

AMERICANAS S.A.

POLICY ON DIVERSITY, INCLUSION AND HUMAN RIGHTS

1. Purpose

This Policy regulates and disseminates the commitment and positioning with diversity, inclusion, equity and promotion of human rights in the development of all activities, partnerships, value chain and in all regions where **Americanas S.A.** is present. It is also established values and guiding principles throughout the **Americanas S.A.** ecosystem, as well as the commitment to the permanent promotion of educational campaigns and actions to combat discrimination and eradicate unacceptable behavior.

2. Field of Application

This policy applies to the Company and must be reproduced by all the people that make up the ecosystem, namely: administrators, associates, suppliers, partners, shareholders and customers.

3. Definitions

- **Senior Management:** includes the Board of Directors and its Management and Advice Committees and the Executive Board, statutory or non-statutory.
- **Company:** includes Americanas S.A. and all other companies related to it as directly or indirectly controlled, including joint ventures and subsidiaries, current and future and applies individually to any of the companies that make up the same Economic Group.
- **Diversity Commission:** multidisciplinary team, formed by members from different areas and companies of the Company's Economic Group, that have a direct or indirect relation with themes related to Diversity, Inclusion and Human Rights, which aims to discuss and evaluate initiatives in this context, as well as periodically review this policy.
- **Human Rights:** According to the United Nations (UN), Human Rights are rights inherent to all people, regardless of race, sex, nationality, ethnicity, language, religion or any other condition. They include the right to life and freedom, of opinion and expression, to labor, to education, among others. Everyone has these rights guaranteed, without discrimination.
- **Discrimination:** In this Policy, the term will always be used in a negative sense, that is, the discrimination that occurs when there is an adverse attitude towards a certain characteristic. Race, gender, sexual orientation, nationality, religion, social status, educational level, among other characteristics.
- **Diversity:** It is the set of cultural, biological, social, economic characteristics, among others, that make each individual a unique being. In the business context, it is related to the representation of different groups that form society among our associates.
- **ESG:** It is the acronym for environmental, social and corporate governance.
- **Ethnicity:** It is a group of individuals who share the same sociocultural system, the same language and/or geographic region.
- **Minority groups:** these are groups that, for historical and social reasons, face barriers to occupying spaces of decision and power in society, not necessarily being minorities in quantitative terms. (examples: Minority groups: black community, ethnic minorities,

LGBTQIAP+ community, PwD'S, black women, women, indigenous/original peoples, immigrants, local communities, low-income/socially vulnerable population).

- **Inclusion:** It is the valorization and insertion of populations that, for historical and social reasons, face barriers in society and in companies, promoting opportunities for all these people.
- **Gender identity:** it is how the individual perceives themselves, the understanding they have of themselves and how they would like to be recognized, regardless of their biological sex.
- **LGBTQIAP+:** It is an Acronym that covers people who are Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex, Asexual/Arromantic/Agender, Pansexual/Polysexual, Non-binary and more.
- **SDG:** It is the acronym for Sustainable Development Goals. These are goals set by the UN to eradicate poverty, to protect the environment and climate and ensure that people everywhere can enjoy peace and prosperity.
- **UN:** The acronym for United Nations, UN is an international organization that aims to facilitate cooperation in terms of international law and security, economic development, social progress, human rights and world peace.
- **Sexual orientation:** It is the affective/sexual and involuntary attraction that a person manifests towards another.
- **Partner:** Includes everyone with whom the Company maintains relationships to provide services, directly or indirectly, such as: service providers in general, sellers, merchants, drivers, couriers, shoppers, pickers, franchisees or affiliates.
- **People with disabilities:** They are those who have long-term impairments, which may be an acquired or congenital disability that may represent barriers to their full and effective participation in society with other people, such as people with physical, hearing, visual, intellectual, multiple or psychosocial.
- **Race:** it is a category created to legitimize systems of domination based on phenotype and origin. It is currently understood as a social, not biological, construction that defines sociocultural, economic and political interactions. In Brazil, race is mapped from the self-identification and self-declaration of each person, being grouped into five main terms: white, yellow, indigenous, pardo and black. The group of pardos and blacks is called *black*.

