

Corporate Policy

International Sanctions Compliance
Policy

01 Introduction

Distribuidora Internacional de Alimentación, S.A. and its subsidiaries companies (hereinafter, jointly, “DIA” or the “Group”) are committed to comply with all applicable laws, regulations and international conventions in all jurisdictions in which they operate.

In this regard, DIA has defined a corporate model based on a culture of compliance and integrity that ensures fair, ethical and sustainable business practices throughout all of the Group’s operations. The objective is that duties within the Group are carried out with responsibility, diligence and transparency, ensuring the early detection and prevention of risks of non-compliance that may have a negative impact on the Group, and by extension, indirectly affect our consumers, employees, suppliers, and all those involved in and affected by our operations.

According to the risks identification carried out by DIA pursuant to the DIA Risk Management Policy provisions, the violation of International Sanctions, as defined in Schedule I, (hereinafter the “International Sanctions”) is among those risks against which the Group guards itself through the adoption of internal procedures.

States and supranational organizations impose sanctions against countries, organizations and individuals, which infringe internationally accepted rules as they have been identified as being involved in weapons proliferation, terrorist organizations or violations of human rights. For further information, see the concept of International Sanctions described in Schedule I of this Policy.

Non-compliance with International Sanctions regulations can expose the Group as well as individual managers and employees to civil, regulatory and criminal penalties, including substantial economic fines and/or imprisonment. Further, any behavior contrary to the International Sanctions regulations will result in the infringement of the values of the Group, which will not be tolerated.

DIA will carry out all its activities in accordance with the legislation in force in all fields of action and in all the countries in which it operates, in accordance with its spirit and purpose.

Accordingly, in compliance with sanctions applicable to DIA and taken by the EU, any individual EU state, the UK, the UN, the US and any other sanctions authority in a country in which DIA operates, have or could have any kind of interest, the Group will refrain from conducting any business that breaches International Sanctions as it involves engaging or acting for the benefit of a sanctioned person or country.

In doing so, the Group has resolved to develop a specific policy that, in harmony with the Code of Ethics of the Group and the Corporate Risk Management Policy, provides general guidelines that will support the Group's efforts to comply with International Sanctions regulations and to halt any conduct that does not comply as soon as reasonably possible after its discovery (hereinafter the "Policy").

02 Applicability

This Policy is applicable, without limitation, to all the Group companies, directors, officers, employees and contracted staff wherever located and any other associated persons performing activities in relation to the Group (hereinafter, the "Obligated Persons").

The Group shall apply and incorporate this Policy in its business practices.

All the Obligated Persons shall comply with this Policy and its provisions and shall perform their business practices in compliance with this Policy. Likewise, Obligated Persons are responsible for ensuring that risks are effectively managed in relation to activities falling within their responsibilities in order to comply with the applicable laws and internal and external regulations.

03 Objective and scope

The aim of this Policy is to establish a regulatory framework regarding International Sanctions for all the scenarios in which the Group may be involved in the performance of its business activities and to establish an authorization procedure that allows the Group to maintain control of all the relationships established with Third Parties (as defined below) as well as those responsible for such processes.

Likewise, the Group aims to protect the entities that comprise the Group from becoming involved in business activities with Third Parties such as employees, commercial suppliers, financial suppliers, agents, distributors and investors (hereinafter a “Third Party” or “Third Parties”) who may be subject to International Sanctions. This includes the screening obligations under trade sanctions laws as well as a description of the internal organization in relation to International Sanctions, and the consequences of non-compliance with this Policy.

International Sanctions are targeted against activities, countries, organizations or individuals contained in lists. This Policy requires, as a general rule, all potential business partners or new activities or business to be carried out by DIA have to be checked against the relevant International Sanctions lists before establishing a business relationship with them and monitored regularly during the course of the business relationship.

This Policy does not provide detailed guidance on the specific restrictions that exist under different national sanctions regimes, nor the extent to which licenses or authorizations are available that would permit activities that are otherwise prohibited by International Sanctions.

