

1. Introduction

Promoting the implementation of mechanisms to prevent and control Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction - ML/TF/FPWMD, the Financial Superintendency and the National Directorate of Taxes and Customs - DIAN issued external public notices 060 of 2008 - 029 of 2014, and 170 of 2002, respectively, applicable to Almacenes Éxito S.A. as issuer of securities and user of foreign trade operations.

In this regulatory context, for the purpose of continuing to strengthen the culture of transparency and to build value relationships with its stakeholders, Almacenes Éxito S.A. has implemented guidelines, procedures and control measures with a risk-based approach, aimed at the prevention and control of ML/TF/FPWMD risks.

2. Objective

This policy has, as its main purpose, the establishment of an action framework based on guidelines and directives addressed to mitigate the risk that Almacenes Éxito S.A. and its national subsidiaries shall be used as an instrument to money laundering, terrorism financing and financing of the proliferation of weapons of mass destruction.

3. Scope

This policy applies to Almacenes Éxito S.A. and its national subsidiaries (the "Company"), which shall follow its general guidelines considering its applicable rules and other obligations of the sector to which they belong.

4. Definitions

- DIAN: National Directorate of Taxes and Customs

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- **Terrorist Financing (TF)**: it is any financial support, in any way, to terrorism or to those who encourage, plan or are involved in terrorism. In accordance with article 345 of the Colombian Criminal Code, crime is established by carrying out the following behaviors: the person who directly or indirectly provides, collects, delivers, receives, administers, contributes, safeguards or saves funds, assets or resources, or perform any other act that promotes, organizes, supports, maintains, finances or financially supports organized crime groups, illegal armed groups or their members, or national or foreign terrorist groups, or to domestic or foreign terrorists, or to terrorist activities.
- **Financing of the Proliferation of Weapons of Mass Destruction (FPWMD)**: any act that provides funds or uses financial services, in whole or in part, for the manufacturing, acquisition, possession, development, export, material transfer, fractionation, transport, transfer, dual deposit or use for illegitimate purposes in contravention of national laws or international obligations, where the latter is applicable.
- **Money Laundering (ML)**: this is the mode by which criminal organizations seek to give the appearance of legality to resources originating in their illicit activities. According to Article 323 of the Colombian Criminal Code, the crime of money laundering occurs under the following behaviors: acquiring, safeguarding, investing, transporting, transforming, storing, preserving, safeguarding or managing assets of immediate or long-term origin in migrant trafficking activities, human trafficking, extortion, illicit enrichment, kidnapping extortion, rebellion, arms trafficking, traffic in minors, financing of terrorism and administration of resources related to terrorist activities, traffic in toxic drugs, narcotic drugs or psychotropic substances, crimes against the financial system, crimes against the public administration, or related to the proceeds of crimes executed under conspiracy to commit a crime, either giving the goods derived from such activities appearance of legality or legalized, concealing or covering-up the true nature, origin, location, destination, movement or right over such goods or performing any other act to conceal or cover-up their illicit origin.

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- **Sanctions lists:** refers to OFAC, UN, US terrorist list, EU list of terrorist organizations or EU list of persons listed as terrorists and any other added as binding for Colombia.
- **Foreign trade operations:** transactions related to the purchasing, sale or exchange of goods or currency, on a permanent basis, through exports, imports or international trade.
- **Unusual operations:** those whose amounts or characteristics are not related to the economic activity of the clients or which, by their number, by the amounts or by their specific characteristics, are outside the normal parameters established for a certain market range of users.
- **Suspicious transactions:** transactions carried out by a natural or legal person, which by their number, quantity or characteristics are not part of the normal business systems and practices of a particular industry or sector, and that according to the uses and traditions of the activity in question, cannot be reasonably justified.
- **External reports:** those sent to the UIAF (for its acronym in Spanish) - Financial Information and Analysis Unit (Special Administrative Unit, part of the Ministry of Finance and Public Credit), whose objective is prevention and detection of operations that can be used for money laundering or the financing of terrorism; it also imposes operations reporting obligations on certain economic sectors.
- **Internal reports:** those that are handled inside the company and can be performed by any employee of the Company, who is aware of a possible attempted, unusual or suspicious operation.
- **Warning signs:** particular circumstances that draw attention and justify further analysis.
- **Transactions in the primary securities market:** transactions through which securities issued by an issuer are sold, which have not been previously traded.

