

Working the DIA way

Code of Ethics



Our mission and values

To offer consumers solutions to their food and consumer product needs, with a commitment to quality and price that is unrivalled in the market, while satisfying our employees, suppliers and shareholders, as well as the society in which we carry out our activity.

EFFECTIVENESS. We are thorough and train our teams to make decisions based on professional criteria. We look for return on our actions.

We offer our customers top-quality products and services at the best price.

INITIATIVE. We remain alert to any changes in the markets in which we operate, and anticipate future needs with creative and innovative solutions.

RESPECT. We respect our commitments. We generate an environment of trust, and accept diversity and differences in opinion. It is in this way that we work in a climate of security, credibility and personal respect.

TEAM. We work as part of a coordinated team with a shared goal. We promote positive relations to make the most of individual talent, allowing us to obtain better results.

CUSTOMERS. Customer satisfaction is our number one goal.

We know how to do things well

This Code aims to reflect and consolidate the ethical culture that already exists within our company, enabling us to focus on the best way of doing things and demonstrating the conduct that makes our values a reality.

DIA is, above all, a group of individuals who work to make the company's values a reality through their day-to-day activity. Honesty, good faith, integrity, respect and commitment are firmly rooted in our ways.

Who is the Code aimed at?

This document describes what is expected of our directors and of all those who form part of the DIA Group, including the parent company and subsidiaries.

What should we do?

There is no better way to learn than by example. We are all therefore responsible for setting an example with our conduct, and encouraging all those around us to do the same.

We must make sure that the way in which we and those around us act is consistent in form and in substance with the company's values and the principles of this Code. Only people who firmly believe that ethical conduct is the sole way of building a company that better itself each day, that earns respect and is useful to its customers, have their place in DIA.

Committed to a job well done

At DIA, doing things well has two meanings. The first of these refers to our public commitments as a company, while the second relates to how each of the men and women who form the DIA team act on an individual basis, in accordance with our mission statement, our values and the internal and external standards that govern our activity.

DIA as a company is committed, in form and substance, to an understanding of business activity that promotes respect and the rights of the company's stakeholders, protects the environment, is committed to the community and prevents bad practices such as bribery and corruption, all from a firm foundation of strict legislative compliance.

The company has adopted the commitments contained in the ten principles of the United Nations Global Compact, and undertakes to promote these principles among all its stakeholders.

DIA also expects its franchisees, suppliers, contractors and collaborating companies to conduct themselves in a way that is coherent with those principles, and reserves the right to collaborate only with those who explicitly make this commitment.

On an individual basis, doing things well means that as DIA employees we carry out our professional obligations in a manner that is coherent with the company's values and the **five principles of conduct outlined below.**

We comply with standards and respect others

Compliance with standards and respecting others form the base of our ethical conduct.

At DIA we all comply with applicable standards, whether external in the form of laws and regulations, or those included in our own internal procedures and policies. **We must act at all times in accordance with the standards that underlie our professional responsibilities**, and it goes without saying that we must be sufficiently familiar with these principles. If we have any doubt as to how to do things, it is essential that we ask our superiors or one of the company's specialised departments (human resources, legal advisory, internal audit, etc.); everyone will be willing to lend a helping hand.

It is also important to document all decisions considered relevant and/or far-reaching so that, if required, we can demonstrate to third parties that they have been taken in accordance with DIA's standards and procedures.

At DIA, our respect for others is based on an open working culture that is inclusive and founded on merit and collaboration, where the group is a priority and individuals are encouraged to give their all.

We treat our customers, suppliers, colleagues and everyone else around us in a respectful, professional manner. **At DIA there is no room for abuse of authority or harassment**, nor do we tolerate conduct that generates a hostile or intimidating working environment. We are frank when it comes to helping others to improve, but always act in a professional manner, judging the facts and not the individual. We are also open when it comes to expressing our opinions, and respectful of the opinions of others.

At DIA nobody is discriminated against on the grounds of age, gender, sexual orientation, political or religious beliefs, disability or any other circumstance. We all have the same opportunities and are assessed under the same criteria during recruitment, promotion, training and all other processes.

Our decisions and relationships are based on ethics: we say no to corruption

At DIA we are aware that individual success is rooted in the team, and that a team can only be successful when it is founded on ethical conduct.

As DIA collaborators, we go to work every day with a mission to serve others, be these our colleagues or anyone else with whom we come into contact. **Our relationships with third parties are based on integrity, objectivity and impartiality.**

The DIA team encompasses the company's collaborators and includes our franchisees and suppliers, who are critical partners when it comes to giving the best service and offering top quality to our customers. All DIA collaborators with responsibilities in the purchasing and services area should ensure that they act in an impartial and objective manner, strictly complying with the selection criteria adopted by the organisation and safeguarding the information and knowledge acquired by the company in this area.

It is imperative that the decisions we make regarding purchases and supplies are documented, so that we can show third parties that we have observed all prevailing standards and procedures.

