



CRIME PREVENTION AND ANTI-BRIBERY POLICY

I. Introduction

Linio is firmly committed to adhering to and complying with all applicable laws and regulations. The Integrity Code likewise establishes our firm commitment to promote a culture of compliance and integrity to guide its conduct and that of all its Associates, irrespective of the country or location where they conduct their activities.

Linio proactively seeks to prevent the commission of any crime, and in particular those related to asset laundering, financing of terrorism, bribery of public officials and all other likely to result in criminal or administrative liability for any of them under local legislation.

II. Purpose

This Policy is intended to establish the principles and basic obligations to guide the behavior of Associates to mitigate and to the extent possible prevent the commission of any offense creating criminal or administrative liability within the Company.

III. Scope

This Policy is corporate in scope, and therefore applicable throughout Falabella.com SpA, Linio Colombia SAS, Falabella.com SAC, Bazaya México, S. DE R.L. DE C.V, and all Associates are expected to implement and be bound by the same.

IV. Definitions

The capitalized terms used in this Policy are defined in Exhibit 1.

V. General Principles

Company and its Associates must comply with the following general principles.

1. Disavowal of Crime

Company requires and encourages compliance with applicable legislation in each country where it is active. It likewise disavows the commission of any crime within the organization, especially those that could entail criminal or administrative liability for the Company.

2. Prevention

Company expects its activities to be conducted with minimum risk of regulatory violations, and it therefore provides its Associates with the necessary tools for such purpose. In turn, Associates are expected to adopt the necessary safeguards for the activities it conducts to be compliant with legislation.

VI. Specific Standards of Behavior

According to the aforementioned principles and the law, Falabella and its Associates shall behave in accordance with the following provisions:

1. Prohibitions

To attain the objectives of this Policy, Falabella absolutely forbids its Associates to engage, inter alia, in the following behavior:

- i) Offer, promise, give or consent to give, directly or indirectly, any improper payment or benefit of any nature to any local or foreign public officials, under any pretext or circumstance and by any means;
- ii) Offer, promise, give, consent to give, request or accept, in the role of Collaborator; an undue consideration, economic or not, directly or indirectly, for another person or the same Collaborator to do or stop doing something that corresponds to him depending on his position or position;
- iii) Conceal or use unlawfully-obtained assets or engage in any activity to conceal their illegal sources;
- iv) Deliver funds or any assets of the Company to finance terrorist activities, e.g. simulating a credit operation; and in general;
- v) Incurring any practical conduct that may constitute a crime that may generate criminal or administrative liability for the Company.

2. Obligations:

Moreover, Associates shall exert their best efforts and utmost care to:

- i) That in any act, contract or activity Company enters into or carries out with third parties, prevent the assets and resources of the Company from being used for unlawful and/or criminal purposes, such as financing of terrorism, asset laundering or others likely to create criminal or administrative liability for the Company;
- ii) Prevent the vendors or sellers of the Company from offering, promising, giving or consenting to give, for the benefit or on behalf of Falabella, any improper payment or benefit of any nature to any local or foreign public officials, under any pretext or circumstance and by any means;
- iii) That the decision of any act, contract or activity that Company celebrates or performs with third parties, is made without mediating any type of payment or, improper offer, or

promise of an improper benefit, whatever their nature; and,

- iv) Communicate, in adequate and timely fashion and through effective means, any fact or situation such as could entail a violation of the internal regulations or legislation of the country of operations.

VII. Adoption of a Crime Prevention Program

Falabella must adopt or adapt to this Policy, and implement, an organizational crime prevention system to be known as Crime Prevention Program^{1.1}

This program is intended to: **i)** prevent risk in activities likely to entail criminal or administrative liability for the Company; **ii)** detect potential violations of this Policy, the Crime Prevention Program and or legislation of the country where the Company operates, related to offenses likely to entail criminal or administrative liability for the Company; **iii)** provide timely response in case the risks identified actualize; and **iv)** monitor, constantly improve and update the same.

Any Crime Prevention Program must include at least the prevention, detection, response and monitoring activities in accordance with the standards established by ISO 19600 on Compliance Management Systems.

The Governance, Ethics and Compliance Department of Falabella S.A. will provide each Company with methodological guidelines to create the Program complying with the standards of this Policy. Also, the Crime Prevention Program must be certified by an outside entity, as per the guidelines defined by the Governance, Ethics and Compliance Department of Linio.

Each Company must allocate sufficient financial and human resources to adequately implement the Program, which shall be commensurate to the risk level each Company faces.

Each Company shall be responsible for implementing, maintaining and updating its respective Crime Prevention Program, and the respective Compliance Officer must advise the Compliance Department of Falabella S . A . upon each update introduced into the same.

VIII. Compliance Officer

Responsibility for the implementation and maintenance of the Crime Prevention Program is incumbent on the Senior Management of the Company, on its Chief Executive Officer and on the Compliance Officer, and the latter bears administrative responsibility to implement

¹ This name must be adjusted to local legislation. Notwithstanding the foregoing, the denomination given to the same must always include the expression "Crime Prevention Program". For example, in the case of Colombia, this instrument must be titled "Business Ethics Program: Crime Prevention Program."

the same.

