

COMPLIANCE AND ANTI-CORRUPTION POLICY

1. OBJECTIVE

The Corporate Compliance and Anti-Corruption Policy aims to establish and formalize procedures to identify, monitor and communicate any practices contrary to maintaining ethical integrity and preventing and combating corruption within Lojas Americanas, B2W Digital and subsidiaries. It is essential for the Company that its business follows the highest ethical standards and must be transparent and guarantee the dignity of all involved.

2. APPLICATION FIELD

This Policy sets forth the guidelines to be observed by all associates, third parties and service providers, as well as any participant in the value chain of Lojas Americanas, B2W Digital and subsidiaries.

3. DEFINITIONS

- **B2W Digital:** Publicly held company controlled by Lojas Americanas, which owns, among others, the websites www.americanas.com.br; www.submarino.com.br, www.shoptime.com.br, www.soubarato.com.br, which operate in the e-commerce business.
- **Lojas Americanas:** Publicly traded company that operates in the retail trade of goods and services through physical stores.
- **Company:** It encompasses Lojas Americanas, B2W Digital and all other companies related to them as direct and indirect subsidiaries, and applies individually to any of the companies that make up the same Economic Group.
- **Law 12,846 /13 (“Anti-Corruption Law”):** Establishes the civil and administrative liability of legal and natural persons for acts that are harmful to the Public Administration, national or foreign; with the objective liability of the legal entity and the imposition of severe penalties on all who participate in acts or omissions defined as transgression of the Law.
- **Decree 8,420/15:** Regulates Law No. 12,846 of August 1, 2013; which provides for the administrative liability of legal entities for the commission of acts against the public administration, national or foreign, and other measures.
- **Reporting Channels:** Reporting Channels are made available by the Company to associates, suppliers, customers and any third parties to anonymously report or conduct information that they deem contrary or potentially offensive to the

Company's Policies; the Code of Ethics and Conduct or applicable law, including the Anti-Corruption Law,

- **Code of Ethics and Conduct:** It is the set of rules by which the Company enforces before its associates, administrators, third parties and suppliers the respect to its values and the prohibition to the practice of acts that characterize disrespect to the ethics, values of the Company or the legislation in force.
- **Counterpart:** Counterpart is any third party with which the Company commercially relates, such as, but not limited to: business partners, customers (contracted and potential), suppliers (contracted and potential) and service providers (contracted and potential).
- **Corruption:** In this Policy the term is used broadly, including the crime of corruption itself, that is, the act or attempt to use one's position for, by abuse of one's power or authority; to gain advantage for themselves or those they are representing, as well as the other harmful acts typified in article 5 of Law 12,846/2013.
- **Company Policies:** These are rules, standards and values established by the Company's main areas, such as People & Management, Information Security, Legal and Sustainability.

4. STANDARD CONTENT

4.1. Ethics, Compliance and Sustainability

The Company is committed to disclosing Brazilian anti-corruption legislation to its associates and stakeholders, in order to be fully complied with. The Company's participation in the fight against corruption is the basis for maintaining corporate ethics, directly reflecting the protection of competitiveness in a free enterprise environment where credibility in business is essential.

Accordingly, the Company undertakes to prohibit any form of bribery, implementing corporate governance principles and encouraging legality and transparency in its management.

4.2. Relationship with Stakeholders

Members of Lojas Americanas, B2W Digital and subsidiaries acting directly or indirectly on their behalf are prohibited from offering, promising, performing, authorizing or condoning any undue advantage in relationships with suppliers,

customers, public agents, shareholders and investors, other associates and members of organized civil society. Actions are not tolerated in order to influence or reward any official action or decision of the value chain for the benefit of the Company or itself - such conduct being considered immoral and unethical.

The direct or indirect offer, as well as the receipt of bribes, are practices considered unacceptable by the Company even to obtain a favorable decision for the business. No associate is allowed to claim, with any customer or supplier, any kind of favoritism in hiring or professional advancement, as a condition of maintaining the existing business relationship between the customer / supplier and the Company.

4.3. Internal Conduct

Regarding ethical conduct, Lojas Americanas, B2W Digital and subsidiaries establish the following general guidelines:

- The member is obligated to comply with the Code of Ethics and Conduct and all laws that regulate the Company's activities. Consultation with the Legal Superintendence should be a habit of the associate whenever there are doubts regarding the legislation.
- It is the responsibility of every associate to know and comply with all Policies related to his area of operation of the Company.
- The Company has the following Policies that are made available to its members:
 - a) Gifts Policy;
 - b) Marketing and Communication Policy;
 - c) Sustainability Policy;
 - d) Human Resources Policy;
 - e) Supplier Policy;
 - f) Safety, Health and Environment Policy;
 - g) Volunteering Policy;
 - h) Product Donation and Project Support Policy;
 - i) Information Security Policy and;
 - j) Compliance and Anti-Corruption Policy

All Company Policies can be found at www.companhiaverde.com.br. Knowledge of the policies is fundamental to the good performance of the associate in the Company's facilities.

- Members must inform all suppliers, service providers and business partners of Company Policies.

- When faced with misconduct by any associate, supplier or any participant in the Company's value chain, the immediate manager, officer or the People & Management Area should be informed.
- The contribution of all associates is essential in the fight against corruption and in building the Company's reputation. Thus, everyone's commitment to the values, principles, policies and norms of conduct is indispensable.

