

CODE OF **ethical conduct**





Value and principles of this code



The recipients of this code



A message for you



How we do what we do



Everyone's commitment

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VALUES AND principles

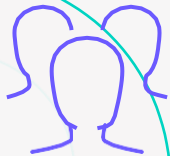
OF VIA

At Via, we daily seek to build a professional environment enabling thousands of people to share the same passion for our work, with eyes sparkling and a sense of belonging to Via. Only this way, we manage to achieve the essence of our everyday delivery: make dreams come true. However, we would not be able to fulfill such a positive impact on the lives of thousands of people with whom we maintain a relationship without the principles that guide us in everything we do in an environment, where **integrity, respect, and transparency** are non-negotiable principles for us. Here at Via, it is not only important “what” we do, but especially, “how” we do. **This is why, indistinctly we shall contribute, so that the topics discussed herein are seen in practice, guiding, inspiring, and engaging our stakeholders to act and take decisions according to the highest ethical values and principles.**



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The recipients

OF THIS CODE

This Code shall apply to all companies and business units composing Grupo Via, here understood as current entities pertaining to the Group (indicated below) and those to compose the Group in the future.

Companies composing VIA's economic group:

- (i) Indústria de Móveis Bartira Ltda. ("Bartira");
- (ii) Globex Administração e Serviços Ltda. ("GAS");
- (iii) Lake Niassa Empreendimentos e Participações Ltda. ("LAKE");
- (iv) VVLog Logística Ltda. ("VVLog") Atual: ASAPLog Logística e Soluções Ltda.;
- (v) Globex Administradora de Consórcio Ltda. ("GAC") [em liquidação];
- (vi) Cnova Comércio Eletrônico S.A. ("Cnova");
- (vii) ASAPLog Ltda. ("ASAPLog");
- (viii) Carrier EQ, LLC ("Airfox") [em liquidação];
- (ix) BanQi Instituição de Pagamento Ltda. ("BanQi");
- (x) I9XP Tecnologia e Participações S.A. ("I9XP");
- (xi) E-Hub Tecnologia em E-commerce Ltda. ("E-Hub");
- (xii) BNQI Sociedade de Crédito Direto S.A. ("BNQI");
- (xiii) Celer Processamento Comércio e Serviço Ltda. ("Celer");
- (xiv) banQi Administradora de Cartão de Crédito LTDA. ("banQi Administradora");
- (xv) CNT Soluções em Negócios Digitais E Logística Ltda ("CNT");
- (xvi) Integra Soluções para Varejo Digital Ltda ("Integra");

(xvii) CNTLog Express Logística e Transporte Eireli ("CNTLog");

(xviii) Fundação Casas Bahia ("Fundação Casas Bahia").

Thus, if you are a member of the board of executive officers, boards, advisory committees, employee, collaborator, trainee, business partner, service provider, or any person working for **Via or any company of Grupo Via or any entity of Grupo Via, this Code is for you!**

Values, principles, and guidelines of personal and professional conduct expressed herein shall guide everyone, without exception, in their actions and employment relations. All of us at Grupo Via shall take cognizance of this Code, practice, and disseminate it, it is our responsibility to ensure that it is observed by all stakeholders. Thus, have this material as a source of search and guidance at all times.

Only this way, with everyone's collaboration, we manage to build and keep an environment guided by values that govern our actions, after all, we are responsible for our behavior, our mission is to guide and inspire everyone around us so that each step always goes to the same direction: **make dreams come true with respect, ethics, and transparency.**



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HOW WE DO what we do

The “how we do” always comes before “what we do” in the way how we work here at Via. That is why to guide our behavior and decisions, besides valuing people and what is simple, enchanting, and innovative, overcome challenges and celebrate results, we have a set of pillars:



Passion for People

I am diverse, I believe in everyone’s potential and my passion is to serve employees, customers, and business partners.

BELIEFS:

I believe in people, I value the best of each person.

BEHAVIOR:

- I am truly interested, I put myself in other people’s places in any situation.
- I know that each interaction is a single opportunity to learn, enchant and serve the other.



Leadership & Collaboration

I play a leading role in our history, I assume as a leader in collaboration with everyone.

BELIEFS:

I am responsible for my result and I contribute to the whole.

BEHAVIOR:

- Irrespective of my position, I have autonomy with a clear direction to find solutions and outperform results.
- I collaborate and connect people to face and overcome challenges.



Simplicity & Objectivity

Objectivity and simplicity deliver better results.

BELIEFS:

I believe that being objective and simple is always the best way.

BEHAVIOR:

- I always practice a transparent, constructive, and direct dialogue.
- I am an agent of debureaucratization, I simplify, I solve.



Continued Innovation

I always learn and evolve, creating an environment that innovates in solutions for customers, the company, Brazil, and the planet.

BELIEFS:

I believe that courage, boldness, diversity, and learning build innovation and make tomorrow better than today.

BEHAVIOR:

- I pursue new paths, the best practices and I adapt to go beyond.
- I dare to challenge, make it happen, I am open to learning, making mistakes, and correcting quickly.



High Performance & Recognition

I have autonomy, I challenge myself and others, I am recognized for delivering results.

BELIEFS:

My contribution is important, this gives me a pride of belonging and achievement.

BEHAVIOR:

- I take a stand, I am not afraid of speaking and acting according to my belief, I know what I do is important for everyone.
- My objectives are clear, I have my plans, I work to be recognized for my results.



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Everyone's commitment

Respect for the company's policies, rules, and procedures

This Code's compliance is mandatory and the conduct presented herein shall be adopted by everyone. Only this way we are able to build a workplace where respecting values is a matter of principle, successfully developing our businesses.

It is worth noting that the failure to comply with this Code shall result in penalties that may include employee's dismissal or the termination of agreements signed with Grupo Via's company(ies), besides legal liabilities.



This Code does not exhaust all the ethical dilemmas we may encounter. Should you face any situation not outlined herein or if you have any doubt, you shall seek support from the chief, the Compliance team and consult Grupo Via's in-house policies, always having in mind in any action and decision-making process, the principles that guide our activities: respect, integrity, and transparency. Never take an action without certifying that it is in agreement with the Code and in-house rules.



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CHAPTER 01 VIA, A PLACE for everyone

Respect is a matter of principle

Respect is a principle that we do not compromise at Grupo Via, which shall be the grounds of all our work relations, whether with co-workers, customers, employees, suppliers, or partners. To accept and appreciate work with people different from you, with different ideas is our way of co-existing at Via. **Our dream is a world where everyone has equal opportunities, regardless of race, origin, age, religion, gender, or sexual orientation.**

Together, we represent Brazilians' diversity, therefore, the human rights defense permeates our operations, our business chain. We repudiate any type of prejudice, discrimination, moral and sexual harassment, slave labor, child labor, degrading working conditions. These situations are forbidden in our Group, also in the workplace of our partners and suppliers collaborating with us.

We offer a safe, healthy, inclusive workplace, free of intolerance, discrimination, prejudice, violence, and harassment. Our principles, values, policies, and strategies are based on respect for each individual's dignity. You are part of this.



