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1. PURPOSE

To establish the risk management principles, process guidelines and responsibilities of Sendas Distribuidora S.A. (hereinafter "Company"), as well as to guide the identification, assessment, treatment, monitoring and communication of risks that are inherent to the activities, incorporating the risk vison to strategic decision-making in accordance with the market best practices; contributing to the protection of the Company's value; supporting the fulfillment of business objectives; reducing uncertainty in a preventive manner; and increasing the identification of opportunities.

2. GUIDELINES

- **2.1.** Our general guidelines are commitment to the Company's value proposition, in line with our Code of Ethics so we can create a risk management culture that reaches all employees.
- 2.2. Risk Management is part of the Company's corporate governance process, being an integral part of the decision-making process and contributing to the execution of its strategy. Risks are identified and treated to ensure that the goals set in the strategic planning are met.
- **2.3.** To that end, the Risk Management structure takes into account the joint action of corporate governance and management bodies, in accordance with the concept of the four lines, as described in table 1 below:

First Line	Second Line	Third Line	Fourth Line	
- Operational	- Specialized	- The assurance	- Independent	
Management,	areas, control	functions,	External Audit	
represented by the	areas and support	represented by the	functions, whose	
directors, managers	functions, Internal Audit		professional	
and other	represented by the	Area, responsible	mission is to	
employees in all	Risk Management	for auditing and	assess the	
business areas	and Business	reviewing Risk	quality of	
(stores, DCs,	Continuity Area,	Management and	internal controls	
regional offices and	which analyzes	Internal Control	aimed at	

Policy Risk Management:

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headquarters) that	the effectiveness	practices, as well	preparing
deal with day-to-day	of risk	as the	financial
tasks and	assessments	effectiveness of	statements. In
operations.	conducted by the	governance,	this role, the
- They must	Operations	identifying	Independent
manage the	Management, and	problems and	External Audit is
performance and	may require	opportunities for	also one line
the assumed risks in	assistance from	improvement with	among the four
accordance with the	other internal	independence,	lines, as it must
provisions of this	areas of the	objectiveness and	report to the
Policy.	Company	power for the	company the
- They implement	responsible for,	recommendations.	shortcomings of
control systems,	among other	- The Internal	these controls, if
action plans and	matters, Legal,	Audit provides	they find any.
render account in a	Tax, Personal	independent and	
timely manner of the	Data Protection,	objective	4
information	Projects Office,	assessment and	
regarding Risk	Compliance,	advisory on the	
Management.	Internal Controls,	appropriateness	
- The responsibility	Information	and efficacy of	
for risk	Security,	governance and	
management is still	Sustainability etc.	risk management,	
an essential part of	- They must guide,	through the	
first-line functions,	monitor and	competent	
and in the scope of	assess adherence	application of	
their management.	to defined	systematic and	
	standards and	disciplined	
	policies, and	process Reports	
	support the first	its conclusions to	
	line in achieving	the senior	
		management and	
·			-



the Co	mpany's	the	governa	ance	
objectives		body	in orde	er to	
- F	acilitate,	promo	te	and	
communic	ate and	facilita	te		
monitor	risk	contin	uous		
managem	ent	improv	ements/	5,	
practices	and help	also	in the	risk	
identify ris	ks.	manag	gement		
		proces	ss (inclu	ıding	
		interna	al contro	ols).	

Table 1: 4-The four lines model

- **2.4.** Risks must be continuously monitored during the performance of your routines, and they must also be reviewed on a quarterly basis, or occasionally, in the occurrence of an event that generates significant impact.
- **2.5.** Risk matrices must be critically analyzed once a year, considering all elements that affect the existing risks, and the internal and external context and organizational strategy.
- 2.6. Identified weaknesses and failures must be informed to Risk Management, so that they can be analyzed and reflected in the existing risk matrices. Weaknesses can be identified in the analysis of sectors such as Information Security, IT, Audit, Compliance, Internal Controls, or the organization's business areas.

2.7. Roles and responsibilities

We describe all stakeholders within the life cycle of the Risk management process, along with their respective responsibilities.