4. Guidelines

4.1. Our positioning

We at **Americanas S.A.** believe that diversity contributes in many ways. This wealth, mainly of ideas and perceptions, opens doors to several possibilities in solving problems and carrying out tasks.

But, essentially, valuing diversity is what should be done, in the sense of following basic human rights principles, of a plural coexistence, which helps us to understand and question conventions. In this perspective, we do not tolerate any form of discrimination. This principle is present in our Code of Ethics and applies not only to recruitment, but also to all decisions regarding training, promotion, employment and working conditions in general. We believe in respect for others and we value the good relationship between our associates and all stakeholders.

4.2. Premises

4.2.1. Diversity is a set of characteristics that differentiate people, making each individual unique and singular. It is the range of human differences, whether physical, social or cultural, including, but not limited to, race, ethnicity, gender, gender identity, sexual orientation, age, social class, disability, religion, religiosity, nationality and political beliefs.

We understand inclusion as the intentional action of understanding, supporting and defending individuals in all their uniqueness (identities, experiences, styles, skills and perspectives), resulting in a culture where all associates feel integrated, welcome, comfortable and safe and are empowered to reach their full potential every day.

We seek equity and universal access to fundamental rights and the recognition of inequalities. We encourage the appreciation of diversity and inclusion not only in the Company, but in our daily lives, as we believe that living with diversity allows us to collaborate, dialogue and learn more, in addition to making us unique and innovative.

4.2.2. This Policy covers all aspects to guarantee the commitment to diversity, inclusion, equity, human rights, women's rights, mothers and fathers (parenting), race, ethnicity, gender, sexual orientation, gender identity, people belonging to the LGBTQIAP+ group, indigenous peoples, refugees, people with disabilities, age diversity and people in economic vulnerability.

4.2.3. Among the topics in this Policy are: equal opportunities, monitoring of working conditions in our labor chains, education and awareness, relationships with service providers, third parties and business partners, customer relationships, non-discriminatory treatment, approach and safety, engagement with society, fair and value-generating work relationships, healthy work environment and organizational climate, ethics, structural and digital accessibility.

4.3. Repudiation and consequences

The Company repudiates any act that represents a violation of current legislation, human rights, its Code of Ethics and other policies, including this one. Thus, the use of physical and/or verbal violence and discriminatory practices against any of the groups mentioned in this policy is strictly prohibited, extending the application with violators subject to penalties, in accordance with our Consequences Policy for all cases.

We also repudiate slave (or similar) labor, child exploitation and inhuman and degrading working conditions in all links in our value chain, with the commitment to combat such practices throughout our corporate ecosystem and exclude the participation of any individual or entity that adopts such practices.

The Company provides a confidential and secret reporting channel, accessible to everyone, as detailed in item 7. The whistleblower is guaranteed absolute secrecy, with no risk of any retaliation or data leakage. The reported cases are 100% investigated and, if valid, treated according to the consequences matrix approved by the Company's Ethics Committee. In addition, the investigations provide inputs for strategic action plans, aiming at the Company's continuous progress.

4.4. Commitments

4.4.1. To our principles, values and beliefs

Our Code of Ethics and Conduct establishes the principles and values that every associate is responsible for following within the Company's premises and wherever they present themselves to represent the Company, within the scope of the exercise of their work. Each associate is committed to knowing and respecting the laws and regulations in force, applicable to their activities, as well as the Company's internal procedures and their penalties. Any form of discrimination, including those related to ethnicity, origin, gender, sexual orientation, free religious belief, political or ideological conviction, union membership status, social class, presence of disability, marital status, age and nationality, is intolerable.

