



Code of ethics

This is how we do things at the Dia Group

Index

About this code

3

Dia purposes and values

4

Ethical principles

5

Help us get it right

8

Glossary

17



About this *code*

The Code of Ethics formalizes the Dia Group's ethics and integrity model and the mandatory behavior guidelines for Group employees and directors, which includes the parent company and its subsidiaries (hereinafter "**Dia Group**" or "Company").

The model of ethics and integrity of **Dia Group** of which this code is an essential part is led by the Board of Directors, based on the principle of due control and aimed at preventing and detecting non-compliance risks, including those linked to criminal offenses, and to reduce or eradicate its effects if they materialize.

The principle of due control applied by **Dia Group** means, among others, that compliance risks are periodically analyzed; that the expected patterns of conduct are expressly defined and communicated; whereas the responsibility for ensuring the ethics and integrity management model lies with the Board of Directors; whereas the Company has a Compliance Department which has sufficient autonomy, independence and resources and which is responsible for, among others, to evaluate the effectiveness of the model; and that, finally, it has established a procedure for the notification of irregularities and for the response to those that may take place.



Dia Group has a Group Ethics Committee that reports periodically to the Board of Directors. In addition, there are Ethics Committees in each of the countries where **Dia Group** operates. These committees have sufficient autonomy and independence to carry out their tasks.



Periodically, **Dia Group**, through the Group Ethics Committee and the Compliance Function, will review the contents of this Code and develop the policies, processes and controls that are necessary to respond to those matters of ethics and integrity that may be relevant at all times.

Purpose Dia

Dia values are the reference to always act correctly and make decisions from an Ethical Culture.



Valores



Passion for the Customer

We are close by offering great quality products at affordable prices and an easy and fast shopping experience to make you fall in love again every day.

Continuous Growth

Learning is our engine for growth. We continually challenge ourselves to do things differently by trying new ideas.

Commitment to Results

We generate impact, defining clear, ambitious and realistic objectives, and we celebrate achievements when we reach them.

Collaborative Spirit

We encourage teamwork and build authentic and trusting relations based on our essence: proximity.

Simplicity in what we do

We add value, we are efficient and we generate high impact. Having a clear purpose allows us to be coherent and to be where, when and how we need to be.



Ethical principles

The people of **Dia Group** develop our professional obligations in a manner consistent with Dia Values and with the five ethical principles that are developed below.

We are an
ethical Company

We have the firm will to continue growing and promoting an **Ethical Culture** through a model of ethics and integrity.



*Cada día
más Ética*

RESPECT

We respect people and generate a **collaborative spirit** and an environment of trust, diverse and inclusive, in which we defend different opinions.

INTEGRITY

We act in an integral and transparent manner. We seek to do the right thing and achieve the best **results** without harming the interests of others.

COMMITMENT

Our **passion** and commitment are that the **customer** and the rest of the Dia Group stakeholders are an essential part of our Company.

LOYALTY

We work loyalty, complying with all the regulations and commitments to which Dia Group is adhered. We strive seek for **continuous growth** and to learn every day the implications of our activity and the way in which it is regulated.

RESPONSIBILITY

In our daily work we prioritize **simplicity** in what we do. We focus on taking care of the assets and information that the Company makes available to us.

Respect

Respect for people is the basis of our ethical behavior.



With Diversity and Inclusion

No one in **Dia Group** is discriminated against for any reason. We do not tolerate any kind of discrimination. We all have the same opportunities and are valued according to the same criteria in the selection, promotion or training processes, among others.

We believe in an environment of diversity and inclusion that helps us better understand the needs of our employees, customers, and society at large. We promote inclusion with the aim of creating value for all of them, as well as to achieve an environment of coexistence and respect.

Respect for people is based on an open, inclusive, merit-based and collaborative work culture, in which the collective prevails and which encourages people to give their best. We treat our customers, franchisees and suppliers, our colleagues and all those with whom we interact with respect and professionalism.