Function	Responsibilities
Board of Directors	Establishing general risk guidelines in line with
	the business context and the strategic planning
	cycle;
	Assessing, deliberating and approving the
	strategic and prioritized risk matrix;



Function	Responsibilities
• Ir	nfluencing and sponsoring Pririoritized Risks
m	nonitoring within the management forums;
• Ir	nfluencing and sponsoring the Risk culture
w	vithin the Company;
• C	Conducting an annual assessment of whether
th	ne Risk Management and Internal Audit Area's
st	tructure and budgets are adequate for the
p	erformance of their functions;
• R	Reviewing and approving general definitions of
th	ne Risk Management strategies;
• A	approving the budget intended for the Audit
C	Committee, aiming at ensuring its operational
	utonomy and covering its operating expenses.
	ollowing the activities of the Company's
	nternal Controls, Risk Management, and
	nternal and External Audit areas;
	ollowing the Company's risk exposures;
	assessing the eligibility of forums, definitions
	nd guidelines to compose the risk
AIAC	nanagement model within the Company;
	ollowing the risk indicators applicable to the usiness context and the Board of Directors'
	uidelines;
	Checking the regular performance of Risk
	Management activities, following compliance
	vith legislation, as well as the Company's
	nternal policies, norms and standards;
	ssessing, monitoring and periodically
	nforming the Board of Directors of Prioritized
	Risks identified in the reviews conducted by the



Function	Responsibilities
	Risk Management area, helping with the assessment of the action plans and fulfillment of recommendations;
	 Assessing, approving and following the execution of Prioritized Risks treatment and monitoring;
	 Assessing, approving and recommending to administration the corrections and/or improvements related to Company's internal policies;
	 Assessing the Company's quarterly information, interim statements and financial statements;
Corporate Governance and	 Planning and ensuring the operationalization of
Sustainability Committee	Risk Management, taking into account all dimensions of the defined structure, including the Company's strategic, tactical and operating activities;
	 Advising the Board of Directors when applying the Company's Risk Management methodology;
ATAC	 Supporting the Board of Directors when defining the Company's prioritized risks;
	Supporting the Company in the analysis and approval of the Rick Management strategy:
	approval of the Risk Management strategy;Advising the Audit Committee and the Board of
	Directors on Risk exposure levels;
	 Assessing the Company's Risk Management process;
	 Identifying risks arising from the Company's strategic and direction changes decided by the Board of Directors.



Function	Responsibilities
Chief Executive Office /	Promoting integration and risk culture in the
COMEX / DirEx (Executive	Company and in strategic planning and
Board)	management cycles;
	Approving the Risk Management Policy and
	supporting the initiatives of the Risk
	Management and Business Continuity area,
	aiming at contributing to the efficacy of their
	actions;
	Promoting the implementation of an efficient
Allen	Risk Management model, in line with business
	objectives and business goals. Applying general
	guidelines established by the Board of Directors;
	Monitoring risks managed at the level of each
	process and operations in order to ensure the
	effectiveness of control measures;
	Taking part in the Company's Risk identification,
	validation and prioritization processes;
	 Monitoring KRIs and KPIs and the mitigation
	strategy for Prioritized Risks;
ATAC	 Assessing and monitoring the treatment of
, , , , , ,	business Risks, in line with the execution of
	strategic planning;
	Assessing in a timely manner the effectiveness
	and applicability of this Policy's guidelines;
	Assessing and supporting adjustments to the
	structure aimed at the management process,
	taking into consideration human, financial and
	technological resources;
	Responsible for the Company's relevant risk
	management, concentrating all efforts required



Function	Responsibilities
	to mitigate the risks deemed to have significant
	impact on the fulfillment of business objectives;
	Assuming and authorizing risks that are above
	accepted levels and, thus, justify strategic
	initiatives and corporate decisions.
Risk Management Area	Establishing the Risk Management Policy and
	Procedures;
	Encouraging the adoption of good risk
	management practices, considering the
Allina	Company's business needs;
	 Fostering training programs and awareness
	campaigns about Risk Management and
	Business Continuity;
	 Defining, establishing and improving the Risk
	Management methodology, in line with the
	value chain, and integrated into the strategy,
	tactics and operations of the Company;
	Managing the Company's Risk Management
	process cycle, jointly with the areas and
ATAC	respective business activities of the Company;
/ 1/1/	Conducting the management of information
	flow within all business areas and activities, in
	line with concepts, methodology and deadlines
	established for each cycle of Risk
	Management;
	Supporting all business areas and activities in
	the cycle of risk identification, assessment,
	treatment and monitoring in order to assist
	them in reducing the level of risk exposure;



