

Position on Human Rights



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foreword

Food is at the heart of our lives. It nourishes us, connects us, and shapes the communities we serve. At Ahold Delhaize, our purpose is to inspire everyone to eat and live better for a healthier future for people and planet. Respect for human rights is inseparable from that purpose, because the way food is grown and reaches our shelves directly affects the lives of people.

As a food retailer with brands that serve over 72 million customers each week, our responsibilities are closely tied to our business decisions. From the products we source and sell, the suppliers we work with, to the conditions in which associates and others across our supply chain operate. Our business does not operate alone. Our impact is shaped through collaboration with thousands of partners and suppliers, across diverse markets and contexts.

Economic pressure, geopolitical instability, climate disruption, and growing societal polarization challenge the systems we depend on.¹ These conditions reinforce the need for human rights due diligence, to identify and assess risks early, to integrate findings and act thoughtfully where we can contribute to positive change.

Against this backdrop, we are committed to respecting human rights across our operations and supply chains, in line with our role as a food retailer. We believe

that a resilient food system is one in which people are treated with dignity and respect, can work in safe conditions, and have fair access to food and opportunity, including through affordability, where our role as a retailer is most direct.

Advancing human rights is not a one-time effort or a destination, but an ongoing process of learning, prioritizing and improving.

Some challenges are systemic and cannot be solved by one company alone. That is why partnership, transparency and continuous improvement are central to our approach.

Our Position on Human Rights sets out how we frame our responsibilities and how we guide our actions as a business. It reflects our values of integrity and care, informs our decisions, and helps us focus our efforts where we believe we can make a meaningful difference. We remain committed to engaging openly, acting responsibly, and strengthening our contribution over time.

Our journey continues, together with others, because how we do business matters.

Alex Holt

Chief Sustainability Officer

¹ As described in the 20th edition of the World Economic Forum's *Global Risks Report 2025*

introduction

Ahold Delhaize and each of its brands share a set of values and ethical principles, as described in our [Code of Ethics](#), that support an ethical culture and that are the foundation of our commitment to conduct our business the right way, every day. Ahold Delhaize and its brands operate in jurisdictions that provide legal frameworks for the recognition and protection of human rights. We are committed to complying with all applicable legal requirements in each of these jurisdictions. Where national legislation falls short of providing such a framework, we aim to bolster existing regulatory requirements in alignment with our internal ethical standards and responsibilities under the UN Guiding Principles on Business and Human Rights (UNGPs).

Our commitment to do what is right is based on our collective belief that all people should be treated with dignity and respect. Besides our internal ethical principles, we also recognize the value of external standards that help us further define and engage on these topics.

As such, our Position on Human Rights is drafted in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises and further

informed by the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We are a signatory to the United Nations Global Compact and Women's Empowerment Principles. We are committed to respecting and promoting the human rights of associates, customers, communities and those who work throughout the supply chains of Ahold Delhaize and its brands.

Respecting human rights can create both social and business value to the communities we serve and the supply chains that our brands depend on. We collaborate with industry peers and experts to drive positive change together. In addition, we aim to mitigate potential negative human rights impacts. By doing so, Ahold Delhaize and its brands aim to contribute to a better society that recognizes and respects human rights.

We believe that acting responsibly today is an imperative to secure a better tomorrow. The purpose of this Position on Human Rights is to address how we aim to achieve this.

our approach to sustainability due diligence

Ahold Delhaize completed its global human rights due diligence assessment in early 2020, followed by an update in 2023. With the finalization of the Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive in sight, we recognized a clear trajectory in both the directives: toward integrated sustainability due diligence that addresses both social and environmental salient impacts.

Our Sustainability Due Diligence (SDD) approach is risk-based, aligned with global standards such as the OECD Guidelines and UN Guiding Principles, and compliant with relevant legislation. With this risk-based approach, we focus on risks that our operations or business relationships may have on individuals, communities, or ecosystems due to social or environmental factors.