CHAPTER 01 VIA, A PLACE for everyone

Diversity and equal treatment

Here at Grupo Via, we value and respect diversity, we are committed to human rights and citizenship.

We are building a Group wherein Diversity is not transitory; this is our way of being and acting. Therefore, we are aware of our responsibility to build a diverse and inclusive environment that increasingly seeks to enhance representativeness and offer development opportunities for all employees, namely: women, Afro-descendants, indigenous people, LGBTI+, persons with disabilities, refugees, or persons with different ages, including

adolescents and persons over 45 years of age. Our pursuit of inclusion and diversity also comprises topics, such as nationality, place of birth, income, aesthetic diversity, and academic background.

We provide an environment of respect where everyone is safe to be who they are and fulfill their dreams. Therefore, we do not accept any type of violence, prejudice, or discrimination, whether with customers, suppliers, service providers, or collaborators, whether during the workday or in an external environment, including virtual environments. Together, we make Via a place of respect for everyone.



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CHAPTER 01

VIA, A PLACE for everyone

WE DO NOT ACCEPT!

- Prejudice, violence, and discrimination of co-workers, customers, service providers, suppliers, partners, or any other person, whether in a physical or virtual environment (internal and external tools and social networks);
- Disrespectful treatment of anyone due to his/her personal characteristics;
- Intolerance or any form to stimulate it;
- Discriminatory jokes and nicknames;
- Allow situations like these to occur in silence, without taking reasonable measures. Get your part: report the incident;
- Any type of violence against women and girls, according to the UN Women principles.
- Use characteristics or personal situations of an employee to discriminate him/her in decisions concerning hiring, promotion, transfer, vacation, or any other professional situation. This is serious misconduct forbidden at Via.

Always put yourself in other people's places and, in case of doubt, consult our supporting materials;

- If you face or witness any situation in disagreement with values expressed in the Code of Conduct, send a report to our Whistleblowing Channel: canaldedenuncia.via.com.br, and in case of any doubts, should you need any guidance, contact the compliance area of your business unit.

» For those working at Grupo Via, it is important to take cognizance of other materials related to this Code, such as the Diversity Management Policy and Diversity, Inclusion and Human Rights Policy, besides the Women Empowerment Principle Booklet available in the link: http://www.onumulheres.org.br/wp-content/uploads/2016/04/cartilha_ONU_Mulheres_Nov2017_digital.pdf

CHAPTER 01

VIA, A PLACE

For everyone

RESPECT FOR DIGNITY,

ALWAYS

We believe that respect and ethics shall always be present for a healthy and productive workplace.

As professionals, we shall maintain, take care and protect our workspace to not become an unpleasant, aggressive, or hazardous place. Here at Via, we work together, valuing different people who have ideas different from ours.

At Grupo Via, we do not accept any behavior to cause any constraint, inferiority, or humiliation of any individual. A word, a gesture, an attitude to evidence disdain or stalking of an employee for any reason, may characterize moral harassment and result in adverse psychological and emotional disturbance of another person.



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CHAPTER 01

VIA, A PLACE for everyone

Moral harassment

We must combat moral harassment at the workplace and in personal life. **We reject any act of hostility, stalking, or mockery against our employees and service providers, we act to protect everyone's dignity.** Report any type of harassment witnessed or suffered. Here, there is no place for harassment, and who practices it!



AT VIA, WE DO NOT ACCEPT!

- Spread rumors and gossips aiming at harming other employees;
- Use offensive gestures and vulgar words in an oral or written communication;
- Blackmail or threaten employees using the possibility of promoting them or withdrawing them from the company;
- Use managerial position to request stressful, excessive activities inconsistent with the position held by an employee, with the single purpose of promoting discomfort and punishment;
- Threaten, curse, play offensively, humiliate, stalk, isolate or punish in situations that may mock an employee, business partner, or service provider;
- Demonstrate indifference, despise, or disrespect towards any person;
- Stalk who suffered or witnessed the moral harassment, for having reported the fact (in cases employee opted for not making a complaint anonymously). Here at Grupo Via, retaliation is unacceptable.

***Note:** We do not accept the behavior described above in the physical and/or virtual environment (internal and external tools and social networks).*



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CHAPTER 01

VIA, A PLACE for everyone

Sexual harassment

An employee's attitude with sexual nature to cause pressure, discomfort, threat, or embarrassment to another employee, whether publicly or without calling attention, with or without physical contact, whether with words, messages, e-mails, inside or outside the company's environment, are considered sexual harassment. **Sexual harassment is unacceptable at Grupo Via and may characterize crime!**



AT VIA, WE DO NOT ACCEPT!

- Intimidate or blackmail someone to accept any sexual appeal proposal;
- Physical contact, comments, and unwanted sexual proposals;
- Practice, stimulate, or participate in sexual harassment behavior (physical or oral);
- Practice or tolerate that others practice moral or sexual harassment and remain silent;
- Stalk who suffered or witnessed the moral harassment, for having reported the fact (in cases employee opted for not making a complaint anonymously). Here at Grupo Via, retaliation is unacceptable.

***Note:** We do not accept the behavior outlined above in a physical or virtual environment (internal and external tools and social networks).*



CHAPTER 01 VIA, A PLACE for everyone

BUILDING A HEALTHY AND SAFE WORKPLACE

Working in an environment that preserves health and where each employee feels safe is essential for everyone's wellness. That is why our team shall have the confidence necessary to make our customers' dreams come true.

CHAPTER 01 VIA, A PLACE for everyone

Occupational health and safety

Here, we observe the rules according to technical training sessions specific for each position, we use personal protection equipment, and **we act carefully to neither cause nor suffer accidents.**

Hazardous substances

We forbid the use or sale of alcoholic beverages or illegal substances at the workplace, during working hours. We also prohibit smoking any type of cigarette in the company indoors.



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CHAPTER 01

VIA, A PLACE for everyone

Bear arms

At Grupo Via, we sow peace! We co-exist peacefully. This means we do not accept any type of gun license at the company's premises, whether white gun (sharp or perforating object), firearm, stun gun, or even toy gun and other objects imitating a weapon. Only legally authorized personnel can use such licenses, such as watchmen, security guards, and escorts, as long as their activities so require. It depends on us to create such a healthy and safe environment.



AT VIA, WE DO NOT ACCEPT!

- Not comply with rules and procedures that protect everyone's health and safety;
- Do not use personal protection equipment;
- Keep, use or distribute illegal substances in the company (illegal drugs);
- Drink alcohol during working hours, work under the effect of alcohol or legal or illegal hallucinogenic substances;
- Smoke at the workplace, inside premises and offices;
- Carry a firearm, stun gun, or white guns (such as knives, penknives, brass-knuckles, amongst others), or also toy guns or similar. They represent danger, threat, or discomfort to co-workers, customers, and the public;
- Conceal infringements of employees who disrespect the occupational health and safety rules.