04 Principles

The principles of action of the Policy are as follows:

1. Comply with current legislation and with internal regulations, acting in accordance with the values and the Code of Ethics of the Group.
2. Provide the necessary human and material resources so that, in an efficient manner, the work of promotion of this Policy can be carried out, as well as implementing the methods for the prevention and detection of illegal actions.
3. Implement the models for oversight and prevention of misconduct in relation with the International Sanctions regulations for all of the companies that are included within the Group.
4. Analyze and investigate, as quickly as possible, any report on conduct that is contrary to this Policy, the Code of Ethics of the Group or external or internal regulations, applying the principles of confidentiality, non-reprisal, and protection of

personal information for all persons affected by the investigation process, with particular attention in relation to the reporting and reported person.

5. Collaborate and cooperate with the State's security forces and any judicial or administrative body, in relation to the investigation of alleged violations by the Obligated Persons of the Group.
6. Provide suitable ongoing training, whether in person or through e-learning, to all of the directors, officers and employees of the Group, placing special emphasis on the International Sanctions related obligations.
7. Impose relevant disciplinary measures on persons responsible for any non-compliance with this Policy, and on those who, with their behavior, cover up or prevent the investigation or clarification of the alleged infringements, all of this in accordance with the penalty scheme applicable in each jurisdiction to each company of the Group.

05 Due Diligence, screening obligations and authorizations

05.1 Introduction

Due diligence and screening obligations are established to assist with the identification of restricted individuals and organizations, as well as restricted activities to which the Group may be exposed. It helps identify areas of potential International Sanctions concern and assists in making appropriately compliant risk decisions. Any due diligence and screening processes pursuant to this Policy may be carried out in connection with, and without conflict with, the rest of compliance procedures established within the Company.

It is important that the Obligated Persons are aware that any goods or services provided to the Group or provided by the Group, which may be linked to restricted or sanctioned persons or entities, may present reputational risk to the Group and may lead to criminal charges, economic sanctions, embargoes, disqualification of directors, disqualification of the group from being able to operate or trade, etc., being brought against the Group and/or the Obligated Persons.

05.2 Due Diligence on new Third Parties

During the preliminary process of contracting any Third Party, it is mandatory to carry out a due diligence process by means of which at least the information and/or documentation included in Schedule II is collected. Additionally it is mandatory to obtain from the Third Party the International Sanctions exposure questionnaire included in Schedule IV duly completed. With this questionnaire, DIA is intended to obtain additional information with regard to any ties or links of the Third Party with any activity, country, organization, entity or persons affected by the International Sanctions to the extent that this may imply a risk for DIA's businesses.

It will be necessary to ensure that all information and documentation obtained regarding the Third Party and the goods or services that will be provided to the Group, are adequate and accurate.

All the information and documentation obtained from the Third Party as well as the International Sanctions exposure questionnaire must be stored as detailed in the record retention clause of this Policy. The person in charge to carry out the transaction or responsible of the business relationship with the Third Party, i.e. sales manager, country manager, category manager, brand manager, IT responsible, procurement manager, etc. (hereinafter, the "Relevant Manager") is responsible for performing all the duties related to the due diligence process and ensuring that the International Sanctions exposure questionnaire is duly completed by the Third Party. In this sense, the Group should have a database with all this information.

Any other documentation or information additional to the one mentioned above, which is considered relevant depending on the case, may be requested and stored when obtained.

05.3 Screening Obligations

05.3.1 Screening Obligations on new Third Parties

Once the due diligence process has been completed, and before any contract is signed with the Third Party any relationship is begun, a screening process will be carried out in order to reduce or eliminate risk of violating International Sanctions.

The Relevant Manager must conduct the screening process, which consist of:

- Screening the details of the gathered documentation/information against the International Sanctions lists through the IT tool provided by the Company.
- Identifying the transaction's value.

The screening process may result in the following:

- The Third Party, its activities or its commercial or professional partners are not included in the International Sanctions lists, as defined in Schedule I: regardless of the transaction's value, it can be considered as a 'safe party' and the transaction shall be authorized as provided in section 5.4.1 of this Policy.

The Third Party is included in the International Sanctions lists or it has commercial or professional ties with any activity, entity, organization or person included in the International Sanctions lists: the transaction should be escalated for authorization according to the authorization process established in section 5.4.2 in order to take a decision on whether to undertake the business relationship with the Third Party or not. All employees must use their best endeavours to ensure, on a risk-sensitive basis, that any agreement entered by the Group contains a description of the services to be provided and appropriate wording to address their compliance with International Sanctions in a manner consistent with this Policy.

