Term: Indefinite

# CONTENTS

1	. PU	IRPOSE	2
2	SC	OPE	2
3	GL	JIDELINES	2
	3.1.	CONTEXT AND PRINCIPLES OF ACTION	2
	3.2.	GENERAL GUIDELINES	2
	3.3.	SPECIFIC GUIDELINES AND SEGMENTATION OF OUR STAKEHOLDERS	5
	3.4.	INTERACTION AND RELATIONSHIP WITH STAKEHOLDERS	5
	3.5.	CHANNELS FOR COMMUNICATION WITH ASSAÍ	5
	3.6.	WHISTLEBLOWING CHANNELS	6
4	PE	NALTIES	7
5	. AT	TACHMENTS	7
6	RE	FERENCES	7
7.	DE	FINITIONS	8
8	VE	RSION HISTORY AND APPROVALS	8

ATACADISTA

### 1. PURPOSE

The purpose of this document is to provide general and specific guidelines for establishing long-term relationships with all stakeholders that influence or are influenced by the activities of the Company. Actions in this regard must be based on dialogue, engagement, ethics, and transparency of information, aiming at generating shared value, identifying opportunities between the parties, and managing social and relationship capital.

### 2. SCOPE

Not applicable.

### 3. GUIDELINES

### 3.1. Context and Principles of Action

- **3.1.1.** Assaí is a retail company operating throughout the country and, therefore, interacts with different audiences on a daily basis. Accordingly, such relationships must be guided by respect, ethics, transparency, dialogue, and availability of various means of communication.
- **3.1.2.** The relationship with stakeholders is a strategic priority; thus, Assaí believes that, by establishing a solid interface, it creates more sustainable relationships that allow it to improve and optimize processes, mitigate risks, create opportunities, and, consequently, generate benefits for the parties involved and strengthen trust.

#### 3.2. General Guidelines

The guidelines in this document follow the United Nations priorities defined in the <u>Sustainable Development Goals (SDGs</u>), and in the UN Guiding Principles on Business and Human Rights and are aligned with the other Corporate Policies, Codes, and Regulations of Assaí.

Open and transparent dialogue with <u>Stakeholders</u> is critical for the Company to ensure:

- The feasibility of its strategic planning and excellency performance, the strengthening of corporate governance, and the search for innovative solutions;
- The consolidation of relationships of trust and sharing of knowledge and learning, enabling the anticipation of challenges and the identification of new opportunities for cooperation;
- The implementation of important practices for stewardship in the economic, social, and environmental dimensions and, consequently, the stakeholder feedback process; and
- Compliance with legal requirements, particularly in the assessment of impacts of new products and/or services in order to adjust and regularize them when necessary.

# 3.2.1 Identification

- Assaí shall continuously, dynamically, and systematically identify stakeholders that influence and/or are influenced by its business, analyzing and seeking to understand their expectations and interests.
- The Company shall map, identify, and assess potential and actual risks and impacts generated by its operations and activities on the communities where it operates and on other audiences, as well as assess the issues identified as relevant and prioritize them in a balanced and equitable manner. The potential risks and operational impacts identified for the publics of interest shall be treated, according to a mitigation hierarchy, to avoid or, when it is not possible to avoid, to minimize and, in cases in which residual impacts remain, to cure them.

#### 3.2.2. Relationship

• Assaí shall maintain communication channels and constantly promote two-way dialogue with stakeholders through informative and

Term: Indefinite

consultative actions and, when applicable, it shall carry out a prior, free and informed consultation with traditional communities. The process of listening, informing, and responding to stakeholders shall be carried out in a consistent, clear, and transparent manner. Complaints or inquiries shall be addressed with seriousness and respect.

• Assaí shall actively provide clear and understandable information, promoting and providing appropriate means of engagement. The particularities of each stakeholder shall be taken into account, and the channels, listening plans, and responses to relevant issues identified with each of them shall be adjusted when necessary.

# 3.2.3. Engagement and Cooperation

- Promoting trust and respect between Assaí and its stakeholders is indispensable to ensure sustainable, healthy, and long-term relationships. Such relationships shall be based on transparency, integrity, and mutual respect, even in situations of disagreement. To this end, the actions of Assaí shall be informed by its values, policies, and ethical principles, with respect for the opinions of its stakeholders, without discrimination, and with respect for diversity and human rights (see the Policy on Diversity and Human Rights of Assaí).
- The Company shall seek to build a strategic partnership, collaborating with relationship audiences through the sharing of knowledge, skills, and tools for the purpose of managing risks and identifying opportunities and solutions that produce positive results for both parties.
- As a connecting link between various players in this chain, the Company shall work in cooperation, always taking into account the contributions of its stakeholders in its strategic planning and actions.

