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CODE OF ETHICS AND CONDUCT

Grupo Gigante and its
Affiliates and Subsidiaries

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**MESSAGE FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS OF
GRUPO GIGANTE, S.A.B. DE C.V. AND THE CHIEF EXECUTIVE
OFFICER OF GRUPO GIGANTE, S.A.B. DE C.V.**

For **Grupo Gigante, S.A.B. de C.V.**, and our Subsidiaries, the wellbeing of our employees, customers and communities is our guiding principle. We seek to promote and maintain long-term business relationships with our suppliers, creditors and contractors, in strict compliance with the governing legal provisions, our **Code of Ethics and Conduct** and our Corporate Integrity Policies.

The conduct of all the collaborators of **Grupo Gigante, S.A.B. de C.V.** and our subsidiaries reflects our culture.

Therefore, it is a source of great satisfaction and commitment for us to share with you our updated **Code of Ethics and Conduct**, which guides our actions based on the daily principles and values.

We shall also make it available to all third parties with whom **Grupo Gigante, S.A.B. de C.V.** and our subsidiaries have business relationships, seeking to generate a community working under the same principles and values that are important to us.

Additionally, we have designed institutional whistleblowing procedures, which identified actions that are contrary to our Policies and/or the **Code of Ethics and Conduct**.

Please read and frequently consult our **Code of Ethics and Conduct** because all the collaborators of **Grupo Gigante, S.A.B. de C.V.**, and Subsidiaries are responsible for understanding and adhering to it.

Together with strong participation, we are confident that we will keep **Grupo Gigante, S.A.B. de C.V.** and our Subsidiaries in the leadership positions we occupy in the different sectors in which we participate, while always staying aligned to our principles and values.

Be assured of the continual support, recognition and commitment from the Board of Administration and Office of the Chief Executive Officer of **Grupo Gigante, S.A.B. de C.V.**

Warm regards.

Ángel Losada Moreno
Chairman of the Board of
Directors of Grupo Gigante, S.A.B. de C.V.

Federico Bernaldo de Quirós
President
Grupo Gigante, S.A.B. de C.V.

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I. INTRODUCTION

Ethical principles guiding our actions also underpin our image as a solid and reliable company. Grupo Gigante, S.A.B. de C.V., and its Subsidiaries (jointly, **Grupo Gigante**) have guided their actions by the certain values which, over time, have been integrated into our philosophy that today serve as a guideline for employees, and create a uniform organizational culture that is reflected in every Business Units.

Grupo Gigante requires the highest standards of ethical and professional conduct from all its employees, service providers and suppliers. Our reputation for honesty and integrity among our shareholders and the business community is the key to our business success. Employees will not be allowed to achieve results or recognition by breaching laws or regulations, or by any misconduct contrary to our policies and the provisions of this document.

Grupo Gigante's employees are committed to these guiding principles and will implement them in their actions and conduct. This will continue to increase the value of our different Business Units.

II. OVERVIEW

This **Code of Ethics and Conduct** provides a guideline that highlights the standards and values that **Grupo Gigante's** employees must share and recognize.

The application of this **Code of Ethics and Conduct** is mandatory for all **Grupo Gigante** employees and is part of the selection criteria and permanence of our Service Providers and Suppliers.

III. MISSION STATEMENT

Mission

To create value for our clients, shareholders and collaborator, through the integration, communication and exchange of experiences, in the search for profitability and synergies of our businesses in the commerce, restaurants, services and real estate sectors.

Vision

Our work is to become a leading business group in the markets in which we participate. We are committed to the profitability of our businesses, as well as to the success and development of our clients, shareholders and collaborators.

Values



Leadership

We focus on creating leaders who inspire and promote the achievement of objectives.



Teamwork

We share our capabilities to maximize our individual contributions.



Excellence

We are constantly setting new goals to exceed expectations.



Creativity and Innovation

We believe in the constant search for doing things better.



Productivity

We make decisions aimed at increasing the results of our Clients and Organization.



Transparency

We act honestly and fairly.



Recognition

We recognize the outstanding performance of our employees.



Social Responsibility

We make positive contributions to our communities as a socially responsible organization.



Respect

We promote respect for oneself, people, institutions and companies.