We recognize that SDD is a continuous process, and we remain committed to learning and improving along the way – particularly when entering new partnerships or navigating operational changes and market expansion, which can introduce additional risks and impacts.

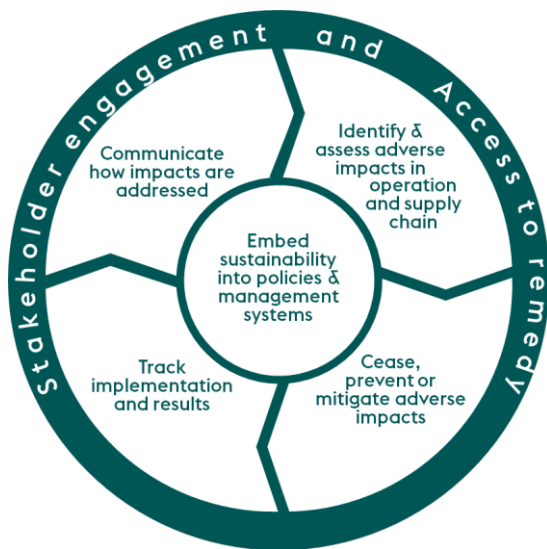
governance

Human rights are integrated into Ahold Delhaize's Growing Together strategy, aligning with its purpose of inspiring everyone to eat and live better, for a healthier future for people and planet. Ahold Delhaize has clear governance in place to ensure effective implementation of the strategy and achievement of our objectives.

Our commitment to human rights is embedded in our governance and overseen by our Supervisory Board and Management Board. Our Management Board is responsible for the overall management of the Company and delegates day-to-day execution to the Executive Committee. Each of our brands implement this commitment locally. The Global Director Ethical Engagement & Human Rights leads the human rights agenda, reporting to the Global SVP Health & Sustainability, who reports to our Chief Sustainability Officer (CSO). Our CSO is a member of our Executive Committee.

To drive and ensure implementation of our human rights agenda we work closely with a cross-brand and cross-functional dedicated Human Rights Working Group. This Working Group aims to ensure that human rights are embedded in corporate policies, due diligence processes, stakeholder engagement, and integrated

into business practices. Human Rights are well represented in our broader Sustainability Leadership Team via regional and group sustainability leaders.



sustainability due diligence process

Our structured, risk-based due diligence approach enables us to identify, assess, and address both actual and potential adverse impacts on people and planet throughout our operations and supply chains, as in line with CSDDD. We strive to address risks by implementation of mitigation measures, monitoring results and embedding due diligence outcomes into our internal policies and management systems. This way, we aim to embed our SDD efforts into our business operations and drive long-term value and resilience for our business and our people.

Transparency helps us better understand and manage risks in our supply chains, while also supporting collaboration and knowledge sharing to enhance our impact. Our annual report includes disclosures of the implementation and

progress of our SDD process. The key steps of this process are displayed in our due diligence framework. Through this position, we aim to embed human rights considerations into our decision-making and ensure accountability.

salient impacts

An important first step in our SDD process was identifying our salient impacts. In 2023, in partnership with an expert due diligence consultancy we identified a set of social and environmental salient topics. For our salient impacts, we have addressed whether they are applicable to our Own Operations (OO) and/or our Supply Chain (SC).

For the purpose of this document, we will focus on the social salient impacts. Our environmental salient impacts are discussed in more detail in our Annual Report. Our commitment to respecting human rights extends beyond these topics. However, these most material social topics guide our approach and are further detailed in the following chapters. Stakeholder engagement and access to remedy are two key elements of our due diligence framework, applying to both our own operations, and our supply chain. The next section provides further detail of these elements, followed by separate chapters on our own operations and supply chain.

