



Applies to:

Ahold Delhaize and its subsidiaries

Effective date:

October 1, 2026

Group Sustainability Policy

Policy: **Group Sustainability Policy**

Functional owner: **VP of Group Health & Sustainability**

ExCo owner: **CSO**

Version no.: **3.0**

Review cycle: **Annually**

1. why this policy matters

Ahold Delhaize is committed to conducting its business ethically by respecting each other, engaging with integrity and following the law.

We balance our impact on the environment, society and economic factors to support the long-term success of the company, and we comply with all applicable laws and reporting obligations relating to sustainability.

This policy provides expectations and guidance around sustainability.

By complying with this policy, you help ensure we:

- follow applicable laws and meet our sustainability reporting obligations
- accurately report our sustainability performance to stakeholders, regulators and the public
- maintain the trust of our customers, associates and partners, and
- protect our reputation.

2. why this policy matters to you

This policy applies to Ahold Delhaize, including all its local and regional businesses.

The requirements in this policy are relevant to all associates involved in delivering and reporting on our sustainability commitments as part of their job.

Group Policy Framework

This policy is part of the Group Sustainability Policy Framework. In this Policy Framework, this policy outlines the main principles, while any underlying Group Standards, Group Procedures, and/or Group Guidance provide more specific rules and instructions for relevant day to day work. It also includes any relevant controls. Referencing the policy is intended to refer to the entire Framework associated with this policy. Local or regional documents may not conflict with Group Policy Framework requirements.

3. what this policy requires

At Ahold Delhaize, sustainability focuses on the long-term success of a company by balancing its impact on the environment, society, and economic factors and ultimately driving value from sustainable business practices. It encompasses how Ahold Delhaize conducts its business, now and in the future, which includes the community, value chain, human rights and social responsibility, and the planet. Our purpose is inspiring everyone to eat and live better, for a healthier future for people and planet.

Our material topics

The six material topics covered by this policy, identified through our Double Materiality Assessment.

climate

circularity

nature

customers

own workforce

labor and human rights
in the value chain

3.1 what it includes

Our Double Materiality Assessment (DMA) is based on the double materiality principle, considering both impact and financial materiality in line with European Sustainability Reporting Standards (ESRS) requirements. The process enables us to identify and prioritize our most relevant sustainability topics based on their financial risk or opportunity to Ahold Delhaize as well as our impact through these topics on our stakeholders and the environment. In addition, our Enterprise Risk Management (ERM) processes identify principal risks, including climate and nature related risks and stakeholder expectations on material topics.

The material topics covered by this policy are: Climate, Circularity, Nature, Customers, Own Workforce, and Labor and Human Rights in the value chain. For more information on (sub)topics included in these material topics we refer to our Annual Report.

Our process for determining and taking action on our material topics includes but is not limited to:

1. We consult with stakeholders on material topics (see also our stakeholder engagement guidelines document).
2. We aim to create awareness on environmental and social sustainability topics amongst our stakeholder groups.

3. We aim to contribute to protecting the environment, through mitigating our business impacts on climate change by reducing our scope 1, 2 and 3 GHG emissions across the value chain.
4. We aim to use natural resources and energy more efficiently, reduce emissions and waste and manage waste responsibly.

For a complete overview of our approach and efforts on sustainability topics, including topics not addressed herein, please refer to our Annual Report which can be found on our Ahold Delhaize website.

The outcomes of both our DMA and ERM processes serve as inputs to our strategy and to identify tangible actions and risk-mitigation processes that drive the formation of policies, procedures and controls; the scope of internal audit activities; and our business planning and performance process. For more information on our DMA and ERM approaches and outcomes on impact, risks and opportunities, see our Annual Report.

Ahold Delhaize has stand-alone Group Policies or Group Standards in place for the DMA-based material sustainability topics and sub-topics covered in this policy. Ahold Delhaize and its local and regional businesses are committed to following the law everywhere we do business, and we expect our suppliers to do the same.

From assessment to action

How our assessments translate into strategy and concrete action across the business.

Inputs

Double Materiality Assessment (DMA) and Enterprise Risk Management (ERM) identify and prioritize our material topics, principal risks and opportunities.