Integrity

We endeavor to fulfill our commitments and keep our word by always adhering to our Code of Ethics and Conduct, Internal Regulations, Organization's Policies and the Laws.

“These are the values governing our actions.”

Governing Principles

1. Constantly seek to understand the needs and expectations of our internal and external customers, and to always endeavor to satisfy them and exceed their expectations in terms of quality, effectiveness and attention.
2. Promote long-term relationships with our suppliers, creditors and contractors in strict adherence to this Code of Ethics and Conduct and our Corporate Integrity Policies.
3. Take all our actions in strict adherence to the rules and principles of personal and professional ethics, and showing a clear congruence between thinking, saying and doing.
4. Perform our work responsibly, planning to avoid potential changes, acting efficiently and quickly, as well as evaluating the results obtained.
5. Make the best use of our resources, avoid variations, as well as waste and/or losses.
6. Continually seek to improve as people and as collaborators, developing and updating the knowledge, skills and attitudes demanded by the challenges and the accelerated changes of our time.
7. Respect all the people with whom we relate, treating them with kind consideration, trust, respect and recognition.
8. Ensure that our communication with others is conducive to understanding, openness and active listening, putting ourselves in the shoes of the other person in order to understand their perspective better.
9. Actively participate to achieve our organization's objectives, assuming our commitment to contribute, give opinions, make suggestions, provide constructive criticisms and make decisions, based on knowledge, experience, criteria and imagination.
10. Collaborate with all areas and people with whom we maintain interdependent relationships, making teamwork a daily practice that ensures the attainment of our common goals.
11. Clearly identify our areas of opportunity and improvement, to make the most of them, using our talent, creativity, initiative and willingness to change.

IV. ANTI-CORRUPTION PRACTICES

We reiterate our commitment to integrity, transparency and ethics in all our business activities as well as our personal and business relationships. Corruption represents a threat to the sustainability, fairness and reputation of our company.

At **Grupo Gigante**, we respect and abide by all governing anti-corruption laws and regulations in all the jurisdictions where we operate, in accordance with the provisions of the Corporate Anti-Corruption Policy.

1. Report on practices contrary to the Code of Ethics and Conduct.

Grupo Gigante has implemented various channels of communication that are secure and confidential for employees to report any activity that is suspicious, irregular or contrary to this Code of Ethics and Conduct, our Policies and Procedures, as well as governing laws.

2. Conflict of Interests.

Conflict of Interests occurs when the actions of a person or individual interfere or appear to interfere in any way with the interests of Grupo Gigante, in pursuit of personal gain, likewise, when a member of their family receives unmerited gains because of their position in the company.

"Conflict" may occur when a director or-board member takes actions or has interests that may affect or hinder the performance of his or her work, either effectively or transparently.

Gifts, special invitations to events, loans and collateral are potential sources for conflict of interest

Likewise, those cases in which the Employee has a relative who is a supplier of **Grupo Gigante** and is privileged by making an inequitable assignment of contract, will be considered conflicts of interest.

A conflict of interest exists when a director, collaborator, board member or a family member has a direct or indirect interest in a company, business of an individual, or a shareholding position and this provides goods or services to **Grupo Gigante**. When engaging the services of a company that meets the characteristics set forth in this paragraph, **Grupo Gigante's** Related Party Policy must be complied with.

Conflict of interest includes couples, including marriages or sentimental relationships between employees of **Grupo Gigante** where there is a direct subordination, dependency relationship and organizational and economic growth obeys in direct line of any of those involved.

Any gift received by **Grupo Gigante's** employees from suppliers, even if they are personalized and exceed the established limit, shall be channeled to Fundación Gigante, which shall decide on how on their best use and allocation in the benefit of any of the social causes it promotes and supports. A thank you note will be sent on behalf of the employee in question and their business unit. The gift will be received and acknowledged, explaining the destination that will be given.

V. ETHICS COMMITTEE

The Ethics Committee is entrusted with implementing the provisions of this document. It will report to the Audit Committee.

Its main duties include to:

- Promote an ethical culture and respect for the principles, values and policies of **Grupo Gigante**.
- Supervise the validity of the Code of Ethics and Conduct and the Corporate Integrity Policies of **Grupo Gigante**.
- Review the due attention to the Complaints received through the institutional complaint line and which are related to faults originated by violations to the Code of Ethics and Conduct and/or to **Grupo Gigante's** Policies.
- Issue recommendations to the Audit Committee and/or the Corporate Practices Committee of Grupo Gigante, S.A.B. de C.V., regarding the timely, transparent and fair resolution of Complaints related to misconduct arising from violations of the Code of Ethics and Conduct and/or **Grupo Gigante's** Policies.

