CERTIFICATION OF THE CORPORATE TRANSPARENCY AND ANTI-CORRUPTION COMPLIANCE PROGRAM

Envigado, April 30, 2025
TO WHOM IT MAY CONCERN:

The Compliance Office of Almacenes Éxito S.A. hereby certifies that the company has implemented a comprehensive Corporate Transparency and Business Ethics Compliance Program, in accordance with Colombian law and international anti-corruption standards, including:

- Colombian Law 1778 of 2016 (Anti-Bribery Law)
- Colombian Law 2195 of 2022
- Foreign Corrupt Practices Act (FCPA - United States)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

This compliance framework is designed to prevent, detect, and respond to ethical misconduct, bribery, and corruption risks through the following core mechanisms:

- A secure and confidential multi-channel Ethics Hotline for the reporting of concerns and violations.
- Annual declaration and review process for conflicts of interest, with documented case tracking.
- Centralized approval and registration of gifts, donations, and sponsorships.
- A published and enforced Code of Ethics, applicable to all levels of the organization.
- A documented corruption risk map and internal controls by business process.
- An active Ethics Committee responsible for case review, decisions, and disciplinary follow-up.
- Technical support to the Internal Audit department in investigations and remediation.
- Ongoing mandatory training and internal campaigns promoting ethical behavior and non-retaliation.

This program is an integral component of the company's corporate governance system and reflects its institutional zero tolerance policy toward corruption and unethical practices.

Sincerely,

Juan Esteban Gómez Sánchez
Compliance Officer
Almacenes Éxito S.A.