Function	Responsibilities
	 Managing the Risks Matrix, communicating in
	the main management forums their status and
	levels of exposure;
	 Assisting the business areas in identifying and
	assessing the risks' impact.
	 Reporting/Informing the status of the most
	significant risks to the Audit Committee of
	Assaí in a timely manner;
	 Analyze potential risks based on the
Annual	vulnerabilities informed by business areas,
	audit, security, internal controls or compliance;
	 Notify risk owners about significant changes in
	risk under their responsibility;
	 Support the Senior Management in the process
	of approval of risks that are above the
	acceptance levels established.
Compliance Area	Assist Risk Management with the identification
	and assessment of third parties' risk, in order to
	mitigate possible risks of corruption, fraud,
AIAC	conflicts of interest and negative media, among
	others, ensuring compliance with current anticorruption and antifraud laws and
	regulations, and in accordance with the matrix of
	prioritized risks;
	 Monitoring risk assessments conducted based
	on the level of risk;
	 Supporting prepare and adjust standards,
	policies and procedures so as to reduce the
	business's risk exposure;
	·



Function		Responsibilities
	•	Assisting the preparation of policies, processes,
		standards and procedures manuals; and
	•	Spreading Compliance culture through training
		and communication, ensuring compliance with
		existing laws and regulations as well as internal
		norms, aiming to mitigate identified risks.
Internal Controls Area	•	Reviewing controls in the SOx matrix together
		with the business areas;
	•	Conducting SOx tests;
Alle	•	Supporting areas in the implementation of
		action plans and remedying identified issues
		before and after the stages of the SOx audit
		process;
	•	Meeting the requests of the external audit;
	•	Supporting with preparation of procedures
		policies, processes, norms and manuals;
	•	Mapping and assessing adherence to Policies,
		Norms and Procedures and adjusting
		processes to the best market practices;
ATAC	٠	Follow up on and controlling the main reported
		aspects (external and internal audit, internal
		controls and risk management);
	•	Supporting the Risk Management and
		Business Continuity area in mapping the risks
		relating to non-compliance to SOx
		requirements;
	•	Provide support to other areas in order to
		improve the internal controls environment of the
		processes.



Function	Responsibilities
Information Security Area	Identifying information security vulnerabilities
	and risks;
	Maintaining effective communication with the
	Risk Management team on possible
	vulnerabilities, threats, failures, abnormalities,
	violations and new security measures;
	Promptly informing the Information Technology
	area about violations, failures, anomalies and
	other conditions that may put the Company's
Alle	information and assets at risk;
	Monitoring access to technology information
	and assets (systems, databases, network
	resources), respecting to the Information
	Security' policies and procedures;
	Implementing and keeping security controls
	and standards defined for technology assets in
	operation;
	Defining controls for treating risks,
	vulnerabilities, threats and non-compliances
AIAC	identified by Information Security processes;
	Proposing methodologies and processes
	referring to information security, such as
	classification of information, risk assessment
	and analysis of vulnerabilities;
	Classifying and reclassifying the level of access to information who power possessary:
	to information whenever necessary;
	 Establishing and maintaining the Information Security Policy;
	 Establishing, controlling, implementing,
	disclosing and updating the Information
	alsolosing and appating the information



Function	Responsibilities
	Security Policy, other policies, and the
	Information Security norms and standards
	applicable;
	Developing and implementing, with the
	engagement of the Internal Communication
	area, awareness programs and training on
	Information Security;
	Conducting vulnerability analyses, aimed at
	ensuring the level of security of the information
	systems and other environments that store,
	process or transmit information of interest to
	the Company;
	Treating risks and vulnerabilities identified in
	assets, systems or processes under the
	responsibility of the area or of interest to the
	Company;
	Conducting the management of Information
	Security incidents, including investigations to
	determine the causes and those responsible,
ATAC	as well as communicating the facts;
, , , , ,	Proposing corrective actions for Information
	Security incidents;
	Requesting information to other areas of the
	Company and conducting security tests and
	assessments aimed at verifying compliance and adherence to the Information Security
	Policy whenever necessary;
	•
	 Conducting project assessment in Assaí's business areas and IT, making the necessary
	business areas and 11, making the necessary



