

GPA Marketing Policy

1. Purpose

GPA's Marketing Policy ("Policy") presents guidelines (general and specific) on GPA's commercial advertising and marketing actions, including all business units and related companies/institutions, as well as suppliers, service providers, customers, social institutions and partners, among other stakeholders.

The purpose of this Policy is to ensure compliance with applicable regulation and good practices in marketing, sales and advertising activities, ensuring that the communication of products and services is done in a responsible, ethical and transparent manner, respecting all the precepts of sustainability, diversity and consumer rights, in line with the guidelines of all other GPA Policies.

2. Scope

This document applies to all GPA employees, areas, brands, business units and related companies/institutions, in addition to suppliers, service providers, customers, social institutions and partners of the company.

3. Terms and Conditions

Marketing: is the set of strategies and actions for promotion, dissemination and sales of our products and services with the objective of strengthening our brands, conquering new customers and retaining customers who already buy our products and services.

Commercial promotion: these are non-routine actions with a specific objective. It is the offer of valuable experiences and actions that strengthen our brands, such as promotional coupons, special promotions, gifts, etc.

Advertising: is the marketing strategy that involves the purchase of a space in a media vehicle to promote a product, service or brand, in order to reach our target audience and encourage them to buy our products and services.
It can be qualified as a "commercial advertisement".

Communication: A process involves the exchange of information between two or more interlocutors through mutually understandable signs and semiotic rules.

Exclusive Brands: are the product brands that are part of the GPA Group. They are Qualitá, Taeq, Casíno, Cheftime, Pra Valer, Club des Sommeliers, Fábrica 1959, Nous

and Finlandek. Exclusive Brands are developed with strict quality control and following market trends and needs.

Interested Parties or Stakeholders: also known as strategic audiences, they are all relevant audiences with interests relevant to GPA, or individuals or entities that assume some type of risk, direct or indirect, in relation to society. Among others, the following stand out: shareholders, employees, community, customers, suppliers, creditors, governments and non-governmental organizations.

Diversity: is the set of characteristics, cultural, biological, social, economic, among others, that make each individual a unique being. In the business context, it is related to the representation of different groups that make up society in the workforce.

4. General Guidelines

Marketing actions are part of our relationship and engagement strategy with our stakeholders, seeking to satisfy their needs, through quality products and services that match the announced characteristics, as well as expectations, in a transparent, respectful and consistent manner. These actions must express the offers and/or messages clearly and guarantee the fulfillment of what is agreed.

Through these actions, we seek to raise awareness of our stakeholders through our communication channels, promoting more sustainable practices and attitudes with less environmental impact.

This Policy must comply with all of GPA's Corporate Policies, Procedures and Regulations. Likewise, ensure strict compliance with current legislation regarding the distribution of advertising material, promotional actions and visual communication of all products and services, meeting the specifications and standards defined by the regulatory bodies in the Country (at the federal, state and municipal levels) in order to ensure that, in the event of any infraction, it is immediately corrected.

4.1 Relationship and Respect with the Consumer

Any and all marketing actions, campaigns and/or advertising in the media, and/or in all sales channels, whether internet, television media, sales platforms and/or physical points, must be respectful, clear, objective and transparent and must be in line with the Consumer Defense Code, GPA Code of Ethics, Human Rights, Inclusion and Diversity Policy, among other rules that deal with the subject, especially those mentioned in the references below.

Our marketing, promotion and sales practices are regularly evaluated by GPA's specialized professionals, always seeking to improve our practices and policies. GPA is responsible for establishing mechanisms that ensure compliance with legislation and internal policies related to the sale of products and services, as well as product labeling and consumer information, seeking to constantly encourage conscious consumption, sustainability, health and well-being in our brands and businesses.

In addition, regardless of the channels in which communications are being disseminated/broadcasted, we make available to all our stakeholders relationships and customer service channels (Customer Home) and for situations of violations of our policies and our Code of Ethics (Ombudsman Channel).

We are committed to the confidentiality of the personal information of our customers, employees and other stakeholders, subject to the terms and conditions of our Privacy Policy.

4.2 Impartiality of Communication

Any and all commercial or institutional communication must be impartial and must ensure that GPA's values and principles are observed and complied with. Disrespectful, prejudiced or discriminatory forms are not tolerated and accepted. Communications are committed to being inclusive, representative and ensuring respect for all people, in accordance with our Policies on Human Rights, Inclusion and Diversity, Relationship with Stakeholders, as well as Corporate Communication.

4.3 Diversity and Inclusion

In order for everyone to be respected in communication, advertising, and other promotional materials for GPA's products and its exclusive brands, it is the responsibility of everyone involved with communication actions (internal and external) to ensure the production, validation and dissemination of content free from discrimination, without stereotypes and that comply with the principles: accessibility, representativeness, clear and without barriers language; and sustainable consumption.

Find out more by consulting our Diversity, Inclusion and Human Rights Policy and our Inclusive Communication Guide.

4.4 Conscious consumption

One of the pillars of GPA's sustainability strategy is the promotion of supply and conscientious consumption. As a link between thousands of suppliers and millions of customers, we are aware of our responsibility to co-build healthier and more sustainable products and services with our chain and encourage our consumers to choose these products.

