



D1 S.A.S

Code of Ethics

Version 5.0

16/09/2025

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1. MESSAGE FROM OUR PRESIDENT

At D1, our strength lies in simplicity: doing the right thing, making good decisions, and executing them. Reliability is our daily value promise to our consumers: “High Quality at Very Low Prices.” Ethics and integrity are non-negotiable pillars of the company. Compliance, transparency, and responsible conduct are principles that guide us and determine how we interact with our employees, customers, suppliers, and society as a whole.

2. ETHICAL AND COMPLIANCE CULTURE

2.1. Our Values

- **Simplicity:** At D1, we believe in the power of simplicity. That is why we work to structure complexity and make clear, direct decisions. We focus on what is essential, prioritizing what truly adds value. We ask specific questions, act decisively, and have the courage to focus on what is truly important.
- **Reliability:** The trust that our stakeholders place in us allows us to deliver on our value promise: High Quality at Very Low Prices. At D1, we act consistently, ensuring that every decision and action contributes to building sustainable relationships.
- **Ethics:** Ethics is a non-negotiable principle that guides all our decisions. At D1, we are honest, transparent, and responsible, always defending the truth. We abide by the law and make good decisions that respect people, society, and the environment.

2.2. Objective and Scope of Our Code

The objective of our Code is to establish guidelines for conduct that guide the behavior of all our stakeholders: shareholders, board members, employees, contractors, and suppliers of the Company. It is a practical guide for dealing with ethical dilemmas, making good decisions, and reporting inappropriate behavior, within the framework of compliance with the law and national and international best practices.

2.3. What do we expect from our suppliers, contractors, lessors, and other business partners?

D1's ethical commitment also extends to our suppliers, contractors, lessors, strategic partners, and other third parties with whom we interact. We expect these parties to share our values and principles and to act with integrity, transparency, and responsibility in each of their interactions with our employees. This Code also applies as a frame of reference for their actions and must be known, understood, and respected by all D1 counterparts or those acting on our behalf.

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3. COMMITMENT TO THE PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT AND SUSTAINABLE DEVELOPMENT GOALS

3.1. Human Rights:

- i) In line with the business vision, the Sustainable Development Goals and the universal standards related to human rights declared by the United Nations, D1 is committed to the Universal Declaration of Human Rights in connection with its workers and in its supply chain.

3.2. Labor Standards:

- Diversity, inclusion, and non-discrimination: Our employees must be treated with respect, dignity, and fairness. We promote equal treatment and equal employment opportunity without regard to race, ethnicity, color, religion, sex, age, national origin, sexual orientation, or other status protected by law. This code applies to our employees, applicants, independent contractors, customers, suppliers, board of directors and shareholders. D1 will encourage labor inclusion programs for vulnerable populations or minorities, such as women victims of violence, mothers who are heads of household, people with disabilities, demobilized population or other initiatives that promote inclusion and diversity.
- Rejection of forced labor: D1 categorically rejects any form of slavery, forced labor, child labor exploitation, migrant smuggling, or torture in its operations and supply chain.
- Freedom of Association: D1 respects the freedom of union association of its workers as a fundamental right, that is, to join and formally constitute permanent organizations that unite them in the defense of their common interests of profession or trade.
 - ✓ The right to organize in accordance with national laws and practices.
 - ✓ The right to collective bargaining through representatives elected by them.
 - ✓ The right of their elected representatives to have reasonable access to our employees to represent them.
 - ✓ The right to engage in other protected activities.
 - ✓ The right not to engage in such activities.
- Zero Tolerance for Workplace Harassment and Sexual Harassment:

What is sexual harassment? Sexual harassment is any conduct of a sexual or lascivious nature, manifested verbally, physically, gesturally, visually, in writing, or through digital media, with the purpose or effect of violating dignity, creating an intimidating, hostile, degrading, humiliating, or offensive environment, or affecting the working conditions, permanence, or access to employment of the person receiving it.

Sexual harassment is considered to be any act of persecution, harassment, or siege of a sexual nature that occurs one or more times in the workplace and is mediated by vertical

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or horizontal power relations, whether based on age, sex, gender, sexual orientation or identity, job position, social status, or economic status.