A report with the result of the screening process must be stored with all the information resulting from the due diligence process as described in section 5.2 above and in the record retention clause of this Policy.

05.3.2 Ongoing screening obligations

In the event that the Group holds an ongoing business relationship with a Third Party, the Relevant Manager must conduct a regular screening process additional to the initial screening established in section 5.3.1 above and update the Group's database with the new information from the Third Party. Specifically, the name and main data must be reviewed and, if necessary, added or updated, and the Third Party must be checked against the sanctions lists through the IT tool used by the Group on the basis of the new information obtained.

This additional screening will occur, at least:

- Before each renewal of a contract;
- when DIA is aware about changes in information listed in Schedule II; and
- in any case once a year.

05.4 Authorization procedure

05.4.1 In case of favorable Due Diligence and screening procedure

In the event that no risk is identified in accordance with section 5.3 above, the authorization procedure for new Third Parties will be carried out as follows:

- After the completion of the due diligence and screening process, the Country Compliance Officer must ensure that all the information required under this Policy has been gathered¹.
- After this revision, the Country Compliance Officer shall communicate the Relevant Manager if the process has been duly completed and the transaction can be carried out or, for the contrary, if any further information is required in order to complete the due diligence and screening process.

¹ The position of the Country Compliance Officer exists only in those countries in which DIA has retail presence. The Country Compliance Officer is the person in charge of the compliance matters within the relevant country.

The Country Compliance Officer must prepare a half year report that shall include, at least, a list of the authorized transactions identifying the Third Party involved, and all the details of the due diligence, screening and authorization process followed.

The report will be sent to the Group's Compliance Officer for his/her acknowledgement.

05.4.2 In case of unfavorable Due Diligence and screening procedure

In the event that a risk or potential risk is identified, the Country Compliance Officer must be notified immediately by the Relevant Manager. The Country Compliance Officer must undertake any enquiries as may be necessary to determine whether the relationship, agreement or transaction with the Third Party is permitted or not under International Sanctions.

Thus, the Country Compliance Officer will prepare a report containing the main aspects of the proposed authorization, or for the contrary, the reasons why authorization must be denied and no business relationship with such Third Party should be maintained.

The report will be submitted to the Group's Compliance Officer for his/her consideration and if the case, its approval. The Group's Compliance Officer will assess the level of risk of the transaction with the Third Party according to the Corporate Risk Management System. In order to perform such assessment, the Country Compliance Officer and the manager of the area in which the transaction is intended to be carried out may be required to provide with additional information regarding the Third Party. As a result, of such analysis the transaction could be approved directly by the Group's Compliance Officer or for the contrary, should be escalated to the Audit and Compliance Committee for its review. The Audit and Compliance Committee shall analyze all the information regarding the transaction and inform DIA's Board of Directors in order to authorize or reject the transaction.

Once the transaction has been approved by DIA's Board of Directors, the Group's Compliance Officer will inform the Country Compliance Officer, who will communicate the decision to the Relevant Manager that raised the risk.

Once the transaction with the Third Party has been authorized, it will be mandatory to include its name and main data in the database that the Group must have in relation to contracted Third Parties.

06 Contractual clause

It will be mandatory for any Obligated Person to include the contractual clause drafted and communicated from time to time by the Group Compliance Department, in each of the contracts or transactions that are carried out by the Group with Third Parties.

In this sense, the contractual clause may be adapted to each case or transaction and any more restrictive determination may be added, but in no case may its scope be reduced, nor may its main content be modified if its purpose is distorted. A standard contractual clause is proposed in Schedule III

Where there is any doubt about the contractual clause, the employee must ask to the Country Compliance Officer that may raise the question to the Group's Compliance Department if necessary.

07 Roles responsibilities

07.1 Approval of this Policy

This Policy has been approved by DIA's Board of Directors, assisted by the Audit and Compliance Committee pursuant to article 5 of DIA's Board of Directors Regulations and article 9 of DIA's Audit and Compliance Committee Regulations.

Any amendment to this Policy must be approved by DIA's Board of Directors, following a prior report from DIA's Audit and Compliance Committee.

