

Addendum to the Ahold Delhaize Group Speak Up Policy

Entity: Alfa-Beta Vassilopoulos (Greece)

Title	Ahold Delhaize Group Speak Up Policy - Addendum Entity: Alfa-Beta Vassilopoulos (Greece)
Business/functional owner	Vice President of Group 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 Group Ethics representative or use the Speak Up line.
- 2) If you wish to report misconduct, you should do that through your local or Group 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 Group Ethics representative or by using the Speak Up line.

The Ahold Delhaize Group Speak Up Policy provides information about how to Speak Up, the available reporting resources, the reporting process and the safeguards. However, the local brands and support offices located in the EU comply with mandatory local whistleblowing laws, resulting from the transposition of the European Union Directive (EU) 2019/1937. Each Addendum to the Group Speak Up Policy contains additional information based on those local law requirements, in so far these requirements deviate from the Ahold Delhaize Group Speak Up Policy.

This Addendum is applicable only when the reported misconduct falls under the scope of the mandatory local whistleblowing laws, resulting from the transposition of the European Union Directive (EU) 2019/1937.

This Addendum is intended to provide you with additional information as explained above, but is not intended to contradict any applicable (whistleblowing) laws and regulations. In case of contradictions, the applicable laws and regulations will apply.

For more information about this Addendum or if you need additional guidance regarding ethical or compliance issues and concerns on local level, please contact the local Ethics representative as identified in this Addendum. For more information about the Ahold Delhaize Group Speak Up policy, the Group Speak Up line, the Ahold Delhaize Code of Ethics, or if you need additional guidance regarding ethical or compliance issues and concerns, you can contact the Group 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 locally using the Ahold Delhaize resources

Who can use the local Ahold Delhaize reporting resources?

Please see the Group Speak Up Policy.

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

As per the European Union (EU) Directive 2019/1937 and implementing Greek law: please see the Group Speak Up Policy, Appendix I.

When should you report misconduct using the local Ahold Delhaize reporting resources?

Please see the Group Speak Up Policy.

What are the local Ahold Delhaize reporting resources?

Locally, the following reporting resources can be used:

- Reporting and Monitoring Officer, RMO (Spyridoula Dedempili) and Substitute RMO (Christina Kaprou) of Alfa-Beta Vassilopoulos:
 - via phone (RMO: +30 210 660 8103 /Substitute RMO: +30 2106608111) , email (ethics@ab.gr) or in person (on your specific request). For more info, please go to [Ahold Delhaize Speak Up page](#)
- Speak Up line of Alfa-Beta Vassilopoulos
 - Online or by phone, go to the [Ahold Delhaize Speak Up page](#) for contact details
 - Anonymous reporting is possible

More information on how the Speak Up line works can be found in the Group Speak Up Policy.

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

Please see the Group Speak Up Policy.

Local Ahold Delhaize safeguards

Who is protected?

Please see the Group Speak Up Policy.

Confidentiality

Please see the Group Speak Up Policy, and in any event in line with European Union (EU) Directive 2019/1937 and implementing Greek law.

Processing of personal data

Please see the Privacy Policy [here](#).

Non-retaliation

Please see the Group Speak Up Policy, and in any event in line with European Union (EU) Directive 2019/1937 and implementing Greek law.

Reporting to local or European authorities

Who can report to local or European Union authorities?

Locally and on European Union level, please see Appendix I of the Group Speak Up Policy.

What can be reported to local or European Union authorities?

Locally, as per the European Union (EU) Directive 2019/1937 and implementing Greek law, all violations as mentioned in Appendix I of the Group Speak Up Policy about European Union laws and regulations.

On European Union level, please see Appendix I of the Group Speak Up Policy.

Which local based authorities can you report to?

Locally, you can also report to the National Transparency Authority (NTA) via phone, email, an electronic platform or in person (on your specific request):

National Transparency Authority (NTA), 195, Lenorman av. and Amfiaraou str., Athens, 10442,
Telephone: +30 213-2129870, Email: info@aead.gr, Website: <https://aead.gr/contact/>

On European Union level, the relevant European Union authorities.