GRUPO LACOMER

FRAUD PREVENTION POLICY

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1. PURPOSE

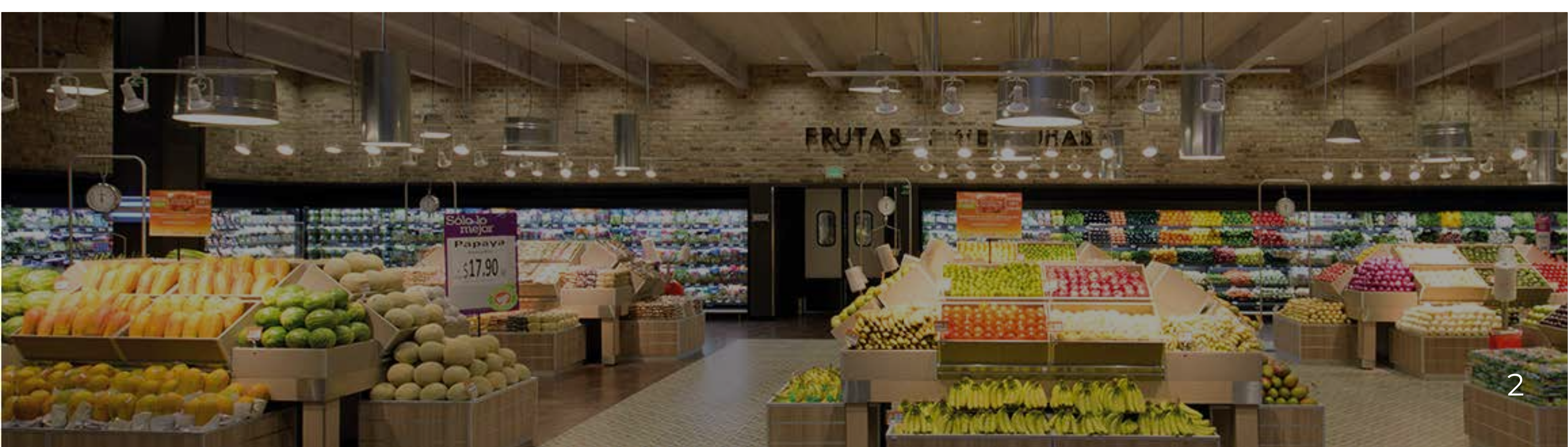
As part of the Corporate Governance Best Practices, the Fraud Prevention Policy is established, which derives from the principles set forth in our Code of Ethics.

Within the framework of the criminal liability of legal entities, this policy establishes the responsabilities and mechanisms related to the prevention, detection, reporting, and investigation of any act that, in the normal course of the company's operations, may constitute fraud.

2. LEGAL FRAMEWORK

The Federal National Code of Criminal Procedures in force establishes in Article 421. Exercise of criminal action and autonomous criminal liability:

"Legal entities shall be criminally liable for crimes committed in their name, on their behalf, for their benefit or through the means they provide, when it has been determined that there was also a failure to observe due control within their organization. The foregoing is independent of the criminal liability that may be incurred by their representatives or administrators in fact or by law."



3. SCOPE

This policy applies to all areas of the Company and is addressed to Board Members, Directors, Executives, Employees, Collaborators, Clients, Suppliers and Third Parties related to the activity and operation of the companies of Grupo La Comer.

For the purposes of this policy, the companies that make up Grupo La Comer are responsible for crimes when they:

I. Are committed on behalf of their collaborators representing the company, for its benefit or exclusive advantage, by its legal representatives and/or administrators in fact or by law.

II. When the crime is committed because there is no adequate control within the company that corresponds within the organizational scope.

Therefore, it is important to define that, for the purposes of this policy, fraud shall be understood as deliberately using deception, lies or concealment, as well as inducing or taking advantage of the error of others in order to illegally obtain something or obtain an undue benefit for oneself or for a third party, to the detriment of Grupo La Comer, its shareholders, business partners, clients, suppliers, collaborators or any other third party.

