



Policy on Giving and Receiving Gifts and Favors

Version N° 1

Approved by Board of Directors
19/02/2018



Policy on Giving and Receiving Gifts and Favors

Scope

This Policy applies to all employees, administrators, vendors, contractors, and third parties who act on behalf of Almacenes Éxito S.A.

Branches and subsidiaries may use an independent policy, provided that it does not contradict the principles and controls established herein.

The objective of this Policy is not to regulate that which concerns sponsors, as these are guided by their respective rules and procedures.

Objective

The objective of this Policy is to regulate all things associated with giving and receiving gifts and favors, as defined in the Code of Ethics and Conduct.

The Company recognizes that in relationships with third parties, it is common to give and receive gifts and favors. For this reason, the goal of the present Policy is to establish rules of conduct, such that in these situations, gifts and favors are appropriate and they are exchanged under ethical conditions that do not compromise Company relationships with third parties.

Definitions

Expressions that begin with a capital letter in this document and which require special definitions are defined below, notwithstanding the other applicable definitions contained in the Transparency Program and the Corporate Governance Code.

- **Favors:** any type of courtesy or invitation that is not a gift.
- **Sponsorship:** economic aid directed toward an activity or third party in exchange for a generally for a consideration, the purpose of advertising.
- **Gifts:** any type of gift, handout, or material presents, consumable or not, which correspond to a voluntary act on the part of the giver, with no consideration expected in return.
- **Travel expenses:** funds paid to a person on business travel to cover costs of travel such as board, laundry, phone calls, and transportation.

1 General principles

The following principles apply when giving or receiving gifts or favors to public servants or other third parties:

- 1.1** Gifts or favors cannot result in a commitment by the receiver to do something for the giver in return.
- 1.2** No commitment can be made to give a gift or do a favor in exchange for influence or benefits.

- 1.3** The conditions of this Policy must be met, and in any case, be proportional, morally adequate, have a legitimate end, and in no case compromise objectivity in relationships with third parties.

2 Receiving gifts and favors

2.1 It is prohibited to

- 2.1.1** Accept cash gifts or any other commercial instrument which may be converted into cash (bonds, securities, stock, letters of credit, or similar) for oneself, a close family member, or related party.
- 2.1.2** Accept gifts which in case of being valued, have a value equal to or greater than five (5) days wages at the current minimum wage salary. This limit does not apply when the receiver of the gift is the Company, in which case the Ethics Committee will validate whether the principles of the present Policy are met.
- 2.1.3** Receive gifts to ex-employees. They must always be returned to the sender.
- 2.1.4** Accept immoral or indecent invitations, or those which may affect the Company's reputation.

2.2 Duties

- 2.2.1** In line with the procedure described below, gifts which exceed the maximum established limit must be returned to the sender (vendor, client, or any other kind of third party with links to the Company) or sent to Fundación Éxito to be donated to entities or social programs:
- Gifts received in Company ticket offices will be marked with a sticker noting compliance with this Policy.
 - The receiver of the gift must notify the sender (vendor, client, or any other type of third party with links to the Company) about this donation by way of email. Furthermore, they must notify Fundación Éxito and copy etica@grupo-exito.com in an email explaining the content, its estimated value, and indicating whether it was returned to the third party (vendor, client, or any other type of third party with links to the Company) or was given to Fundación Éxito.
 - Fundación Éxito will give the products to those entities which may make use of them, and remaining gifts will be sold at employee fairs, but they cannot be used for the benefit of employees.
- 2.2.2** The applicable rules and regulations for receiving gifts will also apply for the prizes awarded in raffles, contests, or events carried out by third parties.

2.2.3 In addition to the general principles, when extending favors, these must comply with the following:

- They must not be frequent.
- They must be authorized by the respective CEO, Vice-President, or Corporate Manager.
- They must not be perceived as excessive in the context of the commercial occasion.
- The person extending the favor must be present.

2.2.4 In addition to the general principles, when third parties pay travel expenses, they must comply with the following::

- They must be reviewed and approved by the respective CEO, Vice-President, or Corporate Manager.
- A written response must be made accepting the payment of travel expenses, given an understanding that this does not violate transparency policies of those who issue the invitation, and that the travel conditions comply with the principles in this Policy.
- On return from the trip, the employee will present the minutes or a report providing results and how they apply to the Company.

3 Giving Gifts and Favors

3.1. Duties

3.1.1 When giving gifts and favors from administrators and employees of Almacenes Éxito to third parties with which there is any type of relationship, or to their employees, these must comply with the principles and limits established in this Policy, and must not violate the policy of those receiving the gifts. Additionally, they must not exceed the limits established in either policy. In that case, they must comply with more restrictive conditions.

The previously mentioned limits will not apply for corporate gifts. However, these must be approved by the Chief Operating Officer of Retail or the CEO.

3.1.2 For commercial activities such as raffles, commercial events, promotions, and those award events organized via competitions to award skills and abilities, the limits established in the present Policy will not apply. These will be governed by their own regulations. In any case, they must comply with the principles established herein.

3.1.3 Gift-giving activities carried out by the Chief Human Resources Officer, aimed at employees, will be governed by their own regulations.