

ENVIRONMENTAL MANAGEMENT POLICY

1. PURPOSE

This policy aims to outline the principles, commitments, and guidelines that govern the performance of the Company, its employees, and service providers for the management of sustainable and environmentally responsible practices, in addition to ensuring compliance with current legislation, as well as directing the company and its partners in reducing and/or mitigating negative social and environmental impacts and contributing to the intensification and dissemination of positive impacts. It also aims to guide any and all decision-making by the Company that may bring potential social and environmental impacts to society and/or its businesses, as well as in the definition of strategies, goals, and targets.

2. SCOPE

This policy applies to all areas and business units of GPA, as well as its stakeholders and potential partners, including subcontractors who provide services to the company, which must also comply with the provisions of this Policy to promote the principles with subcontractors and suppliers through the Code of Conduct, guiding and respecting the principles of sustainability throughout the Group's value chain and communities of interest.

3. GLOSSARY

Paris Agreement: a commitment ratified by 195 UNFCCC member states at COP21 (i.e., the 21st Conference of the Parties) held in Paris aiming at reducing greenhouse gas (GHG) emissions in the pursuit of sustainable development. Such Agreement has as purpose to keep the global average temperature rise well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels.

Supply Chain: denotes the complex system comprising organizations, personnel, operations, data, and resources necessary for the provision of goods and services to customers. Within this Policy, this term denotes the group of companies under direct contract with GPA.

Kigali Amendment: it was approved in 2016 in Kigali, capital of Rwanda, as an amendment to the Montreal Protocol. Its core function was to detail a plan for the stepwise diminution of hydrofluorocarbon (HFC) consumption and production, predominantly used as refrigerants within refrigeration and air conditioning appliances. While hydrofluorocarbons (HFCs) do not deplete the ozone layer, their significant contribution to the greenhouse effect exacerbates climate change.

GHG or Greenhouse Gases: these are a set of gases, both natural and anthropic, that absorb and emit infrared radiation, contributing to intensify climate change. They contain the following gases: Carbon dioxide (CO₂); Methane

(CH₄); Nitrous oxide (N₂O); Hydrofluorocarbons (HFCs); Perfluorocarbons (PFCs); Sulfur hexafluoride (SF₆); and Nitrogen trifluoride (NF₃). The Kyoto Protocol, an international agreement supplementing the United Nations Framework Convention on Climate Change (UNFCCC), established regulations for the emission of these gases.

Private Labels: these are product brands that belong to the GPA Group. They are the following ones: Taeq, Qualitá, Club des Sommeliers, among others. The development of such Private Label products incorporates stringent quality control measures, while remaining responsive to evolving market trends and consumer needs.

The Environment: it constitutes the complex interplay conditions, laws, influences and interactions of a physical, chemical, and biological nature that support, safeguard, and govern life in its myriad forms.

Climate change: it encompasses variations in global or regional climate patterns over time, resulting from natural or human-induced alterations in atmospheric composition. This Policy will examine anthropogenically induced climate change, focusing on rising greenhouse gas emissions and their contribution to extreme climatic phenomena with far-reaching consequences, including impacts on food production and sea-level rise.

Sustainable Development Goals (SDGs): SDGs were set in 2015 by the United Nations Member States as a universal call to action to end poverty, protect the planet, and secure peace and prosperity for everyone by 2030. The framework comprises 17 interdependent goals for the purpose of achieving a balance between social, economic, and environmental sustainability.

Montreal Protocol: it was approved in 1987 and came into force in 1989, with the aim of reducing the production and consumption of substances that deplete the ozone layer. Such protocol was recently amended by the so-called Kigali Amendment, which required the gradual reduction of HFCs (hydrofluorocarbons), gases that were used as substitutes for ozone-depleting substances.

4. GENERAL GUIDELINES

4.1. Context

The guidelines of GPA's Environmental Management Policy are based on the Sustainable Development Goals (SDGs), the Global Compact Principles, and the Paris Agreement.

Since 2012 sustainability has been part of GPA's business strategy and, therefore, is present in all of our operations and businesses. Through this Policy GPA reinforces its commitment to comply with current legislation, in addition to always evolving in its practices and processes. Therefore, GPA seeks to set solid and well-determined governance alongside a transparent and consistent management. We are committed to the permanent and systematic disclosure of our commitments to the environment and performance, setting guidelines and procedures in line with best practices.

4.2. Commitments by GPA

Recognizing its significant role in the Brazilian market, GPA strives to be a catalyst for societal transformation, consistently adopting best business practices and pursuing continuous improvement in environmental management and performance. In line with our purpose of engaging all players in our supply chains to make them more responsible towards the environment, people, and animals, this Policy also seeks to cooperate with our suppliers to prevent and minimize the social and environmental impacts of our supply chain, always looking for innovations able to bring positive impacts, in addition to building a relationship of trust with our customers and stakeholders.