4. GENERAL GUIDELINES

1. Grupo La Comer will develop and maintain updated mechanisms for the timely prevention and identification of fraud, as well as training programs aimed at fostering a workplace culture of zero tolerance toward behaviors prone to fraud, as established in the Grupo La Comer Code of Ethics.
2. Each Director in their respective area is responsible for designing, implementing, and monitoring the control actions necessary to prevent fraud; and their collaborators are required to comply with and follow the controls applicable in their area.
3. All collaborators are responsible for and obliged to properly use the resources and information available to them as part of their duties within the Company, including the handling of funds, movable and immovable assets, data, reports, statements, documents, sensitive information, confidential or private information, etc.
4. Collaborators responsible for preparing records and reports, as well as for fulfilling regulatory obligations, are responsible for their accuracy and truthfulness and must prepare them honestly, correctly, reasonably, and in a timely manner in accordance with applicable standards and provisions and with an adequate level of detail to allow transparency and traceability of operations.

5. All collaborators must know the policies, operational procedures, internal guidelines and legislation applicable to the performance of their duties, as well as participate in risk assessments and identify irregular conduct, actions or activities that may arise within their area of work.

6. All collaborators have the obligation to collaborate and cooperate in reviews and investigations carried out by the Company for the prevention and identification of fraud and to maintain strict confidentiality of the case.

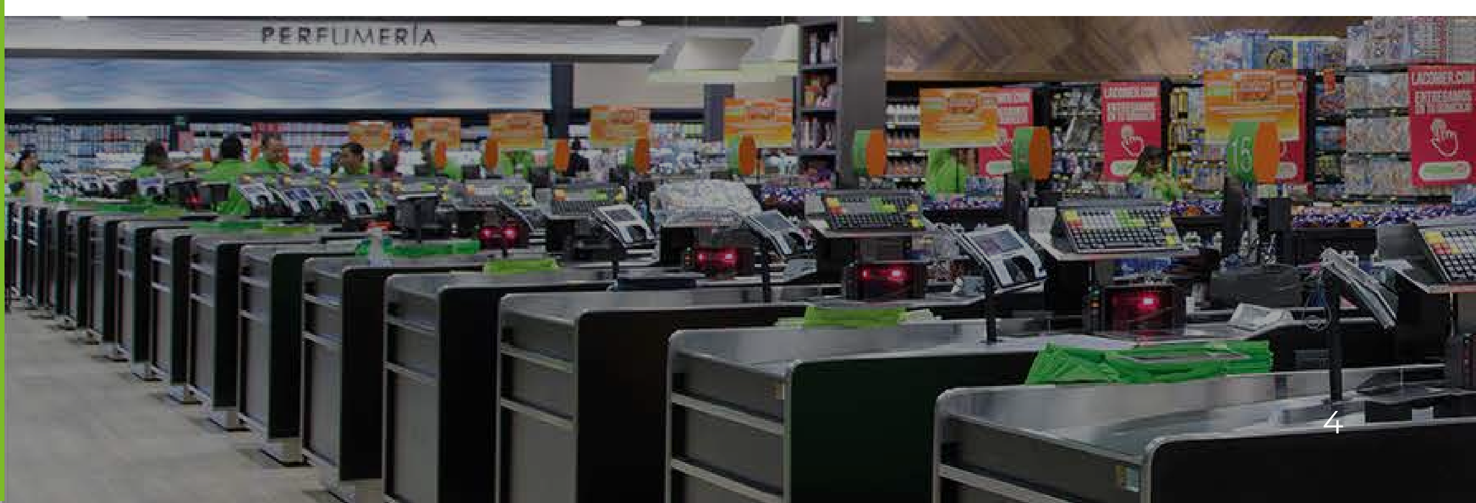
7. The Human Resources area must confirm with the Corporate Audit and Compliance Department that there is no ongoing internal investigation involving collaborators participating in promotion processes.