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CHAPTER 02

DO THE RIGHT THING in the right way

Ethics make us strong

We believe that doing the right thing in the right way is the best way for us to build an inspiring and motivating workplace we desire for everyone. **This means to be ethical and honest, i.e., certain that what we do will neither harm ourselves nor others.** We promote transparent relationships with co-workers, customers, suppliers, partners, and communities, as we believe that we can do more and better for everyone, with integrity, respect, and transparency.

Our commitment is to fully perform our tasks, do the right thing in the right way, being transparent about teams' results. At Grupo Via, we cultivate dedication, passion for work, and total focus on doing the best for the customer.

Compliance with laws

We fully oppose and we do not get involved in situations that are or seem to be irregular or illegal. At our company, we do not allow an undue advantage for others or the person himself, the practice of frauds or corruption."

We continuously review our practices according to domestic and international laws and regulations applicable to our activities, ensuring that our procedures are correct.



CHAPTER 02

DO THE RIGHT THING in the right way

Corruption and Bribery

Practice corruption or bribery infringes our internal rules and characterizes crime, besides opposing our pursuit of positively impacting people.

This involves any form of public or private corruption, i.e., a promise made to obtain personal or professional advantage (whether in cash, products, air tickets, hotels, among others) with suppliers, customers, or among employees or public officials. We also do not accept any action contrary to legal orders and Compliance rules.

Anti-money laundering and combating terrorism financing

We neither motivate nor tolerate suspicious business and/or criminal activities. Should an employee or partner identify or suspect any uncommon practice or transaction, or even atypical transaction that may characterize money laundering and/or terrorism financing, shall immediately notify the Compliance area.



CHAPTER 02

DO THE RIGHT THING in the right way

A few points that can prevent illegal practices:

- Always bear your identification documents, as well as other documents and information requested when receiving agents of accredited public authorities, and, whenever possible, be accompanied by a co-worker;
- Be polite and professional during conversations with agents of public authorities, only discussing issues relating to his position, also within the limit of agent position;
- Never request favors 'under the table' to agents of public authorities on behalf of any company of Grupo Via;
- When exercising citizenship and appearing in public, never link your political preference, ideological standing, or your opinion about any decision or attitude of public officials to the institutional positioning of Grupo Via or the brands composing the Group.



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CHAPTER 02

DO THE RIGHT THING in the right way



AT VIA, WE DO NOT ACCEPT!

- Any attitude that may be considered irregular, even if it seems not to harm Grupo Via;
 - Unduly privilege or benefit public officials, directly or through third parties, even if aiming at obtaining an advantage for Grupo Via's companies or expediting our processes, as the conduct of bribery or misconduct shall always be harmful;
 - Offer donations, gifts, privileges, bonuses, or personal advantages to any government authority or public official, directly or through third parties;
 - Make irregular payments, contrary to in-house rules or not observing legal decisions;
 - Offer assistance to public authorities (such as local governments or police stations) or contributions in products, unless this is beneficial to the local community and only after approval of areas in charge, observing internal policies and procedures, and disclosure in internal and official public channels;
 - Make donations to candidates and political parties on behalf of Grupo Via;
 - Link the name of Grupo Via and its brands to candidacy, political parties, and political party manifestations of any type;
 - Execute partnerships with federal, state, and municipal governments without proper formalization, publicity, and transparency.
- » All employees shall read and consult, when necessary, the Anticorruption Policy available in the business units intranet and participate in the mandatory training on the Anticorruption Law, available in the Intranet. In case of doubts or advice, contact the Compliance area of your business unit.



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CHAPTER 02

DO THE RIGHT THING in the right way

Internal Frauds and Misconduct

At Grupo Via, we focus on and respect our customers. Every day we work to make their dreams come true, applying data, intelligence, empathy, and sympathy, but every result is only valid if achieved ethically, i.e., “playing fairly.” **We do not tolerate any gain obtained irregularly, even if to the benefit of the company’s results.**

Our customers, our reputation, and our integrity are our priorities. It is worth noting that the non-compliance with policies, procedures, and rules that regulate the ethical conduct of Grupo Via’s companies is subject to disciplinary measure and legal liability, when reasonable.



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CHAPTER 02

DO THE RIGHT THING in the right way

⚡ AT VIA, WE DO NOT ACCEPT!

- Authorize discounts not allowed by the company's policies to customers, friends, relatives, or own benefit;
- Use discounts and benefits destined to employees for customer sales in disagreement with the company's rules;
- Benefit customers by granting credit out of procedures and limits authorized in the company's policies and rules;
- Use own resources in transactions, open customer's account for any reason, even if to achieve goals;
- Act with dishonesty to own benefit, (for instance: use improper means to sell);
- Convey misinformation or information different from advertised on the media;
- Act in disagreement with Consumer Defense Code (for instance, subject the product discount to the purchase of another item, service, insurance, or guarantee);
- Put your personal interests above the company's rules, and/or customers' interests;
- Add information to non-accurate systems or not authorized by the customer;
- Obtain and/or maintain customer's login and password to make any transaction without customer's awareness and authorization, as well as request any service;
- Generate, cancel, alter or authorize the sale of items traded without customer's authorization or to own benefit;
- Do not observe the procedures established;
- Use customer's information and personal data to make contacts unrelated to Grupo Via's business, not complying with laws, the confidentiality, and privacy of customers' personal data;



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CHAPTER 02

DO THE RIGHT THING in the right way



AT VIA, WE DO NOT ACCEPT!

- Receive or offer any type of donation, gifts, privileges, bonuses or advantages, money, or another type of transaction to any representative of suppliers, service providers, partners, or customers in disagreement with the company's internal policies;
 - Use registration data different from those informed by customers or use third-party information without consent.
- » For our employees, consult the Credit Fraud Prevention Policy and Procedures, available in the Intranet. In case of doubts, consult your business unit's Compliance area.



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CHAPTER 02

DO THE RIGHT THING in the right way

Via's interest is its top priority

We are a team, with common objectives and challenges, always seeking new opportunities to create value for the customer and the company. To successfully perform this role, we practice impartiality, i.e., we perform our tasks without our judgment being influenced by personal interests contrary to Grupo Via's interests.

For us, working is to bolster the strength of our team to deliver amazing results for our businesses.



CHAPTER 02

DO THE RIGHT THING in the right way

Family and friendship relationships

Family and friendship relationships cannot interfere in the decision-making processes or our activities. Any business decision shall be beneficial and advantageous for Grupo Via, besides observing our internal policies, irrespective of whether concerned with relatives, spouses, partners, relatives, or friends.

⚡ AT VIA, WE DO NOT ACCEPT!

- Do not inform the People & Performance /HR teams about the existence of an affective or family relationship with subordinate employees or heads (direct/indirect);
- Refer relatives and close persons or cause others to refer them in selection processes without notifying the person in charge of hiring and the People & Performance /HR teams about the relationship with the referred person;
- Allow that relationships of any type interfere in any decision or your position.



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CHAPTER 02

DO THE RIGHT THING in the right way

Performance of other professional activities

We know that many people can have another job or a side project. Via authorizes to perform other professional activities, as long as these do not interfere in their professional activities or Grupo Via's businesses, not conflicting with working yours, job interests, and responsibilities.