Sexual harassment can occur between workers, superiors, subordinates, contractors, suppliers, customers, or any person who interacts in the workplace, without the need for a direct employment or contractual relationship between the victim and the aggressor.

These behaviors can occur in the workplace, during work activities outside the company, in digital spaces, on work-related trips, or in any other environment related to work activities.

What is workplace harassment? Workplace harassment is any demonstrable behavior exercised against a worker by employers, superiors, colleagues, or subordinates, with the aim of instilling fear, intimidation, terror, or distress, causing harm at work, generating demotivation at work, or inducing resignation.

This conduct may manifest itself through mistreatment, persecution, discrimination, obstruction, inequality, or lack of protection, and may occur in any workspace or modality, including physical and digital locations, activities outside the company, work-related travel, and any other environment related to work activities.

- Legitimate demands by the employer in the exercise of their authority, such as the application of justified disciplinary measures, the request for compliance with legal or contractual duties, or the adoption of objective business decisions, do not constitute workplace harassment.
- D1 S.A.S. reaffirms its absolute commitment to promoting a safe, respectful, inclusive work environment free from any form of sexual and/or workplace harassment. The Company adopts a zero-tolerance policy towards such conduct and is committed to implementing preventive, corrective, and response measures in compliance with current legislation.

Among the actions that D1 S.A.S. carries out to prevent sexual and workplace harassment are:

- The ongoing dissemination and socialization of this Code and the available reporting channels, guaranteeing confidentiality and respect for the privacy of the individuals involved.
- Regular training for all workers, managers, contractors, and other persons involved in the workplace on the identification, prevention, and handling of sexual and workplace harassment.

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- The existence of clear protocols for receiving, addressing, and processing complaints or reports of sexual and/or workplace harassment, ensuring the protection of victims' rights and guaranteeing non-repetition.
- The adoption of immediate protective measures for victims, such as relocation, teleworking permits, emotional and psychological support, and confidentiality of information.
- The prohibition of any act of retaliation, discrimination, or revictimization against those who report, witness, or participate in proceedings related to sexual harassment.

It is strictly prohibited for all employees, managers, contractors, suppliers, and any person acting on behalf of or representing D1 S.A.S. to engage in conduct that constitutes sexual and/or workplace harassment in any form.

The commission, promotion, concealment, or tolerance of acts of sexual harassment in the workplace are considered very serious offenses, subject to the most severe disciplinary sanctions.

D1 S.A.S. urges all its employees to report any situation of sexual and/or workplace harassment of which they are aware, using the channels provided by the Company, and guarantees the protection of the rights of those who act in good faith in these processes.

Workplace Sexual Harassment Complaints: through the Company's ethics line available on the website.

Workplace harassment reports: via the workplace coexistence committee's email address: comitdeconvivencialaboral@d1.com.co

The prevention and eradication of sexual harassment is everyone's responsibility. At D1 S.A.S., we work together to build and maintain a dignified, safe, and violence-free work environment.

- Occupational health and safety: For D1, the safety and physical integrity of our employees is a priority, we have an Occupational Health and Safety Policy. We are committed to maintaining and providing safe places for our employees and continually generating a culture of prevention. Likewise, we must keep in mind the safety of customers, suppliers, visitors, and the social environment in which we carry out our operations to protect the physical integrity of all.
 - ✓ For the safety of all, employees must immediately report incidents, accidents, unsafe behavior, and conditions to their supervisors.
 - ✓ Avoid performing unsafe acts that endanger your physical safety or personal integrity.

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- ✓ Comply with current legal regulations, internal procedures and commitments subscribed with and by the organization in all matters related to the Occupational Health and Safety management system.
- ✓ Actively participate in the prevention of incidents, accidents and physical injuries related to the activity performed or process related to the organization, through the identification of hazards, evaluation, and permanent control of risks within a process of continuous improvement.