5. CONDUCTS THAT CONSTITUTE FRAUD

For the purposes of this policy, the term “fraud” is considered beyond its legal meaning and will be used to describe unacceptable conduct for which the Company has zero tolerance, including but not limited to the following:

Misappropriation of Assets
This refers to the improper appropriation or misuse of the Company's assets. This may include theft of cash, inventory misappropriation, manipulation of accounting records to conceal theft, and diversion of assets.

Corruption
This refers to the promise, offering or delivery, request or receipt, directly or indirectly, of any benefit, undue advantage, monetary amount or in-kind benefit or any other type of asset to a person so that, in violation of their duties, they act or refrain from acting in order for another person to obtain or retain business or another undue benefit or advantage.



Fraudulent Statements

This refers to false statements, voluntarily inaccurate or biased declarations of any requested information, as well as the modification, alteration, destruction, or concealment of information in the company's financial statements and accounting records or in any other internal or external document of interest to La Comer.

6. FRAUD MANAGEMENT PROGRAM

Grupo La Comer, for compliance with this policy, the Code of Ethics and applicable regulations, uses a Fraud Management Program that establishes mechanisms to identify fraud risks, as well as the prevention, detection and investigation of fraudulent activities within the organization. Its main objective is to protect the Company's assets, preserve its reputation and guarantee the trust of its stakeholders.

The elements of this Program are explained below:

A. IDENTIFICATION AND ASSESSMENT OF FRAUD RISKS

1. Risk Identification

Fraud risk identification is the process by which risks associated with fraud are determined, assessed and prioritized, as well as vulnerabilities and potential threats that could facilitate fraudulent activities within operations, systems, transactions or relationships with third parties.

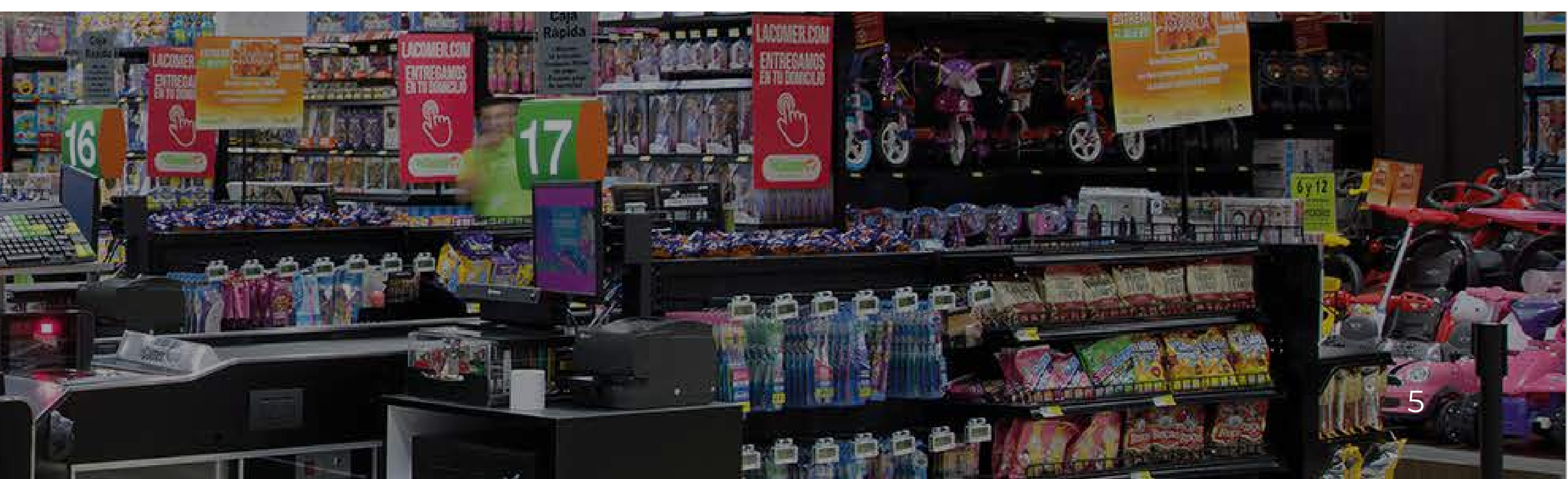
2. Assessment of Operational Risks (Probability of Occurrence / Impact)