With Protection from Harassment

Abuse of authority and harassment are not tolerated in **Dia Group**. Nor those behaviors that generate a hostile or frightening work environment.

Workplace harassment or any other type of harassment has no place in our Company. **Dia Group** puts all the means at its disposal to prosecute these inappropriate behaviors. We do not tolerate any action or omission that has the potential to cause humiliation, shame, fear or may affect a person's honor, dignity, and self-esteem.





With Human and Labor Rights

Dia Group emphasizes the protection of human and labor rights. It has policies, processes and controls aimed at preventing, detecting and eradicating irregularities or breaches of workers' rights, in its direct operations or along its value chain.

The principles that guide the **Dia Group** are reflected in the Universal Declaration of Human Rights, the fundamental norms of the International Labor Organization, the United Nations Guiding Principles on Business and Human Rights and the main applicable national and international regulations.

Dia Group undertakes to work, among others, for freedom of association and the right to collective bargaining, the elimination of all forms of forced labor, the effective abolition of child labor, the elimination of discrimination in employment and occupation as well as the inadmissibility of modern slavery by any supplier, franchisee or business partner. **Dia Group** will observe that all third parties that contract with **Dia Group** strictly comply with these agreements.



With Health and Safety

The safety and health of our employees and our customers is a priority for **Dia Group**. We are diligent in protecting ourselves and those in our environment, including contractors and suppliers.

We start from strict compliance with the law and we make sure to be alert to detect possible deficiencies and proceed to their immediate correction. We act in accordance with the procedures established in this regard by the Company and we avoid conduct or actions that may endanger our safety or that of third parties, including imposing working or safety conditions that harm, suppress or restrict your rights.



Integrity

We act under the principle of **Zero Tolerance to Corruption**. We do things correctly, in an integral, honest and transparent way.



With Honesty

The rejection of corruption and bribery is a fundamental principle of **Dia Group**, being our goal to encourage all employees to act with integrity, diligence and impartiality in decision-making, as well as in relations with public or private third parties. **Dia Group** rejects all forms of corruption, applying a zero-tolerance approach to any breach of specific policies, this Code of Ethics or current regulations.

Dia Group has implemented a Crime Prevention Model in which the risks of committing crimes associated with the Company's activity are identified and evaluated, from which criminal liability may arise for **Dia Group**, as well as the corresponding rules, procedures and controls for the identification and prevention of the commission of such crimes.



With Impartiality

In our relationships we are always upright, objective and impartial. When we work with third parties, including suppliers, contractors, franchises and public administrations, we do not offer or accept gifts or services that go beyond the purely symbolic or that could be misinterpreted. However, if gifts are received, you must act in accordance with applicable internal regulations.





With Neutrality

The relationship with the administrations and public representatives is the responsibility of people of the Company formally authorized to do so, who must remember the principle of traceability. They shall keep the information exchanged and keep a record of the decisions taken.

We are a politically neutral organization. We do not collaborate with or finance political parties in any of the countries where we operate.



With Transparency

In our professional performance we act in the best interest of the Company. We avoid situations or make decisions where it could be understood that there is a conflict between our personal interest, or that of people close to us, and that of the Company and do not take advantage of opportunities that we have known for personal benefit in the performance of our responsibilities.

The people of **Dia Group** must inform the Compliance departments of any situation related to conflicts of interest. The directors of the different **Dia Group** companies are subject to the rules on conflicts of interest established by the specific regulations or rules.

Commitment

We are committed to all stakeholders related to our activity.



With Our Clients

In **Dia Group** we are close and committed, we constantly adapt to customer requests and work innovating in solutions that make their lives easier.

We work with integrity and transparency to provide the best customer experience through friendly and respectful service. We are always willing to listen to our customers for continuous improvement.



With Our Franchisees

We firmly believe that transformation processes are done by people and our franchisees are part of the change.

In **Dia Group** we ensure that our franchisees preserve a work environment respectful of the dignity of people and in which behaviors that may violate dignity and respect or that violate the principles of this Code of Ethics are not allowed.



