



Corporate Policy

CORPORATE POLICY ON MARKETING AND COMMUNICATION WITH CUSTOMERS

Introduction

DIA establishes that in its relationships with Customers it must maintain a high commitment to honesty and professional responsibility.

Respecting commitments acquired with customers, honesty in both written and verbal relations and acting with integrity in all professional activities are objectives that have to be fulfilled.

This Guide to Good Practice in Customer relations is the document that sets out the principles that shall preside over these relationships. These principles should be understood as complementary guidelines to sector-specific regulations on advertising, the purpose of which is not to replace but rather to expand the responsibility of DIA in its relationships and communication with customers.

General Principles

/ The company's commitment to customers/society. Brand values: transparency, closeness and quality, as well as humanity and equality, and how they lead towards responsible advertising with stable principles of action.

/ Commitment to the truth and not mislead customers. Generally speaking, DIA's message is addressed to adults in a way that is transparent and comprehensible to them.

/ Our marketing and advertising practices shall conform to the laws and the decisions imposed by the authorities regulating the sector.

/ We show respect for the ethics and specific values of society through our marketing and advertising programs.

/ We recognize that the purchasing decisions of a customer may be influenced by advertising and believe that we can facilitate decision making by providing information without exerting an influence in one direction or another. The purpose of the DIA advertising message is to inform and raise awareness of the benefits of our range of products and services.

/ We believe in the right to privacy and the lawful processing of customer information and, accordingly, all of our communication practices (off line and digital) comply with the legislation in this area.

/ We maintain an ethical position in regard to advertising, environments and contexts that encourage the development of arguments concerning gender equality, sex, violence offensive behavior, discriminatory treatment towards other people, or in which the environments are not consistent with our corporate image, taking into consideration market standards and practices.

/ DIA forms part of the Spanish Advertisers Association and is guided by the principles published by this association relating to the commercial communication of its brands. It also forms part of Autocontrol, entity that guarantees consumers legal, truthful and responsible communication. Consequently, DIA adheres to what has been established as good practice in commercial communication by the sector's main bodies. In each country in which it operates, DIA will observe the good communication practice identified by the leading advertising associations or, otherwise, market practices and uses.

Specific guides:

The principles that govern our communication to customers, regardless of the means, are the following:

Legality

No mainstream media or relational DIA communication should be unworthy of the service which advertising provides to the market whose good operation it shall contribute to.

We submit ourselves to full compliance with laws and regulations, including retail sector-specific regulatory guides.

Our communication must respect current laws and especially the values, rights and principles recognized in laws.

Good faith

Our communication should never be a means to abuse the good faith of our current or potential Customers.

Misleading advertising

Our information will always be truthful and never misleading. Misleading advertising is understood to be advertising that in any way deceives or is likely to deceive those to whom it is addressed and which may change their economic behavior, whenever it has an impact on any of the following aspects:

- / The existence or nature of the good or service.
- / The main characteristics of the product, such as its availability, benefits, risks, execution, composition, accessories, method and date of manufacture or provision, delivery, fitness for purpose, usage, quantity, specification, geographical or commercial origin or the results to be expected from its use, or the results and material features of tests or checks carried out on the good or service.
- / After-sale customer assistance and complaint handling.
- / The extent of DIA's commitments, the motives for the commercial conduct and the nature of the commercial transaction or contract, as well as any statement or symbol indicating that DIA or the good or service are the object of direct or indirect sponsorship or direct or indirect approval.
- / The price or the manner in which the price is set, or the existence of a specific price advantage.
- / The need for a service, part, replacement or repair, and the modification of the price initially informed, unless there is a subsequent agreement between parties accepting this change.
- / The nature, characteristics and rights of DIA, such as its identity and solvency, qualifications, situation, approval, affiliation or connections and its ownership of industrial, commercial or intellectual property rights or any awards and distinctions it may have received.
- / Legal and conventional rights of the consumer or risks the latter might face.

