

Global Speak Up Policy



Title	Ahold Delhaize Global Speak Up Policy
Business/functional owner	Vice President of Global Compliance & Ethics
Applicable to	Associates of Ahold Delhaize, its brands and support offices and third parties
ExCo owner	Chief Legal Officer
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Introduction

Ahold Delhaize, including all of its local brands and support offices, is committed to conducting its business with integrity and in compliance with all applicable laws, regulations and its own policies. We believe in a Speak Up culture where everyone feels comfortable and encouraged to share their concerns and issues, ask questions and report any potential misconduct.

As an associate of Ahold Delhaize, you have several ways to Speak Up:

- 1) If you have a question, concern or issue you want to discuss, please reach out to your manager, local HR representative, local or global Ethics representative or use the Speak Up line.
- 2) If you wish to report misconduct, you should do that through your local or global Ethics representative or by using the Speak Up line.

If you are not an associate of Ahold Delhaize, we encourage you to report any misconduct by contacting a local or global Ethics representative or by using the Speak Up line.

In this Global Speak Up Policy you will find more information about how to report misconduct and what safeguards are in place if you do so. However, it is not intended to contradict any applicable laws and regulations. In case of contradictions, the applicable laws and regulations will apply.

OUR ETHICAL PRINCIPLES

-  We respect each other.
-  We follow the law.
-  We act ethically in all our relationships.
-  We have the courage to speak up.

OUR VALUES

-  TEAMWORK ENERGIZES US
-  CARE MOTIVATES US
-  COURAGE EMPOWERS US
-  HUMOR BALANCES US
-  INTEGRITY GUIDES US

For more information about this Global Speak Up Policy, the Speak Up line or the Ahold Delhaize Code of Ethics, please contact the Global Ethics team at ethics@aholddelhaize.com.

It is up to each of us individually to show **Integrity** and **Courage** and do what's right, every day, by reporting any potential misconduct.

Reporting misconduct

This section provides information on how associates or third parties can report misconduct by using the global or local Ahold Delhaize reporting resources.

Who can use the Ahold Delhaize reporting resources?

Everyone can use the reporting resources.

This means that if you want to report any misconduct within Ahold Delhaize, one of its local brands or support offices, you can use the reporting resources as explained in this Global Speak Up Policy.

What do we mean by everyone?
Everyone means everyone. It includes anyone who is a future, current or former associate, intern or a self-employed person working for our company. It also includes anyone who has interacted with our company in a different way, like individuals working for current or former suppliers or third parties that are still in negotiations.

What type of misconduct can be reported using the reporting resources?

We encourage you to report any misconduct which, for the purpose of this Global Speak Up Policy, means a violation of:

- The Ahold Delhaize Code of Ethics;
- Any Ahold Delhaize Global Policies;
- Any applicable laws and regulations.

Examples of applicable types of laws and regulations:

- Breach of competition or public procurement rules;
- Bribery and corruption;
- Consumer protection issues;
- Data protection and information security issues;
- Disclosure of confidential information;
- Fraud;
- Health, product integrity and safety issues;
- Human rights and environmental issues;
- Inadequate or inaccurate financial reporting or recordkeeping;
- Insider trading;
- Money laundering or terrorist financing;
- Tax issues;
- Transport safety issues.

The reporting resources should not be used for:

- Any reporting done in 'bad faith'. This could, if you are an associate, result in disciplinary measures against you. Some examples:
 - Reporting with malicious intent;
 - Reporting to settle personal disputes;
 - Making accusations which you know or reasonably believe to be false.
- Consumer complaints, that are not considered a misconduct as explained above.
- If you are an associate, any issues or complaints about HR matters that are not considered a misconduct as explained above (e.g., terms of employment or performance related issues) as these should be directed to your manager and/or local HR representative.

When should you report misconduct using the reporting resources?

Acting the right way, everyday means that you need to have the **Courage** to report misconduct, even if you are not directly involved.

If you become aware of misconduct, you have the responsibility to report it as quickly as possible. This will allow Ahold Delhaize, the relevant local brand or support office to quickly investigate and address the situation before it escalates any further.

What are the Ahold Delhaize reporting resources?

For local brands and support offices, we have the following reporting resources:

- Your local Ethics representative
 - Via phone, email or in person (on your specific request)
- Your local Speak Up line
 - Online or by phone
 - Anonymous reporting is possible

For contact details, please go to the [Ahold Delhaize Speak Up page](#).

What do we mean by misconduct?

Misconduct means any potential or actual misconduct that has occurred or is likely to occur, or attempts to conceal it, and irregularities as defined by the Dutch Corporate Governance Code.

What about the EU whistleblowing rules?