social salient impacts

- Child labor (SC)
- Forced labor (SC)
- Inadequate wages (OO/SC)
- Inadequate working hours (OO/SC)
- Unhealthy and unsafe working conditions (OO/SC)
- Harassment and violence (OO/SC)
- Discrimination (incl. gender inequality) (OO/SC)
- Freedom of association and collective bargaining (OO/SC)
- Community impacts, incl. land rights, and access to water (SC)
- Insufficient access to healthy food (OO)

environmental salient impacts

- Greenhouse gas emissions (OO/SC)
- Water scarcity and overuse (SC)
- Ecosystem conversion, incl. deforestation (SC)
- Overfishing and depletion of fish stocks (SC)
- Plastic pollution (SC)
- Soil degradation (SC)
- Food waste (OO)
- Inadequate animal welfare (SC)

OO = Own Operations | SC = Supply Chain

stakeholder engagement

Open and ongoing dialogue with associates, business partners and suppliers, supply chain workers and their representatives, and other potentially affected stakeholders is essential to understanding and addressing human rights impacts. We pay particular attention to vulnerable individuals or groups who may be at greater risk of negative human rights impacts due to structural inequalities, discrimination, or social marginalization. This includes, but is not limited to, women, members of the LGBTQIA+ community, children and young workers, persons with disabilities, minorities, refugees, migrant workers, smallholder farmers, and Indigenous Peoples. These groups may face additional barriers in exercising their rights or accessing effective remedies. We aim to ensure their voices are heard

and their rights respected throughout our due diligence process.

Ahold Delhaize and its brands encourage associate development through their business or associate resource groups that focus on positively impacting the associate experience through personal development, professional development, learning and experience sharing sessions, and networking opportunities.

Continued active collaboration with other companies, civil society organizations, workers and their representatives, trade associations, governments, and other stakeholders, remains essential. Through partnerships and multi-stakeholder initiatives, as the Consumer Goods Forum and UN Global Compact, we aim to address root causes of human rights challenges and contribute to systemic, lasting change across our industry.

For further details, please refer to our [Stakeholder Engagement Policy and Guidelines](#).

access to remedy

Remediation and access to remedy are important aspects of an effective due diligence process. We support access to judicial remedies through cooperation with legal authorities and respect for due process. In line with the effectiveness criteria outlined in the UN Guiding Principles, we also maintain and continuously improve on non-judicial grievance mechanisms including:

- Our free, confidential and accessible local ethics helplines

- Mediation and dialogue processes facilitated by independent parties

Speak Up lines

Our established, local ethics helplines – also called our Speak Up lines – are free, publicly accessible online and by phone, 24 hours per day, seven days per week, and in the local relevant languages of the countries in which we operate. It is a confidential and secure service that enables our associates, external stakeholders within and connected to our supply chains and the public, to raise concerns about improper behavior or possible violations of law or our policies. This includes reporting on potential human rights issues or abuses, and investigating allegations where human rights may not have been properly respected. When a specific concern is raised, the reported information will be kept confidential to the maximum extent possible consistent with the need to take appropriate corrective action. There is also an option to remain anonymous throughout the process. If someone chooses to raise a concern anonymously, we don't receive identity information.

We will not retaliate or allow retaliation against an individual or representative, including human rights defenders, who, in good faith, raise a complaint or report a potential violation. Retaliation includes intimidation, threats, physical violence, legal action, action impacting economic status, livelihood, career or reputation or any other forms of illegal mistreatment. Any form of direct or indirect retaliation is prohibited. Reports of violations of law or

policy will be investigated. We expect our suppliers to do the same.

We communicate about our Speak Up Lines through multiple channels, including our website, in local languages on the intranets of our local brands, posters displayed in offices, distribution centers, and stores, as well as through our annual Code of Ethics training and related communications which is mandatory for our associates. For more information about our grievance mechanism, please consult our [Speak Up Policy](#).

suppliers' grievance mechanisms

We expect suppliers to establish adequate complaint mechanisms, to provide the right to remedy and to ensure no retaliation. We work with industry organizations and standards' committees to promote the provision of effective supply chain grievance mechanisms by our suppliers and we recognize that our approach to remedy should not obstruct access to other remedies.