07.2 Supervision, communication and training

The Group's Compliance Officer is responsible for implementing this Policy and ensuring its compliance across all companies, their employees and any territories where the Group

operates, monitoring its effectiveness, overseeing the audit of internal controls and procedures and reviewing, on an ongoing basis, the adequacy of all Third Party compliance services.

Country Compliance Officers assist the Group's Compliance Officer in the sanctions risk assessment for the Group within the territory or State where the Group conducts operations, i.e., Portugal, Spain, Brazil, Switzerland, Luxemburg and Argentina. Specifically, the Group's Compliance Officer and the Country Compliance Officers have responsibility for ensuring the compliance with this Policy, as well as ensuring it is effectively communicated to those who are required to comply with it within the region they supervise.

The Group shall provide training on the applicability of the Policy to the employees. The Group's Compliance Officer shall determine the content of the training and the relevant employees who will be required to complete the training.

Therefore, all employees will receive training in relation to this Policy and the training shall include, at least, the following:

- The regulations relating to the International Sanctions.
- This Policy and any other specific procedures that may be approved.
- Identification of risk.
- Prevention of sanctions risk.
- Management of sanctions risk.
- How to mitigate sanctions risk.

New joiners will receive training as part of the induction process. Further training will be provided at least once a year or whenever there is a substantial change in the law or this Policy.

Country Compliance Officers will maintain a record of all the members that have been trained on this Policy and sanctions risk, as well as the whole details of the training (i.e. date, subjects covered by the training, trainer's name).

The Group's Compliance Officer is responsible for coordinating the provision of training and for ensuring that all the employees are informed promptly about any changes to applicable regulations and guidance. In the event that any employee requires further training on any aspect of the relevant regulation, the Policy or its procedures, they should contact the

relevant Country Compliance Officer, who may periodically inform the Group's Compliance Officer about the request received.

The Group's Compliance Officer, through the Country Compliance Officers, is responsible for resolving any questions or concerns that may arise with respect to this Policy.

07.3 Review and report

This Policy shall be reviewed on a regular basis, but at least once a year in order to ensure that the Policy is up to date and reflects the reality of the Group and all changes in applicable laws and regulations. The overview of International Sanctions regimes shall be updated at least annually, and on an ad hoc basis if considered appropriate due to changes in the applicable laws and regulations.

The Group's Compliance Officer will be responsible for the review and update of this Policy and the overview of International Sanctions regimes.

Any proposed changes to this Policy will be submitted to the Audit and Compliance Committee to inform DIA's Board of Directors for its approval. The Group's Compliance Officer is responsible for ensuring that any changes to this Policy are promptly communicated to all employees.

The Group's Compliance Officer shall prepare an annual report informing the Audit and Compliance Committee the level of compliance carried out by the Group in accordance with this Policy as well as the information on the training received by the Group's employees in this matter. In addition, the annual report shall include any anomalies detected by the Group's Compliance Officer and any changes to this Policy.

The Group's Compliance Officer is responsible for assessing sanctions risks for the Group and will ensure that the risk assessment is reviewed at least annually, and on a more frequent ad hoc basis if considered appropriate.

07.4 Audit

Audits and risk assessment should be conducted to monitor compliance with and effectiveness of this Policy. These controls will also aim to identify any anomalies or

problems that may arise with respect to compliance with this Policy and the degree of training that has been provided to employees in order to mitigate any potential risk of International Sanctions.

This task will be carried out by the internal auditors and if needed, assisted by those external advisors selected by the Group's Compliance Officer, and the Audit and Compliance Committee who, working together, must maintain fluid communication and inform each other of any anomaly or issue they detect. The results obtained by both the Group's Compliance Officer and the Audit and Compliance Committee will be used to help identify and implement appropriate systems and controls to mitigate and/or resolve any potential or actual risks identified.

08 Record retention

Any information that may be needed in the future related to this Policy or its compliance will be duly stored by the Group. Likewise, each Relevant Manager has to keep record of any information related to any Third Parties such as suppliers, customers and/or employees that has been requested or obtained during the due diligence, screening or authorization procedure, as well as the refusal, suspension or termination of the business relationship.

The Group's Compliance Officer will make sure that the records are correctly retained on an adequate system and will be engaged to monitor the storage annually. The storage of the information and documentation shall be carried out in a controlled, accessible and digitized manner. The Country Compliance Officers will be able to access to any information.