In all of its environmental projects, actions and programs, GPA is committed to following – and requires all of its suppliers, service providers and partners to also follow – the environmental standards and policies in force in the countries where we operate, considering all the criteria described in the legislation, international agreements to which Brazil has adhered, among others pertinent to the retail segment and other businesses of the Group.

To direct our actions, four key commitments have been established, each encompassing action plans with quantifiable targets subject to continuous monitoring and enhancement. They are the following ones: reducing greenhouse gas (GHG) emissions, reducing waste generation and food waste, guaranteeing sustainable use of natural resources, and respect for biodiversity.

4.2.1. Reducing greenhouse gas emissions

At GPA we seek to minimize our carbon emissions by improving practices and actions that reduce our impacts both on our operations and on our value chain. Accordingly, GPA is committed to:

- Reduce, both in absolute and relative terms, our direct and indirect GHG emissions (scopes 1, 2, and 3);
- Reduce, in absolute terms, our fugitive emissions from refrigerant gases, in line with the Kigali Amendment to the Montreal Protocol;
- Increase energy consumption from renewable sources;
- Conduct a comprehensive risk and opportunity assessment related to the physical and transitional aspects of climate change to identify and manage them, acting on our vulnerabilities, adapting ourselves to climate changes;
- Quantify and consider the externalities generated by the Company's GHG emissions in our decision-making process;
- Improve logistics and transportation aiming at reducing atmospheric pollution and the use of fossil fuels, thus reducing our GHG emissions;
- Promote and encourage technological innovation in Private Labels to reduce GHG emissions in the production and sale of goods or services;
- Foster the development of innovative products, services, and business models designed to mitigate GHG emissions.

4.2.2. Ensuring the sustainable use of natural resources

The responsible use of natural resources such as water, fossil fuels, and other supplies, has become increasingly relevant for corporate environmental management, which seeks to avoid unwanted negative impacts. Accordingly, GPA is committed to:

- Reduce the negative impacts involved in the exploitation of all natural resources that are used in our operations;
- Improve the water and energy efficiency of our operations and across our supply chain, especially the critical links;
- Encourage the use of energy from renewable sources and self-generation, whenever possible;
- Include sustainability criteria in the process of building new stores and operational sites, such as efficient use of energy, conscious consumption of water, responsible application and use of materials in all facilities.


4.2.3. Reducing waste production, preventing food waste, and cultivating a circular economic model

The uncontrolled generation of solid waste, combined with inefficiency in its management, causes great impacts on the environment. Thus, reducing waste generation, preventing food waste, and promoting a circular economic model are GPA's commitments. GPA is committed to:

- Reduce our waste generation through good operating practices and circular economy principles;
- Engage our supply chain to reduce waste generation, as well as landfill diversion;
- Reduce the use of packaging and/or non-recyclable raw materials in the manufacture of our packaging, and replace them whenever possible with recyclable, compostable, or biodegradable materials;
- Cultivate sustainable practices among associates, customers, and suppliers, promoting sustainable product consumption and responsible waste management;
- Foster and execute strategies to prevent food waste and loss, facilitating the donation of surplus food to social welfare organizations;
- Adopt practices to promote selective waste collection within our operational procedures and use recyclable materials in our Private Label product line;
- Encourage the development of innovations that foster circular economy;
- Work on a segment basis and, together with the government, to strengthen laws, standards, and practices for reducing waste and improving the recycling chain.

4.2.4. Protect natural ecosystems and biodiversity

The conservation of ecosystems and biodiversity, including the mitigation of deforestation and native vegetation conversion, are paramount commitments for GPA, encompassing both supply chain and



operational activities. The escalating pressure on protected areas is significantly diminishing the extent of global green spaces and the biodiversity they safeguard. Moreover, agricultural and livestock production are critical components of such deforestation scenario.

For this reason, GPA has a Social and Environmental Beef Purchasing Policy, which, among other objectives, aims to prevent deforestation and the conversion of native vegetation into pastures, to promote the protection of native biomes and the Brazilian cultural heritage, and to respect the rights and way of life of indigenous peoples, local communities, and workers.

GPA has also adopted the Social and Environmental Policy for the Purchase of Palm Oil Products for our Private Label products and Exclusive Brands, which aims at encouraging the responsible purchase of sustainably certified palm oil sourced internationally to guarantee compliance with social and environmental responsibility criteria.

GPA's biodiversity conservation efforts primarily focus on the fishing industry, as detailed in its Social and Environmental Fish Purchase Policy. This policy outlines commitments, principles, and guidelines for responsible fish sourcing, including adherence to closed seasons, minimum catch sizes, and prohibition of endangered species sales.

In addition, GPA engages its business partners to commit to:

- Improve the traceability of the raw materials used in our chains, encouraging the sustainable origin of our products;
- Encourage that our supply chain does not use raw materials from areas of deforestation and/or conversion of native vegetation;
- To ensure the responsible management of biodiversity, preventing the risks of species depletion and/or extinction;
- Direct our actions to promote animal protein production that prioritizes animal welfare whenever feasible;
- Consider the preservation of biodiversity in the process of building new stores and operational sites, avoiding operational activities in the vicinity of World Heritage areas and IUCN Category I-IV protected areas and, when necessary, applying the mitigation hierarchy.