With Our Suppliers

Our Company takes the utmost care to get to know its suppliers, with the intention of working with those who share the same values of our Ethical Code and our Company.

Our suppliers must be aligned with the good practices inherent in complying with the fundamental rights of their workers and their entire supply chain. They must also respect the laws and ensure the well-being, health and safety of their workers and third parties.





With the Market

We work according to the principles of diligence and transparency. We avoid that our actions may be liable to be interpreted as an attempt at deception and provide truthful and complete information to all interested parties.



With Environmental, Social and Good Governance Criteria

We understand sustainability as the only way to ensure the creation of value for all our stakeholders and for our brand. The adoption of a proactive listening attitude in the face of social and environmental challenges allows us to develop, within the **Dia Group**, key capabilities to ensure the Company's future competitiveness.

Our commitment is to work proactively to respond to the main environmental challenges of the sector as well as to strictly comply with the applicable regulations. We also promote environmental engagement among our key stakeholders.

We are an effective, transparent and fair Company, which seeks to maximize the value of **Dia Group** by safeguarding the social interest and transmitting confidence to all our stakeholders. In matters of Good Governance, we follow the recommendations of the National Securities Market Commission that govern the proper functioning of the governing bodies.



Loyalty

We compete loyally and comply with all internal and external regulations that apply to us.



With the Fulfillment of the Code of Ethics

The Code of Ethics formalizes the **Dia Group's** model of ethics and integrity and the mandatory behavior guidelines.

All people of **Dia Group** must ensure knowledge, understanding and respect for the Code of Ethics. Any breach of the Code of Ethics must be brought to the attention of the Compliance Function and/or the corresponding Ethics Committee.



With the Fulfillment of Internal Policies and Regulations

At **Dia Group** we promote knowledge and compliance with our regulations and internal policies. All **Dia Group** employees must comply strictly with our internal regulations and policies.

For this, we have available constant training and receive communications about the updates of said regulations and internal policies, with the aim of making the best decisions for our Company.



With the Fulfillment of Competition Law

We comply with the regulations of free competition, and we compete in an honorable and loyal manner, without incurring in practices that could be considered criminal, anti-competitive, deceptive or unfair.

Market information must have been obtained appropriately and without using confidential information without express authorization, especially if it is owned by other organizations or companies. We must take special care to avoid violating company secrets.





With the Fulfillment Tax and Financial Regulations

In tax matters, we assume as our own the commitments of good practices defined by the tax authorities. In this sense, **Dia Group** has signed the Code of Good Tax Practices with the Spanish Tax Administration, in order to promote transparency, good faith and cooperation, increase legal certainty, and reduce litigation and avoid conflicts.

We do not make use of opaque corporate structures or those based in tax havens whose purpose is to hide relevant information from tax administrations. We avoid in all circumstances the avoidance of payments or the obtaining of undue tax advantages and provide, diligently and in the shortest possible time, the tax information that the authorities may request from us. In the same way, we are rigorous to prevent and avoid the money laundering.

We act in accordance with financial and accounting principles that reflect a true and fair picture of the Company's financial situation, adopting specific procedures that ensure that the financial statements are prepared in accordance with applicable principles and standards and that show the financial position and the result of operations in an appropriate and transparent manner.

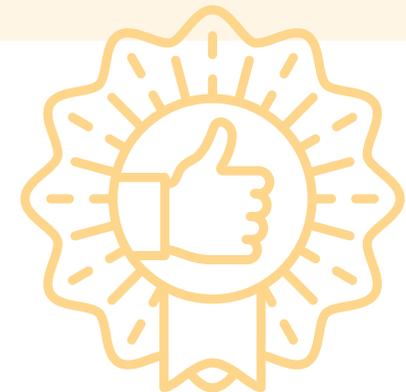
When we transmit financial information, we do so in a transparent and loyal manner, in full compliance with current regulations and applicable to **Dia Group**. Likewise, we ensure the reliability and rigor of financial information, both for internal use and that provided abroad, which will only be carried out by people expressly authorized to do so.