This Ethics and Conduct Committee is comprised by:

- Chief Executive Officer of Grupo Gigante, S.A.B. de C.V.
- Director of Corporate Auditing of Grupo Gigante, S.A.B. de C.V.
- General Counsel of Grupo Gigante, S.A.B. de C.V.
- Director of Organizational Development of Grupo Gigante, S.A.B. de C.V.

VI. PERSONAL LIABILITY

Every employee of **Grupo Gigante** is responsible for knowing and complying with this Code of Ethics and Conduct. To this end, they must submit a letter of confirmation of their understanding to the Department of Human Resources of Grupo Gigante, S.A.B. de C.V., or of the Subsidiary to which they belong.

This Code of Ethics and Conduct, by itself, does not guarantee the professional behavior of **Grupo Gigante's** employees. Ethical standards can only be achieved to the extent that every team member promotes and models the behavior in both word and deed.

The following list outlines the duties for **Grupo Gigante's** employees in benefit of Mexico as well as, if applicable, of the country or entity where they form part, of the society to which they belong, of their co-workers and of **Grupo Gigante** itself:

Responsibility of Grupo Gigante's Employees

- Endeavor to live up to the Group's values every day and comply with the guiding principles detailed in this Code of Ethics and Conduct to help achieve the Mission, Vision and Values.
- Contribute with their talent, commitment and effort while collaborating with the Organization.
- Share their knowledge and experience in the benefit of the organization.
- Encourage integration, collaboration and teamwork.
- Be responsible for their training and development.
- Consistently and honestly fulfill their responsibilities.
- Set a good example, thus projecting a good image inside and outside the company.
- Report to work sober.

- Report any action and/or misconduct in breach of this Code of Ethics and Conduct, the **Grupo Gigante** Policies and the principles set forth in said documents.
- Comply with the safety and health standards established by the corresponding authorities, and with the Internal Labor Regulations of Grupo Gigante, S.A.B. de C.V., or of the Subsidiary to which the employees belong, as applicable.

VII. INTERNAL AND EXTERNAL RELATIONS

1. Employee Relations.

Incorporation of Collaborators

The recruitment and selection process for employees of Grupo Gigante, S.A.B. de C.V. and its subsidiaries, as applicable, shall be carried out within a framework of respect and trust, without creating false expectations. Hiring decisions are based on predefined profiles, skills and competencies, professional experience and the level of identification that candidates have with the values of **Grupo Gigante**, without any discrimination for reasons of race, religion, country of origin, ethnic identity, skin color, sex, age, citizenship, sexual orientation, military service status, marital status or disability.

Likewise, persons shall not be authorized to join **Grupo Gigante**, S.A.B. de C.V., or its Subsidiaries, if they previously worked in any of the companies belonging to the group and ceased to render services due to illegal conduct or actions, or serious misconduct as defined in this Code of Ethics and Conduct.

Relationship with Relatives

Relatives of employees may not work in Grupo Gigante, S.A.B. de C.V., or in the subsidiaries of the latter, when there is a boss-subordinate dependency or absence of separation of duties. If due to the nature of the position or personal characteristics, profile and/or skills of the person, it is convenient or necessary for **Grupo Gigante** to hire a relative under these conditions, it must be authorized in writing by the Chief Executive Officer of Grupo Gigante, S.A.B. de C.V. or the Chief Executive Officer of the Subsidiary, or the General Manager of the corresponding Subsidiary; in the understanding that, in the case of Senior Executives, it will be necessary to have the authorization of the General Director of Grupo Gigante, S.A.B. de C.V., in addition, if applicable, authorization from the General Manager of the corresponding Subsidiary and report this to the Corporate Practices Committee through the Corporate Audit Department.

Commitments to Employees

Grupo Gigante is committed to the following core principles with its collaborators:

- Value the dignity of each person and respect the differences and opinions of others.
- Foster a healthy and productive work environment that promotes the development of potential and creativity.
- Encourage collaboration and teamwork.
- Comply with labor laws and regulations.
- Provide collaborators with decent and competitive compensation and benefits.
- To provide the tools for personal and professional updating and development.
- Recognize and promote them based on their ability and performance, avoiding favoritism.