The Group will retain the records either during the relationship with Third Parties and for at least five years after the relationship ends. The Group's Compliance Officer may increase this period if considered appropriate.

09 Reporting and investigations

All the staff should report immediately to the Country Compliance Officer any suspicion, thought, breach or potential breach of this Policy.

In case of a suspected breach of International Sanctions, the Country Compliance Officer should carry out an investigation, prior to any notification to the Group's Compliance Officer, in order to gather enough information about the breach.

The investigation should be approached as follows:

1. Identify which area or department may be affected.
2. Gather all the information in connection with the transaction and, in particular, to check if the due diligence and screening processes have been carried out correctly.
3. In the event that the suspected breach is confirmed, identify the cause of the breach.
4. Prepare recommendations for remedial actions to be taken, to address the breach or to mitigate its possible adverse effects and prevail from falling in the same breach once again.

Once all the investigation is completed, the Country Compliance Officer shall prepare a report, comprising the facts relating to the breach and his/her recommendations for remedial actions. The Country Compliance Officer shall notify the Group's Compliance Officer and he/she shall determine the appropriate response to the breach and if appropriate will inform the Audit and Compliance Committee in order to find the best response.

In the case of situations of special risk, as indicated in the risk tolerance section, the Audit and Compliance Committee, after having carried out an analysis, will inform DIA's Board of Directors. Moreover, the Group's Compliance Officer will prepare a report at least annually, and on an ad hoc basis if considered appropriate in relation to the compliance of this Policy and any anomalies or problems detected. Such report shall be addressed to the Audit and Compliance Committee for their consideration and acknowledgement.

If considered appropriate by the Group's Compliance Officer and the Audit and Compliance Committee, anything that might constitute a breach or potential breach of International Sanctions should be reported it to the relevant public authorities for its investigation and clarification

10 Adherence to the Policy

The Group's Compliance Officer will ensure that all the Obligated Persons are familiar with the Policy and confirm their acknowledgement and understanding to the Policy on an annual basis.

Likewise, any Third Parties with which the Group holds business relationships will be made aware of the existence of this Policy and, when required, they will be requested to confirm acknowledgement and understanding of this Policy in writing.

11 Risk Tolerance

The Group does not tolerate any breach of the requirements set forth in this Policy that could jeopardise the soundness and integrity of the Group or damage the public trust and confidence.

After applying internal controls such as due diligence and screening obligations, the Group has established a robust control environment, which reduces the risk of a breach.

As established in clauses 5.4.2 and 9, in the event that doubts or discrepancies arise regarding the risk that a Third Party or a specific business relationship may cause to the Group, the Group's Compliance Department will assess the level of risk of the transaction with the Third Party according to the Corporate Risk Management System. As a result of such risk analysis, the transaction could be approved directly by the Group's Compliance Officer or for the contrary, should be escalated to the Audit and Compliance Committee for its review. The Audit and Compliance Committee shall analyze all the information regarding the transaction and inform DIA's Board of Directors in order to authorize or reject the transaction.

DIA's Board of Directors will authorize or reject the relevant transaction in accordance with the risk appetite approved for the Group.

12 Non-Compliance

Any violation of the provisions included in his Policy may lead to disciplinary actions, up to and including termination of employment. Employees who, after consultation with appropriate personnel, decline to enter into a transaction because of concerns regarding trade sanctions will not be negatively affected.

13 Transitional provision

As a transitional measure, all the duties related to the screening process will be assumed temporarily by each Country Compliance Department. This transitional measure will be enforced until the person in charge to carry out the transaction or responsible of the business relationship with the Third Party is provided with the appropriate means to conduct by himself/herself such duties.

This Policy was approved by the board of directors of Distribuidora Internacional de Alimentación, S.A. at the meeting held on 19 February 2020. It will remain in force until the board of directors approves its update, review or derogation.

SCHEDULE I – CONCEPT OF INTERNATIONAL SANCTIONS

The terms 'International Sanctions', 'trade sanctions' or just 'sanctions' refers to laws and regulations that restrict dealings with targeted individuals, governments, organizations, groups and non-state entities, with the aim of modifying a certain behavior or weakening the position of all those who pose a threat to international peace and security.