With the Fulfillment of Consumer Defense Regulation

When we promote our products or our Company we always do so based on their objective characteristics, without falsifying or omitting information. We ensure the veracity of the characteristics of the advertised products and the proper functioning of the equipment to measure, evaluate or charge the products we market. We are alert to prevent irregular, deceptive, fraudulent or malicious conduct that could benefit the Company to the detriment of clients.

The products we put on sale must have followed all controls established by the Company to prevent the appearance of risks related to health, industrial property or the environment, among others. Those of us who have responsibilities in this area must ensure that we have followed the established procedures.



Responsabilidad

We make the best use of the assets and resources that Dia Group puts at our disposal.



With Asset Protection

We protect our Assets and use our resources only for a purely professional purpose and for the benefit of our Company.

Our obligation to protect **Dia Group** Assets includes currency or cash, the merchandise we sell or the resources that the Company makes available to us.

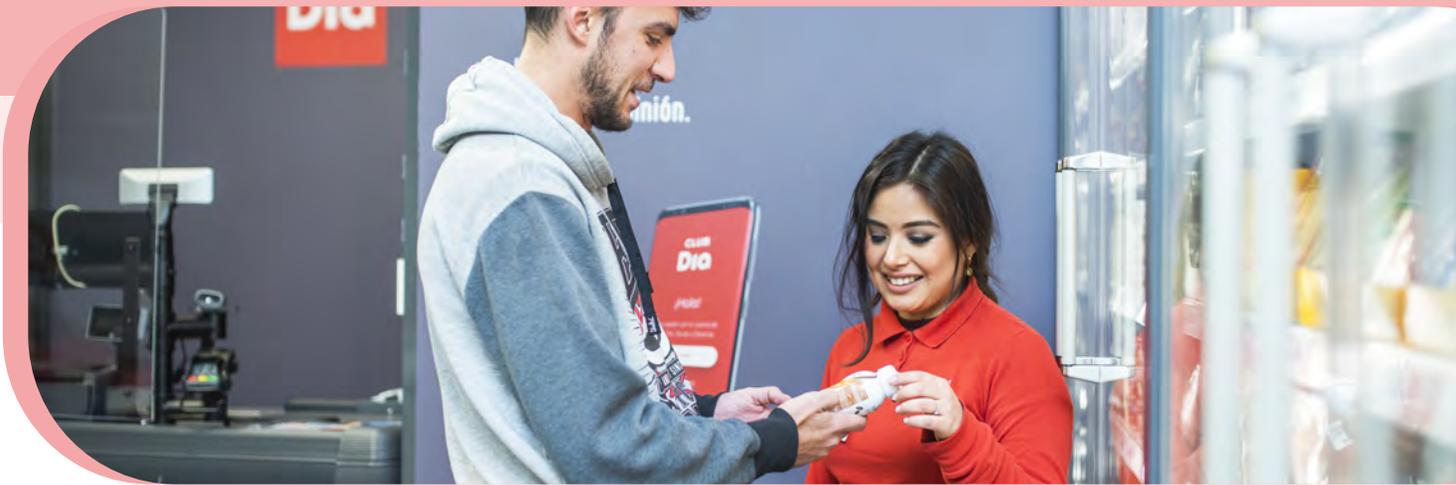


With the Protection of Intellectual and Industrial Property

We have to protect the information we generate or use, including our own intellectual and industrial property and that of third parties. In the course of our work, we will be diligent in ensuring that we accredit the sources and that we have acquired the appropriate licenses or rights.

We do not disclose business secrets or information that may affect any of our brands and banners.





With the Protection of Confidential and Privileged Information

We must treat Confidential Information as confidential and not move information about the Company outside unless we are authorized to do so. In this sense, we are not allowed to disclose or use for our own benefit or that of third parties' information that is not public.

People with access to privileged information will refrain from using it for their own benefit or from providing it to third parties to misuse it. In any case, we will observe the rules established in the securities market legislation and those provided for in the internal rules.



