GRUPO LACOMER

MONEY LAUNDERING PREVENTION POLICY

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1. PURPOSE

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

Its main objective is to prevent, detect and manage acts or transactions involving resources of illicit origin, as well as to comply with the obligations arising from the vulnerable activities carried out by the companies that make up Grupo La Comer.

It is common knowledge that criminal organizations use economic entities as means to introduce into the financial system and the national economy resources obtained illicitly, with companies being the primary vehicle to do so; therefore, developing control mechanisms and tools to prevent any company within the Group from being involuntarily used in money laundering is a priority.

2. LEGAL FRAMEWORK

This policy is based, by way of illustration, on the following regulatory framework:

1. Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita (“Federal Law for the Prevention and Identification of Transactions involving Illicitly Obtained Resources” or “the Law”), and its secondary regulations (collectively referred to as the Anti-Money Laundering Regulation); and
2. Applicable criminal legislation, in particular any conduct or circumstance in accordance with the provisions of Article 400 BIS of the Código Penal Federal (Federal Criminal Code).

3. SCOPE

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

4. GENERAL GUIDELINES

Grupo La Comer, in strict compliance with applicable regulations, has implemented mechanisms aimed at preventing criminal conduct, as defined by the Law, related to money laundering, in order to prevent the company from becoming involved in operations of this nature.

The prevention mechanisms and tools are based on the applicable regulations designed for Vulnerable Activities and on known money laundering typologies or methodologies, through the implementation of internal controls for proper risk management, seeking to prevent and timely detect becoming subject to criminal acts.

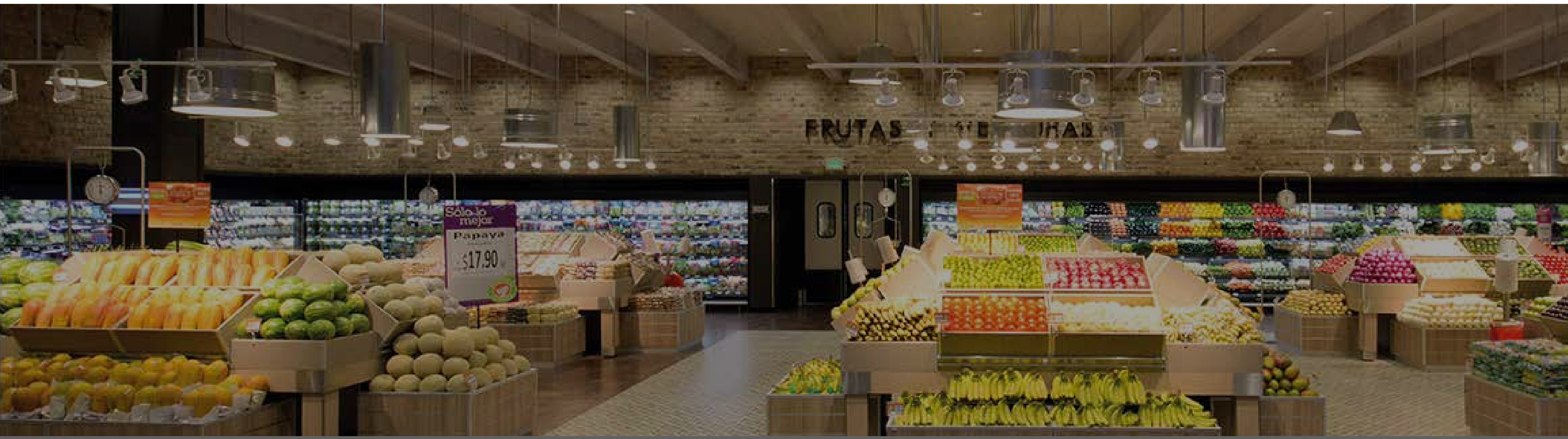
5. OBLIGATIONS TO OBSERVE WHEN CARRYING OUT VULNERABLE ACTIVITIES

In accordance with the reforms and amendments to the Law issued on July 16, 2025, companies that carry out any activities considered vulnerable must carry out the following:

I. Identify and directly know the Clients or Users with whom they carry out the Vulnerable Activity and verify their identity based on documents or other means of identification with official recognition, in accordaince with the General Rules issued by the Ministry.

II. In cases where a business relationship is established, information shall be requested from the Client or User regarding their activity or occupation, based, among others, on the registration and activity update notices filed for purposes of the Federal Taxpayer Registry.