3.3. Environment and Sustainability

- Environment: At D1 we are aware of, mitigate and address all risks that may be associated with the environment and the management of residues resulting from our operations in our value chain.
 - ✓ As part of our social commitment, we recognize and protect the conservation of the environment and promotes internal strategies to optimize power consumption at stores and distribution centers through the energy efficiency area.
- Sustainability: D1 recognizes the importance of a business in tune with sustainable development, and therefore bases its sustainability policy on developing and deepening an innovative business model that generates value for its stakeholders:
 - ✓ Democratizing food.
 - ✓ Keeping customers satisfied with high quality products at very low prices.
 - ✓ Promoting healthy and motivated employees
 - ✓ Maximizing the use of its resources to minimize the impacts of our operation and supply chain
 - ✓ Generating financial sustainability for shareholders
 - ✓ Maintaining a fair and ethical relationship with stakeholders.

4. BUSINESS ETHICS AT D1

D1, committed to its values, principles, standards and rules of the Company, local regulations and the Law, seeks to guarantee integrity, legality, honesty, responsibility, rectitude, good faith, loyalty, general and corporate interest and reliability to all its stakeholders, whether associates, administrators, workers, suppliers and contractors and lessors, for which it has implemented the business ethics and transparency program, in accordance with current legislation and international best practices.

4.1. Conduct towards third parties

The company's stakeholders are all those natural persons or legal entities who are interrelated internally or directly and externally or indirectly.

a. Customers and consumers

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The strategy to strengthen our value proposition is to work continuously to deliver quality products, generate satisfaction and never jeopardize the safety of our consumers.

The following are the behaviors that all employees must observe in their relationship with customers and consumers:

- ✓ D1 is committed to delivering safe, high-quality products.
- ✓ We will meet the regulations and industry standards for product safety and quality.
- ✓ Requests, claims and requirements must be addressed in a timely and accurate manner, in accordance with the law and through the different channels established by the company.
- ✓ Inform when something may negatively affect the safety or quality of products
- ✓ Never jeopardize the relationship with customers and consumers, nor violate the established trust.
- ✓ There is no room for any type of corruption, bribery, favoritism, or any activity that is contrary to good manners or that threatens the health of the population.
- ✓ We will fully comply with the consumer protection law and our internal compliance program in this area.

b. Suppliers and contractors

Suppliers are strategic partners for our company, with whom we seek to generate long-term relationships based on transparency, respect, and good communication. The commitment to conduct all our business in an ethical, honest, transparent, integrated manner, and free of any form of corruption or bribery extends not only to our employees but also to suppliers, contractors and third parties with whom the Company has business relationships.

To ensure that suppliers, contractors and third parties with whom we do business share our commitment to act in compliance with applicable standards, the following guidelines must always be met:

- ✓ All procurements must comply with the company's Procurement Policy.
- ✓ Conduct honest and fair negotiations, without discrimination or imposition of any kind.
- ✓ The selection of suppliers, contractors or third parties must always be made based on objective criteria such as price, quality, presentations and suitability of their product or service.
- ✓ Suppliers must comply with all applicable local and national laws, rules, regulations and requirements for the manufacture and distribution of our products and supplies and for the provision of services.
- ✓ Not offer or receive gifts, entertainment or favors in exchange for obtaining or retaining business with suppliers.
- ✓ All information provided by suppliers will be kept strictly confidential, and in return the company expects suppliers to comply with D1's policies.
- ✓ When conducting business, special attention should be paid to the prevention of

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- disguised agreements such as keeping another supplier out of the business.
- ✓ Background check procedures should be carried out on potential suppliers, third parties or contractors to verify that they conduct their business with integrity and honesty.

c. Lessors

The selection of lessors must be transparent and comply with the expansion criteria defined by the company. The Company has zero tolerance for offering, directly or indirectly, bribes to government officers, public or private service companies through its lessors with the aim of directly or indirectly favoring D1.

4.2. Conflicts of Interest

Conflicts of interest are any situation in which an employee or contractor brings their interests into conflict with those of D1, whether in personal, business, family or commercial activities, affecting freedom, objectivity, good judgment, independence and impartiality in making a decision.