All employees who are owners or partners at any entity and they have doubts about conflict with Grupo Via's activities, shall seek guidance from their manager or business unit's Compliance area.



AT VIA, WE DO NOT ACCEPT!

- Maintain activities that may interfere with your performance or your responsibilities, or competing with Grupo Via's activities;
 - Make negotiation on their own or another person on behalf of Grupo Via without being requested to do this;
 - Sell products and/or services unrelated to our business during working hours.
- » For our employees, please consult the Conflict of Interests Policy available in the Intranet. In case of doubts or advice, contact your business unit's compliance team.



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CHAPTER 02

DO THE RIGHT THING in the right way

Gifts and Presents

The preservation of integrity and ethics shall permeate Grupo Via's actions. Therefore, we only accept and offer gifts or presents in conformity with the internal policies of the company and its partners.

We also never offer gifts or presents to government bodies agents and we fully abide by the Anticorruption Law.



AT VIA, WE DO NOT ACCEPT!

- Receive or offer gifts or courtesies out of the Group's internal policies;
 - Receive or offer gifts or courtesies in cash, check, or another type of financial transaction;
 - Do not inform the Compliance team when it is not possible to return to partner or supplier a present or gift received out of internal policies.
- » *For our employees, consult the Receipt and Offer of Gifts and Hospitalities Policy available in the business units' Intranet. In case of doubts or advice, contact your business unit's compliance team.*



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CHAPTER 03 RELATIONSHIP OF **trust**

Grupo Via's path to fulfill dreams

The passion for what we do is reflected in the excellence of our activities. We care for each detail of processes and areas of our organization, we also protect our partnerships, whether with thousands of employees, customers, service providers, suppliers, partners, or society, nurturing win-win relations built with trust deriving from the practice of integrity, transparency, and respect.

Our duty, as a company and as an employee, is always to work ethically and pursuant to the laws.

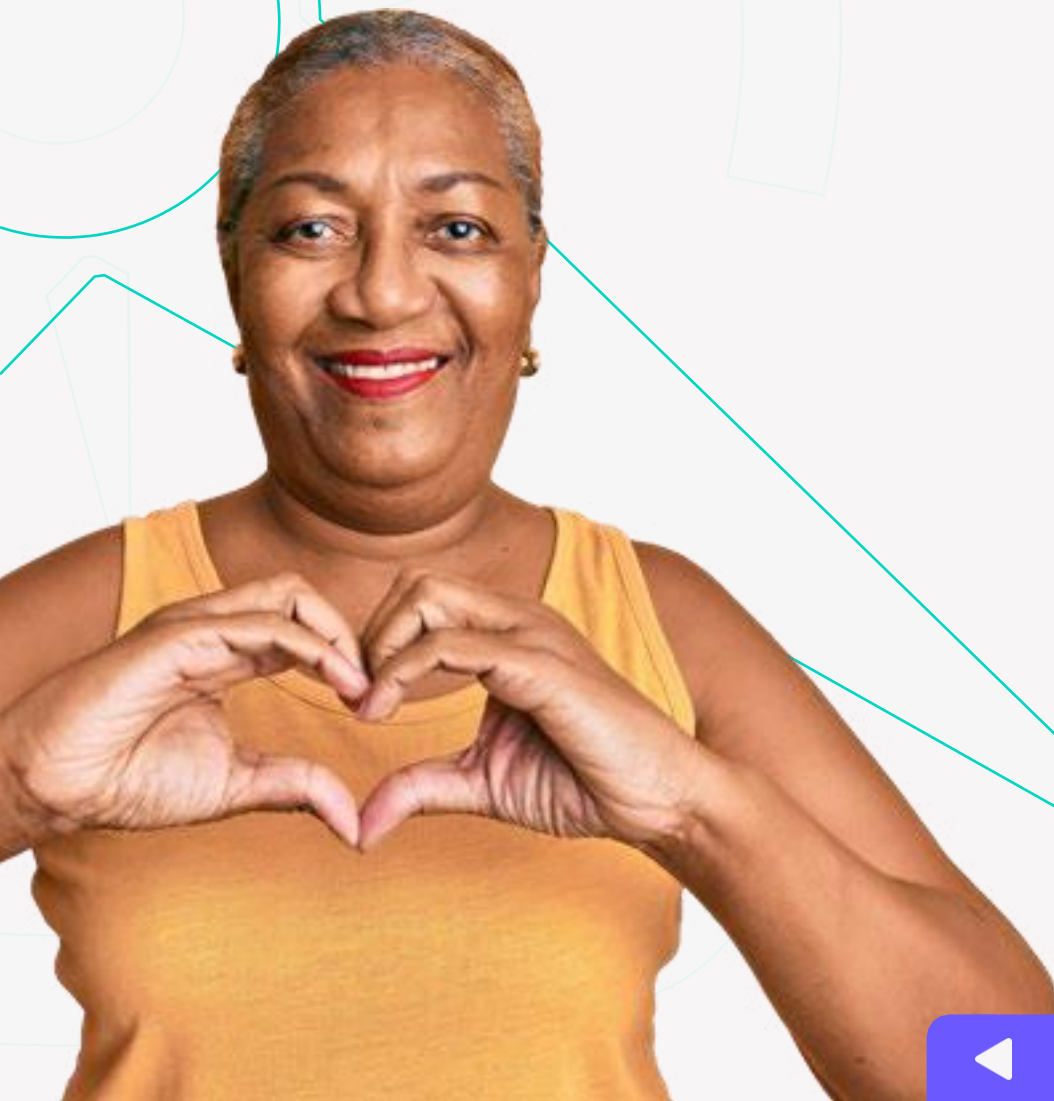


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CHAPTER 03

RELATIONSHIP OF trust



Customer relationships

Customers are our focus. We work every day to make dreams come true. Therefore, we always aim at continuously improving customer experience in our sales and services channels, inclusive post-sale. We want to make dreams come true and guarantee satisfaction. Anyway, our customer is everything.

We value our customers' opinions and feelings. We do not stimulate them to consume something undesired. Our relationship with this so special public is of respect, welcoming, transparency and agility.

We provide correct information so that they can consume from Grupo Via what was advertised in communication vehicles. False advertising does not and will never represent our practices!

We have services channels ready to hear customers and pay attention to requests, complaints, and suggestions. We believe that always we can do more and better. This is only possible by also hearing our public. **We ensure the compliance with Consumer Defense Code, all laws, and normative instruments applicable to our business model.**



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CHAPTER 03

RELATIONSHIP OF trust

⚡ AT VIA, WE DO NOT ACCEPT!

- Act in disagreement with Consumer Defense Code;
- Fail to comply with customer service internal rules;
- Put own interests ahead of customer's interests or act partially;
- Infringe the internal laws or regulations to benefit customers who have or built personal relations;
- Be omissive in the correct and accurate identification of products or services prices, causing customer frustration and confusion;
- Grant discounts beyond the limit authorized for employee hierarchical level and authority according to internal policies;
- Share customer information and personal data without authorization in a formal document signed by those involved and express authorization;
- Expose customer information and personal data in our services terminals without customer's or operator's authorization (ex. assistant, cashier, salesperson, analyst, manager);
- Use customer information and personal data to make contacts unrelated to Grupo Via's businesses, not observing the laws, customer confidentiality, and privacy.