Our Integrity Program addresses issues related to diversity, inclusion and human rights and has as one of its main objectives to develop the Company's culture based on our values, principles and beliefs. Among the activities included in it is developed, there are training and periodic communications that we carry out addressing, among others, the themes of diversity, inclusion and respect for human rights, as well as the program also brings relevant information about other instruments that associates and the Company can use to ensure compliance with this Policy, such as our Whistleblower Channel.

4.4.2. To human rights

The present policy has as one of its main references the UN guidelines in relation to the topic of Human Rights. In addition to giving full relevance to the topic and adopting a series of corporate practices and procedures related to it, such as the inclusion of the "Human Rights" aspect in our corporate risk assessments. In these assessments, human rights are considered points in the Value Chain that may negatively impact minority groups defended by the UN and contemplated in this Policy.

In addition, we carry out specialized training on policies and procedures related to labor rights or relevant human rights, with a minimum participation of 75% or more of our associates. All of them participate in training in relation to diversity, equity and inclusion. We also conduct anonymous surveys of our associates on gender identity, race/ethnic group, disabilities and other demographic factors to monitor the diversity of our workforce and identify opportunities to improve our Policy.

4.4.3. To the approach of the themes of this Policy by the Senior Management

We established as a reference this policy for the appointment of senior leadership, including the Board of Directors and the Fiscal Council. Topics such as gender, race/ethnicity and nationality/culture are assured of relevance. We also create thematic groups to promote gender equity, racial equity/ethnicity, LGBTQIA+ equity, intergenerational equity (age diversity) and valuing people with disabilities.

4.4.4. With the UN Sustainable Development Goals (SDG 10)

The Company undertakes to develop actions, such as those mentioned in this policy, in line with the UN's Sustainable Development Goals, especially with regard to reducing inequalities. For this purpose, it aims to empower and promote the social, economic and political inclusion of all, in order to reduce inequalities, regardless of age, gender, physical or intellectual disability, race, ethnicity, nationality, religion, economic or other condition.

Another commitment is to ensure equal opportunities and reduce inequalities in outcomes, including through the elimination of discriminatory laws, policies and practices and the promotion of appropriate legislation, policies and actions in this regard.

4.4.5. Pacts and commitments with society

Committed to achieving our 5 priority Sustainable Development Goals (SDGs), we have been part of the Ethos Institute for Business and Social Responsibility since 2018. We are signatories, since 2013, of the UN Global Compact in the areas of Human Rights, Labour, Environment and Anti-corruption. Since 2020, we have been adapting the business to achieve B Corp certification and have signed the following public commitments, in line with the ESG strategy:

- Movement for Racial Equity – MOVER
- Business Coalition for Racial and Gender Equity – Ethos Institute
- Business Charter for Human Rights and the Promotion of Decent Work – Ethos Institute
- UN Women's Principles of Women's Empowerment – UN Women

The Company also maintains Affinity Groups aimed at its members focusing on race, gender, ethnicity, disability, LGBTQIA+ community, generation, parenting, among other characteristics shared by its members.

The Programa Somar is the program of **Americanas S.A.** that promotes social inclusion by offering work and development opportunities for people with disabilities. We aim to advance their careers inside or outside the company. In addition to the selection process being fully designed for the needs of people with disabilities, we also have a whole scope of development and monitoring of these professionals that include a mentoring program, continuous feedback, training and talent radar.

4.5.1 Començando Juntos

Starting Together is the young apprentice program of **Americanas S.A.**, this program is aimed at young people who are attending or have completed high school. When they join the Company, they will have a path of development so that they can evolve and learn more and more from this professional experience.

4.5.2 Ame Aprender

Ame Aprender is Ame Digital's young apprentice program. This program is aimed at young people who are attending or have completed high school. When they join the company, they will have a development path and a job rotation, within a period of approximately 18 months, so that they can evolve and learn more and more from this professional experience.

4.5.3 Affinity groups

Affinity groups are created by the members themselves, always in line with the Diversity Department, and are intended to generate an environment for exchanging information, experiences and ideas. The objective The proposal is to bring people closer together, creating connections and carrying out actions related to diversity issues.