Function	Responsibilities		
		security observations for implementing/hiring	
		Software/Service/Solution;	
	•	Proposing projects and initiatives to improve	
		Assaí's level of Information Security;	
	•	Proposing investment related to Information	
		Security aimed at minimizing risks;	
Risk Owner / Person	•	Identifying, classifying and managing risks in	
Responsible		the areas in accordance with mitigation	
		strategies, together with the Risk Management	
A 100		Area;	
	•	Appointing the professional who will be the	
		area's focal point in Risk management process	
		jointly with the Risk Management area.	
AG	•	Ensuring the implementation of action plans	
		and monitoring of KRIs and KPIs;	
	•	Rendering account of the levels of exposure, the	
		action plans and the indicators that describe the	
		residual risk status to the governance and	
		management forums;	
ΔΤΔ	•	Notifying the Risk Management area about the	
AIAC	-	risks, similar events, or changes in the current	
		context of risks that have been identified in work	
		routines.	
Area's focal point	•	Having the technical knowledge of processes	
		where there are Risks;	
	•	Being responsible for updating the information	
		on the mapping and treatment of Risks in their	
		business area/unit (stores, DCs, regional	
		offices, headquarters' areas);	



Function	Responsibilities		
	• ł	Keeping information up to date in a timely	
	r	manner, respecting the Risk Management	
	C	cycle's planning calendar;	
	• 1	Monitoring the status of action plans before	
	t	those responsible for implementing control	
	r	mechanisms;	
	• 1	Notifying the Risk Management area about any	
	r	risks or similar events that have been identified	
	i	n work routines.	
Internal Audit Area	• /	Assessing the quality and effectiveness of the	
	(Company's risk management control and	
	Ç	governance processes;	
	•	dentifying and pointing out opportunities to	
	i	mprove the processes of Internal Control and	
AS	F	Risk Management;	
	• /	Auditing information and controls regarding	
	ŀ	KRIs and KPIs developed and monitored by the	
	f	functioning areas;	
	• F	Periodically reporting to COAUD, body to which	
ΔΤΔ	t	the internal audit area is linked, and to its	
AIAC	* * * * * * * * * * * * * * * * * * *	audited clients the results of independent,	
	i	mpartial and timely assessments on the	
	ϵ	effectiveness of the Company's Risk	
	ľ	Management.	
Employees	• [Ensuring the operationalization of Risk	
	ľ	Management, being part of the identification,	
	8	assessment and measuring processes and	
	i	mplementing preventive and corrective	
	8	actions;	



Function	Responsibilities
	Preparing and fulfilling the action plans
	intended to appropriately address the risks
	under their responsibility;
	Notifying the Risk Management area about
	similar risks or events identified in their work
	routines.

Table 2: Roles and responsibilities

2.8. Risk Management process

The Company's Risk Management process was defined based on the guidelines of COSO - Committee of Sponsoring Organizations of the Treadway Commission and the ISO 31000 standard: 2018: Risk Management Principles and Guidelines. The process's life cycle has 7 subsequent and dependent stages which we execute annually.

2.9. Stages of the Company's Risk management process

Stage 1 - Definition of the Context:

- Understanding the business scenario and context, taking into account factors linked to the Company's and its business areas' short and long-term strategic planning, in line with the environment where these objectives are found.
- This is a crucial stage to ensure that the Risk Management process is in line with the Company's management and strategic planning cycles in order to align its acceptable levels.
- It comprises an annual cycle of executive alignments with process owners, risk owners and Senior Management to build a reference map that in the next stages will help identify risks, emergent risks and opportunities that are in line with the business context.
- In order to establish the scenarios that should support this stage, we take into account two influencing factors, namely:
- **External Factors:** They may include, among others:



- social, cultural, political, legal, regulatory, financial, technological, economic and environmental factors, in the international, national, regional or local level;
- o key drivers and trends affecting the organization's objectives;
- relationships, perceptions, values, needs and expectations of external stakeholders;
- contractual relationships and commitments;
- o complexity of relationship networks and dependencies.
- Internal Factors: They may include, among others:
 - Vision, mission and values;
 - Governance, organizational structure, roles and responsibilities;
 - Strategy, objectives and policies;
 - Organizational culture;
 - Norms, guidelines and models adopted by the organization;
 - Capacities understood in terms of resources and knowledge (for example, capital, time, people, intellectual property, processes, systems and technologies);
 - Data, information systems and information flows;
 - Relationships with internal stakeholders, considering their perceptions and values;
 - Contractual relationships and commitments;
 - Interdependencies and interconnections. Infrastructure, Human Resources, Processes, Governance and Technology.

Stage 2 - Identification of Risks:

- A top-down risk identification approach, beginning with an interview with the main executives in all areas of the Company, in light of the main processes for which they are responsible.
- The product generated in this stage is a broad list of Risks, Emerging Risks and Opportunities based on the events that may identify vulnerabilities, threats putting the achievement of the Company's strategic objectives at



risk, and opportunities that provide an advantage in reaching these objectives.

- In this stage, the owner and the focal point of each one of the Risks and Opportunities identified must be appointed, as well as the description that will guide the next stages of the mapping process.
- A primary key classification of risks and opportunities is as follows: i) "traditional" and ii) environment, social and governance.

■ Stage 3 - Analysis:

- We carry out a more detailed analysis of the identified Risks, including important attributes for clarity and qualitative and quantitative support, in order to generate variables that can classify the risks universe, so we can act more assertively in their prioritization.
- We define, among others, risk causes and factors, as well as their effects, classifying aggravating factors so we can create a broad and relevant list of risks to carry on with the mapping process.
- We raise information in order to obtain data that may quantify and describe the probability and impact of risks, thus generating an assessment map to describe in an executive manner the risks universe based on their classification, as described in Figure 1.



Risco Baixo	de 1 a 4	
Risco Médio	de 5 a 12	
Risco Alto	de 15 a 25	

Legend:

Impact
Catastrophic
Critical
Important
Medium
Low
Occurrence
Exceptional
Rare
Occasional

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Probable
Frequent
Low Risk from 1 to 4
Medium Risk from 5 to 12
High Risk from 15 to 25

Figure 1: Assessment Map - Risk Severity

- We rate Risks in this assessment map according to the following criteria:
 - High Rating or High Risk (Red): They represent a potential threat to the Company's business and priority actions must be taken in order to reduce or eliminate the risk component.
 - Medium Rating or Medium Risk (Yellow): They represent a threat and can be monitored and managed through preventive control measures that can keep the level of exposure or risk acceptance.
 - Low Rating or Low Risk (Green): They represent an acceptable threat with lower levels of impact, thus no continuous monitoring is necessary and the risk is acceptable.

Stage 4 - Assessment:

- We assess inherent and residual risks (at the moment of the assessment) and their potential impacts of their materialization on the achievement of the Company's objectives.
- With the support of Senior Management, executives and process leaders, we assess the events from the perspectives of occurrence (likehood of occurrence of the risk) and impacts. We look for variables to combine qualitative and quantitative assessment methods.
- We take into account, among others, variables for classification of impacts that help with better classification of risks, using quantifications and scales that provide a gradient of high, medium and low for each variable.
- Finally, we combine all assessment variables, define the criticality of identified risks, which allows us to build a prioritization map, from risks of higher exposure to those of lower exposure.
- This map helps the Company to obtain a higher level of alignment of the Company's strategic planning with the acceptable Risk level.