Conflicts of interest are classified as follows:

- **Potential:** When the employee has a particular interest that could influence their obligations at the time of issuing their opinion from the position or role they occupy within the Company but is not yet in a situation in which it should materialize.
- **Real:** When the employee is already in a situation in which they must decide, but within this framework, there is a particular interest that could influence their obligations derived from their role within the Company.
- **Apparent:** When the employee does not have a private interest involved, but a third party could conclude, even tentatively, that one does exist or exists. Therefore, a practical way to identify whether there is an apparent conflict of interest is for the employee to provide all the necessary information to demonstrate that such conflict is neither real nor potential.

The following are some situations, which are not exhaustive, that may constitute a conflict of interest:

- ✓ Participating directly or indirectly in negotiations with customers, lessors or suppliers, in which there is a family relationship that influences the decision. (This means attempting to negotiate and/or contract with a third party, in which the negotiator, the representative or the shareholders are relatives within the fourth degree of consanguinity, second degree of affinity, sole civil or its partners.
- ✓ Hiring relatives of our employees within the same dependence, management, or direction since the labor subordination may generate a conflict of interest.
- ✓ Acquiring shares or advising companies that, due to their corporate purpose, are in competition with the Company.

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- ✓ Serving on boards of directors or providing services to third parties.
- ✓ Participating in profiling and promotion processes if there is any potential conflict to be analyzed by the ethics committee.

In the event of being immersed in any of the situations described above, the potential conflict of interest must be disclosed to the Ethics Committee through the compliance officer or the ethics line. Employees who have family members within the company must disclose this information.

D1 shareholders, board members and managers must disclose conflicts of interest in accordance with the provisions of the Company's bylaws and applicable internal related-party policies or guidelines.

4.3. We do not tolerate any bribery and corruption

All shareholders, board members, employees, suppliers and contractors must comply with applicable anti-corruption regulations. The Company prohibits receiving, accepting, offering, giving, authorizing, promising, directly or indirectly, to government or natural or legal entities, directly or indirectly, as consideration for an improper benefit or an improper advantage for oneself or for the Company.

The Company has zero tolerance for private corruption, bribery, transnational bribery between private parties and/or with government officials in any form, in cash or in kind, including, but not limited to, cash, D1 products or cash equivalents such as gifts, travel, among others.

Any attempted bribery must be reported immediately through the ethics line.

- Facilitation payments: At D1 it is forbidden to make payments, gifts and/or attentions of any value, directly or indirectly to public officials, to obtain, favor in procedures in their charge, regardless of whether the resources allocated to this payment are from the company or the collaborator.

Some examples, but not limited to, are:

- i) Giving money or something of value to expedite obtaining or issuing licenses.
- ii) Promising or giving gifts or presents to a public official with the purpose of obtaining a benefit at the time of issuing a fine.
- iii) Offering money to a public official in charge of making judicial or administrative notifications, with the purpose of speeding up any procedure.
- iv) Giving money or something of value for the connection of a public service.

4.4. Donations and political contributions

D1, in the development of sustainability plans, considers that donations are part of the Company's social responsibility; however, donations may constitute a source of risk. In order to preserve legality and transparency in donations, it is established:

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Donations must strictly comply with the rules contemplated [in the Donations and Sponsorships Policy](#).

- ✓ All donations and sponsorships must be approved by the company's donations and sponsorships committee.
- ✓ All donations and sponsorships made by D1 must have a lawful purpose and will be made following the legal procedures for their formalization.
- ✓ Neither D1 nor the Company's Senior Management will make contributions, financing, donations or contributions to political parties, political campaigns and/or candidates for public office, government entities (except for food banks run by local or regional governments),,, government officials or individuals involved in politics, unless authorized by the Board of Directors.
- ✓ No donations may be made, directly or indirectly, in exchange for obtaining advantages in D1's business or in its commercial transactions.
- ✓ Donations between related parties must be approved by the Board of Directors.

