




D1 S.A.S
Code of Ethics


Version 4.0
06/01/2023

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1. INTRODUCTION

At D1 we ratify our interest and commitment to ensuring the quality of life of our employees, the proper functioning of our operation, business with integrity, the strengthening of our reputation, the transmission of trust and transparency to our stakeholders. This is why the company has established ethics and compliance policies with all its stakeholders that allow us to maintain transparent relationships with partners, employees, customers, suppliers, and the community where we operate. Therefore, we seek that all those who in one way or another are related to the company, adopt correct decisions, act with integrity, honesty, and justice, demanding the same from all those with whom they interact. This code highlights the important legal, ethical, and regulatory requirements that govern D1's operations.

It also provides additional information resources and guidance on how to report potential violations. We reiterate in this code our commitment to conduct all our activities in compliance with applicable legal standards for preventing and combating corruption and bribery, and in compliance with the highest standards of quality and honesty. It is important to read, understand and respect the code.

2. ETHICAL AND COMPLIANCE CULTURE

D1 S.A.S., hereinafter "the Company", committed to the values, principles, standards, and rules of the organization, seeks to ensure the Company's commitment to integrity, legality, honesty, responsibility, rectitude, good faith, loyalty, general and corporate interest, and truthfulness with all its stakeholders.

3. OBJECTIVE

To define the standards of conduct that guide the behavior of all employees and people linked to the Company, based on integrity, discipline, service, innovation, fairness, teamwork, efficiency, productivity, and legality.


4. SCOPE

Our Code of Ethics applies to shareholders, members of the Board of Directors, employees (including contractors and temporary personnel), suppliers, contractors and any person acting on behalf of D1 S.A.S.

The Code of Ethics should be a tool for permanent consultation. The duties set forth herein must be fulfilled in a conscious and mandatory manner and are part of the other obligations contained in the internal work regulations, individual agreements, and procedures of D1 S.A.S.

This document is not, nor is it intended to include all situations where an ethical conflict may arise. Therefore, situations not foreseen in this Code of Ethics will be resolved in accordance with best management practices and the company's ethics committee.

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In case of any doubt or question on the interpretation, application of the content or the way to act in a specific situation, the direct superior or the ethics committee should be consulted.

5. D1INITIATIVE: Global Compact and Sustainable Development Goals


5.1. Human Rights

Human rights are integrated into all aspects of the Company. In line with the business vision, the Sustainable Development Goals and the universal standards related to human rights declared by the United Nations, D1 guarantees compliance with human rights of its workers and will promote compliance with these in its supply chain.

5.2. Labor Standards:

- Human rights principles: we recognize in each of the individuals who are part of the company, directly or indirectly, human rights as the basic, inherent, and essential prerogatives of people that seek to ensure the dignity, equality, and development of individuals. Any form of child labor is prohibited.
- 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.
- 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.
- Harassment: Workplace harassment is defined as any persistent and demonstrable conduct aimed at instilling fear, intimidation, terror, and distress, causing harm at work, generating demotivation at work, or inducing resignation from work. Workplace abuse is understood as any act of violence against the physical and moral integrity, physical and sexual freedom, and property of the employee.

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At D1, we do not tolerate verbal or physical conduct that degrades another person, interferes with the performance of their duties, or jeopardizes the good working environment. In addition to the above, we do not tolerate any form of sexual harassment or conduct of an inappropriate sexual nature.

- Occupational health and safety: For D1, the safety and physical integrity of our employees is a priority. 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 conduct 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.
 - ✓ 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.


5.3. 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 waste and/or residues resulting from our operations in our value chain.
 - ✓ As part of our social commitment, we recognize and protect the conservation of the environment.
- 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:
 - ✓ Keeping customers satisfied.
 - ✓ 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.

6. 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 truthfulness to all its stakeholders, whether

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associates, administrators, workers, suppliers and contractors, for which it has implemented the business ethics and transparency program, in accordance with current legislation and international best practices.

6.1. 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

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

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 or exceed legal and regulatory requirements 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.


b. Suppliers

Suppliers are strategic partners for our company, with whom we seek to generate long-term relationships based on transparency, respect, and effective 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 purchasing procedure.
- ✓ Employees are not authorized to contact suppliers or conduct negotiations without the assistance of purchasing; this ensures process specialization, objectivity and maximizing opportunities for the company.

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

6.2. 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 situations, which are not exhaustive, that may constitute a conflict of interest:

- ✓ Participating directly or indirectly in negotiations with customers 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,

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the representative or the shareholders are relatives within the fourth degree of consanguinity, second degree of affinity or sole civil.

- ✓ 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.
- ✓ 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.

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

6.3. 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 private officials, directly or indirectly, as consideration for an improper benefit or an improper advantage for oneself or for the Company.

The Company strictly prohibits commercial bribery between private parties and to government officials in any form, in cash or in kind, including, but not limited to, cash 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 employees 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.