- Ensure their physical safety by providing security equipment, devices, systems and procedures in all its facilities.
- Conduct an immediate investigation of complaints, maintaining the discretion and confidentiality required, and taking the appropriate corrective measures.
- Information shall be kept confidential, always complying with the governing legislation.

Commitments of Collaborators

Employees must always agree not to distort, alter, manipulate or falsify information, documents or operations, whether to simulate the fulfillment of goals and objectives, to obtain any personal, family or friendship benefit, or for any other purpose, as well as to omit or fail to report in a timely manner any breach of the provisions of this paragraph of which they become aware. This is considered a serious breach of this Code of Ethics and Conduct.

No credit instruments shall be subscribed or guarantees or sureties shall be granted that compromise **Grupo Gigante**, unless the corresponding powers have been granted in terms of Grupo Gigante's Powers of Attorney Policy.

In the event of participating in the recording or review of accounting operations, no fictitious or intentionally misleading entries shall be made; likewise, when preparing financial or statistical information, it shall be done with great care, based on the records of Grupo Gigante. Failure to comply shall be considered a serious breach of this Code of Ethics and Conduct.

Likewise, all employees agree to conduct themselves ethically and honestly. Therefore, they must be fully aware of the prohibitions:

- Failure to comply with safety regulations that put at risk the life of any person, their physical integrity and/or the assets of **Grupo Gigante**.
- Omitting or evading tax obligations that generate penalties, property damage, or future contingencies for **Grupo Gigante**.
- Incurring in serious cases of negligence by disregarding the policies, standards and practices for the proper administration of **Grupo Gigante**.
- Omitting good practices that lead to a negative profitability of **Grupo Gigante**.
- Engaging in acts of sexual harassment.
- Participating in acts of conflict of interest, in violation of the provisions of this Code of Ethics and Conduct.

Work tools, goods and services are provided to employees only to perform their duties according to their position, and must be used properly, without mistreatment or waste that may cause unnecessary expenses. Likewise, they must respect the work items of other employees, avoiding taking or using them without their consent.

Gross Misconduct

The following are considered gross misconduct: recidivism in minor misconduct, any type of behavior that violates the basic human rights of individuals, any behavior or attitude that significantly interferes with the proper operation of **Grupo Gigante**, as well as, rejecting the guidelines established in this Code of Ethics and Conduct, either explicitly or implicitly.

The following behaviors constitute conduct contrary to coexistence, considered as gross misconduct and which, due to their scope or importance, can be qualified as such:

Sexual Harassment

Means a behavior in which a person, regardless of sex, requests sexual favors based on intimidation or in exchange for better work positions or other types of rewards.

Discrimination

Means to make any distinction, exclusion, restriction or preference based on ethnic or national origin, gender, age, disabilities, social status, health conditions, religion, opinions, sexual preferences, marital status, or any other that violates human dignity or has the purpose or effect of nullifying or impairing the rights and freedoms of individuals.

Fraud

Means distorting, altering, falsifying or manipulating accounting records and/or information, or falsifying operations and/or information in any case. Falsifying operations is understood as the reporting of fictitious operations, known as fraud, loans, credits, insurance, operation terminals, purchases and expenses, as well as cashing of checks, falsifying endorsements or vouchers.

Corruption

Means the abuse of power, duties or public means for financial gain or other benefits. Any act of corruption is a serious offense under any circumstances.

Theft

Means to take the property and/or resources of others, using force, violence or intimidation.

Disrespect

Means the repeated and continuous disrespect to their coworkers, regardless of the hierarchical level they occupy in **Grupo Gigante**.

Behavior

Means showing up at Grupo Gigante's facilities under the influence of alcohol, drugs or with symptoms of having been intoxicated.

Possession, traffic and/or consumption of alcohol or drugs.

Any physical assault on any person.

Carrying, using or supplying any type of weapons and/or explosive devices within **Grupo Gigante's** facilities.

Ideological, political and partisan affiliation.