4.4. Specific Guidelines

The Company does not adopt, encourage or allow the conduct of conduct that constitutes or results in acts harmful to the Public Administration, as provided in the Anti-Corruption Law, such as:

- Promise, offer or give, directly or indirectly, an improper advantage to a public agent, or the person related thereto;
- Finance, fund, sponsor or subsidize the commission of unlawful acts;
- Use an individual or legal entity to conceal or disguise their real interests or the identity of the beneficiaries of the acts performed;
- To frustrate, prevent or defraud the competitive nature of the bidding process or contract arising from it;
- Remove or attempt to dismiss the bidder by fraud or by offering advantage of any kind;
- Create, fraudulently or irregularly, legal entity to participate in bidding or contract;
- Obtain an advantage or undue benefit from the public administration, without authorization by law, in the call for bid or in the respective contractual instruments;
- Manipulate or defraud the economic and financial balance of the contracts entered into;
- Make it difficult to investigate or supervise public agencies, entities or agents, or intervene in its activities.

And further prohibited:

- To suggest, offer, solicit, demand, promise or grant, directly or indirectly, upon demand or otherwise, improper advantages of any kind to national and foreign public and private persons and companies, including third sector organizations, in exchange for performing or omitting acts inherent in their attributions or facilitating business, operations or activities for the Company or for the benefit of themselves or third parties.
- Accept, approve or receive from persons and companies from the public and private sectors, national and foreign, directly or indirectly, improper advantages of any nature in exchange for performing or omitting acts inherent in its attributions or facilitating business, operations or activities for the Company or for the benefit of itself or third parties.
- Any form of Corruption, bribery, influence peddling, favoritism and other unlawful acts and similar practices as defined in the Code of Ethics and Conduct.

4.5. Practical Situations

Members should be aware of practical situations that may show evidence of corruption such as the examples below:

- Counterpart has a bad reputation for receiving or offering a bribe;
- The commission or remuneration of the counterpart is incompatible with the services rendered, compared with the history of similar operations;
- Counterpart is controlled and / or appointed by a public official or his first-degree relatives or has a close relationship with the government;
- Counterpart refuses to include reference to anti-corruption measures in the contract;
- Counterpart proposes an unusual financial scheme, such as requesting payment from a bank account in a country other than the one in which the service is being provided or requesting payment from more than one bank account;
- Donation to a non-profit institution at the request of a public agent;
- A third party engaged to represent the Company requests a facilitating payment or cash advance for expenses not clearly specified.

4.6. Reporting Channels

Associates, suppliers or other stakeholders who observe any deviations from the guidelines of this Policy or suspicious conduct should report them through the Company's Reporting Channels, internally referred to as "DISK ALERT".

REPORTING CHANNELS (DISK ALERTA) FOR MEMBERS

- LASA: 0800 282 25 50 or diskalerta@lasa.com.br
- B2W: 0800 020 80 20 or diskalerta@b2wdigital.com
- Direct: 0800 082 50 00 or diskalerta@directlog.com.br

REPORTING CHANNELS (DISK ALERTA) FOR SUPPLIERS AND THIRD PARTIES:

- LASA: disk_alerta@lasa.com.br
- B2W: disk_alerta@b2wdigital.com
- Direct: disk_alerta@directlog.com.br

REPORTING CHANNELS (DISK ALERTA) FOR CLIENTS:

- 0800 021 48 57

The situations and complaints reported by the above channels are treated confidentially, with the option of anonymity in all channels. Everyone involved in reporting has reserved their rights to privacy and confidentiality, and any form of coercion or reprisal is unacceptable.

All reports received will be cleared by the DCP - Loss Control and Prevention Department - and will be classified, at the end of the investigation, as: valid, unfounded or inconclusive.

Complaints found to be well founded will have the appropriate punishments applied.

4.7. Sanctions

A member who fails to comply with any of the provisions set forth in this Policy, the Code of Ethics and Conduct and all other Policies related to his performance in the Company, as well as the corresponding legislation, will be exposing the Company to the penalties described above; It is also subject to the criminal implications of non-compliance and, at the Company's discretion, dismissal for cause.

In addition to the Compliance and Anti-Corruption Policy and Policies related to the area of its performance, the associate must comply with the Anti-Corruption Law and Decree 8.420 / 15, which establish sanctions for the Company in case of non-compliance:

- a) Fine, in the amount of 0.1% to 20% of gross revenues, excluding taxes. If it is not possible to use the criterion value of the billing, the fine may be from a minimum of \$ 6,000.00 to \$ 60,000,000.00;
- b) Extraordinary publication of the judgment condemning mass media at the place of infringement or; in its absence, in a national circulation publication, as well as by posting a notice for a minimum period of 30 days, in the establishment itself, in a visible manner to the public and on the company's website;
- c) Forfeiture of assets, rights or values obtained from the infringement; suspension or partial interdiction of its activities; compulsory dissolution of the legal entity;
- d) Prohibition of receiving incentives, subsidies, grants, donations or loans from the government for a minimum period of 01 year and a maximum of 05 years.

Whenever possible and within the best diligence, the Company will seek to individualize and particularize the conduct that may be classified as a crime punishable in accordance with the Anti-Corruption Law, informing and collaborating with the competent authorities for the complete investigation and accountability of the individuals who practice them.

The liability of the addressees of this Policy will also be ascertained and, if confirmed, they will be personally liable for crimes committed under the Anti-Corruption Law as well as for any compensation for damages suffered by the Company as a result of the commission of such acts.

Equally responsible will be the addressees of this Policy who have committed the wrongful act and also those who have knowledge of its practice, but have omitted it.

Without prejudice to the legal penalties indicated above and also those resulting from the employment and / or service contract, the employee or member of the addressees of this Policy will be liable for any damages that may be caused to the Company and / or third parties.