Our local brands and support offices located in the EU comply with the local whistleblowing laws, as based on the European Union Directive (EU) 2019/1937. If your misconduct report falls under the scope of any such local law, you will be informed of this by the local or global Ethics representative who received the report. Please [check the relevant brand or support office's addendum](#) which may include additional types of misconduct that you can report based on the applicable local laws and regulations.

What is the Speak Up line?

The Speak Up line is administered by Navex Global, an independent third party service provider. It is available 24 hours a day, 365 days a year. The Speak Up line is available in the languages of the countries in which we operate.

Globally, we have the following reporting resources:

- The Global Ethics team
 - Via email or in person (on your specific request)
- The global Speak Up line
 - Online or by phone
 - Anonymous reporting is possible

For contact details, please go to the [Ahold Delhaize Speak Up page](#).

We encourage you to share as much information as possible in your report, even when reporting anonymously. Examples of useful information that will allow us to investigate your report:

- Background, history and reason for the report;
- Names, dates, places and other relevant information;
- Any documents that may support your report.

Certain types of misconduct relating to EU based brands and support offices can be reported to European Union based authorities. For more information, please go to Appendix I: Reporting to European Union based authorities. However, we encourage you to report the misconduct to Ahold Delhaize, the local brand or support office first. This way, you will allow us to investigate and address the situation directly.

What to expect when you report misconduct using the reporting resources?

When you report misconduct by using the reporting resources, even if anonymous, you can expect the following:

- 1) You will receive a confirmation that we received your report within 7 days.
- 2) Depending on which reporting resource you use, the local or global Ethics representative will perform an initial review of your report to assess if an investigation is required. If so, it will be assigned to an investigator for follow up.
- 3) Your report will be assigned to an impartial and competent person (or persons) for investigation, in line with any applicable local legal requirements. The assigned person can differ depending on the type of misconduct.
- 4) Your report will be investigated in an independent, fair and unbiased manner.
- 5) Any investigation will be done in compliance with our internal policies and applicable laws and regulations.
- 6) The assigned person will keep in touch with you and can reach out to you for more information.
- 7) Feedback will be provided to you as soon as possible but in any case within 3 months after the confirmation of receipt.

Please keep in mind that if you report anonymously through the Speak Up line, you will need to check if you have received any responses.

If your report falls under the protection of the European Union Directive (EU) 2019/1937, the local or global Ethics representative will inform you as soon as possible. In that case, your report will be handled in line with any applicable local laws and regulations.

How can you check the status of your report?

After completing your report, you will receive a unique report number. Please make sure to save this number, especially if you have chosen to report anonymously. Your unique report number will allow you to:

- Check on the status;
- Check if you have received any questions or feedback;
- Provide any additional information or documents.

What about the EU whistleblowing rules?

For our local brands and support offices located in the EU, please [check the relevant addendum](#) which may include additional information about their reporting resources.

How long on average does an investigation take?

Please keep in mind that certain investigations, depending on their nature and complexity, may take longer than 3 months to properly investigate. In that case, when you receive feedback, you will be informed of this and what to expect next.

How do we make sure your report is documented correctly?

If you are using the Speak Up phone line, you will be contacted by the global or local Ethics representative, to verify the report. If you request an in-person meeting, subject to your approval, a recording will be made of the conversation.

We will keep records of every report received, in compliance with applicable local laws and regulations, including any confidentiality requirements. These records will be stored for no longer than necessary and proportionate for business purposes, but in any case not longer than legally allowed.

If you believe that your report has not been handled properly and in line with this Global Speak Up Policy, please report your concern directly to the Ahold Delhaize Vice President of Global Compliance & Ethics via ethics@aholddelhaize.com.

What about the EU whistleblowing rules?

For our local brands and support offices located in the EU, please [check the relevant addendum](#) which may include additional information about their reporting process.

Safeguards

This section explains the safeguards that are in place to ensure you are protected when you decide to report misconduct. For our local brands and support offices located in the EU, please check the relevant addendum which may include additional information on safeguards.

Who is protected?

If you report misconduct, the safeguards described in this section will be applicable, as long as you reported the misconduct in 'good faith' and it fell within the scope of this Global Speak Up Policy or applicable local laws and regulations.

The safeguards also apply if you have reported anonymously but your identity becomes known and you suffer retaliation as a result of your report.

Confidentiality

When you report misconduct using the Ahold Delhaize reporting resources, your report will be treated confidentially and only shared on a need to know basis.

Your identity, or any other information that could be used to trace it back to you, will not be disclosed to anyone beyond the authorized persons, including those that have been appointed to receive and follow up on reports. This information will only be disclosed to others with your explicit consent or if we are obliged to disclose it in line with applicable laws and regulations. Any such disclosure will be done in compliance with the applicable local laws and regulations.