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CHAPTER 03 RELATIONSHIP OF trust

Relationships with local communities

We are committed to developing and supporting initiatives that stimulate the transformation of communities in which we operate. Responsibility to seek new opportunities and create value for the customer and the company is also present in our transformational DNA. **Therefore, through Casas Bahia Foundation we strengthen communities and we contribute to human and social development and build a more democratic and sustainable society.**

FUNDAÇÃO
CASAS
BAHIA



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CHAPTER 03

RELATIONSHIP OF trust

Our operation is structured around three strategic pillars:

- Value leadership in communities, foment autonomy, local development, and disseminate a peripheral culture.
- Foment the entrepreneurship education, generation of employment and income, promote the productive inclusion through local micro entrepreneurs' qualification to generate income at communities and support to the entrepreneurship qualification or adolescents professional qualification.
- Stimulate employees' engagement in volunteering actions, an exercise of citizenship to transform society, reinforcing our pride in working for Via.

With Foundation's works, we contribute to positive actions along with and for society.

In addition, we are attentive to situations of emergency and disaster areas that cause vulnerability to communities; we contribute with humanitarian assistance for the affected population.

All initiatives and actions involving social organizations shall always be in line with Casas Bahia Foundation's social investment positioning.



AT VIA, WE DO NOT ACCEPT!

- Support or stimulate donation requests of any nature with third parties, aiming promotions, events or campaigns without involvement of Casas Bahia Foundation and unrelated to in-house policies;
- Projects in disagreement with Casas Bahia Foundation's social and cultural investment positioning and support guidelines via incentive laws.



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CHAPTER 03

RELATIONSHIP OF trust

Relationships with our Suppliers and Partners

Our business nurtures win-win relationships not only with co-workers and customers but also with our suppliers and partners. **We care for our rights and obligations and theirs, always acting ethically and transparently, irrespective of service or product, pursuant to prevailing laws.**

Always pursuing the best development of Grupo Via's businesses, the selection of these Partners shall meet the companies' needs, free of any conflict of interests.

We provide clear information to all employees so that they can make decisions and hire strictly in accordance with in-house rules.



AT VIA, WE DO NOT ACCEPT!

- Receive favors or gifts of any type (presents, discounts in personal transactions, offers, invitations, tickets, etc.) due to internal or external professional relationships that may affect decisions, cause different treatment, facilitate businesses or benefit third parties. These favors can be considered attempts or even bribery;
- Engage companies only due to family or friendship relationship, at any level;
- Allow companies engaged to act or speak on behalf of Grupo Via, without written institutional authorization;
- Receive rewards paid by third parties to make business transactions of their interest. The exception shall apply to the recognized market practices, controlled and authorized by internal areas in charge, such as campaigns, awards, and bonuses previously authorized;
- Engagement and use of suppliers for personal or private purposes;
- Engagement of suppliers in disagreement with new suppliers registration procedures and rules.



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CHAPTER 03

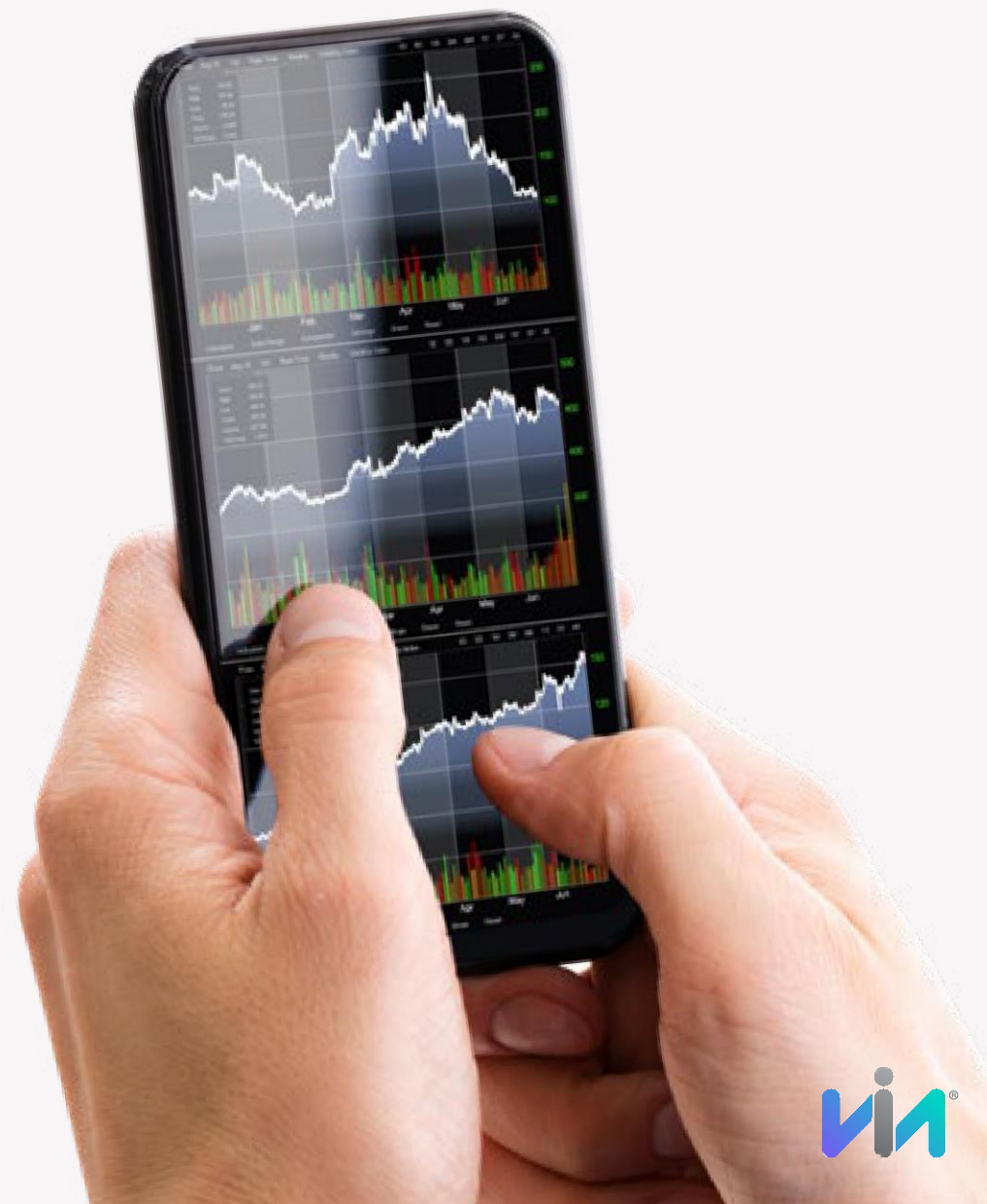
RELATIONSHIP OF trust

Relationships with our shareholders

All Grupo Via's shareholders, and relatives, in the capacity of consumers, shall observe the same rules valid and imposed to any customer buying Via's products or services.