III. When the Client or User is a legal entity, trust, or other legal structure, obtain documents or other officially recognized means of identification that allow the identification of its Beneficial Owner, in accordance with the General Rules issued by the Ministry.



When the Client or User is an individual, obtain a declaration as to whether they have knowledge of the existence of a Beneficial Owner and, if applicable, the documentation that allows such person to be identified, in accordance with the General Rules issued by the Ministry.

IV. Safeguard, protect, secure and prevent the destruction or concealment of the information and documentation that supports the Vulnerable Activity, including records of the transactions carried out that allow the reconstruction of individual transactions, the commercial correspondence shared by the parties involved in order to carry out the transaction, and the results of prior analyses carried out when applicable, as well as the information that identifies Clients or Users.

The information and documentation referred to in the preceding paragraph must be kept physically or electronically, at the address registered with the Ministry for this purpose, for a period of at least ten years from the date on which the Vulnerable Activity was carried out, without prejudice to what is established in other applicable regulations.

V. Create a single file for each client containing the aforementioned information and documentation, which must also be kept physically or electronically for at least ten years from the date the vulnerable activity was carried out.

VI. Carry out the registration and enrollment or, where applicable, modification or cancellation in the Registry of persons carrying out Vulnerable Activities through the Internet Portal.

VII. Provide the necessary facilities so that verification visits can be carried out in accordance with the terms of this Law, its Regulations, and the General Rules.

VIII. Submit Notices and Reports to the Ministry in accordance with the provisions established in the Law and the General Rules.

IX. In the event of suspicion or if there is information based on facts or indications that the resources related to the acts or transactions may originate from or be intended for the commission of crimes involving transactions with resources of illicit origin, a Notice must be submitted within 24 hours following the moment when such information became known or the suspicion was generated, even if the act or transaction was not carried out, considering the guidelines issued by the Ministry in accordance with the corresponding General Rules.

X. Carry out an evaluation with a Risk-Based Approach that allows the identification, analysis, understanding and mitigation of risks, as well as those of Clients or Users.

XI. Prepare and observe an Internal Policies Manual containing the criteria, measures and procedures necessary to comply with the obligations provided for in the Law, including those that allow the identification and monitoring of acts or transactions carried out with Politically Exposed Persons, in accordance with the General Rules issued by the Ministry.

XII. Develop personnel selection processes and adopt annual training programs directed at members of the governing body or sole administrator, executives, compliance representatives and employees who have direct contact with Clients or Users, as applicable, including the dissemination of the Law, its secondary regulations and the Internal Policies Manual.

XIII. Have automated mechanisms that allow permanent monitoring of acts or transactions carried out with Clients or Users in order to identify those that are outside the transactional profile of the Clients or Users in accordance with the General Rules issued by the Ministry or that must be accumulated pursuant to the penultimate paragraph of Article 17 of the Law. Such mechanisms must also allow intensified monitoring of Clients or Users considered Politically Exposed Persons or High Risk.

XIV. Have a review conducted by the internal audit area or by an independent external auditor when the risk of the person carrying out the Vulnerable Activity is low or medium, or by an independent external auditor when the risk is high, according to the evaluation performed, in order to assess and issue an opinion within a calendar year regarding the effectiveness of compliance with the obligations established in the Law and other applicable provisions. Such audits shall be regulated in accordance with the General Rules issued by the Ministry.

XV. Appoint before the Ministry a Representative Responsible for Compliance with the obligations derived from this Law and maintain such appointment in force, whose identity must be safeguarded in accordance with Article 38 of the Law. The designated person must receive annual training for compliance with the obligations established by the Law.

XVI. Refrain, without liability, from carrying out the act or transaction in question when the Clients or Users refuse to provide the corresponding information or documentation.

XVII. It is prohibited to accept settlement of payments for lease transactions through the use of coins and banknotes, whether in national currency or foreign currency, and precious metals, even when the payment is made in cash through a Financial Institution for a value equal to or greater than the equivalent of three thousand two hundred ten times the daily value of the UMA per month on the day the payment is made or the obligation is fulfilled.

6. KNOW YOUR CUSTOMER (KYC) AND CUSTOMER DUE DILIGENCE

This chapter establishes the guidelines and procedures for the proper identification, verification and knowledge of the identity of our Clients, Beneficial Owners, Politically Exposed Persons (PEPs), providers of resources and any other persons who, due to the nature of their relationship with Grupo La Comer, must be known in order to comply with the provisions regarding the prevention, detection and reporting of acts, omissions or transactions that could favor or cooperate in the commission of crimes involving transactions with resources of illicit origin.

