



Donations Policy

Version N° 1

Approved by Board of Directors
19/02/2018



Donations Policy

The Company has a sustainability strategy based on contributing to economic growth, social development, and environmental protection in Colombia.

In accordance with the above statement, the Company may make donations, in cash or in kind, to third parties, in compliance with the following:

- They cannot exceed the annual amount authorized at the General Assembly of Shareholders.
- The donation must be aligned with the Company's sustainability principles.
- The beneficiaries of the donation must be aligned with the Company's Transparency Policy, and with its principles on contributing to economic growth, social development, and environmental protection.
- In no case will the donations represent any commitment or be given for a specific benefit in return.
- Prior to the donation, the person or potential entity to benefit from the donation will be subject to a due diligence study. The legal capacity of the beneficiary must also be reviewed, if it is a foundation or non-profit organization. It is the responsibility of Corporate Affairs Management to validate the legal viability of the donation, conduct due diligence studies to accredit the suitability of the third-party beneficiary of the donation, and verify compliance with the parameters established in this Policy.
- It must comply with the donations process defined by the Company.

Donations in favor of democracy

The Company believes that democratic practices constitute one of the fundamental principles for contributing to economic growth and social development in Colombia. As such, we support initiatives that promote a combination of public and private source financing for political campaigns, in order to avoid corrupt democratic practices, associated with the concentration of a single source of financing.

Keeping in mind that, in Colombia's case, the funding of political campaigns by individuals constitutes a legal and legitimate source of financing. The Company accepts that, in an effort to strengthen democracy, donations be made to political parties, movements, and sizable groups of citizens with recognized legal status.

For such donations, in addition to the previously indicated parameters, compliance with the following is required:

It is prohibited to

- Exceed the current legal limits. However, in no case may they represent more than 2% of the maximum sums to be invested on candidates in electoral campaigns in each electoral constituency. These limits must also be respected by the registered agent, board members, and any of the controlling partners who directly or indirectly

finance political campaigns for the Colombian President, departmental governments, mayor offices, or the Colombian Congress.

- Make donations to presidential campaigns.

Duties

- The Board of Directors must approve the amount and beneficiary of the donation.
- The donation must be made in the legally permitted period.
- When selecting donation beneficiaries, the seriousness of their aspiration and possibilities of obtaining electoral support or their political projection will be considered.
- It must comply with the donations process defined by the Company.
- Annually, the Company will publicly reveal the donations made, specifying the beneficiaries and amounts.
- Should any employee, registered agent, or board member make any personal donation, they must first report it to the Ethics Committee by way of etica@grupo-exito.com in order to define whether or not there is a conflict of interest.
- **The beneficiaries must become familiar with and accept this Policy, use the resources exclusively for democratic purposes, render public accounts regarding the use of resources, and avoid use of the Company's image or name. Similarly, the beneficiary must issue a certificate making these commitments prior to receiving the donation.**

Spaces for promoting democratic dialogue

With the conviction that democracy constitutes a fundamental principle for contributing to economic growth and social development in Colombia, the Company promotes democratic dialogue. Accordingly, it may promote and serve as host to: spaces or forums for sharing appropriate information, pedagogy, and constructive political debate. In these cases, it is also the responsibility of Corporate Affairs Management to verify compliance with the parameters established in this Policy.