5. Responsibilities

5.1. Of Senior Management

- Support and enable the implementation of actions to promote inclusion, diversity and topics related to Human Rights;
- Reflect the Company's position in relation to the themes of this Policy in strategic business decisions;
- Support thematic groups to promote gender equity, racial/ethnic equity, LGBTQIAP+ equity, intergenerational equity (age diversity) and appreciation of people with disabilities.

5.2. Of the managers and leaders of the business departments

- Reflect the Company's position in relation to the themes of this Policy in the management of its subordinates;
- Guide their subordinates in relation to any doubts or inappropriate conduct, considering the themes of this policy, directing them to the People & Management Department or the Diversity Committee, in case questions arise about the Company's initiatives; and
- Report conduct and situations that are in disagreement with this Policy through the Whistleblower Channel;

5.3. Of all the Company's associates

- Reflect the Company's position in relation to the themes of this Policy in the execution of its activities and in its relationship with other associates, suppliers, partners and customers;
- Report conduct and situations that are in disagreement with this policy, whether from its direct managers, teammates or any other associate of the Company, to the People & Management Department, to the Diversity Commission or through the whistleblower channel; and
- Be engaged in the Company's communication activities and actions on the topics of this Policy, especially with the participation in mandatory training;

5.4. Of the People & Management Department

- Hire and develop diverse talents;
- Develop training together with the Diversity Department/Commission;
- Develop and implement inclusive actions;
- Ensuring proper treatment for associates who belong to minority groups;
- Observe the aspects of human rights, Inclusion and Diversity in the Policies, rules and procedures of the People & Management Department;

5.4.1 Of the Diversity Department

- Implement and develop initiatives aimed at inclusion, diversity and human rights;
- Support the People & Management Department in diversity and inclusion actions;
- Answer any questions from managers and associates in relation to the Company's actions and initiatives; and
- Constantly update and improve this policy through the implementation of new actions and initiatives;

5.5. Of the Sustainability Department

- To act in initiatives that promote diversity and inclusion actions inside and outside the Company; and
- Respond to questionnaires providing evidence of fulfillment of requirements capable of legitimizing the Company to participate in the certification and obtaining seals of excellence related to the dimension dealt with in this policy, based on the positioning and actions adopted by the Company.

5.6. Of the Diversity Commission

- Discuss and evaluate new actions and initiatives to be contemplated in this Policy;
- Periodically review and update this Policy; and
- Clarify questions regarding this policy and recommend the application of penalties in case of non-compliance.

5.7. Of Legal Department

- Legal is responsible for evaluating contracts and contractually demanding that suppliers and any partners respect human rights and other principles of this policy in the relationship with the Company and throughout the value chain;
- Provide guidance on the applicable penalties in case of non-compliance with this policy; and
- Assist in the preparation of future revisions and updates of this policy due to legislative changes or the adoption of other actions and initiatives, or to adapt this Policy to others adopted by the Company.

5.8. Of the Investigation Department

- Investigate in a confidential and secret manner the complaints related to acts or conduct that are in disagreement with this policy and with other Company instruments that mention the topics addressed therein;

- Subsidize the Company based on verified and stated information for the application of application of consequential punishments in case of non-compliance with this policy and/or other Company instruments that mention the topics addressed therein;

5.9. Of the Compliance Department

- Develop initiatives within the scope of the Company's Integrity Program that address inclusion, diversity and Human Rights;
- Develop, implement and review instruments related to the topic of human rights; and
- Report the deviations committed against this policy and against the other Company instruments that deal with the topics addressed therein, deliberating on the correction proposals within the scope of the Ethics Committee.

5.10. Of the Risk and Internal Controls Department

- Identify risks and opportunities along the business value chain related to the topics of this Policy, especially in relation to respect for human rights;
- Propose and support the implementation of measures and instruments to mitigate or eliminate risks related to the themes of this Policy;

From the Internal Audit Department

- Conduct an audit to verify compliance with this Policy; and
- Report the weaknesses identified to the responsible areas.