# 3.3. Specific Guidelines and Segmentation of our Stakeholders

- **3.3.1.** The relationship with each stakeholder is critical for the Company. With proactive engagement, Assaí creates opportunities for dialogue and acts with social and environmental responsibility for the purpose of maintaining mutually positive and ethical relationships based on the creation and sharing of value. Relationship audiences are all entities, individuals, or corporations that influence or are influenced by the activities, products, and services of the Company. In the case of Assaí, such audiences are broken down as follows:
  - Competitors;
  - Financial Entities;
  - Shareholders;
  - Investors;
  - Employees;
  - Trade Unions;
  - Suppliers;
  - Customers;
  - Class Associations;
  - Governments, institutions, or regulators;
  - The Society;
  - Civil Society Organizations;
  - Local Communities; and
  - The Media.

#### 3.4. Interaction and Relationship with Stakeholders

**3.4.1.** The People Management and Sustainability and Investor Relations Departments and the External Communications area, together with their related areas, shall be responsible for managing stakeholder engagement and relationship projects, as well as for guiding other employees who play an interaction role.

#### 3.5. Channels for Communication with Assaí

**3.5.1.** Assaí maintains several channels to serve the different profiles of stakeholders, through which it establishes transparent communication and

encourages consistent dialogue so as to build a relationship of trust and provide clear and objective means of responding to complaints.

# 3.5.2. Communication Channels:

- Ombudsman: Telephone: 0800 777 3377
   Email: <u>ouvidoria@assai.com.br</u> Website: <u>https://www.assai.com.br/ouvidoria</u>
- Press: Email: <u>imprensa@assai.com.br</u>
- Investor Relations: Email: <u>ri.assai@assai.com.br</u> Telephone: +55 11 3411 7950
- Customer Area: Telephone: 0800 773 2322 (telephone and WhatsApp) Website: <u>https://www.assai.com.br/espaco-do-cliente</u>
- Sustainability:
  Email <u>sustentabilidade@assai.com.br</u>
- Assaí Website: <u>www.assai.com.br</u>
- LinkedIn: https://www.linkedin.com/company/assaiatacadista/
- Facebook: <u>https://www.facebook.com/assaiatacadistaoficial</u>
- Twitter: <u>https://twitter.com/assaioficial</u>
- Instagram: https://www.instagram.com/assaiatacadistaoficial

### 3.6. Whistleblowing Channels

- **3.6.1.** Failure to comply with the rules and guidelines established herein may be regarded as a severe fault and may be subject to the application of sanctions based on the Ethics Committee Management Policy, on the Code of Ethics of Assaí, on the Policy on Diversity and Human Rights, and on the Policy on Consequences and Disciplinary Measures.
- **3.6.2.** As an official tool for receiving complaints, grievances, and reports of violations of and non-compliance with this Policy, Assaí provides the

Ombudsman Channel to its employees, suppliers, service providers, customers, social institutions, and partners.

3.6.3. Violations of this Policy, of the Code of Ethics of the Company, or of any item in the supplier Ethics Letter can be reported through the channel at <u>ouvidoria@assai.com.br</u>. Each complaint shall be investigated confidentially and, if the whistleblower so wishes, anonymously.

#### 3.6.4. Contact:

- Telephone: 0800 777 3377
- Email: <u>ouvidoria@assai.com.br</u>
- https://www.assai.com.br/ouvidoria

### 4. PENALTIES

Not applicable.

### 5. ATTACHMENTS

Not applicable.

# 6. REFERENCES

The following are part of this Policy:

- 6.1. Code of Ethics.;
- 6.2. Policy on Diversity and Human Rights;
- 6.3. Policy on Consequences and Disciplinary Measures; and
- 6.4. Our direct action with the community and with other stakeholders is based on several guidelines:
- 6.5. Principles of the United Nations (UN);
- 6.6. Guiding Principles on Business and Human Rights (UN);
- 6.7. 17 Sustainable Development Goals (UN SDGs); and
- 6.8. ISO 26000.

# 7. DEFINITIONS

- **7.1. Sustainable Development**: The concept of sustainable development, according to the Brundtland Report (BRUNDTLAND, 1991), assumes a development model that meets the needs of the present without compromising the ability of future generations to meet their own needs.
- **7.8.** Interested Parties or Stakeholders: Also known as strategic audiences, means all relevant audiences with interests that are of concern to Assaí, or individuals or entities that directly or indirectly assume any type of risk in the face of society. The following are included: shareholders, employees, the community, customers, suppliers, governmental authorities, and non-governmental organizations.

# 8. VERSION HISTORY AND APPROVALS

Not applicable.