problems by assigning sufficient time and resources to carry out projects or tasks.



Work with other companies in the industry to apply uniform ethical standards across our industry.

## How to respond when facing a complex and/or delicate situation

If you are unsure about the approach to take in dealing with a situation, you should never make a decision alone, in a hurry or under pressure.

Before acting, you must think carefully and ask the right questions, applying common sense and making the right decision:

Is this in accordance with the law? Is it honest?

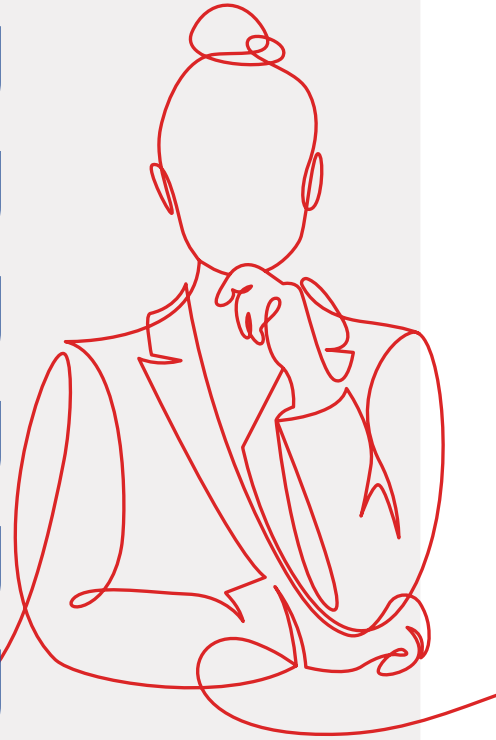
Is it consistent with group values and ethical principles?

Am I comfortable with this decision?

Am I aware that my decision may affect other people in the group?

What would my colleagues think of this? Or my family members?

What if the media reported this?



If you know that an act is illegal or unethical, do not act, or refuse to participate!

## Examples - Questions and Answers

The following examples establish, in the form of questions and answers, various forms of behavior that should be prohibited as they could constitute Corruption or Influence Trafficking.

One of my suppliers or service providers is offering me tickets to an upcoming sporting event. Can I accept these tickets?

**NO**

The offering or receiving of gifts and entertainment invitations is not permitted. Invitations to sporting events can only be accepted when approved by the Compliance area of the respective business unit together with the Director of the area and, in case of divergence, by the Ethics Committee of the respective business of employees in a conflict situation.



I work in a store, and a representative from one of my suppliers offered me a gift certificate on the condition that I guarantee that their products are displayed and available on all occasions and throughout the advertised promotional campaign. Can I accept such gift cards?

**NO**

Under no circumstances should gifts be accepted to facilitate business relationships. Private interests must never override the interests of the Carrefour Group, since attitudes like these constitute receiving an undue advantage.

In the context of a competition, a supplier invited me to visit their facilities, so that I could discover their products and improve my understanding of their strategy. Can I accept this invitation?

**NO**

Any competition process must be conducted in accordance with ethics and competition guidelines. Each supplier must receive the same treatment. In this sense, accepting any invitation, gift or giveaway during a competition process that could influence your judgment is prohibited. Negotiation processes are sensitive moments and all offers, no matter how pertinent they appear to be, must be declined. It is also important to inform managers and the Compliance area of the invitation.

A supplier or service provider I have been doing business with for many years is offering to make a contribution to a seminar held abroad. All expenses will be assumed by the supplier. Can I participate?

**NO**

Not under these conditions. Receiving invitations paid by third parties to participate in events is prohibited. If participation in the event is approved by the Compliance area of the respective business unit together with the Director of the area, payment of all expenses must be made by the Carrefour Brasil Group business unit.

A consultant approached me with an offer to carry out certain government processes on behalf of Grupo Carrefour Brasil. Can I make use of these services?

**YES**

With great caution and under certain conditions. Any use of the services of a consultant or intermediary to facilitate negotiations with government bodies or to obtain undue benefits is strictly prohibited.

The convenience of hiring a consultant who may have contact with public agents and/or initiate government processes on behalf of the Carrefour Brasil Group will require prior validation by the Compliance area of the respective business unit in conjunction with the area Director, after integrity due diligence referring to the consultant considered.

A person approached me with an offer to speed up certain government processes regarding the expansion of a store or a request for work to comply with regulations. Can I accept?

**NO**

It is strictly prohibited to use personal relationships to obtain a favorable result in processes involving the Carrefour Brasil Group. The use of consultants must be based on legitimate and well-founded needs and strict compliance with applicable legislation to avoid possible cases of corruption.

In connection with opening a new site, a representative from a local authority is asking me for a small "bonus" to facilitate access to energy supplies. Should I pay?

**NO**

Payment to facilitate government processes or access to certain services provided by public bodies constitutes corruption and its practice is illegal. Any approach of this nature must be reported to the Compliance area of the respective business unit and the area Director.

A health and health surveillance inspector has just arrived at a store for an inspection. Can I offer him some of our products?

**NO**

Offering products to a public agent in association with an inspection can be interpreted as active corruption, in an attempt to influence the opinion presented by the authority.

I am a volunteer for a local candidate whose values I consider very similar to those of Grupo Carrefour Brasil. Can I use the office or store copier to print some leaflets?

**NO**

The Carrefour Brasil Group respects the commitments of its employees who, as citizens, participate in public life or political matters, understanding that in doing so, they do not represent the company. Everyone can exercise their freedom of expression and political activism outside of working hours, at their own expense and on a strictly personal basis. No company resources may be used to support any political activity.

Can I make a donation to a candidate in an election on behalf of Grupo Carrefour Brasil?

**NO**

Grupo Carrefour Brasil wishes to maintain a politically neutral position and not be involved in political and financing matters. Support, whether financial or otherwise, for political parties or candidates on behalf of the Carrefour Brasil Group is strictly prohibited.



**GRUPO  
CARREFOUR  
BRASIL**

Any violation or suspicion of irregularity  
should be reported to the Confidential  
Channel - Ethical Connection:

Phone:  
0800 772 2975

Website:  
[conexaoeticacarrefour.com.br](http://conexaoeticacarrefour.com.br)