Stage 5 - Treatment:

- The risk treatment stage involves control mechanisms existing within the process for us to classify its effectiveness as a preventive measure and as a measure that reduces the level of exposure (Mitigating Factor), which will help calculating the residual risk.
- For processes that require a higher level of effectiveness of controls or that
 do not have effective mitigating factors, we formalize the implementation of
 one or more action plans to mitigate risk factors in this stage.
- For each action plan, we appoint a risk owner (a member of the Company's Executive Board) and the different persons responsible for actions and implementation timelines in order to ensure the effectiveness and efficiency of the plans, thus reduce the level of residual risk and looking for our target residual risks.
- Within this process, we apply possible risk responses, as shown in Table 2:

Eliminate	Reduce or Mitigate	Transfer	Accept
Taking actions that	Adopting control	Taking actions that	No measure is
change or eliminate	measures to reduce	reduce the impact	adopted to affect the
the risk source,	the impact and/or	and/or occurrence of	impact and/or
whether through the	occurrence of a risk	the risk by	occurrence of the
discontinuance of a	to an acceptable	transferring or	risk.
product, process or	level.	sharing part of the	
project, in order to		risk.	
protect business		Note: The	
objectives from the		transferred	
impacts of this risk.		risk owner	
		continues to	
		be the main	
		manager of	
		the risk, since	

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	the transfer is	
	not absolute.	

Table 2: Possible risk responses

Stage 6 - Monitoring:

- Systematic and continuous activity that is crucial to maintain the efficacy of actions taken to mitigate risks in a preventive manner, in order to reduce the impacts or the occurrence.
- Employees involved in each area must have the ability and competence to identify, assess, prioritize, monitor and manage their risks, taking into account all changes in the internal and external environment so they can achieve a high level of control of their processes, in order to meet targets set in risk treatment (see Table 2).
- The risk monitoring process is composed of two main fronts, namely:
 - Action Plans: Must be conducted by the areas under the leadership of the process/risk owner, according to the responsibilities defined by the risk owners, with a frequency that may vary between monthly, bimonthly, quarterly, half-yearly and up to annually, depending on the Risk Management needs.
 - Control Measures: We use metrics and indicators that we call KRIs and/or KPIs. These metrics and indicators are related to risk factors, preventive measure factors and/or performance indices relating to the level of implementation of the action plans established to mitigate risks. During the risk treatment stage, we identify these metrics according to control mechanisms, making a relationship among financial and non-financial variables that enable us to timely follow the development and/or deviations that may materialize risks, so that triggers may be set for the business areas to take reverse actions on the events and, consequently, the impacts, and also according to the capacity to deliver the action plans established.

Stage 7 - Communication:

We carry out a frequent alignment process aimed at spreading the Risk
 Management culture through workshops, training and/or accountability



processes with risk owners and the Company's main management forums, such as the Board of Directors, the Executive Committee and the Audit Committee, among others.

In order to carry out this communication process, we set a plan that develops communication formats according to the target audience, where we describe the frequency, those involved and the responsibility within that context. These are key activities in keeping and improving Assaí's Risk Management culture.

- **Risk Rating**: We have adopted 4 main risk ratings in this process, namely:
 - Strategic: Risks that affect the Company's strategy or strategic objectives. They are linked to uncertainty and/or opportunity scenarios and are the priority focus of Senior Management.
 - Operational: Risks arising from inadequacy or failure in the management of internal processes, of people or technologies that can hinder or prevent the achievement of objectives.
 - External: Risks arising from events outside the company and are beyond its influence or control. They are linked to external factors, such as the economic environmental, sanitary crises, regulatory environment, consumer habits and others.
 - Corporate Social Responsibility: Risks related to any matters of an environmental, social and/or governance nature, and linked to the reputation and/or image of the Company.

3. REFERENCES

- 3.1. The following are part of this Policy:
 - 3.1.1. Code of ethics.

4. **DEFINITIONS**

4.1. Senior Executives or Senior Management: Person or group of persons in the highest level that run and control an organization, represented by the Board of Directors and the Executive Board.