5. SPECIFIC GUIDELINES

GPA believes that the implementation of this Policy is a cross-functional responsibility for all associates, suppliers, service providers, customers and partners, irrespective of their area of activity or hierarchical level. All of them will receive training on the Policy and must adopt the practices, commitments, and responsibilities presented herein. The Sustainability Board and the Management, People and Sustainability Committee, reporting directly to the Board of Directors, are responsible for maintaining stakeholder engagement.

In order to implement the Environmental Management Policy in its businesses, GPA has set forth some specific guidelines applicable to each of the four commitments presented in section 4.2 as GPA's Commitments. These are as follows:

- Following up, monitoring, and setting targets for the commitments presented;
- Establishing criteria, responsibilities, and performance incentives linked to environmental targets, and aligning the variable compensation of executive officers and senior management with the achievement of GPA's environmental goals;
- Working together with other segments in search of best practices and processes, in addition to taking part in forums, initiatives, and voluntary and recognized business commitments such as ISE, CDP, Global Compact, among other ones;
- Acting in its stores and with its customers and suppliers in a way to provide concrete and effective solutions that are consistent with the commitments undertaken;
- Working together with our suppliers to seek the sustainability of productive supply chains, fostering the replication of good practices and commitments in their corresponding chains;
- Setting strict selection and development criteria that may lead to the exclusion of suppliers that do not adhere to our sustainable practices and commitments;
- Developing projects that value small producers and family farmers, contributing to the protection of native forests;
- Creating and implementing engagement programs with our customers, increasing the offer of healthier products, promoting more sustainable attitudes, and encouraging the reduction of food waste and the proper waste disposal;
- Raising awareness among our associates and stakeholders through our communication channels, promoting practices and attitudes that are more sustainable and having less environmental impact.

5.1. Monitoring, Control, and Transparency

GPA develops quantitative and qualitative Key Performance Indicators (KPIs) for monitoring compliance with the Policy. The disclosure of results connected to actions and projects is performed particularly through the Annual and Sustainability Report, and also extraordinary reports as needed. Moreover, the Company and its brands utilize their respective communication channels for the distribution of specific releases.

GPA cares about agile and consistent information disclosure, its commitment to the securities and exchange market, and its respect for shareholders and investors.

5.2. Supplier Relationship

All our suppliers must comply with laws and regulations, know the values, and respect the ethical principles set forth in the Code of Ethics. According to the Ethics Charter for Suppliers, the standards set forth must be followed in all circumstances within the Group's entire supply chain, including subsidiaries and subcontractors. Among the commitments undertaken, it is worth mentioning:

- Establishing suitable preventive mechanisms for risks associated with their respective operational segments;
- Implementing production and service provision processes with maximal environmental responsibility;
- Ensuring that all business relationships are conducted with the utmost ethical integrity and exemplary manner, within strictest compliance with all relevant laws, regulations, and the Group's internal standards, as well as being free from any kind of undue favoring, active or passive corruption of public agents, extortion, or fraud of any kind.

To bolster supplier sustainability efforts, we published the ESG Good Practices Booklet, providing guidelines, resources, support materials, and recommendations for developing sustainability agendas based on our Group's policies and commitments, in line with this Policy and all other Company Policies.

5.3. Private Labels

All these commitments will also extend to our Private Label product line. We monitor the environmental impacts of our operations and our products, seeking and adopting best practices, always aiming at reducing the social and environmental impacts of the supply chain.

6. PENALTIES

Employees are obligated to report all violations of the previously stated standards through the Ombudsman or the Whistle-blowing Channel. In addition, any failure to comply with the rules and guidelines provided for in this document may be considered a serious misconduct, subject to disciplinary sanctions based on the Ethics Committee Management Policy, the GPA Code of Ethics, and the Consequences and Disciplinary Measures Policy.

7. REFERENCES

- Code of Ethics
- Social and Environmental Beef Purchasing Policy
- Social and Environmental Palm Oil Products Purchasing Policy
- Social and Environmental Fish Purchasing Policy
- Disciplinary Consequences and Measures.
- Ethics Charter for Suppliers

Our environmental management framework is established by a series of guiding and normative documents from partner and signatory associations:

- Principles of the United Nations Organization (UN);
- UN Guiding Principles on Business and Human Rights;
- 17 UN Sustainable Development Goals (SDGs);

- Kigali Amendment to the Montreal Protocol (UN);
- Task Force on Climate-Related Financial Disclosures (TCFD);
- Global Reporting Initiative (GRI).

8. POLICY UPDATE AND VALIDATION

GPA acknowledges that full compliance with the goals of this Policy is a continuous improvement process. This Policy, initially released in 2013, underwent revisions in 2020 and 2022, culminating in the publication of the current version in 2025 with the approval of the Executive Directors.