human rights in our own operations

At Ahold Delhaize, we know that everything we achieve is thanks to our people – their passion, talent and creativity is what enables us to bring our purpose and our strategy to life every day. Ahold Delhaize's people promise is our pledge to help them thrive: we create a caring place to work that inspires growth and collaboration, where everyone is heard and valued and finds purpose in serving our brands' communities. That is why Ahold Delhaize and each of its brands commit to respect fundamental human rights at work in its contexts and locations. Each brand is committed to providing safe, secure and inclusive environments. In addition, each of our brands strives to provide associates with challenging and rewarding opportunities for personal and professional growth.

equal employment opportunities and respect in the workplace

Our associates deserve a workplace where they are treated with dignity and respect. Each of our brands complies with applicable laws and company policies relating to equal opportunity and non-discrimination. Our brands respect the rights to a workplace free from harassment and discrimination in respect of employment and occupation. We do not tolerate conduct by our associates or any other person that creates an

intimidating, offensive or hostile work environment. We hold our associates accountable when misconduct occurs. Retaliation for raising concerns or issues is prohibited. Ahold Delhaize's people promise is underpinned by a shared set of values and ethical principles that support our brands' cultures and associates.

labor rights

Our commitment to human rights prohibits forced labor, child labor and human trafficking in any form. Ahold Delhaize is a signatory of the Consumer Goods Forum's Forced Labor Resolution, which includes three Priority Industry Principles for responsible recruitment:

- Every worker should have freedom of movement
- No worker should pay for a job (Employer Pays Principle)
- No worker should be indebted or coerced to work

Each brand complies with all applicable laws on working hours, including maximum allowable working hours and days and payment for overtime hours at a premium rate, and has regular work weeks that do not exceed 48 hours per week. We respect the principles of freedom of association and the legal right to collective bargaining.

adequate wages*

At Ahold Delhaize, we pride ourselves on being open to everyone and we want every associate to thrive. Striving for pay equity is an important mission for each of our brands.

We believe that the total value proposition for an associate is more than the wages and benefits they receive. It includes other factors, such as well-being support, opportunities to learn and grow, recognition and the diversity and inclusiveness of the workforce. Pay equity is an integral part of each brand's total rewards philosophy and principles. For associates, the aim is to drive fair and meaningful rewards and recognition as part of our thriving people strategic priority. Each brand is committed to delivering equal pay for equal work and equal access to career opportunities to its associates.

Ahold Delhaize and its local brands have adopted the following six overarching principles of fundamental "procedural justice" to guide fair compensation:

- A solid base for comparing roles
- Market-based compensation
- Compensation in compliance with the law
- Equal pay for equal work
- Compensation aligned with individual performance and brand business strategy
- Compensation that is transparent, consistent and explainable for the individual associate

safe and secure working environment

Ahold Delhaize and each of its brands recognize and support the right of associates to work in a healthy and safe workplace. We verify responsible labor practices to support associate health and well-being. Safety at Ahold Delhaize extends beyond physical measures to include digital safety, ergonomic considerations and emergency preparedness. At Ahold Delhaize, we aim to:

- Optimize associates' well-being through a safe, supportive environment
- Incorporate health and safety into every level of the Company, fostering a better place to work and shop
- Promote continuous improvement through teamwork, innovation and training

We believe that safety is a responsibility shared by everyone. To this end, we encourage all associates to report any potentially unsafe conditions, practices or safety violations to their supervisor, local safety team or through the Speak Up line. Associates are also expected to participate in safety training and to support their colleagues in adhering to local safety practices. We comply with applicable safety and health laws and regulations, and maintain high standards of health and safety through comprehensive internal policies and procedures.

**An adequate wage is as a wage that provides for the satisfaction of a worker's needs and those of the worker's family given national and economic and social conditions (ESRS definition).*

human rights in our supply chain

Our local brands depend on suppliers and vendors in global supply chains for raw material sourcing and production. These suppliers and their supply chains are a fundamental part of our business model. Meeting our customers' expectations is dependent on the tens of thousands of suppliers and vendors who supply us.

Our brands strive to maintain a professional and ethical relationship with their suppliers and other business partners, and to demonstrate a commitment to respecting and promoting labor and human rights. We expect our business partners to do the same.