4.5. Lobbying and revolving door

Lobbying: The representation of private interests before public authorities, which can occur:

- Direct representation of D1's interests without any intermediation, through officers who fulfill a specific role within the Company.
- Indirect representation, that is, through a third party with expertise in a specific field, according to the Company's needs (consulting firms specialized in strategic communication for companies or professional lobbyists, among others).

Therefore, all lobbying agreements must be in writing and include anti-corruption and money laundering prevention clauses.

Revolving door: This is the movement of professionals who move from working in the private sector to the public sector and vice versa, taking advantage, among others, of the experience acquired in roles previously held to put it at the disposal and service of their new employer.

At D1, adopting the best practices and recommendations of the OECD, in order to mitigate the effects that can be produced by lobbying and the revolving door, we have adopted the following practices:

- ✓ Establish "cooling off periods" prior and subsequent to occupying positions within the Company of persons coming from the public sector considered politically exposed persons of at least one year.
- ✓ Lobby by former public officers: Employees with an executive or managerial position and their equivalents, who come from the public sector, will have an abstention period of one year, during which it will be prohibited to lobby, to work with public officers to whom they have had access by execution of their immediately previous position,

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performing functions of their new role in the Company.

These recommendations allow us to reinforce the standards of conduct embodied in this code, to make transparent business that allow us to advance the mission and vision of our Company, always showing our slogan, very high quality at very low prices.

4.6. Payments, Commissions and/or Bonuses

- ✓ Remuneration to employees in D1 is made according to the positions and functions assigned, and if any extra or additional payment is recognized, it will be in accordance with applicable labor law or the benefits programs defined by the Company.
- ✓ The conditions of payment of remuneration, commissions and bonuses to employees must respond to objective and standardized criteria.
- ✓ D1 shall under no circumstances make payments to its employees, such as commissions or remuneration, other than those contemplated in the labor contracts or those defined in the benefits programs defined by the Company.
- ✓ All payments made to contractors or providers, whether domestic or foreign, must be supported by the values stipulated in an agreement or purchase order, and no payments will be made outside the stipulations of such agreements, except for petty cash payments, which are regulated in the respective petty cash policy.
- ✓ All payments to Contractors or Providers shall be duly supported by invoices or collection accounts prepared in accordance with the terms established in the agreement.
- ✓ Payments for fraudulent or corrupt purposes directly or through agents, proxies, contractors or any third party are not accepted and are prohibited at D1.
- ✓ Workers shall ensure that the terms and conditions incorporated into agreements are not used to conceal or give the appearance of legality to unjustified and prohibited payments.

4.7. Courtesy, Gifts and Entertainment

At D1, employees are not allowed to give or receive Gifts, Courtesy or Entertainment from a person or company that are intended to alter their independence or influence a decision or seek to obtain something in return or that could be considered a bribe. The rules are more demanding when it comes to invitations involving a public officer, to whom it is prohibited to offer gifts, favors, and/or entertainment.

Therefore, at D1, among others:

- ✓ We do not receive, give, pay, offer, promise, or authorize, in our personal capacity or on behalf of D1, directly or indirectly, money, gifts, salaries, travel, commissions, or anything else of value to obtain any undue advantage or benefit of any kind.
- ✓ We do not give or offer gifts to public officers.
- ✓ We only accept, give or offer occasional D1 or promotional "merchandising" gifts that

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- do not exceed COP 50,000.
- ✓ All receptions or deliveries of gifts, courtesy and/or entertainment activities must be reported through the channel provided by the Company.
- ✓ If an employee is going to provide hospitality to a supplier, contractor, or landlord, it may not exceed COP 50,000, unless authorized by the vice president of the area or the president. The expense must be legalized, indicating the name of the third party to whom hospitality was provided.

Meetings with providers should preferably be held at D1's facilities, except when required to attend the facilities of the provider or contractors, for which employees must always be accompanied by at least one other employee.

In the event that, exceptionally, an employee requires approval to receive a courtesy from a third party, this must be authorized by the national director or vice-president of the corresponding area and reported to the compliance officer.

It is forbidden to give and receive gifts and hospitality to public officers.