Advertising will also be regarded as misleading when it omits information that the person to whom it is addressed needs in order to take an informed transactional decision and in doing so may materially distort the consumer's economic behavior. Our goal is to provide our customers with all the information they require for making purchasing decisions.

In this way, consumers will take into account all the features and circumstances of the advertising, as well as the limitations of the communication medium used. Where the medium imposes limitations of space or time, these limitations and any measures taken by the business person or professional to convey the necessary information by other means will be taken into account in deciding whether information has been omitted.

The visual presentation of our products will show as accurately and objectively as possible the reality and actual characteristics of the product, including size, content, health benefits and nutrition.

The word "new" (or similar) may not be used in regard to a product or presentation that has been on the market in the country for more than two years.

And when we say that someone is a DIA customer, they really are.

Our communication will always conform to law, ethics and truth.

Aggressive communication

Our communication shall not be aggressive. Aggressive communication is understood as that which is likely to significantly impair the freedom of choice or conduct of those to whom it is addressed, by harassment, coercion, including the use of physical force, or undue influence and, consequently, affects or may affect the consumer's economic behavior.

Exploitation of fear

Our communication will not use arguments that take advantage of fear, distress or superstitions of those to whom it is addressed. Advertisers may resort to fear as long as it is proportionate to risk, in order to encourage prudent behavior or discourage dangerous, imprudent or illegal actions.

Non-incitement to violence

Our communication will not incite violence, or suggest that there are advantages in violent or abusive behavior.

Non-incitement to illegal behavior

Our communication will not incite (or be based on) illegal behavior.

Respect for good taste

Our communication shall not include contents that cause offence against prevailing standards of good taste, social decorum and good custom.

Dangerous practices and security

Our communication shall not encourage dangerous practices, except when made in a context in which it may be specifically deduced that it promotes safety.

Discriminatory communication

Our communication shall not allude to discriminatory situations, whether in regard to race, nationality, religion, sex or sexual orientation, nor will it infringe

people's dignity. In particular, it will avoid communication that could be degrading or discriminatory for women. In our messages, we will present balanced gender roles and power relationships.

The right to dignity and honor

Our communication shall necessarily respect the right to honor, intimacy and personal image.

We do not use concepts that exploit painful or unfortunate personal situations, offensive behavior, vulgarity or bad manners.

Protection of children and adolescents

If the occasion arises to communicate to children, we must proceed with extreme caution. Such communication must not exploit the naivety, immaturity, inexperience or natural credulity of children and adolescents, or their sense of loyalty.

Advertising addressed to children or adolescents, or which is likely to influence them, shall not contain statements or visual presentations that could cause them moral, physical or mental harm.

Animal Protection

If animals are used in our communication, this shall never entail any type of abuse or cruel treatment.

Health protection

Advertising will avoid inciting its recipients, especially adolescents, to acquire habits/behaviors that could be harmful to their health.

We will not encourage the excessive consumption of any product line or category, or promote inactive, sedentary or unhealthy lifestyles or habits.

We are committed to communication that always encourages a healthy and active lifestyle.

Comparative communication

Comparative communication must respect the principles of fair competition. Therefore, it may not directly or indirectly discredit or speak ill of competing companies and products. In any case, comparisons should address analogous, relevant and objectively demonstrable aspects and, in general, should not mislead the persons to whom they are addressed.

Comparative advertising, whether direct or indirect, must respect the requirements shown below:

- a) The goods or products compared must have the same purpose and meet the same needs.
- b) The comparison must be made in objective way between one or more essential, relevant, verifiable and representative features of the goods or services, among which price may be included.
- c) In the case of products with designation of origin, geographical indication, specific designation or guaranteed traditional specialty, the comparison may only be made with others with the same designation.
- d) Goods or services cannot be presented as imitations or replicas of other goods or services to which a protected trade mark or trade name applies.
- e) The comparison may not infringe the provisions on misleading, denigrating or confusing acts, or exploitation of the reputation of others.

Common characteristics

We will not suggest that our products or services possess characteristics which are particular to them when these are common to similar products or services.