Grupo Gigante has no ideological, political or partisan affiliation, but encourages civic collaboration in professional associations and citizen organizations, as well as the responsible exercise of political rights, in support of democracy. Collaborators' participation in cultural, community, political or electoral activities must be entirely on a personal basis and without using **Grupo Gigante's** time or resources. When Collaborators choose to participate in any of such activities, they may do so within their free time and with their own resources; if they decide to make their opinion known, they shall always do so as an individual, expressly clarifying that they are acting in their personal capacity and not on behalf of **Grupo Gigante**, and shall not give the appearance of acting on behalf and/or in representation of the latter.

Employees who intend to make their personal positions public, using **Grupo Gigante's** time or resources, may do so without breaching this Code of Ethics and Conduct, provided that they obtain prior written approval from the Ethics and Conduct Committee. Expressing an opinion includes any posting on social media or on the radio or television.

Employees accept that, at any time, personnel from the Corporate Audit and Human Resources Departments of **Grupo Gigante** may audit, review and have access to the work tools provided to employees, such as documents, files, records, computers and personal property located in the office or workplace.

Harassment and bullying practices

Grupo Gigante recognizes the absolute value of people, and therefore promotes respect and dignity, so any offensive behavior, physical or verbal disrespect, harassment or threats, and any act of this nature, will not be tolerated and must be sanctioned.

The following conduct is forbidden:

1. Conduct that disrupts or interferes with the work or performance of another employee and creates an intimidating or hostile work environment.
2. Physically or verbally abuse of another person
3. Using profanity within **Grupo Gigante's** facilities.
4. Using degrading language to refer to a person.
5. Making fun of another collaborator.
6. Implicitly or explicitly use their authority so that an employee performs or covers up activities that violate the Policies of **Grupo Gigante**, as well as the provisions of this Code of Ethics and Conduct.
7. Intimidating or retaliating against employees who use the Institutional Whistleblower Hotline.
8. Unjustifiably and maliciously denouncing an innocent person.

Relationship between the Collaborators

At **Grupo Gigante** we seek to ensure that working relationships stimulate the achievement of our Mission, Vision and Values, through a work philosophy that promotes communication, the integration of our people, teamwork and the development of our human capital.

Therefore, all the actions of our employees should aim at:

- Providing the timely and effective assistance to our employees' requests for support, thus promoting integration and teamwork.
- Fulfill the objective of our Mission, in such a way that the results of each individual do not exceed the overall results of **Grupo Gigante**.
- Not lose focus on the long term to obtain better results in the short term.
- Promptly communicate with responsibility, objectivity and honesty our ideas and concerns, through constructive contributions and comments.
- Ask for feedback, know how to listen to it and use it to improve.

2. Customer and Supplier Relations


Grupo Gigante strives to provide total satisfaction to our internal and external clients, complying with the highest standards of quality and attention in each of the products and services we offer through our specific Business Units.

We will demonstrate integrity in all our marketing and promotion with ethical, accurate and truthful information.

At **Grupo Gigante**, we will not accept deliberately misleading messages or omit important facts.

Relations with our suppliers will always be conducted with transparency, without generating false expectations, within a framework of respect that allows us to provide equal opportunities to all.

Grupo Gigante always endeavors to promote and maintain long-term business relationships with our suppliers, creditors and contractors. To this end, we always provide Code of Ethics and Conduct, which must be observed in conjunction with the Code of Ethics and Conduct for Suppliers and Service Providers of **Grupo Gigante**. We aim to create a community that operates under the same principles and values that are important to us.



Code of Ethics and Conduct

Our selection of suppliers is impartial, based on criteria of quality, profitability and service.

We will not establish any type of relationship with contractors and suppliers that do not respect and apply the Labor Laws and Regulations, as well as with those that promote discriminatory or forced labor and/or that hire minors.

We will always respect the agreements and commitments established in the contracts.

We shall respect copyrights; moreover, **Grupo Gigante's** employees may not establish business relationships with contractors and/or suppliers who fail to evidence that they are duly authorized to use or market products and services, subject to payment of royalties or copyrights to third parties, as well as their authenticity and legality of. All the business that we conduct must be legal and ethical; therefore, we shall never accept special favors, deals, bribes or kickbacks.

3. Business Opportunities

All employees and members of the Board of Directors of **Grupo Gigante** are forbidden from carrying out, or taking for themselves or their family members, business opportunities resulting from the use of Grupo Gigante's assets, as well as any information from the group for personal gain or business.