5. PRESERVATION OF D1 ASSETS

At D1 we have the responsibility to make proper use and safeguard the Company's assets, as well as to take advantage of the resources established for the performance of our functions, therefore we have defined the following points:

5.1. Use of D1's Assets

The Company's property and assets are not only those that have been assigned for the development of the work of the role assigned in D1, but also all those made available to employees, such as information, computers, cell phones, vehicles, fixtures and facilities, as they could present risks such as loss, damage or even misappropriation. Therefore, all assets must be used for business purposes. D1 will monitor, supervise, and control its information assets in accordance with employment contracts, internal Company policies, and applicable legislation, through video surveillance systems, biometrics, computer fraud prevention systems, among others.

5.2. Use and Handling of Information

- Confidentiality of privileged and confidential information: At D1 we maintain absolute confidentiality and reserve of the information to which employees have access. This information shall be confidential, regardless of the means by which it has been provided, including information provided in software or electronic storage media. The use of public virtual folders such as Dropbox, Google Drive, iCloud, WeTransfer, and/or similar services for storing information that involves exposure of information owned by D1 S.A.S. is restricted. In addition, the Company includes within the agreements signed with its

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suppliers, strict clauses of confidentiality and protection of personal data where the duty of custody and protection of personal data is established and must be followed by the suppliers and other legal and natural persons who receive such information in their capacity as data processors. Access to personal data information is restricted according to the profile of each user (employees), which is created at the time of joining the Company and has enabled only the necessary accesses under the profile of the position to be performed within D1.

- Integrity in accounting records: For D1, transparency and ethics in accounting records and accounts are very important, therefore we correctly and timely record financial information in accordance with current regulations for our operation, ensuring the reliability of the reports. Therefore, all recorded data must be true, with reasonable detail and give an accurate and faithful account of transactions. Falsifying accounting records is strictly prohibited and implies disciplinary and criminal actions.
- Intellectual Property: For our Company it is important to maintain the Know How of the business, therefore, at D1 we do not disclose any confidential information, including confidential industry knowledge, strategies, methods, plans, products, processes, among others. Our duty is to maintain confidentiality even when the employment relationship with the Company is terminated.
- Personal Data: Personal data managed by D1, will be collected, used, stored, updated, transmitted and/or transferred, for the purposes described in the Personal Data Protection Manual and Policy, disclosed within the Company, therefore, we obtain and process personal data responsibly, ethically and in accordance with applicable local laws.
- Employees are prohibited from taking photographs of video surveillance monitors, customers, D1 suppliers, or their coworkers in the course of their duties and disseminating them through unauthorized channels or personal social media accounts.
- Information Security and Cybersecurity: At D1 we have an Information Security and Cybersecurity policy, a document through which we have described the responsibilities and obligations of each user, supplier and third party that have some kind of relationship with the management of the Company's assets to ensure the Confidentiality, Integrity and Availability of the information. The Company has zero tolerance for paying for data kidnapping or ransomware.
- Use of Artificial Intelligence (AI) tools: [The information security and cybersecurity policy](#) includes guidelines for the ethical, non-discriminatory, and appropriate use of artificial intelligence tools. It is prohibited to upload D1 information or personal data for which D1 is responsible to free AI tools or those not authorized by the Company.
- Proper handling of the press and social media: At D1 we expect that Employees make responsible, correct and loyal use of social networks and different media, therefore, Employees are not allowed to use social networks or media to disseminate information

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that discredits and/or damages the reputation of the brand. It is also prohibited to publish photographs or videos wearing the D1 uniform, unless they are used appropriately.

6. PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

In accordance with current regulations, D1 has implemented policies, procedures and controls to mitigate the risk of Money Laundering and Financing of Terrorism and the Proliferation of Weapons of Mass Destruction (ML/TF/FPWMD), in order to prevent the activities, operations, processes and business relationships that D1 carries out in the course of its activities from being used to launder money or finance terrorist activities.

D1 employees, suppliers, lessors, and contractors are prohibited from making extortion or security payments to terrorists, illegal groups, or common criminals. In the event that a third party requests an extortion payment, the security department must be immediately informed so that the corresponding protocols can be activated.