With the Protection of Personal Data

We treat personal data responsibly and in accordance with the provisions of applicable regulations. Authorizations for the use of personal data must respond to express, concrete, specific needs, and must be carried out in compliance with the applicable internal procedures and regulations.



With the Protection of Technological Means

The technological means that **Dia Group** makes available to us are the property of the Company and exclusively for professional use. We cannot use them for illicit purposes, to access, download, view or distribute content that is offensive or that violates the rights of third parties.

Nor can they be used for any other activity that may harm the image or reputation of the Company, the legitimate interests of third parties or adversely affect the operation of the Company's systems.

Help us *get it right*

All employees and directors of Dia Group must comply with the principles of behavior contained in this Code.

In **Dia Group** we are committed to acting diligently to prevent and, where appropriate, detect and eradicate, irregular practices or practices contrary to the DIA Values and principles of behavior. Acting with diligence means that our Company has different elements to ensure the knowledge, understanding and compliance with this Code.

The Company will provide the means for employees to know and understand the principles of behavior contained in this Code, as well as the rules and procedures they need to know.

Dia Group has set up an Ethics Committee at Group level, with a corporate scope of action, and specific Ethics Committees in each country or business unit, whose tasks include facilitating the dissemination and implementation of this Code, ensuring its knowledge, understanding and respect.

**We are an
*ethical Company***

We have the firm will to continue growing and promoting an **Ethical Culture** through a model of ethics and integrity.

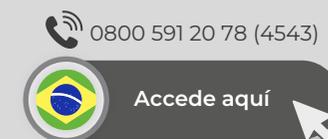
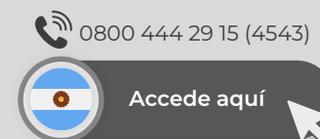


*Cada día
más Ética*

How can i contact the *ethics committee* ?

The company has an Internal Information Channel for consultation and communication, called **LíneaÉtica**, whose purpose is to allow all stakeholders to resolve doubts and report possible breaches of this Code or other irregular conducts. This channel guarantees the privacy and protection of the whistleblower and is managed by the Compliance Function and the various Ethics Committees.

To do this you can safely access the following links, depending on the country where you are located:



Additionally, if you receive any communication through mail or any other means, which may be related to the communication of suspicious behavior, you must send it through LíneaÉtica or contact the ethics committee or the corresponding Compliance department.

The processing of your communication will be totally confidential and you may accompany your communication with all the documentation and details that you deem pertinent.

Dia Group will not tolerate any retaliation to any person who has made use of LíneaÉtica in good faith.

Glossary

| | | |
|--|--|----|
| ASSETS | | |
| Protection of Assets | | 14 |
| BANNER | | |
| Property Protection Intellectual and Industrial | | 14 |
| BRAND | | |
| Environmental, Social and Good Governance Criteria | | 11 |
| Protection of Intellectual and Industrial Property | | 14 |
| BRIBE | | |
| Honesty | | 8 |
| COEXISTENCE | | |
| Diversity and Inclusion | | 6 |
| COLLEAGUE | | |
| Diversity and Inclusion | | 6 |
| COMPETENCE | | |
| Compliance with the Regulations of Competition | | 13 |
| BRAND | | |
| Compliance with the Regulations of Competition | | 12 |
| Protection of Intellectual and Industrial Property | | 12 |
| CONFLICT OF INTEREST | | |
| Transparency | | 13 |

| | | |
|---|--|----|
| CONSUMER | | |
| Compliance with Consumer Protection Regulations | | 13 |
| CORRUPTION | | |
| Honesty | | 8 |
| CUSTOMER | | |
| Diversity and Inclusion | | 6 |
| Health & Safety | | 7 |
| Our Clients | | 10 |
| Compliance with Consumer Protection Regulations | | 13 |
| DECEIT | | |
| Market | | 10 |
| Compliance with the Regulations of Competition | | 10 |
| Compliance with Consumer Protection Regulations | | 13 |
| DIGNITY | | |
| Protection from Harassment | | 6 |
| DILIGENCE | | |
| Honesty | | 8 |
| Market | | 10 |
| Regulatory Compliance Fiscal and Financial | | 12 |
| Help us get it right | | 16 |
| DISCRIMINATION | | |
| Diversity and Inclusion | | 7 |
| Human and Labor Rights | | 7 |