Our [Standards of Engagement](#) require that our suppliers and their subcontractors observe all applicable laws and regulations, respect human rights – especially of vulnerable people – and implement the minimum human rights protections defined in this position. We expect our suppliers to apply the same standards throughout their supply chains. Commitment to our Standards of Engagement is an integral part of the contractual relationships with our suppliers and business partners.

risk-based approach

Our Standards of Engagement apply to all workers in Ahold Delhaize and its brand's supply chains across products and services. However, our monitoring

efforts are focused on own-brand product suppliers in high-risk countries through our social compliance program and commodity certification programs, since this is where we hold the greatest influence to drive meaningful change.

We apply a risk-based approach, identifying high-risk countries in accordance with amfori's Country Risk Classification. It is in these countries where governments may fall short on safeguarding workers' rights or provide essential protections, where the most serious human rights abuses, including forced and child labor, can occur.

In addition to high-risk countries, we conduct risk assessments to evaluate specific risks linked to product categories and key raw materials used in own-brand products. We use various methods, such as collaborations with suppliers, third-party experts and stakeholder representatives, human rights impact assessments and external sources like the Labour Rights Index, the Global Slavery Index, UNICEF child labor report and the Gender Inequality Index.

Human rights impact assessments (HRIAs) enable us to proactively identify potential risks to human rights for workers, particularly vulnerable workers, and evaluate the effectiveness of current mitigation measures and grievance mechanisms. These assessments also

include affected stakeholder engagement (directly and via legitimate credible representatives) to provide valuable insights into their perspectives, helping us make informed and meaningful decisions.

social compliance program

Our social compliance program, implemented across our brands, relies on social audits and certifications as scalable tools to help prevent or mitigate impacts, monitor working conditions and, progress on corrective action plans, and monitor compliance with our Standards of Engagement. It is also an integral part of our due diligence approach, serving as a basis to identify risk and enhance human rights monitoring and support where needed. Our ambition is to have 100% of production sites of own-brand products in high-risk countries audited against an accepted standard, with a valid audit report or certificate and no noncompliance on deal-breakers.

The scope of our social compliance program is focused on the stage that involves labor to produce or process the final product—we call this, the last stage of production (LSOP). For unprocessed fruit and vegetables, LSOP is at the farm and packing station levels and excludes (re-)packing or ripening in a non-risk country. With this focus, we emphasize workers beyond our direct, first tier suppliers.

Ahold Delhaize's brands require own-brand suppliers and their subcontractors to demonstrate social compliance through amfori Business Social

Compliance Initiative (BSCI) audit reports – or equivalent accepted third-party audit reports or certificates – both during the supplier selection process and throughout the contract period. Audits need to take place at least every two years, and in case of major noncompliance, a re-audit must be done every year. We recognize stepping-stone standards, which ensure compliance against our Standards of Engagement while offering a streamlined set of requirements to support suppliers in specific countries as an initial step in making progress toward an accepted standard, acknowledging that meaningful change takes time and cannot happen overnight.

Auditing working conditions, policies, mitigation measures and progress on corrective actions forms an important foundation for aiming to protecting labor and human rights at production locations within our supply chain. These accredited independent third party audits focus on requirements such as:

- adequate wages
- working hours
- health & safety in the workplace, and, where applicable, living conditions
- no precarious employment
- prohibition of child labor
- protection for young workers
- prohibition of forced, bonded or trafficked labor
- prohibition of violence and harassment
- prohibition of discrimination

- equal treatment and opportunities
- freedom of association and the legal right to collective bargaining

Details on the requirements for these topics are provided in the [AD Standard of Engagement guidance document](#).

Our brands have committed resources to selecting suppliers, monitoring results of their performance and supporting them in improving their processes and working conditions.

