

Information Security Policy



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Information Security Policy

1. Purpose

The purpose of **the Dia Group Information Security Policy** is to set out the guidelines intended to protect the Company's information and that of its stakeholders, as well as the assets that process, transmit and/or store it.

This Policy must be supplemented by and governed by all other internal standards, regulations and policies of the same or similar nature as this Policy.

Furthermore, the aim of this Policy is to demonstrate the commitment of senior Management, the Board of Directors, supervisory bodies (e.g. commissions and committees) and all other employees.

2. Scope of Application

The Information Security Policy applies to all companies belonging to Dia Group and has the following scope:

- Corporate information of any nature and in any format.
- Personal information of employees and third parties (such as franchisees, suppliers and customers).
- Physical assets (hardware).
- Digital assets (software).
- Communications networks.
- Employees.
- Third parties (suppliers, creditors and franchisees).
- Premises (e.g. offices, warehouses, stores, data centres, etc.).

2.1. Distribution and Control

The Information Security Policy must be disseminated, distributed and provided to all employees and subcontractor staff in an official Dia Group repository.

The Information Security Policy, as well as all the rules and procedures underpinning it, must be understood and complied with by all employees and relevant third parties who have access to Dia Group's assets and/or data (personal and/or professional).

3. Information Security Strategy

The information security management strategy has risk management at its core, and seeks to establish technical and operational measures that enable:

- **Identification** of Dia Group's critical processes and assets.
- **Protection** through measures and controls that reduce the likelihood of risk events occurring.
- **Detection** of any event that compromises the security of information and business processes.

- **Response** to incidents to prevent their spread and reduce or eliminate the impact.
- **Recovery** of processes and assets to normal levels following a security incident.

For this purpose, Dia Group Management, with the support of the Information Security team, must oversee the governance of the cybersecurity strategy and the management of the risk lifecycle established within the organization.

4. General Guidelines

Dia Group's information security strategy is implemented using the following processes:

- Roles and responsibilities.
- Internal and external communications.
- Human resources security.
- Training and awareness.
- Classification of information.
- Asset management.
- Vulnerability management.
- Identity and access control management.
- Protection of data when stored and transmitted.
- Physical security.
- Operational security.
- Telecommunications security.
- Project and development security.
- Artificial Intelligence Security.
- Security with third parties.
- Security monitoring.
- Security incident management.
- Legislative and regulatory compliance.
- Continuous monitoring and improvement.

The information security strategy at Dia Group is carried out and applied in compliance with current regulations, especially on matters of Information Security and Privacy/Personal Data Protection.

The security levels applicable to Dia Group's data, assets and environments are defined and applied according to:

- Business needs.
- Criticality of assets and information.
- The need for confidentiality, integrity and availability.

This Policy has been approved on **XX May 2026** by the Board of Directors of Distribuidora Internacional de Alimentación S.A. and is applicable until the Board of Directors approves its update, review or repeal.