I) Risk-Based Approach for Customer Due Diligence
Grupo La Comer shall apply a risk-based approach to identify, measure and mitigate risks, taking into account the identification and knowledge of its Clients, which implies differentiated due diligence depending on the level of risk that each Client represents. Such approach shall consider, among other factors:

a. **Customer Segmentation:** A classification of Clients will be established in Low, Medium and High risk categories, considering variables such as: i) type of Client (individual, legal entity, trust), nationality, place of residence, occupation, profession, activity or corporate purpose; ii) products or services contracted; iii) geographic area of the leased property; and iv) transaction channels or forms of payment.

b. **Basic Due Diligence:** Applicable to all Clients, regardless of their level of risk, and will include the collection and verification of the minimum required information and documentation.

c. **Enhanced Due Diligence:** This shall apply to Clients classified as “High” risk, including but not limited to national and foreign Politically Exposed Persons (PEPs), as well as those who, due to their activity or profile, present an elevated risk. It will involve obtaining additional detailed information regarding: i) The origin and destination of their funds; ii) The purpose and expected nature of the business relationship; iii) The justification of high value or unusual transactions; iv) Verification of the information through additional and independent sources; and v) Approval of the establishment of the business relationship by higher hierarchical levels.

II) Identification and Identity Verification Process
The identification and verification of the identity of Clients will be carried out prior to the start of the business relationship or the execution of any transaction and will include the following steps:

1. Collection of information and documentation.
2. Verification of information and documentation. The data and documents provided by the Client will be compared with the information contained in official databases and the authenticity and validity of official identifications and proof of address will be verified.
3. Validation and analysis. If, as a result of the previous steps, inconsistencies, suspicious patterns or possible alerts requiring further investigation are detected, a validation and analysis of the information will be conducted before establishing the business relationship.

III) Identification and Update Files
For each Client, a single file shall be created containing all the information and documentation collected during the identification and due diligence process, as well as the results of the verifications, analyses and monitoring carried out. This file must be electronic and/or physical and properly safeguarded by the responsible area.

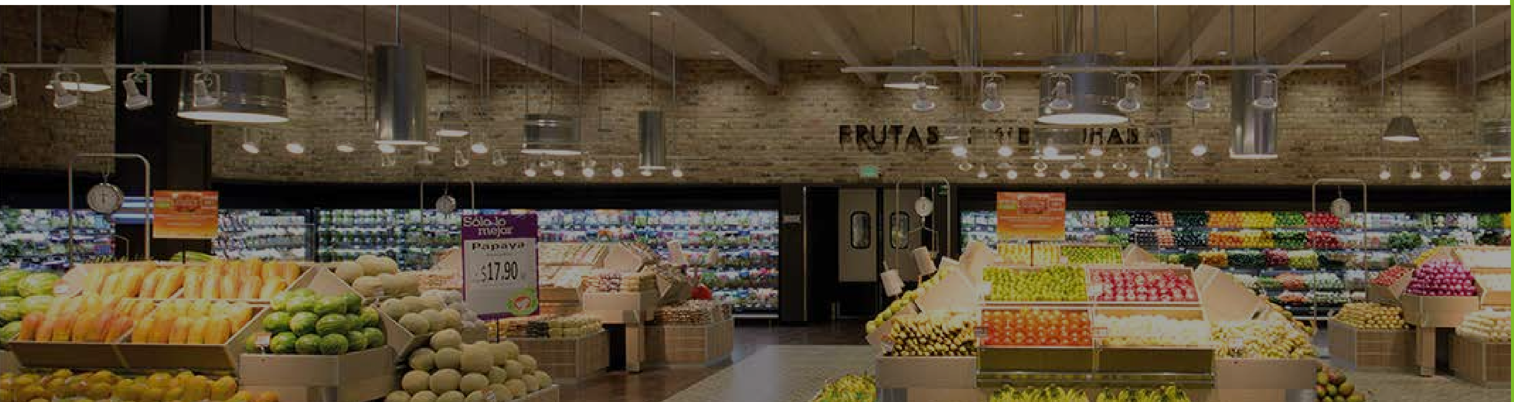
For Clients with periodic transactions, their file must be updated at least once a year or when there are indications of significant changes in the Client's profile or activity.

