



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE

## Governance

**Our commitment to integrity is foundational to effective governance. We believe that our values and ethical principles should guide everything we do. Having the right governance helps ensure that we take a structured approach to our ESG commitments and is critical to our success.**

At Ahold Delhaize, governance is more than our policies, processes and controls. Effective governance depends on having an ethical culture in place, and we work hard to embed that culture in everything we do. Transparency and accountability are guiding principles of our approach to governance.

See also *Introduction to ESG* for how we manage our ESG performance.



## BUSINESS ETHICS

### BUSINESS ETHICS AND COMPLIANCE

#### Definition

Building strong practices for how we conduct business and ensuring our business is transparent to stakeholders. Establishing anti-competitive, anti-corruption and whistle-blower practices.

**Boundary:** Own operations

#### General developments in 2023

The increasingly complex regulatory environment in which we operate has heightened our focus on addressing new compliance risks. Evolving regulatory mandates in regional, national and local legislation across our operating footprint have required that we evolve our capabilities and resources through innovation and efficiency. Additionally, as our business continues to grow and evolve, we encounter new compliance risks that require additional capacity and expertise to effectively manage.

#### Our impact

At Ahold Delhaize, we are committed to conducting our business “the right way, every day.” Our ethical culture drives ethical decision making in every aspect of our business, including compliance with external laws and regulations, a clear policy framework, and controls that create transparency and accountability.

Our Code of Ethics provides four ethical principles that guide our actions:

1. We respect each other.
2. We follow the law.
3. We act ethically in all of our relationships.
4. We have the courage to speak up.

### Our approach and progress

Our ethical principles apply to all associates of Ahold Delhaize and its businesses. Manager-level and above associates are assigned an annual Code of Ethics training. In addition, the Code of Ethics and our ethical principles are communicated to associates through our website, local intranet pages, posters, videos, local campaigns and during our global Ethics Week. The full Code is available in the corporate governance section of our website at [www.aholddelhaize.com](http://www.aholddelhaize.com).

In addition to our Code of Ethics, we have a global Governance, Risk Management and Compliance (GRC) framework that addresses and monitors key risks to our business, including risks related to ethical business practices such as conflicts of interest, anti-corruption and bribery, and competition. This framework also includes policies and controls that relate to internal processes as well as legal and regulatory risks. You can read more about the framework under *Risk management*.

In 2023, we conducted a global Ethical Culture Survey to measure our progress on awareness and implementation of our ethical principles among associates. We plan to conduct a follow-up survey in 2025 and will report on our progress.



## BUSINESS ETHICS

BUSINESS ETHICS AND COMPLIANCE  
CONTINUED

## Speak Up line

Ahold Delhaize and its brands provide multiple ways to report misconduct. Our Speak Up line enables associates and third parties, including individuals in our supply chains, to report misconduct, including irregularities, and raise concerns about improper behavior or possible violations of law or policy.

The Speak Up line is accessible online and by phone, 24 hours per day, seven days per week, in the local languages of the countries in which our brands operate. It is a confidential and secure service hosted by NAVEX. The Speak Up line is communicated to associates on our website, on the brands' intranets, on posters and in our annual Code of Ethics training and communications. You can find the contact details and more information about the process, including a response timeline, as well as the detailed Speak Up Policy, at [www.aholddelhaize.com](http://www.aholddelhaize.com). In 2023, we updated our Speak Up Policy and related process to address new expectations of the EU whistleblower directive.

In 2023, our Speak Up lines received 4,741 reports (2022: 5,128). The top ten issue types reported were:

1. Unfair treatment (27%)
2. Misconduct or inappropriate behavior (26%)
3. Bullying (8%)
4. Discrimination (6%)
5. Request for guidance (6%)
6. Sexual or other harassment (5%)
7. Other violations of company policy (3%)
8. Retaliation (3%)
9. Workplace safety (3%)

## 10. Substance abuse (2%)

There were no substantiated reports involving senior management.

All reports are forwarded to the appropriate internal resource for review and investigation. If misconduct is substantiated, appropriate corrective action is taken and remedy provided.

Approximately 64.2% of reports were made anonymously in 2023. On average, reports were investigated and resolved within 30 days. Approximately 31% of investigated reports were substantiated. In 2023, there were no substantiated reports of significant financial reporting, accounting, fraud or ethical violations and there were no substantiated reports involving senior management.

The Ethics team of Ahold Delhaize and its brands review the reports from the Speak Up lines on a quarterly basis and discuss and incorporate learnings to improve the system and ensure that processes are in place to address and prevent the reported issues. In addition, the Ethical Culture Survey includes questions about the accessibility, potential barriers, implementation, performance and outcomes of the Speak Up line. In 2023, Ahold Delhaize also conducted a survey of a sample of users and worked with NAVEX to continuously improve the system.

## No retaliation

Ahold Delhaize and its brands strongly encourage reporting misconduct. We will not retaliate or allow retaliation against anyone who, in good faith, reports potential misconduct. Any form of direct or indirect retaliation is strictly prohibited.

## Corruption and bribery

Ahold Delhaize and its brands are committed to conducting business in an ethically responsible manner and complying with the law in all countries and jurisdictions in which we operate. This commitment includes compliance with laws relating to anti-corruption and bribery. The Ahold Delhaize Code of Ethics and our [Global Anti-Corruption and Bribery Policy](#) prohibit any form of corruption or bribery, including facilitation payments. This guidance is available to all associates and is addressed in our Code of Ethics training, as well as in training and communication for functions that are at risk of encountering corruption and bribery. Based on our monitoring systems across our operations, including the Speak Up line, there were no incidences of bribery or corruption during the year.

None of the Ahold Delhaize-controlled brands incurred any legal action, fines, penalties or settlements related to anti-competitive business practices in 2023, and there were no significant instances of non-compliance with laws or regulations.

## Legal compliance

All significant instances of non-compliance with legal obligations are reviewed by the global GRC committee to ensure that the non-compliance is appropriately addressed and remediated.

During 2023, there were:

1. No confirmed incidents of legal non-compliance related to bribery, corruption, and anti-competitive business practices.
2. No significant breaches of laws or regulations, including social or environmental impacts.

## Data privacy

The protection of personal data is paramount to Ahold Delhaize. Customers, associates and business partners entrust our businesses with their personal data and we are committed to safeguarding this information, consistent with relevant security and privacy legislation and regulations. At Ahold Delhaize and its brands, we strive to use customer data to benefit customers, whether it is checking their home address for deliveries, accessing their shopping history for personalized benefits or confirming account details for online orders. Our four privacy foundations guide how Ahold Delhaize and its brands manage personal data. More information is available on our [website](#), as well as further information on key practices around how we maintain the [security of systems and data](#). Ahold Delhaize and each of the brands have a privacy notice for customers and associates, in line with local legal obligations, available on their websites.

## How we measure performance

Due to the nature of this material topic, we manage potential incidents as we become aware of them, but do not track specific indicators.

## Our ambitions

## AMBITION

We consistently strive to create a strong ethical culture where our decisions and actions align with our values and ethical principles and in which any misconduct is reported without fear of retaliation.