

Ahold Delhaize VNO NCW Tax Governance Code

Reference is made to the details in the VNO-NCW Tax Governance Code published on the VNO-NCW website

A Approach to Tax: Tax Strategy & Tax Principles	Where to find	Section
1 Tax strategy and approval	Tax transparency report	Accountability and governance
2 Board reporting	Tax transparency report	Accountability and governance
3 Tax strategy applicable to all entities	Tax transparency report	Introduction
4 Applicable for employees, customers and contractors	Tax transparency report	Business structure
B Accountability & Tax Governance		
1 Board accountability	Tax transparency report	Accountability and governance
2 Tax Control Framework	Tax transparency report	Tax in control statement
3 Internal and external audit	Tax transparency report	Tax in control statement
C Tax Compliance		
1 Complete, accurate and timely compliance	Tax transparency report	Compliance
2 Responsible tax planning	Tax transparency report	Compliance
3 Reasonable interpretation of tax laws	Tax transparency report	Compliance
4 Use of tax incentives	Tax transparency report	Compliance
5 Use of rulings from tax authorities	Tax transparency report	Compliance
D Business Structure		
1 Tax heavens	Tax transparency report	Business structure
2 Tax on value creation	Tax transparency report	Business structure
3 Arm's length principle	Tax transparency report	Business structure
E Relationships with Tax Authorities and Other External Stakeholders		
1 Cooperative relationships with authorities	Tax transparency report	Relationships with tax authorities
2 Constructive dialogue	Tax transparency report	Relationships with tax authorities
3 Dispute issues and controversy	Tax transparency report	Relationships with tax authorities
F Tax Transparency & Reporting		
1 Tax policy and tax risk management strategy	Tax transparency report	Full document
2 List of entities owned	Annual Report	Note 35
3 CIT paid and accrued per country	Tax transparency report	Transparency
4 Taxes borne and collected	Tax transparency report	Transparency
5 Tax incentives	Tax transparency report	Tax incentives
6 Advocacy approach	Tax transparency report	Stakeholder engagement