6. Sanctions

The associate who fails to comply with any of the provisions set forth in this Policy is subject, at the Company's discretion, to sanctions in accordance with the Consequences Policy, leading to dismissal for just cause. The Company will seek, whenever possible and with the best diligence, to individualize and particularize the conducts for the complete investigation and accountability of the individuals who practice them.

The recipients of this Policy who have not complied with the provisions will be equally liable, as well as those who are aware of its practice, but who have omitted, regardless of the hierarchical position occupied in the Company.

7. Whistleblower Channel

As mentioned in item 4.3, the Company provides a Whistleblower Channel, confidential and confidential, intended and accessible to all. Complaints are received by an independent and specialized company and, to the complainant, their rights to privacy and confidentiality, and any forms of coercion or reprisals are unacceptable.

If you become aware of any situation that may violate this Policy or the Code of Ethics and Conduct, please contact the Whistleblower Channel at <https://canaldedenuncias.com.br/universoamericanas> ou pelo telefone 0800 282 25 50.

8. Validity

This policy takes effect on the date of its publication.

9. References

- Objetivos do Desenvolvimento Sustentável da ONU (<https://brasil.un.org/pt-br/sdgs>)
- Princípios Orientadores sobre Empresas e Direitos Humanos da ONU (https://www.gov.br/mdh/pt-br/assuntos/noticias/2019/outubro/Cartilha_versoimpresso.pdf)
- Carta Internacional dos Direitos Humanos da ONU e seus instrumentos: Declaração Internacional dos Direitos Humanos, Pacto Internacional sobre Direitos Civis e Políticos e Pacto Internacional sobre Direitos Econômicos, Sociais e Culturais (<http://www.pge.sp.gov.br/centrodeestudos/bibliotecavirtual/instrumentos/direitos.htm> e http://www.planalto.gov.br/ccivil_03/decreto/1990-1994/d0591.htm)
- Pacto Global da Organização das Nações Unidas da ONU (<https://www.pactoglobal.org.br/10-principios#:~:text=O%20Pacto%20Global%20advoga%20Dez,das%20Na%C3%A7%C3%B5es%20Unidas%20Contra%20a>)
- Constituição Brasileira (http://www.planalto.gov.br/ccivil_03/constituicao/constituicao.htm)
- Consolidação das Leis Trabalhistas (http://www.planalto.gov.br/ccivil_03/decreto-lei/del5452.htm)
- 17 Objetivos de Desenvolvimento Sustentável (ODS) da ONU (<https://brasil.un.org/pt-br/sdgs>)
- Circulares da Associação Brasileira do Varejo Têxtil (ABVTEX) – (<https://www.abvtex.org.br>);
- Princípios pelo Empoderamento de Mulheres (https://www.onumulheres.org.br/wp-content/uploads/2016/04/cartilha_ONU_Mulheres_Nov2017_digital.pdf)
- Pacto pela Erradicação do trabalho escravo (<https://www.ethos.org.br/conteudo/apoiados/pacto-nacional-pela-erradicacao-do-trabalho->
- Coalizão Empresaria para Equidade Racial e de Gênero (<https://www.ethos.org.br/conteudo/projetos/direitos-humanos/33221-2/>)
- Carta empresarial pelos Direitos Humanos e pela Promoção do Trabalho Decente (<https://www.ethos.org.br/wp-content/uploads/2015/04/Carta-Empresarial-pelos-Direitos-Humanos.pdf>)
- Diretrizes de auditoria da DNV para fornecedores críticos (<https://www.dnv.com.br/services/gestao-e-avaliacao-de-fornecedores-63043>)
- Circulares do MOVER/Movimento pela equidade racial (<https://somosmover.org>)

- Circulares do Fórum LGBTQIAP+ (<https://www.forumempresaslgbt.com/10-compromissos>)