

2016 COMPANY INDICATORS



S02 Corruption risk analysis _____ 2

S07 Unfair competition behavior _____ 5

S03 Employees trained in the organization's anti-corruption policies _____ 3

S08 Significant fines and sanctions _____ 6

S04 Measures taken with regard to incidents of corruption _____ 4

Has the company conducted a risk analysis of issues related to corruption?	
Spain	Yes
Argentina	No
Brazil	Yes
Portugal	Yes
China	Yes
State the nature of risk analysis aspects.	
Spain	Continued risk monitoring through the company's risk management system with indicators from the reporting channel and from the crime prevention plan. 1. DIA Group Ethics Code: In the wording of the ethics code for the DIA Group, one of the five principles for behaviour is to be ethical in terms of our decisions and relationships while avoiding corruption. Employees have been taught not to accept gifts or other favours from product or service providers. Additionally, a thorough corruption risk analysis has been undertaken. 2. Crime Prevention Plan: The DIA Group in Spain has a crime prevention scheme whose aim is to establish the most appropriate internal procedures and policies to prevent the commission of crimes in our organisation and, if applicable, to mitigate and/or release our company of liability. For said purposes, the business activities undertaken by the different DIA business areas were analysed and the risk of each activity in terms of the possible commission of a crime (probability and impact) was evaluated taking into account the measures already in place at DIA to mitigate risks. Likewise, an individual was designated to be responsible for prevention within the organisation. Said individual reports to the Regulatory Compliance Director and is responsible for the maintenance and proper workings of the prevention scheme. 3. Corporate Policy to prevent crimes and corruption, approved by the DIA Group's board of directors and published on the corporate website. 4. Additionally, the DIA Group has undertaken an anti-fraud programme with the aim of preventing and detecting fraudulent situations.
Argentina	DIA Argentina, just like the rest of the Group, has an "Ethics Code" which is known by and applicable to 100% of its workers.
Brazil	Corruption-related risks have been analysed and these are part of the Anti-Fraud Plan that is currently under way. On 02.09.2016, managers received training on general crimes, including corruption, and training on Brazilian law 12406/13 (the "Ethical Company Law", known in Portuguese as the "Lei da empresa limpa"). In addition to this, in the wording of the ethics code for the DIA Group, one of the five principles for behaviour is to be ethical in terms of our decisions and relationships while avoiding corruption. Employees have been taught not to accept gifts or other favours from product or service providers.
Portugal	The anti-fraud programme aims to analyse conditions which may imply fraud risk. Its aim is to create procedures to mitigate risks.
China	It has not conducted a thorough analysis of risks related to corruption. In the drafting of the code of ethics applicable to DIA Group, one of the five principles of behavior is to be ethical in our decisions and relationships, avoiding corruption. It has raised employees awareness so that they do not accept gifts or attentions from suppliers or service providers. Anti-fraud project Implementation is pending.

S03**Employees trained in the organization's anti-corruption policies**

Number of workers trained in the prevention of corruption		
Comentarios		
Spain	100%	Through the Ethics Code Implementation Process and the training related thereto, undertaken via e-learning and provided to the office staff. In warehouses and stores, on-site training is undertaken through the welcome module for new hires.
Argentina	100%	DIA Argentina, just like the rest of the Group, has an "Ethics Code" that includes "saying no to corruption" as a principle. As all workers are familiar with the ethics code, the value expressed shows the percentage of awareness thereof
Brazil	0,33%	Training for managers as of 02.09.2016.
Portugal	0%	There are general instructions to guarantee anti-corruption measures; however, there is not specific training
China	100%	

S04 Measures taken with regard to incidents of corruption

Have there been any dismissal or sanction of workers related to corruption issues, or a cancellation of contracts with companies on these grounds?	
Spain	No
Argentina	No
Brazil	No
Portugal	Yes
China	No
Describe the measures taken in response to incidents of corruption	
Portugal	Dismissal
Number of open trials and litigation of this nature	
Spain	0
Argentina	0
Brazil	0
Portugal	1
China	0

S07 **Unfair competition behavior**

Total number of actions for causes related to monopolistic practices and anti-competitive	
Spain	0
Argentina	0
Brazil	0
Portugal	0
China	0

S08 Significant fines and sanctions

Legal: Important sanctions and fines	
Spain	Yes
Argentina	No
Brazil	No
Portugal	No
China	No
Total amount of sanctions [EUR]	
Spain	60.102 €
Indicate the reasons for the sanctions imposed	
Spain	Fines for the sale of alcohol to minors in shops. Pending payment