6.4. Donations and political contributions

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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. To preserve legality and transparency in donations, it is established:

- ✓ Donations must strictly comply with the rules contemplated in the Donations Procedure.
- ✓ All donations 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, organizations, 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.

6.5. 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 activity 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, 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 after 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, performing functions of their new role in the Company.

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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, remarkably high quality at incredibly low prices.

6.6. Payments and Commissions

- ✓ Remuneration to D1's employees 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.
- ✓ The conditions of payment of remuneration and commissions 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.
- ✓ 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.


6.7. 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, as described in the internal Ethics and Transparency policy.

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 do not exceed COP 50,000.
- ✓ All receptions or deliveries of gifts, courtesy and/or entertainment activities must be reported by employees through the channel provided by the Company.

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

If, 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.

7. PRESERVATION OF ASSETS AT D1

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:


7.1. 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 fixtures and facilities, as they could present risks such as loss, damage or even misappropriation. Therefore, all assets must be used for business purposes.

7.2. 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 how it has been provided, including information provided in software or electronic storage media. In addition, the Company includes within the agreements signed with its suppliers, strict clauses of confidentiality and protection of personal data where the duty of custody and protection of personal data is established, 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 particularly 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 prohibited and implies disciplinary and criminal actions.

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- **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.
- **Information Security:** 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.
- **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 that discredits and damages the reputation of the brand.

The relationship with the media must be limited to the delivery of marketing information or business strategies defined by the President's Office and must be done through the persons authorized by the Company for this purpose, to protect the good name and reputation of D1. Employees who receive invitations to participate in interviews, programs, or other media formats, must escalate this request to the President's Office for analysis and, if applicable, approval of their participation in the space.


8. ANTI-MONEY LAUNDERING

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/FT/FPWMD), 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.

9. FAIR COMPETITION

For D1, fair competition will be a basic element in all relationships where we are present. For this reason, employees will refrain from making comments that may affect the image of competitors or contribute to the dissemination of rumors about them, perform acts aimed at generating confusion or deception among its customers or use and exploitation of the reputation of its competitors.

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Committed to a framework of integrity based on quality, service, and commercial strategy, in accordance with our principles, respecting our competitors in every way. Any comparison with the competition will be made using accurate terms, without qualifiers and without using misleading information or argumentation.

Within commercial activities in a competitive business environment, it must be kept in mind that, if exposed to information about competitors, legal and ethical limits must take precedence over any conduct.

- ✓ Do not try to acquire information through improper means, such as bribes or hidden surveillance of our competitors.
- ✓ Do not hire an employee of a competitor to obtain confidential information or encourage employees of competitors to disclose confidential information about their employer.
- ✓ If you are offered information about a competitor that you believe may be confidential, you should ask whether it is confidential and how it was obtained. If you are uncertain whether the information was obtained properly, you should contact the Ethics Committee.
- ✓ If written material is offered confidentially, you should not accept it, immediately make a note of what happened and then contact the Ethics Committee.

10. 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.

10.1. Training and Disclosure

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


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

10.2. Ethics Committee

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 Director
- Legal Director
- Financial Vice-President

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

In addition, the following shall be considered for the Ethics Committee:

- Quorum to hold the meetings, i.e., that half plus one member attends 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 ethics hotline 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 hotline 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 Department, the Legal Department, or the corresponding areas.
- Audit Committee Report

The matters 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.

10.3. Ethics Hotline

D1 has set up an Ethics Hotline channel so that Employees and associated third parties 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 hotline is outsourced, guaranteeing confidentiality and anonymity, available 24 hours a day, 7 days a week at:

Web:

<https://d1.com.co/linea-etica-d1/>
<https://etica.resguarda.com/d1/main.es.html>

- **Complaints:** When a person calls the Ethics Hotline, 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).

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- **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.

10.4. 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.

10.5. 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.

The Policies were established with the following approach:

- A risk-based approach is applied in which the level of risk of the Counterparties and operations is proportional to the measures taken for their knowledge and monitoring.
- Guidelines are established for the knowledge of Counterparties.
- The provisions, stages and elements of the Systems are part of the Company's compliance culture that all Employees must know, comply with, and apply, and in case of non-compliance, the corresponding sanctions are applied.
- Cash transactions are duly regulated in the SAGRILAF Manual.
- Discretion, confidentiality and zero retaliation will be guaranteed for reports of unusual operations made by employees. The company makes available to employees and third parties the ethics hotline 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

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control of the System. For this purpose, possible Conflicts of Interest are regulated, and a regime of disqualifications and incompatibilities is established.

11. 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. 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.

12. TERM

The Code of Ethics becomes effective upon approval by the Board of Directors of D1 S.A.S. and disclosure.

| Version | Description of modification | Date |
|---------|-----------------------------|------------|
| 4.0 | Modification of document | 06/01/2021 |

| Version | Prepared by | Reviewed by | Approved by |
|---------|-----------------------------|---|--------------------|
| 4.0 | Compliance and Risk Manager | Control and Compliance Director – Lina María Torres | Board of Directors |

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