Business relations between shareholders and/or relatives with Grupo Via's companies are authorized, however, these shall observe the principles of exemption, equity, transparency, ethics, competitiveness, and no conflict of interests, as well as evidence that their businesses or activities do not exclusively rely on Grupo Via or its subsidiaries, without prejudice of compliance with rules provided for in Grupo Via's Related Party Transaction Policy, where applicable.

It shall be incumbent upon people or companies interested in building a business relationship with Grupo Via, check and previously inform the existence of family relationships with employees and/or managers of Grupo Via's companies, if this is the case, as well as any economic dependence. Thus, Via will be able to identify the need for approval from deliberative bodies or even factors preventing the execution of business.



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CHAPTER 03 RELATIONSHIP OF trust

Relationship with companies of the same economic group or persons with considerable influence over the company

All transactions executed between Via and/or subsidiaries, with companies of the same economic group, affiliates, as well as persons with considerable influence over the Company's businesses, shall strictly observe the processes and procedures imposed by Related Party Transaction Policy.

Our commitment is to nurture sustainable, equitable, and transparent relationships across our businesses, always in the best of Via's interest.



AT VIA, WE DO NOT ACCEPT!

- Act or decide without exemption, transparency, ethics, and a continued eagerness for competitiveness;
- Existence of conflict of interests;
- Unveil situations that may cause harm for the company and its businesses;
- Actions for personal or third party advantage;
- Lack of business communication among shareholders, relatives, and companies of the same group for the Board of Directors' approval.

» **It is also necessary to consult:** *Grupo Via's Related Party Transaction Procedure. For assistance about this topic, consult the Corporate Legal Department.*



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CHAPTER 03 RELATIONSHIP OF trust

Attention with institutional information

The communication and disclosure of Grupo Via's information and data are made by a team of professionals with authorization to speak on behalf of the Company and its subsidiaries with internal or external stakeholders.

But what is this institutional information and data? Any strategic information or not, relating to the company's sales, sales information, sales estimates, business information, headcount, investments, new projects, for instance, are sensitive issues that shall be exclusively conveyed by these groups of people, observing the communication rules and periods allowed.

Only the Corporate Communication, Institutional Relations, Sustainability & Diversity, and Investor Relations Departments, and Grupo Via's Board of Executive Officers may answer doubts and requests about Grupo Via's institutional information and its brands to ensure consistency of information to be disclosed, thus, not harming the transparency, part of our principles.



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CHAPTER 03 RELATIONSHIP OF trust

⚡ AT VIA, WE DO NOT ACCEPT!

- Give interviews and clarifications to journalists, researchers, and students without the written authorization of areas in charge;
- Allow third parties to record or take photos of employees or customers inside stores and our premises without the proper written authorization of persons and areas in charge;
- Convey misinformation, inaccurate or offensive information about competitors or third parties to directly or indirectly benefit Via;
- Speak badly of other companies and professionals;
- Disclose, at any time and via any vehicle, insider and confidential information to which employee has access due to position held at Via.

Any information relating to Grupo Via's businesses only can be disclosed to the market in general through authorized channels and personnel.

» **It is necessary to also consult:** *Grupo Via's Disclosure and Use of Material Information and Preservation of Confidentiality Policy.*



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CHAPTER 03 RELATIONSHIP OF trust

Relationships with associations and unions

We recognize the relevance of union representation, free association, and respect for unionized employees. We believe in the open dialogue for collective negotiations, guided by balanced relations between employer and employee.

⚡ AT VIA, WE DO NOT ACCEPT!

- Do not recognize the legitimacy of union representation;
- Speak with union entities on Grupo Via's behalf without Labor and Union Relations Department's authorization;
- Make any illegal payment or offer gifts and presents, without observing the Union Relations Policy, the Receipt, and Offer of Gifts Policy, and the Donations, Contributions, and Sponsorships Policy.

CHAPTER 03 RELATIONSHIP OF trust

Environment: preserving is everyone's duty

We initiated a journey to strategically insert the concepts of circular economy in our operations. The circular economy proposes to reduce waste production until it is completely re-introduced in the production and consumption cycle.

This should be done by also decreasing emissions from production, distribution, and recycling processes, and increasing the use of energy from renewable sources. It is based on three principles:

1. Eliminate waste and pollution from the beginning.
2. Keep products and materials under use.
3. Regenerate natural systems.

The management of the most critical environmental aspects in Grupo Via's operations is directly connected with these principles. The aspects are: organization's reduced energy consumption, management of vehicle fleet emissions (logistics), packages recycling, and product reverse logistics post-consumption. This can begin with simple acts, such as solid waste disposal (we consider this material useless) in the right way, contributing to the REVIVA Recycling Program; saving natural resources (water, energy, and paper); voluntarily contributing to the company's social projects or out of it; seeking suppliers who comply with local and national environmental laws and policies.



AT VIA, WE DO NOT ACCEPT!

- Be indifferent or adopt actions to harm the environment;
- Practice any action against federal, state, or municipal laws, environmental policies, internal procedures, and environmental commitments voluntarily assumed by Grupo Via.



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CHAPTER 04 OUR INFORMATION and resources

A commitment to transparency and information for all

It is in our DNA working to make our customers' dreams come true, thus, we smartly use data to eliminate any disagreement. We do this to preserve the personal information of everyone who entrusted us their data, whether customers, employees, or partners, adopting a safe and non-discriminatory behavior that respects the principles of privacy, purpose, transparency, and unequivocal consent for data collection, preserving Grupo Via's credibility and its business sustainability.



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CHAPTER 04 OUR INFORMATION and resources

Data privacy and information security

The disclosure of passwords and confidential information is forbidden. To keep the workplace safe, we can monitor the content of professionals' e-mails, if necessary, without prior notice.

To protect your data and our customers' data is everyone's duty to observe the guidelines when performing their work. The disclosure of Grupo Via's confidential information is strictly forbidden. **In case of doubt, talk to your manager or the Compliance team and the Privacy Office.**



⚡ AT VIA, WE DO NOT ACCEPT!

- Act or decide without exemption, transparency, ethics, and continued eagerness for competitiveness;
- Existence of conflict of interests;
- Dissemination of situations that may cause harm for the company and its businesses;
- Actions for personal or third party advantage;
- Lack of business communication among shareholders, relatives, and companies of the same group for the Board of Directors' approval.

» **Necessary also consult:** *Grupo Via's Related Party Transaction Procedure. For assistance about this topic, consult the Corporate Legal Department.*



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CHAPTER 04 OUR INFORMATION and resources

⚡ AT VIA, WE DO NOT ACCEPT!

