

**Responsible
Artificial Intelligence Use Policy**





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1. Purpose

The purpose of this policy is to establish the principles and guidelines for action that must govern the design, development and use of artificial intelligence (hereinafter, AI) and algorithms owned and/or acquired from a third party, ensuring compliance with applicable legislation, the values of Dia Group, the code of ethics and the other standards that are part of the internal regulatory system of Dia Group. In this regard, this policy establishes the guidelines for ensuring the responsible, transparent, safe and reliable use of AI and algorithms by Dia Group.

2. Scope of Application

This policy on responsible use of AI applies to all companies that make up Dia Group.

3. General basic principles of responsible AI use

The principles and guidelines for action that must govern the design, development and use of AI and algorithms to achieve the purpose of this policy are as follows:

3.1. Principle of tangibility

Tools that use AI or algorithms must be at the service of people, generating tangible benefits that can be objectively measured by Dia Group and in particular, we will seek to ensure that their development contributes to the fulfilment of the sustainable development objectives approved by the United Nations.

3.2. Principle of justice

Dia Group will ensure fair and responsible use of AI and algorithms, in compliance with the commitment to human rights, with the values of Dia Group and its code of ethics. It will also seek to ensure that the results of their use are not contrary to and/or do not undermine the principles of equal opportunity, diversity, inclusion and sustainability, which may lead to unjustifiably discriminatory biases and impacts (based on race, ethnicity, religion, sex, sexual orientation, disability or any other condition of people).

3.3. Principle of transparency

Dia Group shall ensure that the processes in which AI and/or algorithms are used do not contain traceability limitations that prevent their objective verification by audit. When necessary, Dia Group will inform users of the category of personal data that, where appropriate, is used by its AI tools and/or algorithms, as well as the purpose of the processing of personal data that arise from their use, in accordance with the provisions of the legislation on the protection of personal data applicable in each case.



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3.4. Principle of security

Dia Group will have physical and logical security systems and mechanisms in place to protect its AI-based systems and/or algorithms against any alteration, misuse or unauthorised access and will ensure the integrity of the data stored or transferred through them.

4. Prohibited uses of AI

The use of Artificial Intelligence is not permitted in the following cases:

- Divergences from the values and code of ethics of Dia Group: any use of AI that is detrimental to and/or contrary to the five principles that govern Dia Group's code of ethics.
 - Respect: zero tolerance for actions or omissions arising from the use of AI that have the potential to cause humiliation, embarrassment, fear or may affect people's honour, dignity and self-esteem.
 - Integrity: avoiding situations or decision-making based on AI where it could be understood that there is a personal conflict of interest or a conflict regarding people close to Dia Group.
 - Commitment: taking into account environmental challenges, Dia Group will ensure the efficient and respectful use of AI and the impact that the training of models and/or algorithms has on CO2 emissions.
 - Fairness: all data and/or information for training purposes or interaction with AI-based tools must be obtained appropriately and must not make use of confidential information without explicit authorisation.
 - Responsibility: making strict use of technological means for purely professional purposes and for the benefit of Dia Group, when training and/or using AI.
- Non-compliance with legislation: any use that does not sufficiently ensure compliance with applicable legislation. Especially where the law prohibits:
 - AI-based applications that undermine citizen rights, such as sensitive feature-based categorisation systems and/or indiscriminate capture of images from surveillance camera recordings to create facial recognition databases.
 - Recognition of emotions in the workplace.
 - AI-based employee scoring systems.
- Damage to third parties: any use of AI that may cause damage to third parties, even if accidental. Especially in:
 - The development or upgrade of automatic AI-based systems to adjust prices, promotions, or recommend products.
 - AI-based recruitment filters: AI-based pre-selections of candidates that may harm and/or penalise them due to implicit biases in historical recruitment data.
- Behavioural Manipulation: use of AI to influence the behaviour of individuals (customers, employees, franchisees, etc.) in a subliminal manner or by exploiting their vulnerabilities. Especially in:
 - The development or upgrade of AI-based recommendation systems that may encourage impulsive product purchasing.
- Mass Surveillance: use of AI for indiscriminate monitoring or follow-up of individuals (customers, employees, franchisees, etc.) on or off premises.
- Automated Employee Assessment: use of AI to evaluate personal or professional aspects of employees without human supervision.



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- Use of Deepfake: implementing Deepfake technologies to create misleading or counterfeit content, whether in advertising, customer interaction, or representing company employees or spokespersons.

5. AI governance model

Dia Group will establish rigorous, reasonable and effective mechanisms for accountability, including regular reviews, performance reports and feedback channels to ensure that any issues or deviations from the expected outcome of the use of AI and/or algorithms are identified and addressed promptly, and that all parties involved are responsible for their actions and decisions related to AI.

In line with the above, an AI Committee will be established, an entity dedicated to ensuring that all of our activities and developments in AI comply with the Responsible AI Use Policy.

This committee must be led by the Chief Data Officer (CDO) and must be made up by members of the Data Protection (DPO), Information Security (CISO), and Data Governance teams. Likewise, if necessary, the committee may be extended to members of the business units who require it.

6. AI training and awareness

Dia Group will provide the professionals who design, develop and/or make use of these tools with training on AI, its functioning and the consequences that may arise from the use of incomplete, biased or non-transparent algorithms and, in particular, on the impact that the misuse of AI may have on Dia Group.

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.