- **4.2. Risk Cause:** Risk factors that contribute for the risk to materialize, increasing its impacts through related consequences.
- **4.3. COAUD**: Audit Committee.
- **4.4. COMEX**: Executive Committee.
- **4.5. Risk Consequences:** Aggravating factors of an event's results and impacts, which can positively or negatively affect the Company's ability to achieve its objectives.
- **4.6. Controls or Mitigation Initiatives:** Actions carried out to reduce inherent risks, which can be periodic or continuous activities in the business units to help monitor the levels of risk exposure.
- **4.7. DIREX**: Executive Board, which represents the Senior Management.
- **4.8. Event:** An occurrence or set of occurrences that can generate impact, either positively or negatively affecting results.
- **4.9. Risk source**: Element that, individually or combined, has an inherent potential to originate the risk.
 - *NOTE: A risk source can be tangible or intangible.
- 4.10. Risk Management: Systematic application of policies, procedures and management practices in activities linked to communication, inquiries, definition of context, and identification, analysis, assessment, treatment, monitoring and critical analysis of risks.
- 4.11. Impact: Aggravating factors or consequences in case the risk materializes, which can be classified as Financial, Business, Physical Security, Food Security, Compliance, Reputational and Image Impacts.
- **4.12. Mitigation Initiatives or Controls:** Actions carried out to reduce inherent risks, which can be periodic or continuous activities in the business units to help monitor the levels of risk exposure.
- **4.13. Key Performance Indicator (KPI):** Metrics used to measure and monitor the performance and results of processes, as well as the level of development and performance of action plans established to mitigate risks, and they can be used to monitor Risks.
- **4.14. Key Risk Indicator (KRI):** Metrics used to measure and monitor exposure to risks. They are related to the causes of the risk help the Company act



- preventively in order to reduce the impacts of risk materialization, also being a control and good practice mechanism in Risk Management.
- **4.15. Mitigation:** Option for treatment of risks, intended to reduce risks through controls and actions that are taken in **a tolerable level**.
- **4.16. Opportunity**: Risk identified based on a positive source that allows to obtain gains or advantages through an effective action.
- **4.17. Risk Management Policy**: Declaration of an organization's intentions and general guidelines relating to risk management.
- **4.18. Probability of Occurrence or Frequency**: Measure on the probability of an event, expressed as the number of events or results occurred during a defined time unit.
- 4.19. Risk: effect of uncertainty on the objectives.
 - **NOTE 1:** "Effect" is a deviation relating to the expectations positive and/or negative.
 - **NOTE 2:** The objectives may have different aspects (such as financial, health and safety, and environmental targets), and they may be applied in different levels (such as strategic, across the organization, project, product and process).
 - **NOTE 3:** Risks are often characterized by their reference to potential events and consequences, or both.
 - **NOTE 4:** Risks are often expressed in terms of a combination of consequences of an event (including changes in circumstances) and the related occurrence probability.
 - **NOTE 5:** "Uncertainty" is the state, even partial, of the information gaps relating to an event, the understanding thereof, its knowledge, its consequences or its probability.
- **4.20. Emerging Risk:** Any risk recently identified with a possible long-term impact on the Company's business, although, in some cases, it may already have started to impact the Company's business today.
- **4.21. Inherent Risk:** Property in which the risk is always present in an intrinsic manner, both in its potential or residual condition, as long as its source exists.
- **4.22. Potential Risk**: Pure or gross risk; risk that does not have treatment measures or controls that could reduce its impact or probability of occurrence.
- **4.23. Residual Risk*:** Level of risk after taking into account all controls and actions identified to reduce its impacts or probability of occurrence.



Note*: This is the level of risk that the Company will have after the end of the period in question, once the established actions plans have been implemented, and the Company's existing control activities have been maintained.

- **4.24. Prioritized Risks (Top Main Risk TMR):** List of risks deliberately defined by Senior Management. which describes the levels of exposure that can enhance high impacts for the business. Their management must be a structured priority.
- 4.25. Handling Risks: Process to modify risks.

NOTE 1:

The handling of risks may involve:

- actions to avoid risks through the decision of not starting or interrupting the activity that originates the risk;
- undertaking our increasing the risk in order to search for an opportunity:
- elimination of the risk source;
- change in probability;
- change in consequences;
- sharing the risk with another party or parties (including contracts and risk financing); and
- knowingly retaining the risk.

NOTA 2: The treatment of risks relating to negative consequences is often referred to as "risk mitigation", "elimination of risks", "risk prevention" and "risk reduction."

NOTE 3: The handling of risks may result in new risks or change the existing risks.

4.26. Vulnerability: Intrinsic properties that result in the susceptibility to a risk source that may lead to a consequence.

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