What do you need to do?

Everybody involved in a report is entitled to confidentiality to avoid unnecessary damage to their reputation. This means you also have a responsibility to keep the matter confidential, to be discreet and preferably not discuss your report with colleagues or others.

Processing of personal data

Ahold Delhaize is committed to protecting the privacy of everyone involved in the reported misconduct. We will safeguard personal data from unauthorized access and processing. Any personal data obtained on the basis of this Global Speak Up Policy or in the process of a related investigation will only be used for the purposes explained in this Global Speak Up Policy or to comply with applicable laws and regulations or an important public interest.

You can find the European Privacy Procedure here: [European Privacy Procedure](#).

Non-retaliation

If you report misconduct in good faith, you are protected from retaliation. Also protected against retaliation are:

- 1) People who assist you in the reporting process in a work-related context and whose assistance should be confidential (facilitators);
- 2) Anyone who is connected with you and who could suffer retaliation in a work-related context, such as your colleagues or your relatives;
- 3) Companies that you own, work for or are otherwise connected with in a work-related context.

If you experience or observe any retaliation against you or against anyone else for reporting misconduct in good faith, please report this via the Speak Up line. A report on retaliation is treated like any other report of misconduct and the same procedure is followed.

Any form of retaliation, including any indirect retaliation or encouraging others to retaliate, is a violation of the Ahold Delhaize Code of Ethics and may result in disciplinary action, up to and including termination of employment.

What does retaliation mean?

Retaliation means any threatened or actual attempts to:

- Suspend or terminate the employment agreement in any way;
- Demote or withhold promotions;
- Change agreed conditions such as duties, location, wages, working hours;
- Withhold training;
- Give a negative performance assessment or employment reference;
- Impose or administer any disciplinary measure, reprimand or other type of penalty;
- Coerce, intimidate, harass or exclude;
- Discriminate, disadvantage or treat unfairly;
- Not being given a permanent contract if you had legitimate expectations that you would be offered a permanent position;
- Not renew or terminate a temporary employment contract early;
- Infliction of harm to your reputation, for example through social media, or financial loss, including loss of business and loss of income;
- Blacklist you on a sector or industry-wide (in)formal agreement, which may lead to you not finding employment in this sector or industry in the future;
- Terminate or cancel a contract for goods or services early;
- Cancel a license or permit;
- Psychiatric or medical referrals.

Conclusion

Speaking Up is an important aspect of Ahold Delhaize's ethical culture. As such, Ahold Delhaize encourages everyone to Speak Up, and where necessary report misconduct. You can choose from resources on a local and on a global level and if you report any misconduct, the safeguards are in place to protect you.

If you have any questions, about this Global Speak Up Policy, the Speak Up line or the Ahold Delhaize Code of Ethics, please contact the Global Ethics team at ethics@aholddelhaize.com.

Appendix I: Reporting to European Union based authorities

This Appendix provides information on how to report specific types of misconduct to European based authorities. This process is relevant only to local brands and support offices that are located in the European Union. Please [check the specific addendum](#) which may include additional information on external reporting options based on the applicable local laws and regulations. This Appendix is intended to cover specific European Union legal requirements. It is not meant to take away from any other available reporting options based on applicable local laws and regulations or provided by third parties/organizations.

Who can report to European Union based authorities?

Who can report externally will depend on applicable local laws and regulations. At a minimum, anyone who has obtained information about misconduct (or 'violation') in a work-related context and reporting this information could lead to retaliation. The nature of these work-related activities does not matter and the work-related context can be ongoing, in the past or in the future.

What can be reported to European Union based authorities?

What can be reported externally will depend on applicable local laws and regulations. At a minimum, it's actual or potential violations of specific European Union laws and regulations. This includes any reasonable suspicions of a violation or attempts to conceal a violation.

Overview of the specific areas of European Union laws and regulations for which you can report externally:

- public procurement;
- financial services, products and markets, and prevention of money laundering and terrorist financing;
- product safety and compliance;
- transport safety;
- protection of the environment;
- radiation protection and nuclear safety;
- food and feed safety, animal health and welfare;
- public health;
- consumer protection;
- protection of privacy and personal data, and security of network and information systems;
- breaches affecting the financial interests of the European Union;
- breaches relating to the internal market, including breaches of European Union competition and Member State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.

Applicable local laws and regulations may include additional issues that can be reported.

Which European Union based authorities can you report to?

This will be different per European Union country and the type of violation but generally these are (1) authorities or other types of local (governmental) bodies that are appointed by local laws and regulations to receive and investigate reports or (2) European Union authorities.