Risk assessment is carried out through a risk matrix that combines two key factors:

- **Probability of occurrence:** the likelihood that the risk will materialize.
- **Impact:** the negative consequences that would result from the materialization of the risk.

3. Risk Classification

- **High Risks:** high probability of occurrence and high impact. They require immediate attention and robust control measures.
- **Medium Risks:** moderate probability or impact. They must be closely monitored and require appropriate control measures.
- **Low Risks:** low probability of occurrence or low impact. They may be tolerated or require basic controls.



B. PREVENTION AND CONTROL

The Prevention and Control component must be a dynamic and continuous process that involves the entire organization, clearly defining risks, effective controls, and permanent monitoring of their compliance.

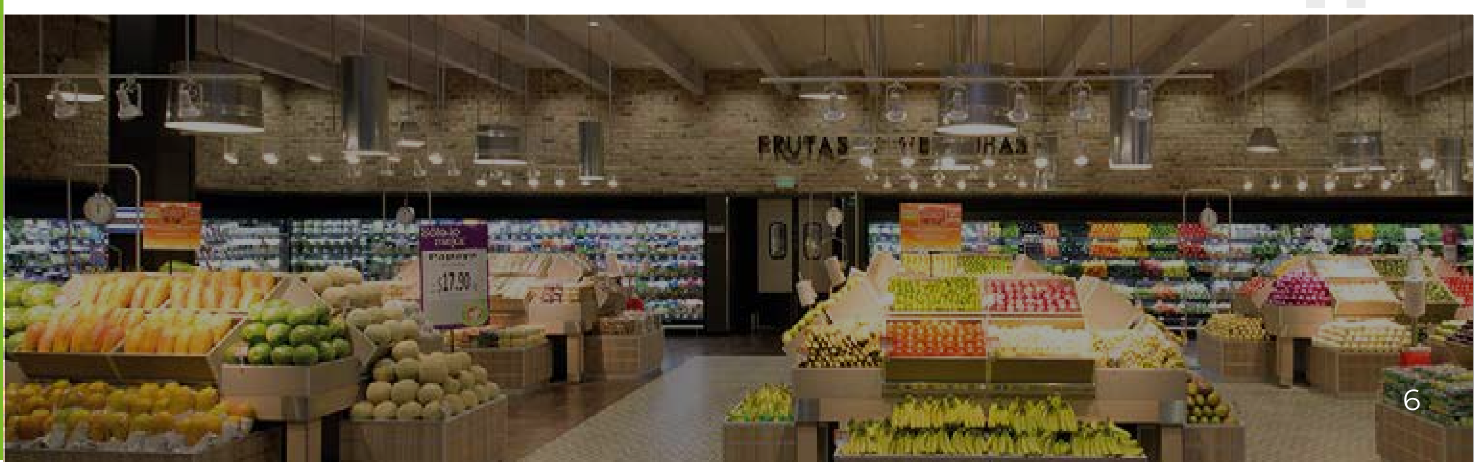
At this stage, the following activities must be clearly defined:

1. Assignment of responsible parties for the management of each identified risk.
2. Identification of existing fraud prevention controls at the entity or process level over the selected risks.
3. Determination of the response to the risk according to the following:
    a. Elimination of the risk through the implementation of controls.
    b. Determination of risk appetite in order to establish tolerance for certain processes or activities considered risky.
    c. Risk mitigation through the implementation of key controls.
    d. Risk transfer by shifting responsibility and impact to a specialized third party.
4. Establishment of controls for each identified risk.
5. Definition of appropriate indicators for monitoring the implemented controls.