| | |
|--|----|
| DIVERSITY | |
| Diversity and Inclusion | 6 |
| EMPLOYEE | |
| Diversity and Inclusion | 6 |
| Health & Safety | 7 |
| Honesty | 8 |
| Fulfillment of Internal Policies and Regulations | 12 |
| ENVIRONMENT | |
| Environmental, Social and Good Governance Criteria | 11 |
| ETHICS COMMITTEE | |
| Help us get it right | 16 |
| FINANCIAL | |
| Regulatory Compliance Fiscal and Financial | 13 |
| FRANCHISEE | |
| Diversity and Inclusion | 6 |
| Human and Labor Rights | 7 |
| Impartiality | 8 |
| Our Franchisees | 10 |
| FREEDOM | |
| Human and Labor Rights | 7 |
| GIFTS | |
| Impartiality | 8 |
| GOOD GOVERNANCE | |
| Environmental, Social and Good Governance Criteria | 11 |
| HARASSMENT | |
| Protection from Harassment | 5 |

| | |
|---|----|
| HEALTH | |
| Health & Safety | 7 |
| Our Suppliers | 11 |
| Fulfillment of Consumer Defense Regulation | 13 |
| HONESTY | |
| Honesty | 8 |
| HONOR | |
| Protection from Harassment | 6 |
| Compliance with the Regulations of Competition | 13 |
| HUMAN AND LABOR RIGHTS | |
| Human and labor rights | 7 |
| Our Franchisees | 10 |
| IMAGE | |
| Protection of Technological Means | 15 |
| IMPARTIALITY | |
| Honesty | 8 |
| Impartiality | 8 |
| INCLUSION | |
| Diversity and Inclusion | 6 |
| INTELLECTUAL AND INDUSTRIAL PROPERTY | |
| Property Protection Intellectual and Industrial | 14 |
| LINEAETICA | |
| Help us get it right | 16 |

| | |
|--|----|
| NEUTRALITY | |
| Neutrality | 9 |
| PARTNER | |
| Human and Labor Rights | 7 |
| PERSONAL DATA | |
| Protection of Personal Data | 14 |
| PLACE | |
| Diversity and Inclusion | 6 |
| Health & Safety | 7 |
| POLITICAL PARTIES | |
| Neutrality | 9 |
| PREVENTION | |
| Honesty | 8 |
| PRINCIPLES | |
| Human and Labor Rights | 7 |
| Honesty | 8 |
| Neutrality | 9 |
| Our Franchisees | 10 |
| Market | 11 |
| Fulfillment of Tax and Financial Regulations | 13 |
| PROFESSIONALISM | |
| Diversity and Inclusion | 6 |
| REPUTATION | |
| Protección de los Medios Tecnológicos | 15 |

| | |
|--|----|
| SAFETY | |
| Health & Safety | 7 |
| Our Suppliers | 11 |
| Fulfillment of Tax and Financial Regulations | 13 |
| SOCIETY | |
| Diversity and Inclusion | 6 |
| Our Suppliers | 11 |
| STAKEHOLDERS | |
| Environmental, Social and Good Governance Criteria | 11 |
| Help us get it right | 11 |
| SUPPLIER | |
| Diversity and Inclusion | 6 |
| Human and Labor Rights | 7 |
| Health & Safety | 7 |
| Impartiality | 8 |
| Our Suppliers | 11 |
| SUSTAINABILITY | |
| Environmental, Social and Good Governance Criteria | 11 |
| TAX | |
| Fulfillment of Tax and Financial Regulations | 13 |
| TECHNOLOGICAL MEANS | |
| Protection of Technological Means | 15 |