We expressly reject bribery and corruption. When dealing with third parties **we do not offer or accept gifts, commissions, hospitality or other donations** which are more than just token gestures or which, due to their nature, could influence the course of our relationships. Any gifts you may receive should be handed over to the company and recorded. If you are unsure about this, you should contact the Ethics Committee.

We also avoid situations or decisions where it could be understood that there is a conflict between DIA's interests and our own, or where a decision we may take could benefit us or someone close to us. If you are uncertain as to whether there is a conflict of interest, please inform the Ethics Committee.

We safeguard assets and information

We are thorough, professional and loyal to the company, making the best use of the assets and resources made available to us by DIA, but never forgetting that their use is strictly for professional purposes.

Our obligation to safeguard DIA's assets includes the goods we sell and the resources provided by the company to carry out our work. This obligation also extends to the information we generate or use, including intellectual and industrial property. Through our personal and professional conduct we also protect DIA's good name and reputation, and remain alert to detect and quickly report any practices that could discredit the company's image.

The IT resources made available by DIA remain the property of the company and are for professional use only. DIA does not tolerate the use of its computers to access or distribute content of an offensive nature or which may infringe third-party rights.

The information we access should be considered as restricted, and should therefore be used in accordance with prevailing standards, such as data protection legislation. Information on the company should not be disclosed externally unless we are authorised to do so. We are therefore not permitted to divulge private information, or to use this information for our own benefit or for the benefit of others.

We are committed to offering clear and accurate information to the markets and all our stakeholders at all times. The principles of conduct followed by the organisation and each of its members include transparent and reliable financial reporting. **If we observe irregular conduct relating to the preparation of, or internal control over, such information, the issue should immediately be reported to the Ethics Committee.**

We are committed to our customers and society as a whole

We compete fairly, avoiding manipulation, fraud or any other form of conduct that may place us at an unfair advantage.

When promoting our products or the company we do so always on the basis of objective characteristics, without distorting their features or discrediting our competitors, and playing by the rules of fair competition at all times. In our view, this manner of working and interacting with others is the only way that is coherent with our aim of generating long-term, sustainable value for our shareholders.

We only sell products once they have undergone all the controls in place within the company to prevent the emergence of risks related to health, industrial property, the environment and other areas. Those of us with responsibilities in this field must make sure that we have followed all the established procedures.

When looking for information on our competitors we must do so in an ethical manner.

Our commitment also extends to health and safety and environmental protection, based on strict compliance with applicable regulations in the areas in which we work. We also promote these issues among our collaborators, ensuring that any weaknesses detected are corrected as soon as possible.

Our social commitment is multi-faceted and includes collaboration with social projects and initiatives geared towards helping the most underprivileged members of society, with a particular focus on food and childhood-related issues. When cooperating in these fields, we make sure to only work with organisations that have a solid reputation.

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

We lead by example

We are responsible for ensuring that our company maintains the ethical conduct we all strive for. Our values and principles of conduct are more than just written texts; they should influence the way in which we act every day.

This means that we should lead using our own conduct as an example for others, and that we should stay alert to prevent the emergence of irregular conduct within the company or among our collaborators.

Everyone within the company must be aware of and comply with the principles of conduct provided in this Code, as well as being familiar with the standards and procedures on which they are based. This is particularly important when it comes to health and safety issues. We are all responsible for complying with the health and safety standards applicable to our workplace, our facilities and our products, ensuring our own safety and protecting the health of our customers

We must take full advantage of the training and knowledge opportunities offered by the company. If our responsibilities include managing others, **we must strive to ensure that the people for whom we are responsible are familiar with and understand the DIA mission, values and principles of conduct, as well as the company's standards and procedures.**

We are proactive when it comes to being aware of and complying with this Code, approaching our direct superior or the Ethics Committee with any queries we have, and informing the company of any circumstances in which we perceive there may be an irregularity.

We ensure compliance: how you can help

As with the other standards defined by the company, all those who collaborate with the DIA Group must comply with the principles of conduct contained in this Code.

Our company is committed to acting diligently to detect, eradicate and prevent irregular practices or those which go against its values and principles of conduct. Acting with diligence means that our company uses a number of elements to make sure that everyone is aware of, understands and complies with this Code.

DIA will provide the resources required for its employees to become familiar with and understand the principles of conduct included in this Code, as well as the standards and procedures of which they need to be aware.

DIA has created an Ethics Committee at corporate level, the remit of which includes promoting the distribution and implementation of this Code, ensuring that it is acknowledged, understood and respected. Ethics coordinators have also been appointed at country level.

The company has created an ethics channel for consultation and information purposes, which is managed by the Ethics Committee and the ethics coordinators at country level. This channel is geared towards resolving any queries that may arise with respect to interpretation of the Code and any possible breaches of its terms. Breaches will be analysed by the Ethics Committee, and will be resolved in accordance with applicable internal and external regulations.

Any reports received (which must contain the name of the persons concerned) will be assessed and handled confidentially. Information on those involved in the issue will be managed in accordance with prevailing data protection regulations.

The company will not tolerate any form of reprisal against employees who have used this channel to report irregularities.