For consultation and updating purposes, both the detected risks and the implemented controls must be recorded in the following documents:

1. Inventory of selected risks and their controls.
2. Inventory of indicators.
3. Action plan with responsible parties and implementation dates for the controls.

Prevention mechanisms
The prevention mechanisms adopted by Grupo La Comer are focused on reducing the probability of irregularities or fraud occurring, mitigating exposure to them. Among these mechanisms are the following:



- **Tone at the Top.** Senior management must lead by example by complying at all times with laws, regulations, and internal policies and by actively promoting their compliance.

- **Assessment of operational risks through Periodic audits.** Based on historical reports and incidents resulting from reporting mechanisms and audits, risks and vulnerable operations will be analyzed and determined in order to identify controls that were ineffective or the need for new controls related to risks that materialized.

- **Technology.** Use technological tools to improve the efficiency of controls and fraud detection, such as data analytics systems and risk management software.

- **Clear Policies and Procedures.** Develop and communicate a clear code of ethics defining the expected behavior of all collaborators and interested third parties and detailing the legal and organizational consequences of fraud, as well as issuing specific policies that, under a zero-tolerance premise, explicitly prohibit corruption, prevent conflicts of interest, and describe procedures for reporting suspected fraudulent activity.

- **Communication and Training.** Training and communication programs must be developed to promote a culture of honesty and transparency and raise awareness among personnel about their responsibilities and the actions required to comply with this program.

- **Evaluation of Business Partners.** Implement strict due diligence processes to evaluate potential business partners, avoiding relationships with third parties that have backgrounds or links with fraudulent practices.

C. FRAUD DETECTION

Fraud detection is a shared responsibility. This program seeks to involve all members of the organization in the identification and reporting of suspicious activities, strengthening our internal controls to protect the Company's assets.

The common methods for fraud detection are the following:

- Data analysis.
- Fraud indicators:
    - Unusual transactions.
    - Sudden changes in employees' lifestyle.
    - Conflicts of interest.
    - Resistance to audits.
    - Customer complaints.
- Internal and external audits.
- Reporting hotlines.

D. INVESTIGATION PROCEDURE

Any fraudulent act or suspicion of a fraudulent act must be reported by the personnel who discover it through the reporting channels.

The Corporate Audit and Compliance area will carry out a preliminary investigation aimed at verifying the accuracy of the information received.

Depending on the magnitude, complexity, and type of fraud, the investigation strategies will be defined by the Corporate Audit and Compliance area with the support of the Legal area, except when the investigation involves said area, in which case the support will be provided by an external legal firm.

Additionally, the Corporate Audit and Compliance area may use the services of third parties specialized in the relevant matter in order to:

1. Establish the objectives of the investigation. If the fraud is confirmed, it will specify whether the strategy will be criminal prosecution, restitution of the misappropriated assets, termination of employment and/or commercial relationships, or a combination of the foregoing and;
2. Based on the above, determine which evidence must be obtained to support the strategy to be followed.

All area departments, at the request of the Corporate Audit and Compliance area, will ensure that it is granted full access to the area under investigation, as well as assistance in the immediate search for information, including files and computers. The search will be conducted with the formalities dictated by the Legal area in order to ensure that, if applicable, the evidence may be admitted before the courts of justice.The Corporate Audit area will maintain records of any action taken or handling of evidence.

The investigating area will issue a report with the findings and conclusions for each completed investigation, including recommendations for future actions. The results of investigations will not be disclosed or discussed with other persons except those whom the Corporate Audit and Compliance area determines must be informed of the investigation.

E. REMEDIATION MEASURES AIMED AT PREVENTING FUTURE IRREGULARITIES

For fraud to occur, the procedures and controls established by the area management must have failed. Consequently, it will be necessary to reassess:

- The risks identified in the operation in question, taking into account that losses caused by fraud are usually significant and therefore justify stricter and more costly controls that may initially have been disregarded due to cost-benefit considerations.

