

Corporate Policy - PTC	Issuance Date: 08/20/2021
Private Social Investment	Identification: HDG.PTC.012
	Version - 02 Review and update on: 08/21/2023
Approval: Executive committee	Classification of information: Public

1. GOAL

To Establish the Social Investment guidelines of the Carrefour Brasil Group, committing to investments with an impact on society, presenting priorities for the creation and maintenance of social programs that strengthen the strategy and material challenges of society, contributing to the transformation of people and processes our business.

2. APPLICATION

It is applied to the entire Carrefour Brasil Group and stakeholders

3. ACRONYMS AND DEFINITIONS

Private Social Investment (ISP) - voluntary and systematic transfer of resources, in a planned and monitored manner, for social projects of public interest.

UN - United Nations Organization

SDG - Sustainable Development Goals

4. GENERAL GUIDELINES

The Carrefour Group's social investment pillars are the fight against hunger and inequalities, through short-term emergency actions and medium and long-term structuring actions. Complementing this pillar, the group's social investments have the premise of prioritizing vulnerable or underrepresented groups in the spheres of public policy, in addition to having, in territorial terms, a priority in the surroundings of our operations.

Notwithstanding the guidelines of this Policy, the Donations and Sponsorships Policy, Code of Conduct and other internal regulations, as well as all applicable legislation, must be observed.

Every Social Investment decision by the Carrefour Group is premised on meeting the mission, values and principles of the Carrefour Group, as well as the UN's sustainable development objectives aligned with the materiality matrix and the business model of the Carrefour Brasil Group.

The SDGs preferably addressed by Social Investment initiatives are: SDG 2 - Zero hunger and sustainable agriculture; SDG 10: Reduction of Inequalities; SDG 12 - Responsible consumption and production and SDG 14: Action against Global Climate Change.

4.1 Priority guidelines

The following are priority guidelines for the Carrefour Brasil Group:

Acting and influencing partners, suppliers, customers to promote initiatives to combat hunger and social inequalities, promoting actions and programs that make it possible to meet the emergency needs of vulnerable publics and structuring initiatives that promote conditions for the reduction of social



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inequalities.

On the first front, it promotes and encourages the donation of food and mobilization of people to meet emergency needs to contemplate people in situations of hunger and food insecurity.

It also leverages initiatives and programs to generate employment and income that address vulnerable groups in a structural way, with a view to promoting their social inclusion, to:

- Contribute to the social inclusion of small producers, supporting them in their greater professionalization, increase in income, through the improvement of production processes and business management.
 - Give access to new markets for the sale of sustainably grown products.
 - Technically and financially support small producers and traditional communities so that they conserve the biomes in which they operate and recover potentially degraded areas.
 - Value food and fight its waste, by donating and distributing it to people in situations of social vulnerability, in partnership with civil entities.
 - Support professional qualification in retail and the promotion of solidarity meals.
 - Entrepreneurship focused on reducing social inequalities.
 - Stimulate dialogue and engagement with customers, suppliers, civil society organizations and other links in the production chain so that agriculture becomes a sector that practices broad socio-environmental responsibility.
 - Develop the local communities in which the company has operations, valuing its role, as well as promoting and encouraging actions and programs aimed at mitigating the social inequalities present in society.
 - Contribute to the participatory construction of public policies and/or collective agendas for sustainable development. The company's social investments act in a structuring manner and, whenever possible, converge with public policies that contribute to social development

4.2 Fundamental requirements

In the process of designing Social Investment initiatives, the following requirements must be evaluated:

- Impact Assessment: During the analysis, criteria such as the number of beneficiaries of the project will be evaluated; the existence of feasible goals and their monitoring and the expected result for the proposed project.
- Transparency assessment: during the analysis, the regularity, legality, management and transparency of the application of resources to projects will be evaluated.



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- Assessment of adherence to the Carrefour Group's values and strategy: adherence to the values and strategy of the Carrefour Brasil Group will be analyzed.
- Impact Assessment on Reducing Inequalities: will be measured by the number of people impacted by the projects.
- Assessment of surroundings considering the potential for benefiting local communities impacted by the Group's Operations, aiming at their improvement and the generation of opportunities.