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- **Transfers in the secondary market:** transactions through which investors trade, securities already issued by an issuer and that are in circulation.
- **UIAF (for its acronym in Spanish):** Financial Information and Analysis Unit, an economic and financial intelligence entity part of the Ministry of Finance and Public Credit.

5. Organizational structure

With respect to the System for the Prevention of Money Laundering and the Financing of Terrorism, the following organizational structure was defined, with the following responsibilities:

1. Board of Directors or body that exercises as the maximum administrative body in national subsidiaries

This corporate body oversees performing the following functions:

- a) Identifying policies for prevention and control of ML/TF/FPWMD.
- b) Approving the manual for prevention and control of ML/TF/FPWMD and updates.
- c) Approving the mechanisms and instruments that make up the ML/TF/FPWMD prevention and control system.
- d) Designating the Compliance Officer, who must have the decision-making capacity, have the necessary time for the development functions, and be supported by a human and technical work team that allows him/her to perform functions adequately.
- e) Reporting on each of the points contained in the reports submitted periodically by the Compliance Officer, expressly stated in the respective minutes.

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- f) Deciding on the reports submitted by the Statutory Auditor and the Internal Audit, and following up on the recommendations adopted, expressly stated in the respective record, when so determined by the applicable regulations in force.
- g) Ordering of the technical and human resources necessary to implement and maintain the operation of the SIPLA (Integral System for the Prevention of Money Laundering and Financing of Terrorism).
- h) Ordering corrective actions as appropriate for the proper functioning of the SPLA.

5.2 Legal Representative

It is the responsibility of the Legal Representative to perform the following functions:

- a) Verifying that established procedures for prevention and control of ML/TF/FPWMD develop policies established by the Board of Directors.
- b) Providing the technical and human resources necessary to implement and maintain the system.
- c) Submitting for approval by the Board of Directors, in coordination with the Compliance Officer, the System Procedures Manual and its updates.
- d) Providing effective, efficient and timely support to the Compliance Officer

5.3 Compliance Officer

It is the responsibility of the Compliance Officer to perform the following functions:

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- a) Ensuring the effective, efficient and timely operation of the ML/TF/FPWMD prevention and control system, as well as strict compliance with all the legal norms that the ML/TF/FPWMD apply for the company, implementing the procedures that it deems necessary for the fulfillment of this work.
- b) Submitting monthly and semi-annual written reports to the Board of Directors, all of which should address at least the following:
- I. Management Results
 - II. Compliance on filing reports to multiple authorities
 - III. Effectiveness of the mechanisms and instruments established for the operation of ML/TF/FPWMD prevention and control system, as well as of the measures taken to correct any faults in the system
 - IV. Results of corrective measures ordered by the Board of Directors
 - V. Results in securities exchange every time the term of any public offer carried out ends
 - VI. Report on ML/TF/FPWMD control made to any transfers in the secondary securities exchange market
- c) Report to the Legal Representative of the requirements of IT, technological, physical and human resources necessary for the fulfillment of functions
- d) Promoting the adoption of ML/TF/FPWMD corrective measures on the prevention and control system.
- e) Evaluating reports submitted by the Statutory Auditor and Internal Audit and taking appropriate action against reported deficiencies.

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- f) Complying with and coordinating any request, filing or diligence of competent judicial or administrative authority in this matter.
- g) Receiving internal reports of unusual operations, analyzing them, and determining whether they are suspicious transactions. In such case, they must immediately be reported to the UIAF.
- h) Informing the company's management of possible failures or omissions in the prevention and control of the ML/TF/FPWMD prevention and control system, which compromise the responsibility of the employees and of the company.
- i) Designing, programming, and coordinating training programs on ML/TF/FPWMD prevention and control of the prevention and control system, with support from the organizational learning team or that in charge within the company.
- j) Designing, programming and coordinating communication and awareness campaigns related to prevention and control of the ML/TF/FPWMD prevention and control system, with support from the Directorate of Culture or that in charge within the company.
- k) Evaluating reports submitted by the Statutory Auditor and Internal Audit and taking appropriate action against reported deficiencies.
- l) Designing and coordinating the supporting files and their flow, related to the prevention and control activities of the ML/TF/FPWMD prevention and control system, with support from the document management area.