7. CONSUMER PROTECTION

D1 participates in the market freely and fairly, in accordance with its own value proposition, operational policies and structures, costs, and commercial objectives. D1 understands the importance of free and fair competition in the markets in which it participates, which benefits both end consumers and all market participants.

D1 complies fully with all laws that protect and regulate free and fair competition. In this regard, D1 rejects and strictly prohibits any act contrary to such laws, regulations, and practices contrary to free and fair competition or good faith in the market, and has implemented a series of policies, manuals, and procedures within the Company aimed at preventing D1, its employees, and contractors from engaging in conduct contrary to free and fair competition.

Without prejudice to the provisions of the prevention and control system, D1 expects its managers, employees, and collaborators to fully comply with Colombian regulations protecting free and fair economic competition and to behave in accordance with commercial good faith, ethics, and good customs. In this regard:

- ✓ No director, officer, or employee of D1 should assume that the Company's interests require the violation of rules protecting free and fair economic competition.
- ✓ The fulfillment of commercial or other goals is not an excuse for violating the rules protecting free and fair economic competition or internal policies and procedures for preventing risks to free and fair competition.
- ✓ There is a zero-tolerance policy for conduct that limits free competition or that may be unfair in the market.
- ✓ Any commercial or strategic decision is made autonomously and independently, based on objective factors.

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- ✓ D1 rejects and prohibits the obtaining of information from competitors through illegal or unethical means.
- ✓ Similarly, if there is suspicion of a violation of the rules protecting free and fair economic competition, D1 managers and employees must contact the Legal and/or Compliance departments so that they can follow up on the concern and determine the steps to be taken.

8. COMPLIANCE WITH THE CODE

Compliance with this code is the responsibility of each employee and leaders have a special responsibility, as they are the ones who must set an example so that their teams fully comply with these guidelines.

8.1. Training and Disclosure

Disclosure of this Code will be the responsibility of the Control and Compliance Department, together with the Vice -Presidency of Human Resources or those who in the future will perform these functions.

It is mandatory for employees to participate in all training related to this Code.

8.2. Ethics Committee

In order for all D1 employees to comply with the provisions of the Code of Ethics, to be properly interpreted, and to understand how to manage any conflict of interest, the Company has an Ethics Committee, composed of:

- Presidency
- Human Resources Vice President
- Legal and Corporate Affairs Vice President
- Financial Vice-President
- Compliance Officer

The Compliance Officer will act as the Committee's technical secretary.

In addition, the following shall be taken into account for the Ethics Committee:

- Quorum to hold the meetings, i.e., that half plus one members attend the previously scheduled sessions and the special sessions.
- Four previously scheduled meetings shall be held during the year and any extraordinary meetings that may arise, which shall be documented by means of minutes.

Some functions of the Ethics Committee:

- Give instruction and guidance for the attention of reports received through the D1

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ethics line channel, as well as with concerns related to possible non-compliance with this code and other Company guidelines.

- Promote and monitor that the investigations resulting from the cases raised through the ethics line channel are objective, impartial and confidential.
- Recommend corrective measures for acts or omissions to the Company's Code of Ethics, as well as suggest their application to the Human Resources area, the Legal Department or the corresponding areas.

- Audit Committee Report

The matters relating to Company executives or material issues dealt with in D1's ethics committees shall be reported to the Audit Committee on a quarterly basis or in extraordinary sessions as and when required.

9. ETHICS LINE

D1 has set up an Ethics line channel so that employees, suppliers, lessors, contractors, and the community at large can openly, confidentially and/or anonymously send complaints, questions or issues regarding violations of the Code of Ethics, conduct and/or situations that they consider unethical, and that go against the parameters established herein or issues that arise in the Company related to non-compliance with rules, procedures, regulations, policies and standards of conduct.