IV) Training
All personnel of Grupo La Comer with direct or indirect interaction with Clients and with the KYC process must receive periodic training regarding the guidelines of this chapter, the importance of knowing the Client and the identification of unusual transactions.

7. RED FLAGS

During the identification and renewal processes of Operations, the following situations, among others, constitute red flags when the Client:

- Does not show willingness to provide the required documentation and questions the requirements and handling of information.
- Provides incomplete or inconsistent information.
- Carries out an activity that does not correspond with their main business activity or corporate purpose, uses an address lacking information that does not allow reliable location of their domicile, or has complex ownership structures that are not reasonably justified.



- Has negative background due to having been involved in criminal, civil proceedings or investigations related to tax fraud, money laundering activities and/or organized crime or other administrative proceedings.
- Refuses or is unable to identify a legitimate source of funds, attempts to make payments or requests that payments be made in cash for amounts higher than those permitted by the Law, considering the type of operation involved.
- Attempts to bribe, threaten or persuade Grupo La Comer personnel in order to avoid compliance with this Policy, the Law, the Regulations or the Rules.
- Offers to pay rent corresponding to a long period of time in advance without logical justification.
- Pays rent corresponding to a long period of time in advance in cash without apparent justification.
- Conducts multiple lease operations in a very short period of time without apparent relation.
- Shows no interest in the characteristics of the property subject to lease or in the amount of rent and contractual conditions.
- Does not want to be related to the lease operation.
- Shows strong interest in completing the transaction quickly without justified cause.
- Accepts to pay a lease amount significantly higher than market values.
- The client or user makes payments through an international transfer without the occupation, profile or nationality of the client or user justifying it.
- The client or user makes payments through an international transfer originating from a country considered a tax haven or high-risk jurisdiction.
- Requests unusual special conditions in the execution of the transaction or in the conditions of the property to be leased.
- Refuses to provide information regarding the intended use of the property to be leased.

Additionally, the following situations also constitute red flags:

- There are indications or certainty that the leased property is not being used for the purpose expressed by the client or user but rather for possible illicit activities.
- The rent payments for the property are made by a third party with no apparent relationship to the client or user.
- According to the income declared by the client or user, the transaction appears to be beyond their financial capacity.
- There are indications or certainty that the parties are not acting on their own behalf and are attempting to conceal the identity of the real client or user.
- Transactions with non-profit organizations when the characteristics of the transaction do not match the objectives of the entity.
- There are suspicions that the property is used as a center providing assistance to the community or vulnerable groups that may be linked to criminal organizations or activities.

8. TRANSACTION MONITORING

As part of prevention measures, Grupo La Comer, through the Corporate Audit and Compliance area, will conduct periodic monitoring of those third parties with whom it carries out operations and activities considered by the Law as Vulnerable.

If any red flag arises in operations and business relationships, the Corporate Audit and Compliance area may order the following actions as part of the investigation process:

- Temporary suspension of operations with the client under investigation if deemed necessary to mitigate risks until the investigation is concluded.
- Update the KYC process, ensuring compliance with regulatory requirements and identification of the client according to applicable legislation.
- Request additional documentation from the client or involved third parties to support the legitimacy of their operations.
- Review of restrictive lists and blacklists, both national and international (e.g., OFAC, UN, Interpol, Financial Intelligence Unit of Mexico).
- Notification to competent authorities if indications of illicit operations are detected, in accordance with the provisions of the Law; and
- Submission of 24 hour alerts in accordance with the guidelines issued by the Financial Intelligence Unit when there are indications or certainty that the resources originate from illicit activities.

9. PAYMENT RECEPTION

With the objective of reducing money laundering risks, all payments accepted by the Group must originate from the client's bank account and be made through:

- Bank transfers from a verifiable account in the name of the contract holder or beneficiary.
- Checks issued from a bank account verifiable in the name of the contract holder or beneficiary.

Payments with any of the following characteristics will not be accepted:

- Cash payments under any circumstance.
- Payments originating from a bank account where the account holder is different from the Tenant; that is, payments made by unrelated third parties (e.g. companies, service providers, clients of the Tenant, companies where the Clients act as shareholders, etc.).
- Payments originating from checks or transfers issued through exchange houses or money transfer companies.