- Use without authorization the name, brands, logotypes, slogan, colors, types of letter, mascots, and everything related to Grupo Via's brand visual identity in social networks and virtual communities, or any other means (such as photos, audio, and video recordings, among others);
- Access, store and disseminate during working hours, at the company's workplace or using the company's equipment: vulgar content, lying content, marketing unrelated to the company's purpose, pornographic content, or prompting violence that may discriminate someone or against the company's laws or policies.
- Do not comply with rules and procedures laid down in the Security, Treatment and Information Management policies;
- Disclose Grupo Via's confidential or strategic information, its brands, customers, employees, and third parties, without previous authorization of areas in charge and data holder.
- Ignore the guidelines of the Privacy Office and act not in conformity with the company's privacy guidelines.

If you find any content disclosed that desires the company's attention, it is your duty to contact the media relations area and the Whistleblowing Channel.

» *For employees, consult:*

- *Information Classification Policy*
- *Use of Technological Resources Policy*
- *Information Treatment Policy*
- *Access Management Policy*
- *Information Security Policy*
- *Information Asset Management Policy*
- *Manual of Good Practices at Social Networks*



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CHAPTER 04 OUR INFORMATION and resources

Results transparency

We are committed to transparency and accuracy, therefore, we work to have auditable information. This means that our financial information shall be prepared and disclosed by areas in charge, representing the organization's figures and indicators, with a focus on transparency of information for our investors and stakeholders. To ensure the accuracy of this information, we rely on advisory services of independent external auditors, indicated in our Reference Form on the website

<http://ri.viavarejo.com.br/>



AT VIA, WE DO NOT ACCEPT!

- Lack of transparency and accuracy of auditable information;
- Actions or false, inaccurate, or incomplete information.



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CHAPTER 04 OUR INFORMATION and resources

Protection of secrecy of confidentiality of information

We treat as confidential the in-house information to ensure that it is not used against our people, our purposes, or our businesses or stakeholders.

We are committed to protecting the confidentiality of personal information about our employees, customers, suppliers, and our businesses. We only share this information in cases of court orders or other assumptions authorized by laws. All other cases shall be previously analyzed by the Privacy Office.

Information about our businesses, especially financial and strategy issues, shall not be disclosed to anyone, not even to friends and relatives.

⚡ AT VIA, WE DO NOT ACCEPT!

- Comment confidential information on public sites, social networks websites, or discussions on the internet. Discuss the company's businesses with other people, whether friends or relatives, making negative comments, spreading rumors, or conveying insider and confidential information;
- Share confidential information with competitors or discuss with them internal issues of the company;
- Use for a personal reason or transfer to third parties confidential documents and information, even if prepared by the employee in his/her workplace;
- Use confidential information to own benefit or third parties, even after no longer holding any job, position in the Group or his/her employment relationship has been terminated with Grupo Via, not observing the commitment assumed;
- Use business information or our strategies, our customers or business partners;



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CHAPTER 04 OUR INFORMATION and resources



AT VIA, WE DO NOT ACCEPT!

- Obtain confidential or insider information, plans or actions of third parties and competitors through illegal means, manipulation, or economic espionage;
- Convey information to competitors, even if the collaborator has been hired by them;
- Act alone or jointly with competitors to manipulate market conditions (interfere in pricing or create artificial supply or demand conditions). These practices characterize unfair competition;
- Trade the Company's Securities using the company's confidential or strategic information;
- Trade database without previous authorization of the Board of Executive Officers or not observing the laws, privacy, and/or secrecy of our customers' data.

» Consult:

- *Via's Securities Trading Policy*
- *Information Security Policy*
- *Classification of Information Policy*
- *Manual of Good Practices at Social Networks*



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CHAPTER 04 OUR INFORMATION and resources

Clean table, printer, and devices locked

We care for sensitive and confidential information, especially on our desks and printers. Therefore, always clean out your desk, do not leave sensitive or confidential documents on printers, and lock the computer every time you leave your workstation.



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CHAPTER 04 OUR INFORMATION and resources

Care for the Via's assets and resources

Our entrepreneurial spirit means to feel responsible with an ownership mindset in relation to objectives and preservation of the company's businesses. Therefore, responsibility guides all the company's equipment and resources, according to the rules established, protecting goods and resources. We always seek to produce wealth, optimize resources, and add value to our businesses.

⚡ AT VIA, WE DO NOT ACCEPT!

- Waste and improperly use the company's resources;
- Allocate and use goods and resources in disagreement with the company's policies;
- Use of social networks on the company's behalf in disagreement with internal policies and/or without proper authorization;
- Destroy or discard records and documents, unless this process occurs in observance of guidelines of areas in charge or in-house rules;

- Use Grupo Via's vehicles and equipment in disagreement with its policies;
- Use software or apps not authorized by the Company;
- Access or download pirated products using Grupo Via's internet and equipment;
- Remove equipment or material from the Company without formal authorization of areas in charge;
- Damage or steal any good, furniture, material, installation, or property of the company.

» **For employees, consult** Information Security Policy and Technological Resources Acceptable Utilization Norm at the Intranet.

CHAPTER 04 OUR INFORMATION and resources

Intellectual Property

We adopt leading-edge technology to ramp up our businesses and deliver greater convenience for our customers. This means we significantly invest in intellectual property, including in this concept all and any rights, registered or not, registerable or not, including trademarks, distinguishing marks, commercial names, internet domains, patents, inventions, utility models, industrial designs, software, hardware rights, computer programs, platforms, apps, source codes, object codes, mobile device apps, virtual platforms, copyrights, technical confidential information, and commercially confidential information, and any other confidential information, including research and development, know-how, formulas, designs, prototypes, models, projects, technologies, compositions, productions, algorithms, and other production techniques and processes, as well as schemes, technical data, designs, layouts, slogans, production and other designs, projects, notes, industrial models, specifications, commercial methods, as well as any other information fitting into the definition of commercial secrecy.

Therefore, employees, partners, and everyone maintaining a relationship with us shall observe our intellectual and industrial property rights, as well we observe third-party rights. **No person shall have any expectation of copyright, intellectual, and/or industrial property right over any creation, invention, development, and/or improvement due to legal relationship maintained with the Company and its subsidiaries, also when these actions are performed outdoors.**



AT VIA, WE DO NOT ACCEPT!

- Copy or storage or source codes in personal, media, portable devices and/or sending of this information to employee's personal e-mail;
- The violation of any intellectual property right of the Company or any company of Grupo Via.



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CHAPTER 05 ADVOCATE for our code

Our attitudes help to transform Grupo Via

All of us are responsible for what we do in our daily pursuit of making dreams come true, contributing to the growth and preservation of our businesses. Observing and advocating for the conduct presented in this Code, guided by the principles of respect, integrity, and transparency, compose our joint pursuit of a spirit of transformation.

With this material, you can feel safe to adopt our conduct during your activities successfully. Cases of non-compliance with the Code of Ethical Conduct guidelines shall be directly and exclusively reported to Grupo Via's Whistleblowing Channel. All issues reported to the channel shall be ensured impartiality, secrecy, and confidentiality.

If you witness or suspect, denounce.