While employees have a business relationship with **Grupo Gigante**, they are strictly forbidden from competing with the business operations developed by **Grupo Gigante**.

4. Government Relations

Grupo Gigante assumes the responsibility to become familiar, respect and promote compliance with the Laws and Governmental Regulations that apply in Mexico and in the countries where they operate. This includes having consideration to the local customs and usages. They are also committed to paying their taxes and government charges correctly and in a timely manner.

Before formalizing commitments and drawing up contracts on behalf of **Grupo Gigante**, employees must consult in writing with the legal department of Grupo Gigante, S.A.B. de C.V., and/or of the Subsidiary of which they form part, to ensure compliance with the governing laws.

Grupo Gigante's employees shall refrain from offering and granting payments, favors, commissions and/or extra-legal compensation to any authority and/or any official or public representative to secure a competitive advantage for **Grupo Gigante**.

5. Community Relations.

Social Responsibility

Grupo Gigante maintains a permanent social responsibility policy to contribute and support the development of the communities where it operates. It endeavors to create jobs and care for its social and environmental surroundings as well as seeking the wellbeing of the users and customers of the different business units, offering them quality products and services.

Through Fundación Gigante, A.C., **Grupo Gigante** participates in alliance with different recognized organizations, developing and supporting programs and activities that promote family integration, health, education and economic development. Its mission is to increase the standard of living of the communities where our different Business Units are present, providing them with tools to encourage self-sufficiency.

Additionally, Fundación Gigante fosters the voluntary projects with collaborators, partners, shareholders, customers and suppliers in support of different social causes.

6. Relations with Competitors.

Grupo Gigante does not use illegal or unethical methods to obtain information about competitors.

Grupo Gigante's employees shall comply with the antitrust laws, unfair trade practices or competition, pursuant to the governing legislation.

If, by mistake, information is obtained that could constitute a trade secret or privileged information of another company, or if there are concerns or questions about the legality of the collection of information, or of any commercial action of a competitor, the Ethics and Conduct Committee must be consulted. This committee must provide a reply in this case and inform the Audit Committee in writing.

VIII. HUMAN RIGHTS

Grupo Gigante, S.A.B. de C.V. and its Subsidiaries are committed to train their employees and offer them a professional development plan, as well as to recognize outstanding work and implement communication and feedback channels at all levels.

Additionally, Grupo Gigante, S.A.B. de C.V., and its Subsidiaries shall always comply with governing labor laws, including the managing the payroll property and always avoiding forced or child labor.

We value and promote equal opportunities and diversity as fundamental principles that enrich our culture and strengthen our work environment.

We strive to always act with integrity by respecting human rights and paying special attention to the following aspects:

- Complying with basic human rights, with legal prohibitions regarding slavery and child labor, as well as avoiding any type of discrimination.
- Avoid discriminating based on any individual trait, issue or characteristic such as age, race, ethnicity, religion, disability, marital status or sexual orientation.
- Promote a safe, healthy, productive and dignified work environment.
- Improve our processes and procedures to minimize our carbon footprint and impact on the communities in which we operate.
- We value the diversity of perspectives, experiences and cultures, and will use them to enrich our decisions and solutions.
- We foster an inclusive and respectful work environment, where every employee feels valued and can contribute fully without fearing prejudice.

IX. ECOLOGY AND ENVIRONMENT

Grupo Gigante is committed to environmental conservation and compliance with governing environmental laws in our country, while continuously striving to minimize the environmental impact of its operations, as well as promoting the sustainable and careful use of natural resources.

We are also committed to reducing waste and minimizing our carbon footprint by recycling and reuse processes and reducing electricity with technology focusing on environmental wellbeing.

Similarly, **Grupo Gigante** is committed to:

- Identifying the environmental risks associated with its business and implementing an environmental management plan to eliminate or mitigate them, while promoting continuous improvement.
- Implementing measures that promote responsible water management, continuous improvement in the efficiency of water consumption and management.

X. INFORMATION MANAGEMENT

1. Confidential Information.

Grupo Gigante's employees shall keep any information owned by **Grupo Gigante** in a confidential and exclusive manner, which they must identify and store properly. This provision also applies to the information that suppliers, customers or third parties entrust to us. The commitment will continue even when the employment relationship with the company has concluded.