- The organizational structure when there have been cases of concentration of responsibilities.
- Authorization levels, signature authority and access credentials to systems, information or assets.
- Operational procedures and established controls.

In the case of irregularities committed by, or with the collaboration of, clients and suppliers, additional attention must be given to:

- The criteria for initial engagement, from first contact to the onboarding of the client or supplier, as well as the validations carried out prior to onboarding, particularly regarding background verification.
- Contracts signed with clients and suppliers regarding the responsibilities of the parties in the event of economic damage caused to the counterparty and the imposition of penalties or the requirement of guarantees in such cases.

7. POLICY VIOLATIONS

When it is determined internally within the Company, after the corresponding investigations have been conducted, that fraud or any of the conducts described in this policy has been committed, or when there is sufficient evidence to determine that there was an attempt, in accordance with the Code of Ethics, the Internal Work Regulations, corporate policies and applicable legislation, the Company may exercise the corresponding criminal, civil, administrative, commercial or any other legal actions.

The first sanction that must be adopted is the termination of the relationship with those who are involved in irregularities or who demonstrably facilitated them.

In the event of negligent conduct, the sanction will depend on the magnitude of the misconduct committed and whether it is repeated or a first-time occurrence.

If the negligence is minor and a first occurrence, a sanction that does not necessarily imply termination of the relationship may be considered; however, a written warning with acknowledgment of receipt must be issued in order to document the record in case the misconduct is repeated, thereby helping to reduce the margin for potential legal actions against the Company should the relationship be terminated in the future.

When referring to termination of the relationship, it may involve:

- Collaborators
- Clients
- Suppliers
- Creditors

The collaborator or supplier who is separated from the Company as a consequence of a fraudulent act will be permanently banned from all areas and workplaces.

Resolution to commit a crime that is manifested by partially or totally carrying out the acts that should produce the result (fraud or prohibited conduct), or omitting those that should prevent it, if the result is not completed due to causes beyond the will of the collaborator (the person who attempted to commit it).

8. REPORTING CHANNELS

Grupo La Comer provides customers, suppliers and partners with the following official channels for reporting, either openly, anonymously or confidentially, any prohibited practice, conduct or activity that does not comply with the provisions of this document and contravenes the values, policies, regulations, Code of Ethics and spirit of Grupo La Comer. Reports may be made via the following channels:

- Telephone: 55 52 70 99 90 / 800 52 36 701
- Email: auditor@lacomer.com.mx
- Website: www.intracomer.com.mx / www.provecomer.com.mx

9. GLOSSARY OF TERMS

For the purposes of this policy, the following terms shall be understood as indicated below:

- **Conflict of Interest.** For the purposes of this policy, in general terms a conflict of interest shall be understood as “the possible impairment of the impartial and objective performance of duties due to personal, family or business interests”, arising from a pre-existing relationship or during the time in which the involved parties are influential in the decisions of one or more areas of Grupo La Comer.

  It arises when there are direct or indirect private interests or family relationships up to the fourth degree of consanguinity or affinity with tenants, suppliers, potential clients, creditors and/or competitors.

- **Grupo La Comer.** Whenever this policy refers to company, entity, corporation or La Comer, it shall be understood as referring to the companies that make up Grupo La Comer.

- **Fraud.** Fraud occurs when a person deceives another or takes advantage of another person's error in order to unlawfully obtain something or achieve an undue profit.

- **Fraud Management System.** It is an integrated set of technological tools and processes designed by Grupo La Comer to prevent and mitigate fraudulent activities within the organization.

- **Transparency.** Refers to the openness and willingness of a Collaborator to share information about their activities with those who are authorized to request it, transmitting it in a timely and accurate manner in order to promote trust in the performance of their duties and integrity in all transactions and activities of the Company.

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EL RESPETO ES LA REGLA DE ORO

GRUPO LACOMER