D1 S.A.S.'s ethics line is outsourced, guaranteeing confidentiality and anonymity, available 24 hours a day, 7 days a week at:

Via Web:

<https://d1.com.co/linea-etica-d1/>

https://etica.resguarda.com/d1/main_es.html

- Complaints: When a person calls the Ethics Line, he/she must ensure that the information he/she provides is valid and provide sufficient details in order to conduct an investigation taking into account the report (who, how, when, where, how often).
- Doubts and concerns: D1 invites its employees to contact their leaders or the Compliance Officer in case of doubts or concerns regarding the regular procedure or steps to follow in a particular situation.
- Internal investigations: Internal investigations may be conducted by internal staff or specialized third parties. Where deemed necessary, evidence may be collected through data analysis, interviews, monitoring of corporate devices, voluntary polygraph tests, forensic audits, etc., which may include the use of tests to safeguard, preserve, and analyze evidence.
- Zero tolerance for obstruction of investigations and/or elimination of evidence during internal

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investigation processes by employees.

9.1. Whistleblower Protection

D1 does not tolerate retaliation against whistleblowers, investigators or third parties involved in an investigation. Anyone who retaliates will be subject to disciplinary action in accordance with the Company's internal work regulations and applicable labor laws. At D1, we know that expressing and sharing your concerns requires courage; therefore, it is prohibited to intimidate employees or third parties who wish to file inquiries or complaints related to our business ethics.

When we report unethical acts and/or wrongdoing, we uphold our Code and values. Reporting a concern will not get you in trouble if you do it in good faith, even if you make a mistake. Intentionally providing false information goes against our values and the person who does so will be subject to disciplinary action.

This means that no person may take negative employment actions such as separation, demotion, suspension, loss of benefits, threats, harassment or discrimination against another individual for raising an inquiry, complaint or concern. Any employee who retaliates or has retaliated against another will be subject to disciplinary action.

Discretion, confidentiality and zero retaliation will be guaranteed for reports of unusual operations related to alerts from the money laundering risk prevention system made by employees. The company makes available to employees and third parties the ethics line available on our website to make confidential or anonymous reports of unusual operations, maintains a strict separation of roles and functions between those responsible and areas in charge of the management, supervision and control of the System. For this purpose, possible Conflicts of Interest are regulated, and a regime of disqualifications and incompatibilities is established.

The procedure for requesting protection or reporting any act of retaliation is set out in the Whistleblower [Protection and Non-Retaliation Guide](#).

9.2. Corrective Actions and Sanctions

Sanctions for non-compliance with the Code of Ethics and Conduct shall be applied in accordance with the internal work regulations and current labor regulations, without prejudice to any civil and criminal actions that may be applicable in accordance with the Law.

In addition, the ethics committee may request corrective measures related to action plans to strengthen internal control.

In the event of identifying unethical conducts on the part of suppliers, contractors, and lessors, contractual clauses will be enforced, or a risk-based and due diligence approach will be used to evaluate the continuity of the third party.

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10. RESPONSIBILITY FOR KNOWING THE CODE OF ETHICS

It is the responsibility of all employees and other persons related to the Company to know and fully respect the guidelines of this code. In order to comply with the above, it is a duty to attend all training scheduled for this purpose by the Ethics and Labor Conduct Committee or the Company's senior management.

The Company's policy has zero tolerance for any type of conduct that may be considered an act of corruption, national or transnational bribery or any other conduct that violates the provisions set forth in this code of ethics. The infringement, violation or transgression of this code will result in an internal investigation that may result in formal warnings, termination of employment contracts and reporting to the competent authorities, when appropriate.

11. EFFECTIVE DATE

The Code of Ethics and its updates shall become effective upon approval by the Board of Directors of D1 S.A.S. and disclosure.

12. DOCUMENT VERSION CONTROL AND RESPONSIBLE PARTIES

Version	Description of modification	Date
4.0	Modification of document	01/06/2023
5.0	Update of guidelines on workplace harassment, workplace sexual harassment, fair and free competition, consumer protection, asset security, and internal investigations.	16/09/2025

Version	Prepared by	Reviewed by	Approved by
4.0	Compliance and Risk Manager	Control and Compliance Director – Lina María Torres	Board of Directors
5.0	Control and Compliance Director	Audit Committee	Board of Directors

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