

RESPONSIBLE MARKETING POLICY

Dia Group

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INTRODUCTION

Distribuidora Internacional de Alimentación S.A. (hereinafter Dia Group), is a food and household products distribution company that has established a large network of **neighbourhood stores and an online channel as part of its commitment to marketing through all channels**, through which it enables an **easy and fast shopping experience**, with a **wide assortment** that highlights **fresh and locally sourced products**, as well as the **highest quality Dia products at affordable prices**.

Dia Group moves forward guided by principles of **respect, integrity, commitment, fairness and responsibility**, and by having a clear purpose: **to be closer every day in order to offer great quality for everyone**. This has allowed it to build a strong and future-proof business, focused on people, to respond to their expectations and needs.

To achieve this purpose, and on the marketing side, **Dia Group is committed to encouraging more conscious decision-making by its customers**, especially when it comes to **access to healthy eating**. This not only strengthens customer trust, but also creates value for the neighbourhoods, communities and ecosystem where it operates to build a strong, future-proof business and a more sustainable society.

PURPOSE AND SCOPE OF THE RESPONSIBLE MARKETING POLICY

The current Policy is a set of principles that determine how Dia Group develops all of its **business communications** to promote ethical, transparent, sustainable and respectful practices with **its customers and society in general**.

These principles are aligned with the Group's **Sustainability Policy**, especially with the commitment to facilitate access to healthy, quality food through the **"Eating Better Every Day"** programme.

This Policy covers the **main industry codes of conduct and regulatory frameworks** in the countries where Dia Group operates, with a focus on **protecting vulnerable groups, ensuring truthfulness in advertising and safeguarding consumer data**, thereby maintaining high standards of integrity and accountability in all company marketing activities.

This Policy **applies to all marketing activities and all branded products online and offline** via which Dia Group communicates with its customers. In addition, this Policy applies **to all the marketing activities of the manufacturing brands that are disseminated through Dia Group's own communication channels**. These channels are: physical stores, Club Dia, television, radio, website, social media, apps, press, advertising brochures or billboard advertising. In addition, this Policy addresses sponsorship activities, social campaigns, and collaborations with public characters and influencers.

KEY PRINCIPLES OF RESPONSIBLE MARKETING

PRINCIPLE 1: Respect and comply with applicable legislation for fair, truthful, honest and legal marketing.

Dia Group's marketing practices are strictly governed by the laws of the territories in which it operates and the industry's regulations:

- Communications **are not misleading or ambiguous**, seeking to avoid misleading the customer. The language used is always understandable by the general public and respects the principles **of Dia Group's tone and style manual**, encouraging diverse and inclusive communication.
- **There is prior verification of the truthfulness** of the features provided on a specific product and no particular characteristics are attributed to products that lack them.
- The **visual presentation of the products reflects the actual characteristics of the products as objectively and precisely as possible**. Similarly, customers are always reminded that images are representative and may vary between the product promoted and the actual product.
- Information regarding products and services is not omitted so **that customers can make informed purchasing decisions**.
- Products in the food and beverage category always have **nutritional information in line with the regulatory bases of the territories** in which they are distributed.
- **Comparative communication** respects the rules of fair competition. Thus, competitor companies and products are not directly or indirectly disparaged or discredited. If a comparison is made, it must be relevant and objectively demonstrable, without misleading the recipients.
- Dia Group's communication also does not contain, either explicitly or implicitly, **references to the distinctive signs of any other advertiser**, apart from comparative advertising cases that are accepted legally or by agreement.
- Dia Group's advertising **that includes testimonials** is truthful and has the written authorisation of the person in question, who must be able to demonstrate the truthfulness of their claims.
- **The privacy of customers and the responsible and careful handling of their personal data is respected**, complying with all laws and regulations. Customer data will only be used for the purposes they have authorised.

PRINCIPLE 2: Facilitate a high-quality assortment at affordable prices, encourage healthy eating habits, and highlight the role of fresh products in a balanced diet

- With the commitment to giving customers **freedom of choice**, a complete and varied assortment is offered, **balancing manufacturer brands and top-quality Dia products** at affordable prices.

- **Local suppliers are encouraged** whenever possible, as a key way of ensuring access to healthy, quality food and strengthening ties with the communities in which the Group operates.
- Through **Club Dia**, accessible purchasing is promoted by offering **offers and discounts** on products, including on the first unit when feasible. The combination of choosing Dia products with Club Dia's weekly offers and promotions helps households and customers **increase savings on their annual spend on their shopping basket**.
- In line with the **"Eat Better Every Day" programme**, to help mitigate food barriers and make it easier for everyone to eat quality food, **the acquisition of a basic and balanced basket**, with products – chosen by experts – that have a high nutritional value and that are easy to incorporate into the daily diet, is encouraged through awareness-raising actions. Added to this is the promotion of an **active and healthy lifestyle**.
- The Group is committed to selling **fresh products to facilitate access to healthy eating**. On a weekly basis, offers and promotions of these products are included for all customers in the various communication channels.
- **Products include real and transparent information** about their uses and properties.
- The information provided about **product and service pricing is accurate and transparent**. There are no hidden costs and all rates are clearly stated.
- **No products are offered that cannot be provided, unless the delivery or provision time or deadline is stated in the advertisement**. If the stock of any of the promoted products is sold out, a sign is placed indicating the unavailability of the product.
- To ensure customer satisfaction after purchase and/or to collect their claims and complaints related to misleading advertising, **customer service addresses any issues or enquiries in a timely and professional manner**, promising to resolve them satisfactorily, fairly, efficiently, seriously, and taking steps to prevent future incidents.
- The conditions, protocols and rules of **our promotions and contests** are communicated clearly and simply, without encouraging overconsumption, and without masking the requirements necessary to obtain the prizes or the implicit costs of receiving them. Impartial judges are also assigned to determine the respective winners of such contests.