Data shall be processed according to and in compliance with the laws of Mexico, thereby observing the guiding principles of the Federal Law for the Protection of Personal Data Held by Private Parties (LFPDPPP) and its Regulations.

Personal data may only be processed in relation to the specific and legitimate purposes for which they have been obtained and which have been specified in the privacy notices of **Grupo Gigante**.

All personal data collected by **Grupo Gigante** shall be treated in such a way as to protect the interests of the owner and keep them confidential.

This aspect shall be governed, additionally, in accordance with the provisions of the corresponding Information Security Policy (use of computer resources) and data privacy that Grupo Gigante, S.A.B. de C.V. and/or its Subsidiaries.

Any violation of the provisions of this section shall be considered a serious breach of this Code of Ethics and Conduct and may result in disciplinary action by Grupo Gigante, and even the termination of the employee's employment contract, without liability for **Grupo Gigante**, regardless of any other rights or legal actions that **Grupo Gigante** may have against the offender.

Violations of the provisions of this section by any employee must be reported to the Corporate Audit Department, which will determine the admonishment or corrective measures in each case.

2. Use of E-mail, Information and Internet Services.

Grupo Gigante's e-mail and internet systems are means to assist the normal performance and work of employees. Personal, incidental and occasional use is permitted, but not for personal business.

Code of Ethics and Conduct

It is forbidden to access, send any type of information or messages by any electronic media that could be illegal, insulting or offensive to another person. This includes sexual messages, inappropriate images, caricatures, "chains", jokes, unseemly propositions, ethnic, political or racial slander or defamation, or harassment against any individual.

The violation of the provisions of this section is considered a serious breach of this Code of Ethics and Conduct and may result in disciplinary action by Grupo Gigante, and even the termination of the employee's employment contract without liability for Grupo Gigante, regardless of any other rights or legal actions that Grupo Gigante may have against the offender.

Violations of the provisions by any employee must be reported to the Corporate Audit Department, which will determine the admonishment or corrective measures in each case.

3. Accounting and Financial Controls and Records

The books, records and accounting and financial accounts must reflect transactions and events accurately and comply with applicable financial reporting standards, as well as with Grupo Gigante's internal control systems and policies. Moreover, these must always include supporting documentation.

Grupo Gigante's employees must report the information generated by their work in an honest, transparent, objective and timely manner.

4. Transactions with Securities of Grupo Gigante, S.A.B. de C.V.

Employees may not perform transactions with Grupo Gigante, S.A.B. de C.V. securities in contravention of the provisions of the Policy on Transactions with Securities performed by Directors, Officers and/or employees of Grupo Gigante, S.A.B. de C.V., or in contravention of the provisions of the governing legislation.

XI. USE OF MATERIAL RESOURCES

1. Custody of Assets.

Assets are understood as tangible and intangible goods owned by **Grupo Gigante**, such as buildings, machinery and equipment, inventories, cash, accounts receivable, shares and securities, as well as information, inventions, business plans, patents and trademarks, goodwill, trade names, identity, corporate image, information technology, among others.

At **Grupo Gigante**, employees are responsible for the custody and safeguarding of the assets under their care. Under no circumstances shall they participate, influence or allow situations or actions related to the theft, misuse or the unauthorized loan, disposal or sale of **Grupo Gigante's** assets.

The assets, material resources, as well as the services available to **Grupo Gigante**, are to be used in terms of Grupo Gigante's Policies or in the performance of the functions that the employees are responsible for and for the benefit of **Grupo Gigante**.

It is the responsibility of the employees to maintain these assets and those assigned to them in good condition and to comply with the maintenance plans for the correct operation of **Grupo Gigante**. They must avoid accidents and seek to increase the useful life of the assets.

