

**Grupo Dia  
Corporate Policies**



# Grupo Dia Corporate External Communication Policy

## 1. Context

As a listed company Grupo Dia must ensure that all information it discloses externally is accurate, consistent and in compliance with the appropriate legal and regulatory requirements. Particularly any sensitive information that when made public could affect its reputation and share price.

This duty coexists with the duty assumed by the Board of Directors which in addition to its non-delegable powers such as the determination of the company's general policies and strategies, ensures that it maintains fluid and responsible communication with all its stakeholders.

- The information relationships with the media, regulatory bodies and associations (regardless of their corporate purpose) which are represented in this Media Policy.
- Its shareholders as established in its Policy on Information, Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisors.
- Its employees as reflected in its HR Policy.
- Its customers clients as explained in its Marketing and Customer Relationship Policy, which is also applicable to the use of media advertising.

## 2. Goal and purpose

All relations with the media regarding their informative aspects and with the institutions are ruled by this Media Policy, which purposed is to protect the reputation of Grupo Dia and ensure the distribution of information in a manner that is consistent with its strategy, purpose and values.

This document describes the bases for the main verbal and written that may take place at a local and global level, as well as the processes and the tools that are commonly used to carry out this communication.

- The [corporate web](#) and its [press room](#), will always be duly updated.
- Press releases.
- The communications made through the e-mail [comunicacion@diagroup.com](mailto:comunicacion@diagroup.com).
- Any type of meeting (individual or group).
- Internal channels (Intranet, *newsletters*).
- Corporate social media ([Twitter](#), [Linkedin](#)).

## General Principles

- Information relations with the stakeholders targeted by this Media Policy are based on the principles of **honesty, transparency, prudence, respect and responsibility**.
- Grupo Dia's communication with any of its stakeholders will also guarantee the accessibility, legality, political neutrality, confidentiality and integrity contained in its Code of Ethics, in its Information Security and Anti-Corruption Policies and in the remaining company internal regulations.
- The Communication Department (hereinafter, CD) will prepare the guidelines for the **Communication Plans** over which the corporate communication framework for the entire Grupo Dia will be established.

### 3. Scope of application

This Policy is applicable to Grupo Dia and all its companies in all the territories in which it operates.

All company employees who deal with social media and institutions in its informative aspect (Public Administrations or representatives associations of any type) or are exposed to them should familiarize themselves with this document.

The CD will be responsible for reviewing it annually and assessing when it needs to be updated.

### 4. Policy development

#### **Relations with the media, institutional communications and relations with third parties**

The Grupo Dia spokesperson office framework will be defined by the DC. Only authorized employees, i.e. **spokespersons**, may disclose information to the media (printed, TV, radio and online), regulatory bodies and associations on behalf of Dia, within the framework and limitations of their responsibility.

All such inquiries made on behalf of the company (interviews / participation in public or private forums / opinions in specialized publications, blogs, podcast and any support and broadcast medium) must be addressed to the CD and executed only by authorized spokespersons.

In the case of Grupo Dia franchisees, they may not become spokespersons without the prior authorization from the CD.

## 5. Annexes

### Glossary

- **Corporate events with external impact:** interviews, public or private forums, meetings or opinions in any distribution medium (specialized publications, blogs, podcast, etc.).
- **Global Communication Management:** Team responsible for coordinating Grupo Dia's communication at a global level.
- **News fact:** knowing or having news of something.
- **Newsworthy fact:** fact worthy of being communicated or published as news.
- **Periodic financial and non-financial information:** Information about the company that is required by law to be published. Includes the annual and semi-annual Financial Report, the Non-Financial Information Statement (NFIS), the Annual Corporate Governance Report (ACGR), the Annual Report on Directors' Remuneration (ARDR) and the annual Average Payment Period to Suppliers.
- **Inside information and Other Relevant Information (ORI):** All information regarding Dia or its financial instruments that are traded in a regulated market. It will be communicated prior to its distribution to the media.
- **Trading Update:** This includes comparable like-for-like sales growth data and the net sales figure for the period (quarterly / biannually). It is released to the media once it has been communicated to the market ORI.
- **Profit and loss report and presentation of financial information to investors:** This includes the results in the annual or biannual financial report. It is distributed to the media after it is communicated to the market as ORI.
- **Stakeholders or investors:** employees, franchisees, suppliers, shareholders and creditors.