Such restrictions may include:

- General or partial prohibitions to trade with individuals or entities listed on applicable assets freeze lists, or with entities owned or controlled by entities on the lists referred to above
- Travel bans
- Restrictions related to the export of telecommunications services and software
- Rejection of claims and other legal actions and contracts the performance of which is affected by restrictive measures will not be assessed.
- Financial embargoes that prohibit placing assets of any kind at the disposal of sanctioned parties or providing them with financial services of any kind.

These measures are imposed by states and supranational organizations like the European Union (EU), which in many cases implement United Nations (UN) Security Council sanctions through a diversity of legal measures that whoever imposes them enforces with more or less severity, as required to achieve the ultimate objectives for which they have been imposed.

Moreover, the targets of International Sanctions and nature of the restrictions imposed by International Sanctions are subject to change on a regular basis and the modifications sometimes do not respond to the adaptation of the realities they regulate, but follow interests and events of a political (and, indirectly, economic) nature and are therefore especially exposed to sudden, immediate and (sometimes) unforeseeable changes.

For compliance purposes, it is therefore essential to maintain up-to-date information about all International Sanctions that apply to the business as penalties for violating trade sanctions can be severe, including large fines or imprisonment, as well as posing substantial reputational risk for the company.

Of particular importance are the UN, EU and the United States of America (US) sanctions, given that the latter implement, by transposition or extension, the restrictions proposed by the former and that the Group conducts a significant proportion of its business in those territories.

- UN Sanctions Regime

Chapter VII of the Charter of the United Nations provides the legal basis for the imposition of coercive measures within the United Nations. Sanctions are adopted through a Security Council Resolution.

They apply to any entity or national citizen of a UN member state.

- EU Sanctions Regime

Within the EU, restrictive measures are configured as a key tool of the Common Foreign and Security Policy (CFSP) for the defense of its strategic interests and the protection of its fundamental objectives abroad.

Sanctions are imposed by Council Decision and implemented through Regulations to be applied by the Member States, who will be responsible for taking action against infringements of International Sanctions.

EU Sanctions apply to:

- EU companies and nationals;
- Non-EU companies and non-EU national employees in relation to anything they do in the EU and any business conducted wholly or partly in the EU.

For further information about the EU sanctions regime, you can visit the following site:

Overview of EU Sanctions: <https://www.sanctionsmap.eu/#/main>

- US Sanctions Regime

The US sanctions regime is particularly complex, which makes it is very necessary to resort to the lists of sanctioned subjects published by the Office of Foreign Assets Control (OFAC), the government agency which takes action. In general, it is the Specially Designated Nationals and Blocked Persons List (SDN), and the OFAC publishes specific lists.

In the American system, the Congress delegates the power to impose embargoes to the President, who applies them through the so-called Executive Orders. In addition, there are laws that sanction specific countries (Cuba, Iran, Libya).

US Sanctions apply to:

- US companies and their overseas branches, including non-US subsidiaries, US citizens and permanent residents, in relation to anything they do anywhere in the world; and
- Non-US companies and non-US nationals in relation to anything they do in the US and in relation to any transaction that may concern the US (the so-called "secondary sanctions").

It should be noted that general or specific licenses may be granted in order to carry out transactions with sanctioned countries or entities.

For further information about the EU sanctions regime, you can visit the following sites:

The United States Office of Foreign Assets Control (OFAC):

<https://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-AssetsControl.aspx>

Overview of US Sanctions:

<http://www.treasury.gov/resourcecenter/sanctions/Programs/Pages/Programs.aspx>

OFAC Specially Designated Nationals and Blocked Persons List Search:

<http://sdnsearch.ofac.treas.gov/Default.aspx>

SCHEDULE II – INFORMATION AND DOCUMENTATION REQUIRED FOR THE DUE DILIGENCE PROCESS

Details of the Third Party (entities):

▪ Company's name	
▪ Incorporation information (i.e. Incorporation public deed)	
▪ Address	
▪ Business sector/activity	
▪ Countries where business is conducted	
▪ Names of all directors	
▪ Authorized signatories	
▪ Ultimate beneficial owner	

It is mandatory to gather all the supporting documentation that accredits the information collected.