10. RECORD AND DOCUMENTATION RETENTION

The single files and the documentation and information related to the compliance with the Group's obligations must be retained for a period of at least 10 years from the date on which the transaction in question was completed, counted from July 17, 2025; transactions executed prior to that date must be safeguarded for a period of 5 years.

11. CONTRACTUAL CLAUSES

Grupo La Comer will include in the contracts it executes the necessary clauses to ensure that clients:

- Comply with the legislation and other applicable provisions regarding money laundering prevention.
- Have not participated and do not participate in transactions involving resources of illicit origin.
- Have not carried out nor carry out activities prohibited by legislation and other applicable provisions regarding money laundering prevention.
- Carry out in the leased property the same economic activity indicated in their tax status certificate.
- Comply with the provisions established in this Policy.

12. SUPERVISION AND VERIFICATION OF POLICY IMPLEMENTATION AND COMPLIANCE

The areas performing vulnerable activities are responsible for ensuring compliance with this Policy and for safeguarding the information related to applicable regulations. The Corporate Audit and Compliance area, in addition to the activities it performs for compliance with the Law, is responsible for verifying compliance through periodic audits of such areas and for suggesting the necessary measures to correct deficiencies.

Directors, immediate supervisors and area managers are responsible for ensuring compliance with this Policy. To do so, they must ensure that new personnel are aware of it and that all personnel receive continuous training. It is essential to maintain a detailed record of trained personnel, including a certificate signed by each of them.

13. POLICY VIOLATIONS

Failure to comply with this Policy may have serious consequences for Grupo La Comer, ranging from fines to the suspension or revocation of operating licenses, as well as reputational damage that could directly affect the trust of clients and investors. Additionally, both the company and the employees involved may be subject to criminal and financial penalties.

Personnel who fail to comply will be subject to disciplinary measures in accordance with the Code of Ethics, the Internal Work Regulations and, when applicable, those determined by the Ethics Committee, which may include:

- Verbal warning
- Written warning with copy in the employee file (Administrative Record)
- Termination of the employment relationship

The sanction determined will be applied by the Human Resources area with the support of the Labor Relations area.

14. REPORTING CHANNELS

Grupo La Comer makes the following official reporting channels available to Customers, Suppliers, and Employees to openly, anonymously, or confidentially report any prohibited practice, conduct, or activity that fails to comply with the provisions set forth in this document or that is contrary to Grupo La Comer's values, policies, regulations, Code of Ethics, and spirit. Reports may be submitted through any of the following channels:

- Telephone: 55 52709990 / 800 5236701
- Email: auditor@lacomer.com.mx
- Website: www.intracomer.com.mx / www.provecomer.com.mx

15. GLOSSARY OF TERMS

- **Vulnerable Activities:** Those determined in Article 17 of the Law which, for understanding purposes, are considered high risk because they are commonly used methods to integrate illicit resources into the formal economy.

- **Beneficial Owner:** Refers to the individual or group of individuals who, directly or indirectly, exercise ultimate control over an entity, legal person, trust or other legal structure, as well as over its operations.

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

- **Law:** Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita. (Federal Law for the Prevention and Identification of Transactions with Illicit Resources).

- **Regulations:** Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita, its Regulations, the General Rules and the Código Penal Federal.

- **Transactions with Resources of Illicit Origin:** Any act or transaction classified as a crime under Mexican legislation by which a person acquires, converts, transfers, possesses, administers, disposes of, safeguards or uses resources, rights or assets of any nature knowing that they originate from or represent the proceeds of illegal activity.

- **Cash Payments or Equivalent:** Refers to payments received in legal tender and those whose origin cannot be traced through a financial institution, including cash, remittances, bearer checks, traveler's checks, money orders, bank drafts, promissory notes, gift cards, electronic wallets, direct cash deposits at bank counters and electronic money.

- **Politically Exposed Person (PEP):** Individuals who perform or have performed public functions in national territory or in a foreign country.

  For the purposes of this Policy, spouses and relatives up to the second degree of consanguinity or affinity will also be considered PEPs. Legal entities, trusts or other legal structures in which such persons maintain control or significant influence will also be included.

- **Red Flags:** A fact or circumstance that may indicate suspicious or illicit activity.

- **UMA:** Unidad de Medida y Actualización ("Unit of Measurement and Adjustment"), an economic reference expressed in Mexican pesos and used to determine the amount of payment obligations, thresholds, penalties, and other statutory amounts established under Mexican federal and state laws and the regulations derived therefrom.

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