

Health and Nutrition Policy

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Public

1. Purpose

At DFI Retail Group, we are committed to supporting our customers to access healthy products, through the way we design, formulate, label, price, place and promote our products—across own brand and, through our influence on national brands. This Health and Nutrition Policy (“Policy”) sets out our requirements and guidance for our business activities to promote health and nutrition for our customer bases, and to support responsible marketing practices. This Policy applies to all relevant food categories across DFI Retail Group banners in the countries and regions where we operate, and excludes non-food categories and products.

2. Definitions

In this Policy, the following definitions apply:

“**Business Partners**” has the meaning given to it in Section 3.2 below.

“**DFI**” means DFI Retail Group Holdings Limited.

“**DFI Retail Group**” means DFI and its majority owned or controlled subsidiaries, affiliates and businesses.

“**Senior Management**” has the meaning given to it in Section 5.1 below.

“**Team Members**” has the meaning given to it in Section 3.1 below.

3. Who does this Policy apply to?

- 3.1 This Policy applies to all DFI Retail Group employees, including full-time, part-time, contract and temporary employees of all levels, and any person who acts on DFI Retail Group’s instructions (“**Team Members**”). Our different markets may provide further addenda to refine the local application of this Policy and/or provide supplemental guidance in light of the applicable local legal framework.
- 3.2 In addition, we expect DFI Retail Group’s contractors, consultants, suppliers, and other business partners including but not limited to franchisees (“**Business Partners**”) to follow the principles of this Policy in their dealings with us.
- 3.3 DFI Retail Group’s direct and indirect associated companies and joint venture partners are also encouraged to adopt the Policy or incorporate its principles in their own policies.

4. Commitments

- 4.1 DFI Retail Group commits to:
 - monitor and comply with all applicable public and local laws and regulations relating to product safety, nutrition, food and health claims, labelling, marketing and consumer protection in the countries and regions where we operate. Where this Policy sets a more stringent requirement than applicable law, this Policy shall prevail. If local law prohibits full application of this Policy, DFI Retail Group will comply with the law while seeking to meet the intent of this Policy to the maximum extent permissible;
 - provide nutrition information and health-related communications that are based on substantiated evidence and recognised public health guidance;
 - review and manage the health and nutrition profile of DFI Retail Group’s product portfolio on an ongoing and continuous improvement basis, considering evolving science, customer needs, technical feasibility and commercial developments;

- support customers in making informed healthy choices through responsible product design, formulation, labelling, placement, pricing and promotion;
- maintain high standards of product safety, quality and integrity across all markets, formats and channels of DFI Retail Group; and
- take steps to execute this Policy in line with DFI Retail Group's Sustainability Framework and guiding principles; to help ensure it is relevant to DFI Retail Group's operating context.

5. Governance, Roles and Responsibilities

- 5.1 The senior management ("**Senior Management**") of the business units within DFI Retail Group are responsible for implementing this Policy within their respective scope of operations and areas of responsibility, helping to ensure alignment with the objectives and principles declared in this Policy. In particular, Senior Management is responsible for:
- supporting the implementation of this Policy across functions and banners by promoting collaboration and allocating adequate resources and budget;
 - ensuring appropriate governance and internal controls are in place to manage health and nutrition-related risks and opportunities; and
 - providing appropriate training for relevant Team Members and reviewing competency needs periodically.
- 5.2 In observing this Policy, the Commercial, Own Brand, Technical and Marketing teams:
- For Own Brand food and beverage products: Should apply category-specific nutrition guardrails for new product development targeted as healthy products, to be aligned with national and international dietary guidelines, including thresholds for fat, salt, sugar, additives and portion sizes;
 - For Own Brand food and beverage products: Should periodically review product nutritional profiles and identify healthier alternatives or reformulation opportunities to reduce nutrients of concern or enhance positive nutrients, where technically and commercially feasible;
 - For Own Brand health supplement products: Should periodically review product portfolios, formulations and ingredient profiles to identify opportunities for optimisation or reformulation to improve safety, quality, efficacy, regulatory compliance or consumer relevance, where technically and commercially feasible;
 - Shall maintain robust product safety, quality assurance and traceability systems that meet regulatory requirements and internal standards;
 - Shall provide accurate, transparent and evidence-based nutrition information in accordance with local guidelines or international guidance, including portion or serving size guidance;
 - Shall take steps to ensure nutrition and health claims are substantiated, permitted under local regulations, aligned with recognised international, industry, governmental or independent third-party standards, and applicable for use in the markets they are intended for;
 - Should take additional care in marketing communications that may reach children, individuals with health conditions or other sensitive groups;

- Should promote and increase the availability and visibility of healthy products across assortments, subject to feasibility and responsible marketing;
- Should apply responsible promotions, in-store product placements, pricing strategies and customer communications to support nutrition literacy;
- Should keep track of relevant product, nutrition, claims and reformulation information, where relevant, to perform assigned responsibilities under this Policy; and
- Should support internal reviews, risk management and disclosures where relevant, in line with the scope and materiality.

6. Data Management and Reporting

- 6.1 DFI Retail Group recognises the importance of consistent, credible and proportionate data to support effective management of health and nutrition-related topics. In approaching nutrition and health-related data, DFI Retail Group is guided by the following principles:
- prioritise relevant and material data that meaningfully supports decision-making on product nutrition, health claims, reformulation priorities and customer information;
 - apply appropriate controls and review processes to help ensure health- and nutrition-related information is reliable, evidence-based and aligned with regulatory and internal requirements; and
 - apply consistent definitions, methodologies and assumptions used across reviews and reporting where feasible.

7. Breach of this Policy

- 7.1 Any material breach of this Policy (such as willfully or negligently providing misleading nutrition, health claims or non-compliant labelling) can amount to a breach of employment terms by a Team Member and can result in disciplinary action being taken, which could include termination of employment or termination of contractual arrangements.

8. Reporting Violations

- 8.1 Team Members are encouraged to report any actual or suspected breach of this Policy through available channels, including their line managers or Sustainability team. Line managers are expected to direct and report any such incidents they become aware of to ensure timely review and investigation.

9. Policy Update and Interpretation

- 9.1 This Policy may be updated by the Policy Owner from time to time. Any questions related to this Policy shall be referred to the Policy Owner or the Legal Head of your business or function.
- 9.2 In case of any discrepancy, the English version shall prevail.

Related policies and documents: Technical Standards for product categories.