

Position on Human Rights



Title	Ahold Delhaize Position on Human Rights
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Applicable to	All Ahold Delhaize Companies
ExCo / Management Board owner	Jan Ernst de Groot
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Introduction

As part of our Leading Together Strategy, Ahold Delhaize and each of its brands share a set of values and ethical principles that support an ethical culture and that are the foundation of our commitment to conduct our business the right way, every day. Each of the countries in which Ahold Delhaize and its brands operate maintain basic legal recognition and protection of human rights. We always comply with these legal requirements and we often exceed them.

Our commitment to do what is right is based on our collective belief that all people should be treated with dignity and respect and is based on our own ethical principles. Our Code of Ethics supports our commitment to conduct business by doing what's right, every day. We also recognize the value of other external standards that help us further define and engage on these topics. In accordance with the UN Universal Declaration of Human Rights, we respect the human rights of each of the associates, customers, communities and the people who work throughout the supply chains of Ahold Delhaize and its brands. Our commitment to human rights is drafted in accordance with the UN Guiding Principles on Business and Human Rights and further informed by the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. We are a signatory to the United Nations Global Compact and to the Women's Empowerment Principles. In addition, we reference other relevant frameworks to prioritize our Healthy & Sustainable ambitions, including the UN Sustainable Development Goals (SDGs). We will continue to report on operations and strategies in relation to these principles and goals.

Our commitment to human rights is not limited to our own operations. We believe that we have the opportunity to create positive change that extends to the communities we serve and the supply chains that our brands depend upon. Ahold Delhaize and its brands strive to proactively speak up for human rights and create positive impact beyond our own operations and supply chains.

Our own operations

Human rights are about people, and people are our most valuable assets. That is why Ahold Delhaize and each of its brands commit to respect fundamental human

rights at work in all contexts and locations. Each brand is committed to providing safe, secure and inclusive environments where all associates and customers are respected and appreciated. In addition, each of our brands strive to provide associates with challenging and rewarding opportunities for personal and professional growth.

Equal employment opportunities and respect in the workplace

All 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 any associate or any other person that creates an intimidating, offensive or hostile work environment. We also maintain reporting options when such misconduct is observed or experienced and we hold our employees accountable when misconduct occurs. Any retaliation for raising concerns or issues is prohibited.

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.

Safe and secure working environment

Each of our brands is committed to providing safe and secure working environments for all associates and customers. We comply with all applicable safety and health laws and regulations and we maintain high standards of health and safety through comprehensive internal policies and procedures.

Our suppliers

Our business depends on the vendors and suppliers who make it possible for us to meet the needs of our customers. Each of our brands strives to maintain a professional and ethical relationship with its suppliers and other members of the business community, and we expect our suppliers and vendor partners to commit to ethical business practices that recognize and respect human rights.

Working conditions

We expect all of our suppliers to demonstrate a high standard of business ethics and a commitment to respect human rights, and to provide products that are safe and produced in clean and safe facilities with good working conditions. Our Standards of Engagement define the minimum human rights protections that we expect our suppliers to support and implement. The Standards of Engagement are an integral part of the contractual relationships with these suppliers.

The Standards of Engagement require that suppliers observe all applicable laws and regulations and observe and conform to the *amfori* Business Social Compliance Initiative (BSCI) Code of Conduct. Suppliers must treat their employees fairly and with dignity and must respect human rights relating to i) freedom of association and the legal right to collective bargaining, ii) prohibition of discrimination, iii) compensation, iv) working hours, v) workplace health & safety, vi) child labor, vii) the rights of young workers, viii) precarious employment, and ix) the prohibition of forced, bonded or trafficked labor.

We require *amfori* BSCI audit reports – or audit reports or certificates that are equivalent to *amfori* BSCI – from our own brand suppliers with production locations in high-risk countries. Each of our brands has committed resources to selecting suppliers, monitoring their performance and supporting them in improving their processes and working conditions. If we learn about child labor, forced labor or serious violations of occupational health and safety regulations, we will suspend our relationship with that supplier. If a supplier is unable or unwilling to remedy their non-compliance within a reasonable timeframe, we will terminate our relationship with that supplier.

Industry collaboration

Each of our brands works with industry organizations to drive food safety and social and environmental sustainability. In addition, Ahold Delhaize takes an active role in various committees and working groups, including those of the *amfori* BSCI and the Sustainable Supply Chain Initiative (SSCI), to address human rights issues in collaboration with the business community and other relevant stakeholders.

Governance and monitoring

Our commitment to human rights is established and supported globally through our Executive Committee and our Supervisory Board and implemented locally by each of our brands. The Executive Committee oversees the implementation of our Roadmap on Human Rights and monitors its progress through a quarterly progress report and at least an annual in-person review. Progress against our Roadmap is also reported to the Health & Sustainability Steering Committee, consisting of Executive Committee and regional leadership team members, and the global Governance Risk & Compliance (GRC) Committee is informed of key organizational risks related to human rights. The Supervisory Board reviews the GRC reports quarterly. Additionally, all Supervisory Board members actively participate in the Sustainability Committee which addresses specific topics and reviews overall progress on a semi-annual basis.

The leadership team of each brand is ultimately responsible for supporting the Roadmap on Human Rights within their respective brand and ensuring compliance with applicable laws and internal policies in their own operations. Working conditions within supply chains for own brand products and critical commodities are monitored at the brand or regional level.

Our approach to due diligence

We recognize that human rights due diligence is an ongoing process of assessing actual and potential human rights impacts and addressing them effectively. As part of the due diligence process outlined in our Roadmap on Human Rights, we commit to respect the rights of groups or individuals who are vulnerable or marginalized, including, but not limited to, women, members of the LGBTQ+ community, children,

persons with disabilities, minorities, refugees, migrant workers and indigenous peoples, and we expect our suppliers to do the same. Ahold Delhaize remains committed to track and report transparently on the progress on our Roadmap on Human Rights and to engage with relevant internal and external stakeholders.

Access to remedy

One of the Principles in our Code of Ethics is that we have the courage to Speak Up. Our established, local ethics helplines are free, accessible, confidential and secured services administered by a third party that enable each of our brand's associates, third parties within and connected to our supply chains and the public to raise concerns about improper behavior or possible violations of law or policy. This reporting capability includes the opportunity to report on potential human rights issues or abuses and we investigate allegations that human rights are not properly respected.

We encourage raising concerns about improper behavior or possible violations of law or policy. We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation. Any form of direct or indirect retaliation is prohibited. All reports of violations of law or policy will be investigated. Where there has been a violation, appropriate corrective action will be taken. We commit that any findings of violations or improper behavior, as well as adverse human rights impacts that we cause or contribute to, will be remedied in good faith through legitimate processes, and we expect our suppliers to do the same.

We also expect suppliers to establish adequate complaint mechanisms and to ensure no retaliation. We work with industry organizations and standard's committees, including *amfori* BSCI, to promote the provision of effective grievance mechanisms by our suppliers and we recognize that our approach to remedy should not obstruct access to other remedies.