Strategy

Outcomes feed our strategy and the identification of tangible actions and risk-mitigation processes.



Action

Driving the formation of policies, standards and controls; the scope of internal audit activities; and our business planning and performance process.

3.2 who is responsible

Sustainability includes many of the material topics mentioned in this policy and more. Reflecting sustainability's growing importance, topics can be added to the general purview of sustainability, yet this would not make them material to Ahold Delhaize yet, only if this follows from a DMA. The breadth and criticality of these activities mean that several parts of our organization are involved in setting the strategy and driving the execution of different parts of sustainability.

The AD Management Board (MB) is responsible for the overall management of the company and for the actions and decisions of the AD Executive Committee (ExCo), which manages our general affairs and ensures effective implementation of the strategy and achievement of the company's objectives. The MB and ExCo together support our business, meet the needs of our stakeholders where reasonable and ensure we comply with relevant rules and regulations. The Group Chief Sustainability Officer (CSO), chairs the cross-functional Sustainability Leadership Team (SLT). The SLT brings together leaders from different parts of Ahold Delhaize. The regional CSOs serve as a key interface to regional CEOs and regional leadership teams ensuring (regional) business priorities and sustainability priorities are cohesively integrated.

The Group Chief Human Resources Officer (CHRO) is responsible for aspects of own workforce, including Diversity, Equity & Inclusion and associate well-being, while AD Group Compliance & Ethics is responsible for the material topic of product safety, certain social and governance matters, and worker safety and reports to the Group Chief Legal Officer (CLO). Our Group Chief Financial Officer (CFO) maintains oversight of our sustainability-related financial activities and reporting. The CSO, CLO and CHRO are part of the ExCo, whereas the CFO is part of both the ExCo as well as the MB.

The AD Supervisory Board (SB) and its committees supervise the MB on the performance of its duties and advise both the MB and ExCo. For more information on the MB, ExCo and SB please refer to the Governance section on our website and the applicable Rules of Procedure documents, as well as our annual report (Sustainability Statements and general Corporate Governance chapter).

Regional and local leadership teams are responsible for establishing and resourcing implementation plans and monitoring performance around targets and aims as defined by Ahold Delhaize Group as well as locally relevant sustainability topics.

3.3 how we set targets and determine our aims

Topic-specific targets and aims are agreed by the MB and ExCo to effectively monitor and report performance against our ambition and this process is guided by the CSO and other relevant ExCo members with support from the cross-functional SLT. Our DMA, ERM and strategy processes are key inputs to setting targets and defining aims. Each brand is responsible for setting targets supportive of Ahold Delhaize Group targets, in collaboration with the AD Group Business Planning and Performance (BPP) team and expert teams such as the AD Group H&S team.

3.4 how we report

We are committed to monitor sustainability performance and externally report progress on an annual basis through the Ahold Delhaize Annual Report or on our Ahold Delhaize website. This includes both qualitative updates on the actions taken by Ahold Delhaize and its local and regional businesses to support the targets and aims made and quantitative information on how Ahold Delhaize performed against its targets and aims. For reporting on sustainability, we ensure to fulfill all legislative requirements and report under the applicable reporting framework and underlying acceptable reporting standards. The AD Group ESG Reporting team, ultimately reporting into the CFO, is responsible for writing the Sustainability Statements in our Annual Report.

3.5 risk governance

Our local, regional and group management must translate defined control objectives for sustainability-related key performance indicators into specific controls to mitigate risks and provide assurance over the accuracy and completeness of sustainability-related information.

Sustainability related Key Performance Indicators (KPIs) refer to the non-financial environmental, social and governance (ESG) indicators which we monitor and report progress on, and which are subject to assurance requirements.

4. reporting violations

Report violations or potential violations of this policy, including any applicable laws, through the available Speak Up resources:

- your local or Group Ethics representative;
- the Speak Up line.

If you report any violation in good faith, you are protected from retaliation. 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.

5. additional information

On the [Ahold Delhaize Group Policy page](#) on OurShelf, you can find more information about this policy, related policy documents and guidance, and the contact information of the Policy owner.

For a complete overview of our approach and performance on sustainability, please refer to our Annual Report and the Governance section on the Ahold Delhaize website.