PRINCIPLE 3: Promote health, diversity, inclusion, accessibility and animal protection in all commercial and advertising communications.

- **Excessive consumption is not encouraged** in any product lines or categories, nor are sedentary or unhealthy lifestyles or habits. Dia Group is committed to ensuring that its communication **always promotes a healthy and active lifestyle.**
- No **content is used that appeals to arguments regarding gender, sex, offensive, discriminatory or emotionally negative behaviour** towards other people or groups. Nor will content be included that appeals to the **exploitation of fear, incites violence and/or illegal behaviour** by people.
- Dia Group's communication never involves **abuse or degrading treatment of animals.**
- **Digital channels (websites and apps) are designed with criteria** to ensure easy access to all people, regardless of physical condition, intellectual condition, or any other different need or capability.
- Certain marketing materials are produced in two languages: **Spanish and Catalan.**
- In all circumstances, Dia Group is committed to using **inclusive language with the goal of giving visibility to minorities, avoiding any bias, and promoting diversity and representation.** This approach will be maintained as long as it does not affect legibility, or distort or interfere with the messages to be transmitted. For example, nouns are preferred over adjectives and generic nouns are the preferred choice. In addition, when gender is defined, the one representing the majority is placed first; an example of this would be the case of "female cashiers and male cashiers."

PRINCIPLE 4: Build transparent and trusting relationships with the media and other institutions.

- We work with **transparent advertising agreements** based on positive synergies, generating useful, quality and relevant content that does not harm the company, the particular medium, or consumers.
- We evaluate how advertising investment decisions are made and carefully examine **relationships** with the media and its members, avoiding agreements that compromise their **editorial integrity**.
- **Commercial communications**, both in traditional media and on social media and, above all, from public characters and influencers, **are identified as such**. This will be governed under the agreements established in the code of conduct on the use of influencers in advertising, **ensuring the correct use of advertising labels in their content**.
- When **social campaigns and actions for a cause** are reported, Dia Group's **involvement** is explicitly disclosed and, if **another charity is referred to**, it is always under an explicit prior agreement with the entity.

PRINCIPLE 5: Pay special attention to marketing actions that may affect children and adolescents.

- Marketing actions **focus primarily on the idea that it is an adult who is** responsible for the purchasing decision.
- Marketing actions whose scope includes **children under 12 years of age and, online, children under 15 years of age** are studied carefully, given the fact they have less experience and greater credulity and naivety. **No communication may exploit this condition**.
- Commercial communications aimed at children and adolescents will **not show: 1)** Any visual representation or description of potentially dangerous practices or situations; **2)** Any disregard for the safety or integrity of minors; **3)** Any content that could cause mental, moral or physical harm; and; **4)** Any content that could lead them to believe that the consumption of a product improves their skills.
- **Products that are inappropriate or harmful for the health of children and adolescents** are not advertised in media directed to this group, while commercial communications directed at this group are also not included in media, channels or platforms where the editorial content is not suitable for them.
- We ensure that commercial communications **do not mislead or deceive** children or adolescents, with respect to the actual size, value, nature, durability and performance of the advertised product.

PRINCIPLE 6: Contribute to a positive environmental and social impact.

- **Greenwashing or social washing are not accepted.** Clear, relevant and reliable information on environmental claims, social characteristics of products and sustainability hallmarks is provided as far as possible.
- **Behaviours considered harmful to the environment** are not shown unless there is an educational or exemplary reason in favour of showing them.
- Customers are clearly and relevantly informed about the **early expiry** of some products.
- As much as possible, **the printing of handouts in physical format is reduced** and **the use of digital channels is encouraged.**
- Some of the work that is carried out from the marketing area is done in collaboration with **companies, employment centres or associations that promote the inclusion of vulnerable people into the workplace.**

APPROVAL SYSTEM

Dia Group's governing bodies assume certain functions associated with the approval, supervision and compliance with this Responsible Marketing Policy:

- The Board of Directors is responsible for approving and overseeing the proper execution of this Policy.
- The Management Board is responsible for proposing this Policy to the Board of Directors and ensuring that it is continuously complied with, through the implementation of the necessary internal controls.

UPDATE TO THE RESPONSIBLE MARKETING POLICY

It is thus integrated into the catalogue of corporate policies and complements Dia Group's internal regulations, particularly:

- Corporate External Communication Policy.
- Code of Ethics.
- Sustainability Policy.
- Risk Management Policy.

Dia Group is committed to complying with and enforcing the principles and commitments set out in the Responsible Marketing Policy, as well as updating its content in line with possible regulatory obligations, substantial amendments to the business model, demands and expectations of stakeholders.

This Policy was approved on 27 June 2024 by the Board of Directors of Distribuidora Internacional de Alimentación S.A., being applicable until the Board of Directors approves its update, revision or repeal.