## Corruption risk analysis

<table>
<thead>
<tr>
<th>Country</th>
<th>Has the company conducted a risk analysis of issues related to corruption?</th>
<th>State the nature of risk analysis aspects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spain</td>
<td>Yes</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
<tr>
<td>Francia</td>
<td>No</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
<tr>
<td>Argentina</td>
<td>No</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
<tr>
<td>Brazil</td>
<td>Yes</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
<tr>
<td>Portugal</td>
<td>No</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
<tr>
<td>China</td>
<td>No</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
<tr>
<td>Turkey</td>
<td>Yes</td>
<td>Crime Prevention Plan: DIA has implemented a model of crime prevention in order to establish the procedures and internal control policies more appropriate to prevent the commission of acts contrary to the law and, where appropriate, to mitigate or hold harmless the Company after the reform of the Organic Law 10/1995 of the Penal Code. To this end, we have analyzed the activities of the different business areas of DIA and evaluated the risk of each activity in relation to the commission of offenses in terms of likelihood and impact, taking into account the controls already in place by DIA to mitigate risks. It has also been designated within one organization responsible for prevention, which will report to the DCN and the Ethics Committee at the corporate level and is responsible for the proper maintenance and operation of the prevention model.</td>
</tr>
</tbody>
</table>

## Comments

- **Spain**: There are no written processes specifically dedicated to corruption but company through referencing process, economic dependance policy, training, ethic code or power of attorney has some tools to prevent corruption risks. A written process should be done in 2013.
- **Brazil**: There is no corruption risk analysis but there is an anti-corruption guide.
<table>
<thead>
<tr>
<th>Country</th>
<th>Number of workers trained in the prevention of corruption</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spain</td>
<td>0</td>
</tr>
<tr>
<td>France</td>
<td>0</td>
</tr>
<tr>
<td>Argentina</td>
<td>0</td>
</tr>
<tr>
<td>Brazil</td>
<td>4,502</td>
</tr>
<tr>
<td>Portugal</td>
<td>0</td>
</tr>
<tr>
<td>China</td>
<td>0</td>
</tr>
<tr>
<td>Turkey</td>
<td>0</td>
</tr>
</tbody>
</table>

- **Spain**: Workers have not been specifically trained in corruption prevention. However, corruption was part of some business formation processes.
- **Brazil**: There are general instructions to ensure implementation of the anti-corruption but there is no specific training for workers in preventing corruption.
- **N/A**: N/A
<table>
<thead>
<tr>
<th>Country</th>
<th>Spain</th>
<th>France</th>
<th>Argentina</th>
<th>Brazil</th>
<th>Portugal</th>
<th>China</th>
<th>Turkey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Results</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

HR Department and Ethics Committee maintains communication with the staff concerned and, if the staff cannot justify their behavior, the contract is restricted or persuaded to resign, if from the company does not have sufficient evidence to dismiss, or proceed to transfer to another post.

<table>
<thead>
<tr>
<th>Country</th>
<th>Spain</th>
<th>France</th>
<th>Argentina</th>
<th>Brazil</th>
<th>Portugal</th>
<th>China</th>
<th>Turkey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trials</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Country</td>
<td>Public Policy Information</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td>------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spain</td>
<td>The company policy regarding public policy is completely neutral.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>France</td>
<td>We follow the policy established by the French government called the “Grenelle de l’environnement”.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Argentina</td>
<td>The position of the company in Argentina is neutral to any political position.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brazil</td>
<td>DIA Brasil rely on the rules and regulations of public policies established by Group DIA, always observing and adapting to regional laws and regulations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Portugal</td>
<td>There is no corporate policy on public policies.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>China</td>
<td>The company defends the interests of the industry through their participation in the sectorial association.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Turkey</td>
<td>To protect our interests and make lobbying to public authorities we have joined FCD (French Federation for Trade and retail store) and Perifem (French technical association for retail stores).</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spain</td>
<td>While there is no explicit policy of lobbying we have an interest in the ASU (united supermarket association).</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brazil</td>
<td>DIA Brasil has no policy of Lobbying.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Portugal</td>
<td>As a company, DIA is not directly involved in any lobbying activity.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>China</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Turkey</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Financial and in-kind contributions to political parties, politicians, and related institutions

<table>
<thead>
<tr>
<th>Country</th>
<th>Total value of financial and in-kind contributions to political parties, politicians, and related institutions [EUR]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spain</td>
<td>0</td>
</tr>
<tr>
<td>France</td>
<td>0</td>
</tr>
<tr>
<td>Argentina</td>
<td>0</td>
</tr>
<tr>
<td>Brazil</td>
<td>0</td>
</tr>
<tr>
<td>Portugal</td>
<td>0</td>
</tr>
<tr>
<td>China</td>
<td>0</td>
</tr>
<tr>
<td>Turkey</td>
<td>0</td>
</tr>
<tr>
<td>Country</td>
<td>Total number of actions for causes related to monopolistic practices and anti-competitive and results</td>
</tr>
<tr>
<td>-------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Spain</td>
<td>0</td>
</tr>
<tr>
<td>France</td>
<td>0</td>
</tr>
<tr>
<td>Argentina</td>
<td>0</td>
</tr>
<tr>
<td>Brazil</td>
<td>0</td>
</tr>
<tr>
<td>Portugal</td>
<td>0</td>
</tr>
<tr>
<td>China</td>
<td>0</td>
</tr>
<tr>
<td>Turkey</td>
<td>0</td>
</tr>
<tr>
<td>Country</td>
<td>Does the company have been fined monetary penalties?</td>
</tr>
<tr>
<td>-----------</td>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td>Spain</td>
<td>No</td>
</tr>
<tr>
<td>France</td>
<td>No</td>
</tr>
<tr>
<td>Argentina</td>
<td>No</td>
</tr>
<tr>
<td>Brazil</td>
<td>No</td>
</tr>
<tr>
<td>Portugal</td>
<td>No</td>
</tr>
<tr>
<td>China</td>
<td>No</td>
</tr>
<tr>
<td>Turkey</td>
<td>No</td>
</tr>
</tbody>
</table>

There are no significant (>50K€) penalties in 2012.