The Compliance Officer shall be hired directly by Almacenes Éxito S.A.

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5.4 Statutory Auditor and Internal Audit

It is the responsibility of the Company's Statutory Auditor to conduct evaluations on the ML/TF/FPWMD prevention and control system, which include the examination of the functions performed by the company's administrators and Compliance Officer, and to inform the Board and the Compliance Officer of the conclusions obtained therein.

It is the responsibility of the Company's Internal Audit, to evaluate the effectiveness and compliance of the elements of the ML/TF/FPWMD prevention and control system, and to inform the Board of Directors and the Compliance Officer of the conclusions obtained therein. The periodicity of the evaluations depends on the planning made by this division, resulting from the company's risk assessment carried out annually.

5.5 Employees

It is the duty of all employees to know and ensure compliance with the Company's defined ML/TF/FPWMD prevention and control policies, subject to the application of disciplinary actions as defined in the Company's Internal Labor Regulations and Code of Ethics and Conduct.

6. General guidelines

Almacenes Éxito S.A is committed to the prevention and control of ML/TF/FPWMD and has a policy of zero tolerance with the realization of behaviors that may lead to the materialization of such risks. To do this, there is a system approved by the Board of Directors, based on the following general guidelines:

6.1 The Company must promote prevention as a fundamental pillar in the management of the risks of ML/TF, this, considering that the human resource is the key factor in the multiplication of awareness for the formation of a culture of prevention of these risks, and to this end, it must be constantly sensitized and trained.

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6.2. For the proper management of these risks, the Company's Compliance Officer must lead the conduct of periodic risk assessment exercises for money laundering and terrorist financing, following the methodologies that the company defines in terms of risk management.

This assessment shall generally include the following general steps:

- Risk identification
- Risk assessment
- Definition of treatment measures
- Monitoring

This evaluation process must be properly documented through the respective document repository defined by the company.

6.3. The Company is committed to the continued compliance with legal regulations, as well as its internal policies and procedures related to the management of these risks. Therefore, it must allocate the resources relevant to the proper functioning of ML/TF/FPWMD prevention and control system.

6.4. The Board has defined that it shall never be linked to third parties appearing on OFAC or UN lists and other sanctions lists binding to Colombia.

6.5. The Company must refrain from generating commitments or commercial links without first performing the internal procedures defined for the knowledge of the third party.

6.6. The Company shall adopt mechanisms oriented to the knowledge of the third party in accordance with applicable rules, which must be implemented prior to the establishment of commercial links and after their adoption.

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7. Training and outreach

The Company shall take the necessary actions to train its employees and disclose to its stakeholders their commitment and policies to manage the ML/TF/FPWMD risks. This may involve the generation of focal content oriented to processes or higher risk businesses.

Training content should be available during onboarding process for new employees.

8. Transparency Program and Code of Ethics and Conduct

The Transparency Program and the Company's Code of Ethics and Conduct provide key guidelines that contribute to the promotion and compliance with this Policy. It is complemented and integrated with this a framework that encompasses risk management (ML/TF/FPWMD) in corporate values and principles. In this sense, it is established that shareholders, directors, managers and employees, among other related third parties, shall comply with this policy.

9. Governance of this policy

The Board of Directors of Almacenes Éxito S.A., shall be the body responsible for the approval of the content of this policy, as well as its modifications and updates. For Almacenes Éxito S.A. subsidiaries in Colombia, the approval authority shall be their highest administrative body.

The Compliance Officer shall supervise the proper implementation of the guidelines and policies contained herein.

10. Availability of consultation

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This policy shall be available for consultation by employees in the Company's document repository and shall also be posted on the corporate website for consultation and knowledge by different stakeholders.

11. Updates

This policy shall be updated by the Compliance Officer in accordance with the regulatory requirements, regulatory changes and definitions adopted in the management of these risks.

12. Related documents

- [Transparency program](#)
- [Code of Ethics and Conduct](#)

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