Exploitation of the prestige of others and imitation

Our communication shall not contain, either explicitly or implicitly, any reference to the distinctive signs of another advertiser, other than in legal or conventionally permitted cases or in the case of acceptable comparative advertising.

Advertisements will not imitate the general outline, text, slogan, distinctive signs, visual presentation, music, or sound effects of other national or foreign advertisements, even if the campaign has come to an end, when any of these items are protected by industrial or intellectual property rights or the advertising may create a risk of confusion among consumers, or involves taking unfair advantage of the effort or reputation of others.

Denigration

Our practices shall not implicitly or explicitly discredit or denigrate other companies, activities, products or services

Product availability

Products or services may not be offered that cannot be provided or rendered, unless the advertisement states the time or delivery period or when the service can be rendered. DIA will make every effort to guarantee the availability of products at the stores, working diligently to replenish stocks as soon as possible.

Scientific corroboration

All of the products we sell contain the nutritional information corresponding to total content and to 1 serving.

All content referring to the benefits of the product, as well as all health and nutritional claims, must be substantiated by tests, facts or evidence, in accordance with the regulations in this area.

All the information and advertising statements must be correct, scientifically substantiated, true, objective and balanced and should reflect the current state of knowledge. All statements must be adequately referenced, unless they specifically reflect product information approved by the competent Health Authorities.

Where the promotional material refers to published studies, these should be faithfully reproduced or a clear reference should be provided that makes them easy to consult.

We do not invoke the idea that consuming our brands or purchasing at our store will lead to social or sexual success.

Proof of allegations

Responsibility for proving the accuracy of the statements and allegations contained in the advertising rests with the advertiser.

Technical information

When technical, scientific or statistical data are disseminated in our communication, these shall be relevant and verifiable, and leave no room for error with regard to the individuals or legal entities, the nature of these or other supporting circumstances.

Comparative tests

The dissemination of comparative tests of products and services shall disclose the identity of the individuals or legal entities conducting them, as well as the date on which they were performed. In the case of partial dissemination, this should be carried out in an equitable manner.

Testimonials

When advertising includes recommendations and/or testimonials, that is, assertions from parties not connected to DIA and who are not acting as spokespersons for the latter, whether they are paid or not, these must be truthful, both in regard to the person recommending/testifying and the content of the recommendation and/or testimonial. DIA shall have the written authorization of the person testifying and bears the burden of proving the truth of the advertisement. Such communication may only be used as long as the above conditions are held to be valid.

Guarantees

Our communication shall not contain any reference to a guarantee that does not improve the legal position of the purchaser. The communication may

contain the words "guarantee", "guaranteed", "certified" or words having the same meaning provided that it does not deceive or is likely to deceive the consumer regarding the scope of the guarantee.

Prizes, contests, promotions

For each strategic alliance with suppliers or partners, we will choose the attributes of the relationship that best reflect our image and reputation.

The conditions and mechanics of promotions, contests and special offers will be communicated in a clear and simple manner.

The promotions will not encourage the over-consumption of a product, but rather will respond to a scheme that respects an average consumption frequency of the same.

Contest rules will be published in a clear, complete and concise manner and impartial judges will be assigned to determine the winners.

The compulsory communication information will be clearly expressed and easily understood by the general public.

Promotional advertising, such as contests or similar operations, will clearly indicate the main conditions of participation and the duration. Under no circumstances will it conceal the necessary conditions for obtaining the prize or the costs implicit in its receipt or for participating in the promotion.

Sampling

The main objective of giving out free samples is to raise customer awareness of the product and its organoleptic characteristics, in accordance with the spirit of current legislation.

Campaigns with social cause

When our communication refers to the participation of an advertiser in a charitable act or campaign, it shall scrupulously respect the principles of truthfulness and good faith.

The following rules shall also be observed:

- a) The advertiser shall disclose, explicitly, unequivocally and without being misleading, the extent of its participation in the corresponding charitable act or campaign.
- b) If the communication refers in any way to a solidarity organization, it must have the consent of the latter and shall respect the instructions it gives or the conditions under which it concedes the authorization.