Details of the Third Party (natural person):

▪ Name and surnames	
▪ Address	
▪ Business sector/activity	
▪ Countries where business is conducted	

SCHEDULE III – STANDARD CONTRACTUAL CLAUSE

“The Supplier warrants and represents that:

- Neither it nor its subsidiaries, directors, officers, agents, employees, affiliates and/or representatives, are owned, controlled, related, located, organized by any entity, person, country or territory that are subject to any general export, import, financial, investment embargo or assets freeze sanctions administered or enforced by the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC"), the United Nations Security Council, the European Union, Her Majesty's Treasury (UK), or other relevant sanctions authorities, including designation on OFAC's Specially Designated Nationals and Blocked Persons List, OFAC's Foreign Sanctions Evaders List or other similar applicable legislation or rules (hereinafter "Sanctions").
- Neither it nor its subsidiaries, directors, officers, agents, employees, affiliates and/or representatives, buy, obtain, acquire, invest in, procure, sell, trade, dispose of, barter or perform any activity, directly or indirectly in or involving any country or territory subject to Sanctions.
- Neither it nor its subsidiaries, directors, officers, agents, employees, affiliates and/or representatives are involved in or will perform transactions in connection with financial resources, assets, goods, capitals or securities derived, originated, hold, kept or owned from any entity or person subject to Sanctions.

Within a maximum timeframe of 48 hours from its knowledge, the Supplier is obliged to give a written notice to DIA group and/or its affiliates, if any action carried out by the Supplier may be considered a violation of, inconsistent with, or expose DIA Group and/or its affiliates to punitive measures under Sanctions.

DIA Group and any of its affiliates may terminate this agreement forthwith upon written notice to the other party at any time, if in its reasonable judgment, supported by credible evidence, the Supplier is in breach of any of the above warranties and representations under this clause related to Sanctions.

The Supplier shall be solely liable for any breach of their obligations related to Sanctions and herewith detailed, and therefore no liability shall arise for DIA Group and any of its affiliates, which shall not be liable to be prosecuted or pursued by any court for such breach by the Supplier. In the event that DIA Group is sanctioned for non-compliance with the sanctions regulations by reason of information received under this clause, DIA Group shall have a right of recourse against the Supplier, who must hold harmless DIA Group from any penalty, sanction, liability or in general, any kind of damage suffered by DIA Group."

SCHEDULE IV – INTERNATIONAL SANCTIONS EXPOSURE QUESTIONNAIRE

New Third Parties

Please note that you are receiving this questionnaire in compliance with the International Sanctions Compliance Policy of DIA Group.

DIA Group is committed to comply with all applicable laws, regulations and international conventions in all jurisdictions in which it operates. In this regard, DIA Group has established a procedure for avoid and mitigate potential International Sanctions.

The purpose of this form is to ask questions that seek to best identify and understand the nature of DIA’s suppliers and client’s activities and their extent with certain sensitive sanctioned countries and list based sanctions regimes.

The sanctioned countries infringe internationally accepted behavior and regulations as they have been identified as being involved in weapons proliferation, as terrorists or supporters of terrorist organizations, as violators of human rights, or involved in corruption and bribery.

Please answer all the questions when applicable.

Legal Entity Name/Natural person:

Country of incorporation/residence:

Branch Location (where applicable):

Business Sector:

1. Do you/the company have any subsidiary, branch, permanent establishment, office or other kind of presence in a sanctioned country? If yes, please specify the sanctioned country, nature of business / operations and some further details.

Business/Operation	Country	Details

2. Do you/the company trade in goods or services that directly or indirectly involves individuals, entities, organizations or states which are currently targeted by International Sanctions? If yes, please provide details.

YES

NO

3. Do you/the company have any current business activity² involving directly or indirectly individuals, entities, organizations or states, which are currently targeted by International Sanctions? If yes, please provide details.

YES

NO

4. Do you/the company business/transactions on behalf of a third party, involving individuals, entities, organizations or estates, which are currently targeted by international Sanctions? If yes provide details.

YES

NO

² “Business activities” includes any activity a business engages in for the primary purpose of making a profit. In general terms this may include any suppliers, customers, agents, investments in bonds or/and securities, transportation, lenders, trustees, operations with state owned or controlled entities etc.