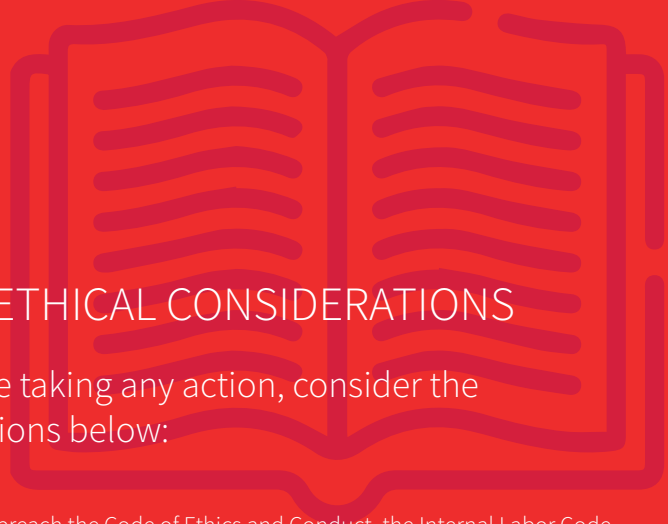
XII. CONCLUSION

The principles and provisions provided herein shall govern and guide our behavior and values in the daily work.

The General Management, the Audit Committee and the Ethics and Conduct Committee of Grupo Gigante, S.A.B. de C.V., each within their purview and responsibilities, shall supervise strict compliance with this Code of Ethics and Conduct. To this end, the Audit Committee will rely on the Corporate Audit Department to verify compliance with this document.

This code provides a framework for action and conduct that will allow us to fully comply with the fundamental principles we have set for ourselves through **Grupo Gigante's** Mission Statement, Vision and Values. These ethical principles, which are the basis of our image as a solid and reliable public company, should be a permanent guide for our employees, creating our own uniform organizational culture, which is reflected in all our actions.

Therefore, the commitment of all who work at **Grupo Gigante**, S.A.B. de C.V., or its Subsidiaries is to bring these concepts and principles to life by applying them daily, through our actions and behavior, thus seeking the wellbeing of our company, community and ourselves.



XIII. ETHICAL CONSIDERATIONS

Before taking any action, consider the questions below:

- Does it breach the Code of Ethics and Conduct, the Internal Labor Code and **Grupo Gigante's** policies and procedures?
- Is it legal?
- Do I feel it is the right thing to do?
- Would you be embarrassed if someone found out about the way you act?
- If your actions were disclosed, how would it look in the news?
- Can I sleep in peace at night?
- Could anyone else be affected by my actions?
- If I gave myself enough time to think before taking an action, would I act the same way again?



XIV. WHISTLEBLOWER HOTLINE

At **Grupo Gigante** we are committed to promoting a safe, ethical and respectful work environment for all our employees. It is essential for employees to be at liberty to report in a confidential manner any potential ethical violations without fear of retaliation.

- We do not tolerate any form of retaliation or unfair treatment against employees who report in good faith possible ethical violations of policies, laws or inappropriate behavior as set forth in this Code of Ethics.
- Any allegations of retaliation will be investigated fairly and objectively. **Grupo Gigante** will take appropriate steps to address and correct any substantiated retaliation.

Grupo Gigante

If you identify any action contrary to the provisions of this Code, please report it at any of our hotlines:



Whistleblower Hotline and voice mail:

800 017 3767 (Grupo Gigante)

800 400 6361 (Gigante Grupo Inmobiliario)

800 005 2520 (Grupo Restaurantero Gigante)

800 366 3833 (Odemás)

800 000 6641 (Petco)

800 967 7622 (Casalideas)



Online:

gg.lineaetica.live (Grupo Gigante)

ggi.lineaetica.live (Gigante Grupo Inmobiliario)

grg.lineaetica.live (Grupo Restaurantero Gigante)

odemas.lineaetica.live (Odemás)

petco.lineaetica.live (Petco)

casaideas.lineaetica.live (Casalideas)



E-mail:

gg@lineaetica.live (Grupo Gigante)

ggi@lineaetica.live (Gigante Grupo Inmobiliario)

grg@lineaetica.live (Grupo Restaurantero Gigante)

odemas@lineaetica.live (Odemás)

petco@lineaetica.live (Petco)

casaideas@lineaetica.live (Casalideas)



ID APP Ethics Global:

(GCG-7250-GGC) (Grupo Gigante)

(GCG-3901-GGI) (Gigante Grupo Inmobiliario)

(GCG-5394-GRG) (Grupo Restaurantero Gigante)

(GCG-8974-ODE) (Odemás)

(GCG-3380-PET) (Petco)

(GCG-6820-CID) (Casalideas)



Whatsapp (All Business Units)

(+52) 55 6538 5504