While Ahold Delhaize recognizes the limitations of social audits, we believe that those audits and certifications are an important, scalable tool to monitor working conditions in complex, global supply chains. The amfori BSCI approach focuses on improving working conditions in supply chains through continuous improvement. Their approach emphasizes continuous improvement through corrective action plans (CAPs) that address noncompliance, followed by progress reports.

awareness raising and worker engagement

Awareness raising for workers on labor and human rights is one of the indicators assessed during a social audit of the Ahold Delhaize accepted standards. Worker interviews are also a key element during audits of the accepted standards. These interviews provide understanding and perspectives of workers as affected stakeholders on working conditions and labor practices.

dealbreakers

When a social compliance audit identifies a serious compliance issue or violation such as child labor, forced or bonded labor, or life-threatening health and safety situations, we consider these dealbreakers. In the event of a serious compliance issue or violation, orders with the affected supplier or their subcontractor may be suspended until compliance is restored and the impact is mitigated. We will engage with the supplier to ensure the issue or violation is thoroughly investigated and work together with them to support an appropriate remediation process. If a supplier is unable or unwilling to remediate this serious issue or violation effectively within a reasonable timeframe, we may ultimately terminate our relationship with that supplier.

commodity certification program

Our approach to critical commodities emphasizes certification to address the high risk of adverse environmental and human rights impacts linked to these commodities. Our commodity certification program addresses workers deeper in the supply chain who extract commodities used in our own brand products. An example is the increasing pressure on the availability of potable water, often in areas of agricultural production, which can affect local and Indigenous communities and small farmers. We aim to address this for our critical commodities through our accepted standards.

Ahold Delhaize and its brands aim to have 100% own-brand products containing soy, palm oil, cocoa, coffee, tea, wood fiber, and seafood certified to an accepted standard. Most accepted standards include social requirements. We consider these seven commodities to be critical.

community impacts

Ahold Delhaize and its brands recognize that local communities are part of our supply chains. Therefore, we respect the rights of Indigenous Peoples, local communities and smallholder farmers to land and natural resources.

We do not tolerate land grabbing and expect suppliers to respect land rights. We expect suppliers involved in the acquisition, leasing or disposal of land to respect the rights and title to and the use of property, land and natural resources of individuals and local communities. In addition, suppliers must actively seek and document the effective implementation of free, prior and informed consent (FPIC) when it concerns Indigenous Peoples.

We also recognize access to sufficient and safe water as a fundamental right to livelihoods of communities. Therefore, we aim to respect the right to water across our operations and expect our suppliers to do the same.

Furthermore, we expect suppliers to comply with all applicable environmental legislation and maintain relevant permits related to water management.

industry collaboration

As mentioned in the introduction, the challenges our industry faces are

complex and systemic by nature. Therefore, partnerships and collaborations play an important role in our work and in making a broader impact on human rights in supply chains. Ahold Delhaize and its brands participate and take active roles in several multi-stakeholder initiatives, committees, working groups and consultations, including those of the amfori BSCI, which is an important part of our social compliance program, and the Consumer Goods Forum (CGF) Sustainable Supply Chain Initiative (SSCI). Since 2025, we also participate in the CGF Human Rights Coalition, which focuses on using due diligence to address forced labor. Our brands also take part in national industry-wide commitments in favor of human rights. Both Albert Heijn and Delhaize Belgium work together with IDH The Sustainable Trade Initiative to address the topic of living wage in the banana sector. Another example is the board membership of ADUSA in the Seafood Task Force, which has as a mission to drive seafood supply chain oversight at scale.

We continue to work closely with standard-setting organizations and other stakeholders to address the credibility and effectiveness of social audits, find ways to improve working conditions and address adverse human rights impacts throughout the supply chain.

management and outlook

Our Position on Human Rights is managed through a governance framework that ensures that human rights are embedded in our daily operations, decision-making, and stakeholder engagement.

We are committed to continuous improvement. As global standards evolve and new regulations such as the CSDDD come into effect, we will regularly review and update our Position to reflect emerging risks, stakeholder expectations, and best practices.

Future updates will be informed by:

- Ongoing due diligence and impact assessments
- Feedback from (affected) stakeholders
- Regulatory developments and international frameworks

We will continue to report on our progress in our annual report, covering both our own operations and our supply chain.