4.3 Investment criteria and definition of investment projects

For each Carrefour Group initiative, the purpose, benefits, selection criteria and project management must be formally defined in a clear and objective manner.

The rules for each initiative will be defined in Regulations, Procedures, Notices or Project Proposals, as the case may be, and must be formally approved by the Social Sustainability Board and Financial Board, with review by the Compliance and Internal Controls area.

The Legal and Tax areas must be consulted for each initiative, to assess the legal risks and tax optimizations for defining the investment model.

Investments will take into account the scope of initiatives and the potential of actions for impacted publics and their benefit.

4.3.1 Prohibitions

Investments must not:

- Be offered, promised or granted to Public Agents (except for cases of public donations permitted by law), political parties and candidates for public office;
- Be offered, promised or granted to projects or initiatives related to the defense of religious causes or partisan politics;
- Be offered in alcoholic or tobacco products;
- Be offered, promised or granted to Beneficiaries and/or projects that have principles that are incompatible with those of the Carrefour Group;
- Have the purpose of influencing the action, obtaining or granting undue advantage to Public and Private Agents, including suppliers and partners;
- Be carried out in cash;
- Be held in bank accounts abroad;
- Be carried out by an Employee on behalf of the Carrefour Group;



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- Be intended for activities not strictly related to actions with an impact on society and the commitments disclosed.

4.4 Resources and dissemination of results

4.4.1 Sources of funds

The funds to be allocated to social investments, either from the Company's own investment or from incentive resources, must be approved by the Sustainability Board.

4.4.2 Resource management

The management of the ISP's resources will be carried out by the Sustainability Board and will be subject to permanent monitoring and evaluation. All supporting documentation for each project must be kept on file and preserved by the Social Investment area, linked to this Board.

Additionally, the Board must guide programs and initiatives to avoid their financial dependence and discontinuation in case the resources are no longer available. It must ensure that projects and programs are aligned with public policies or that are designed to become relevant public policies in terms of scope and impact.

4.4.3 Disclosure of Results

The results will be disclosed through the company's internal and external communication channels (walls, intranet, internal newspaper, e-mail), and officially in the Annual Sustainability Report, as well as through participation in events, seminars, benchmarking groups and awards.

5. RESPONSIBILITIES

Sustainability Board:

- Approve documents related to projects, approve budgets, archive and preserve project documents.

Financial Board:

- Approve documents related to projects.

Compliance and Internal Controls Board:

- Review the project documents and analysis of this Policy.

Legal and Tax Areas:

- Evaluate the legal risks and tax optimizations for defining the investment model.



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6. ASSOCIATED DOCUMENTS

Code of Ethical Conduct of the Carrefour Brasil Group, available at:

<https://ri.grupocarrefourbrasil.com.br/governanca-corporativa/estatutos-politicas-e-codigos/>

Accounting Control Records Policy and other Corporate policies of the Carrefour Brasil Group, available

at: <https://ri.grupocarrefourbrasil.com.br/governanca-corporativa/estatutos-politicas-e-codigos/>

7. DOCUMENT REVIEW AND UPDATE

This rule must be reviewed every three years with regard to adherence to the Policies, Rules, Procedures or whenever significant changes in processes are identified.

8. CONSEQUENCE RULES

Deviations from regulations may lead to appropriate disciplinary measures, permitted under current legislation and the internal rules of the Carrefour Brasil Group.

In cases of non-compliance with these guidelines, reports can be made at: ETHICAL CONNECTION: Website: conexaoeticacarrefour.com.br or Phone Number: 0800 772 2975

The confidential channel - Área Ética is managed by an external and independent company, guaranteeing the whistleblower in good faith absolute secrecy and non-retaliation. All communication, to the extent permitted by law, will be treated confidentially, with all forms of retaliation against good faith whistleblowers prohibited.

9. REVIEW HISTORY

DATE	VERSION	DESCRIPTION	AUTHOR
08/20/2021	01	Policy Issuance	Sustainability
08/21/2023	02	Layout review and change	Internal Controls and Engagement

10. RESPONSIBLE FOR THE DOCUMENT

RESPONSIBLE	VERSION	NAME	AREA	CODE
Approval	2	COMEX	Executive Committee	-----



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