

SO2 **Corruption risk analysis.**

Has the company conducted a risk analysis of issues related to corruption?		
	2013	Comments
Argentina	No	
Brazil	Yes	
China	No	
Spain	Si	
France	No	
Portugal	No	Without prejudice to the company have not done an analysis of specific risk issues related to corruption, ongoing Model Risk Management and anti fraud project. There are also instructions for anti-corruption.

State the nature of risk analysis aspects.	
Spain	The analysis consisted of the implementation of the Code of Ethics, especially the awareness of employees not to accept gifts from suppliers and others.
Brazil	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 in organizing 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.

SO3

Legal: employees trained in the organization's anti-corruption policies.

Number of workers trained in the prevention of corruption.		
	2013	Comments
Argentina	0	
Brazil	2,411	
China	0	
Spain	18,000	
France	0	
Portugal	0	There are general instructions to ensure implementation of the anti corruption but there is no specific training for workers in preventing corruption.

Legal: Measures taken with regard to incidents of corruption.

2013	
	Have there been any dismissal or sanction of workers related to corruption issues, or a cancellation of contracts with companies on these grounds?
Argentina	No
Brazil	No
China	No
Spain	No
France	No
Portugal	No
	Number of open trials and litigation of this nature.
Argentina	0
Brazil	0
China	0
Spain	0
France	0
Portugal	0



Position in public policies and lobbying activities.

Explain the company policy regarding public policy.	Argentina	The position of the company in Argentina is neutral to any political position.
	Brazil	DIA Brasil rely on the rules and regulations of public policies established by Group DIA, always observing and adapting to regional laws and regulations.
	China	
	Spain	The company policy regarding public policy is completely neutral.
	France	We continue to follow the policy established by the french government called the "Grenelle de l'environnement"
	Portugal	
	Explain the company policy regarding lobbying activities.	Argentina
Brazil		DIA Brasil has no policy of Lobbying.
China		
Spain		The company defends the interests of the industry through their participation in the sectorial association.
France		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).
Portugal		

SO6**Financial and in-kind contributions to political parties, politicians, and related institutions.**

	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country [EUR].
Argentina	0
Brazil	0
China	0
Spain	0
France	0
Portugal	0

SO7 [Legal: Unfair competition behavior.

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

SO8

Legal: Important sanctions and fines.

	¿La empresa ha sido multada con sanciones monetarias?
Argentina	No
Brazil	No
China	No
Spain	Sí
France	No
Portugal	No
Turkey	
	Total amount of sanctions [EUR].
España	132,546 €
	Indicate the reasons for the sanctions imposed.
España	Sanction of the Galician Consumer Institute for not shown price per unit of measurement in TV ads, it is currently under appeal in administrative channels..