Communication is essential as a channel of information and awareness of consumers on conscious consumption, according to Akatu Institute¹, "consumption with better impact, without excess or waste, making choices that contribute to the sustainability of the planet, so that there is enough for everyone forever".

¹ <https://akatu.org.br/>

5. Specific Guidelines

5.1 Internal Engagement & Awareness

We understand that the implementation and adherence to this Policy depends on the engagement of internal teams, from the leadership to the operational areas. Thus, the Group's employees involved in the Communication and Marketing process are frequently trained and updated on respect for consumers, inclusive communication, fighting stereotypes, and other good practices with regard to the promotion, sales and communication of our products and services from the perspective of sustainable consumption.

5.2 Relationship with Suppliers

All suppliers must follow the laws and regulations, know the values and respect the ethical principles settled in our Code of Ethics, establishing business relationships in an integral and exemplary manner, following the standards established in the Ethics Letter for Suppliers.

5.2.1 Hiring Suppliers

The hiring of communication vehicles, event and/or advertising agencies, promotional actions, among others, must always occur through technical, legal and ethical conduct criteria that attest to the qualification for the action and respect for the Letter of Ethics for Suppliers.

5.3 Provision of Communication and Marketing Materials

It is the responsibility of the Communication and Marketing Department to oversee GPA's communication strategy, brands, products and services. When necessary and in line with the communication proposal, it must make publicity material and institutional campaigns available in all stores and/or other vehicles and media. For this, it is necessary to prepare and make available guidance guides, for all teams involved, containing the amount to be disclosed, disposition guidelines, time and spaces, among other points considered important to ensure the best operation and communication to the consumer.

The production of any material by any area, store or team is prohibited without the proper formal consent of the Communication and Marketing teams. Likewise, the use or mention of the GPA brand(s) and/or any product in electronic, printed, or internet parts is prohibited without the authorization of the aforementioned departments.

5.4 Promotions

Any and all commercial promotions must have their own regulations with clear and transparent rules regarding the scope, validity, impacted public, forms of participation, forms of redemption of the prize, if applicable, ensuring clear and objective communication for the final consumer participants.

5.5 Monitoring and Validation

In order to ensure that marketing and sales practices comply with the requirements set forth in the Consumer Protection Code, as well as the other rules dealing with such practices, GPA has the legal department responsible for validating and evaluating the entire and any communication and/or material relating to marketing and sales practices to the consumer, as well as the laws and regulations related to the products.

6. Exclusive Brands

This Policy also covers any and all communication involving our Exclusive Brands, developed with strict quality control and following market trends and needs.

As a marketing strategy, we seek to adopt a line of communication with an emphasis on well-being and quality of life, engaging our consumers and other stakeholders in the adoption of more responsible habits, promoting conscious consumption, personal care, as well as a practical, healthy and affordable lifestyle.

GPA has an internal evaluation process with the Company's legal department, which is responsible for ensuring compliance with legislation on consumer information, as well as marketing and sales practices.

6.1 Products (Labeling)

For our Exclusive Brands, the content of the labels follows current legislation and the standards that govern each type of product, with instructions for use, information on handling and conservation, description of substances that may generate social and environmental impacts, as well as the health and safety of consumer.

8. Restricted Products

We are committed to complying with all laws and guidelines related to the sale, communication and disclosure of restricted products, such as alcoholic beverages, cigarettes and medications.

9. Complaints Channel

Failure to comply with the rules and guidelines set forth in this document may be considered serious misconduct, subject to the application of sanctions based on all GPA's Policies and Code of Ethics.

As a reporting channel and official tool for receiving complaints, dissatisfactions and allegations of violations of non-compliance with this Policy, GPA makes available to its employees, customers, suppliers, subsidiaries, social institutions and external public with commercial relations and institutional with the Group, the **Ombudsman Channel**.

The purpose of this channel is to investigate and correctly deal with all occurrences, ensuring adherence and consistency to the ethical, institutional and universal values of the relationship between GPA and its companies and their stakeholders.

Violations of this Policy, the Company's Code of Ethics or any item in the Supplier's Letter of Ethics can be reported through the channel: ouvidoria@gpabr.com.br. The complaint will be investigated in a confidential manner, even allowing for anonymity.

Contact:

GPA – 08000 55 57 11 – ouvidoria@gpabr.com

Office hours: Monday to Saturday, from 8 am to 8 pm.

10. References

Internal documents:

- GPA's Corporate Communication Policy;
- GPA's Diversity, Inclusion and Human Rights Policy;
- GPA Code of Ethics;
- GPA's Inclusive Communication Guide;
- GPA Privacy Policy.

External documents:

- Consumer Protection Code (Law 8.078/1990);
- Conanda Resolution n. 163/2014;
- CONAR Self-Regulation Code;

- Law 9294/1996 (Restrictions on the use and advertising of tobacco products, alcoholic beverages, medicines, therapies and agricultural defensives);
- Scattered legislation from ANVISA and other regulatory bodies.

11. Policy Update

This Policy is valid for an indefinite period and without prejudice to the provisions contained therein, GPA reserves the right to revise it, as often as it sees fit.

12. Policy Approval

This Policy was approved by the Sustainability Committee in July 2021.