The position of Compliance Officer must meet the requirements recommended by best international practices for the execution of this mandate: **i)** high visibility throughout the Company; **ii)** professional and discretionary independence in exercising these functions; **iii)** sufficient administrative and budgetary autonomy; and **iv)** access to freely and promptly report to Senior Management: all of the above in order to implement, monitor and enforce the Crime Prevention Program.

The Compliance Officer must be appointed by Senior Management, which shall be tasked with ensuring that said officer meets the attributes indicated in the previous paragraph.

IX. Integrity Channel

Associates must channel the information in their possession or the reports regarding any activity forbidden under this Policy or the Crime Prevention Program through the Integrity Channel.

The Integrity Channel may be contacted: **i)** by e-mail sent to contactofalabella.com@gerenciadeetica.com; **ii)** through the online platform each Company has established for such purpose; and **iv)** directly, by visiting or contact online with the offices of the Compliance Department of Linio.

X. Identification of and Follow-up on Local Legislation

The Company must identify and follow up on legislation that establishes the criminal or administrative liability of bodies corporate, and take them into account when drafting its Crime Prevention Program.

XI. Compliance with the Policy

All Associates are required to adhere faithfully to this Policy, to the internal regulations issued by the Company in this area and the legal provisions that penalize asset laundering, financing of terrorism, bribery of public officials, and all others that could entail any criminal or administrative liability for the Company.

Any violation to the above laws and regulations could lead to disciplinary action against the Associate as provided in the Integrity Code, current legislation and the Internal Orderliness, Health and Safety Regulations or Job's Internal Regulation of the Company, up to and including dismissal in case of serious or repeat offenses. Sanctions will be imposed once the investigation to be conducted in accordance with the General Investigation Procedure of the Company has been completed.

Associates having any doubt as to whether any given behavior is likely to constitute a violation of this Policy, the internal regulations issued on this matter, must consult with the

Corporate Legal Affairs and Compliance Department of Company. and refrain from acting until and unless they receive a reply to their inquiry.

XII. Related Documents

- Integrity Code.
- General Investigation Procedure.
- Crime Prevention Model.

Exhibit 1 Definitions

In this document, the following words and terms, when capitalized as in each individual definition below, whether or not necessary according to the spelling rules applicable to capitalization, will carry the meanings given to each of them regardless of where they are used herein or if they are used in a given person, number, mode, tense or grammatical variable, as necessary for the correct understanding thereof, shall bear the meaning each such word or term is given below:

“Senior Management” means the ultimate administrative authority of any Company, whether its Board of Directors, its General Manager or whoever discharges similar duties, depending on the management structure or model existing therein.

“Integrity Code” means, whatever the name given to it by the Company in question, the guide that establishes the principles and values of the Company and indicates the behavior expected of the associate.

“Associate” means **i)** any and all persons related to a Company under an employment contract and/or providing services on a fee basis; **ii)** anyone acting on behalf of a Company irrespective of the nature of the relationship therewith; and **iii)** all the members of the board of directors or any other multi-member body of senior management that applicable law requires of any Company.

“Company” means any Falabella.com SpA, Linio Colombia SAS, Falabella.com SAC, Bazaya México, S. DE R.L. DE C.V company to which the provisions of this instrument could be applied in any particular case.

“Public Officers” means any officer or employee of a department, agency or division of the State, and any person who participates accidentally or permanently in the exercise of public functions, in a remunerated or honorary manner, either by popular choice or by appointment of a competent authority; any officer or employee of permit, authorization and license offices, customs officers, candidates for public office and officers of international public organizations. The term also includes officers or employees of companies controlled by the State or owned by the State.

“Falabella” means, **i)** Falabella S.A.; **ii)** any other legal entity in any jurisdiction in which Falabella S.A. controls, directly or through another individual or entity, more than 50% of its voting capital stock or capital if not a stock company, or is able to elect or designate or have elected or designated a majority of its directors, board members or administrators; and **iii)** any other legal entity in any jurisdiction in which Falabella S.A. controls, directly or through another individual or entity, 50% or less of its voting capital stock or capital, provided that the former is known to the public as a business with trademarks of Falabella S.A., or of any of the Falabella companies described in ii) above.

“Ethics Department” means the namesake department that is part of the Corporate Legal Affairs and Governance Department of Falabella S.A.

“Governance, Ethics and Compliance Department” means the namesake department that is part of the Corporate Legal Affairs and Governance Department.

“Compliance Officer” means the Associate designated by Senior Management who, together with the same, designs, implements and oversees the Crime Prevention Program.²

“Crime Prevention Program” means the internal regulations intended to effectively implement an organization and processes to reasonably mitigate the commission of offenses likely to result in criminal or administrative liability for the Company.

“Supplier” means that natural or legal person that supplies goods or services to the Company.

“Seller” means that natural or legal person who, having signed the general terms and conditions, sells their products through the Company's platform.

² If local legislation establishes a different denomination for the Compliance Officer, said denomination will be used.