We point out that penalties can be applied to those practicing any retaliation or stalking of whistleblowers who act in good faith, in collaboration with the company. Grupo Via's Whistleblowing Channel is fully independent, technically qualified to send, solve and instruct people about issues raised.

Chanel is liable for analyzing and monitoring the issue until it is solved, including, if necessary, its referral to the Ethics and Discipline Committee.



Whistleblowing channel

Telephone **0800 450 450 4**

E-mail **viavarejo@canaldedenuncia.com.br**

Website **www.canaldedenuncia.com.br/viavarejo**

Available 24 hours/7 days a week.

Whistleblowing can be anonymous and non-retaliation of good-faith whistleblowers is guaranteed.



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CHAPTER 05 ADVOCATE for our code

Code of Ethic Conduct Management

Grupo Via's Ethics and Discipline Committee manages the Code of Ethical Conduct in partnership with Grupo Via's Compliance team and business units, in charge of keeping the Code of Ethical Conduct updated and deciding on issues referring to the regular or irregular conduct practiced inside Grupo Via.

In case of doubt, consult your immediate manager or your business unit's Compliance team for support and clarifications necessary about the issue. The Legal, People, and Performance/Human Resources departments and Internal Audit are also available to support interpreting the Code or send issues to your business unit's Compliance team.

For additional details, consult the Management Policy of the Ethics and Discipline Committee.



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CHAPTER 05 ADVOCATE for our code

Penalties

Those practicing acts to violate the Code of Ethical Conduct or its essence shall be subject to the applicable legal and administrative effects, as provided for in the civil, criminal, and labor laws.

The penalties applicable to the violation of the Code of Ethical Conduct shall be analyzed case by case, with impartiality, taking into account: (i) the nature and severity of infringement; (ii) the position (the higher is the position, the greater is employee's responsibility), the offender's history, his responsibilities; (iii) mitigating or aggravating circumstances to the infringement committed; (iv) the means used and the objectives pursued; (v) the risks involved; and (vi) eventual consequences of sanction.

The Ethics Committee shall be liable for the sanctions applied to the cases.

Among the penalties, we include: (i) Guidance; (ii) Written warning; (iii) Suspension; (iv) Dismissal without cause; or (v) Dismissal with cause.

Training sessions

All employees shall participate in periodic and mandatory training sessions about the principles and guidelines of this Code of Ethical Conduct, which can take place on-site or at Universidade Via's e-learning platform.



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CHAPTER 06 glossary



What do prejudice and discrimination mean?

Consciously or unconsciously consider that a person as he/she has a certain characteristic, this person does not have the same value as others. Discriminatory practices can be seen in various actions, although we do not realize them at first glance. For instance, any written, spoken, or physical attitude expressed by gestures negatively discriminating someone's personal characteristics, such as social condition, gender, ethnic group, race or color, religion, age, sexual orientation, region of origin, physical or mental condition, marital status, pregnancy, breast-feeding, political opinion, amongst others.

What does moral harassment mean?

It is the exposure of one or more employees in embarrassing, repetitive, and lingering situations, aiming at humiliating them for any reason. This can happen publicly or privately. This conduct, a type of violence or stalking, can be oral, written, or through gestures making employees feel incapable to perform their work, isolated from others, activities, and routines, even apathetic in their personal relationships. Overall, moral harassment is practiced by a head in relation to a subordinate, but also from a subordinate to his/her head, or also among co-workers of the same hierarchical level, with mockery, humiliating jokes, for instance.

CHAPTER 06 glossary

What does slave labor mean???

It is the exploration of a worker who does not receive salary or only receives survival basic items (food and housing) in exchange for physical or intellectual work. Very often, the employer retains employees' documents, constantly monitors employees, and does not allow him/her to leave the workplace, depriving him/her of freedom, even including psychological or physical aggression.

What does child labor mean?

Child labor is the work performed by children and adolescents below the minimum age authorized, pursuant to each country's legislation. In Brazil, as a general rule, work is prohibited for those under 16 years of age. As an apprentice, work is authorized for 14-year old minors. Night, hazardous or unhealthy work practiced by minors under 18 years of age is also considered child exploration.

What do degrading working conditions mean?

These are actions and situations that disrespect workers' health, safety, and wellness. This is when an employee is submitted to an unacceptable condition of lack of cleanliness, inadequate installation, or another subhuman condition, generating or even causing health and psychological problems, diseases, even more, drastic cases putting his/her life at risk.

What does sexual harassment mean?

These are situations in which the offender practices any type of inconvenient, embarrassing, and undesired attitude with a sexual nature towards another employee (making undesired invitations, initiating indiscreet conversations, etc.) or, also, extorting or expressly imposing sexual favors on the attacked person in exchange of maintenance of employment or professional advantages. Overall, sexual harassment is practiced by a superior in relation to his subordinate, but also from a subordinate to his superior, or also, between co-workers of the same hierarchical level.

What does occupational health and safety mean?

Occupational health and safety are protection measures, laws, regulatory rules, training, and procedures the company shall observe and implement to improve the workplace of its employees, besides preventing and avoiding diseases or accidents, or even minimizing the risk of death of its employees when performing their duties or in the company's physical environment.

What does fraud mean?

It is any bad-faith act to mislead information, data, or fact aiming personal advantage or unduly benefiting third parties, or to harm another person. It can be considered an internal irregularity but also can be considered a crime, depending on the case.

CHAPTER 06 glossary

What does bribery mean?

This is the cash payment or offer of advantages (gifts, presents, meals, travels, etc.) to a government agent, public official, or private sector professional, for them to practice any illegal act and/or deprived of ethics. This conduct is considered a crime.

What does corruption mean?

This is to use the power or authority to obtain advantages for own interest or third party. Corruption is practiced by someone who pays to obtain an advantage, and who receives the amount of benefit in exchange for these advantages. This conduct is considered a crime when it involves an agent of any public authority. Private corruption involving suppliers or customers is forbidden at Via.

Who are public officials?

Government authorities, agents, or public officials, government-owned companies employees or under public hiring regime, including employees of banks and public hospitals, utility permissionaires, and concessionaires.

What does anti-corruption law mean?

Law No. 12.846, referred to as Anticorruption Law, holds legal entities liable for the practice of acts against the public, national or foreign administration, practiced to own benefit or interest, exclusive or not.

The law applies to companies, regardless of the incorporation or corporate model adopted.

Which are forbidden substances, alcoholic beverages, firearms, and white guns?

Forbidden substances are drugs, narcotics, hallucinogens, and any other illegal substances. Alcoholic beverages are those with any level of ethyl alcohol. Firearms are handguns, rifles, or other artifacts firing projectiles or bullets. White guns are any sharp or perforating objects that can be used to injure or threaten people. Here we also include toy guns, as they cause threat and discomfort for simulating real guns.

CHAPTER 06 glossary



What does consumer rights mean?

These are the rights contained in the Consumer Defense Code, Law No. 8.078 of September 11, 1990. The Code compiles a set of rules that aim at protecting consumer's rights, also governs the relations and responsibilities between supplier (product manufacturer or service provider) and end consumer, defining conduct standards, terms and penalties.

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