



## **Speak Up** – Frequently Asked Questions

### **How do I report a concern or ask a question?**

If you are aware of any potential or actual misconduct, the following **Speak Up** resources are available:

- Your manager
- Your HR representative
- Your local Compliance & Ethics representative; or
- Your local **Speak Up Line**

### **Where can I get a copy of the Code of Ethics?**

The Code of Ethics is available in Bahasa Indonesian, Czech, Dutch, English, French, Greek, Polish, Romanian, Serbian or Spanish and – can be viewed on the **Speak Up** website.

### **Can I report anonymously?**

Yes, you may choose to remain anonymous, and the information you report will be kept confidential. If you choose to identify yourself, your identity will be kept confidential in a manner consistent with conducting a thorough and fair investigation.

### **What if I fear retaliation?**

We encourage Associates to raise 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 of law, the Code of Ethics or any policies of Ahold Delhaize companies. Any form of retaliation is a serious violation of the Code and may result in disciplinary action, up to and including termination of employment by your employer. At the same time, an Associate who knowingly or recklessly makes statements or allegations that are not in good faith may be subject to corrective action by their employer. Any person who engages in retaliation, directly or indirectly, or encourages others to do so, may also be subject to corrective action by their employer.

### **What happens when I make a report?**

Reports are entered directly on the secure third-party hosted NavexGlobal system to ensure confidentiality. NavexGlobal makes these reports available only to specific individuals who are responsible for investigating and resolving each report. Each of these report recipients is trained in keeping these reports confidential and is committed to ensure reports are not inadvertently shared with implicated parties, their peers or subordinates.

After reporting a concern through the **Speak Up Line**, you will be assigned a report ID and password. When you make a report, you will be asked to log in or call back within three to five business days to provide any additional information that may be needed from you during the investigation process. In this secure environment, you can provide answers to requests for



more details or track progress. Your reports of unethical or illegal behaviors will be appropriately investigated. Where there has been a violation of the Code of Ethics or the law, appropriate disciplinary action may be taken by the employing company.

### **What types of situations or concerns should I report?**

The **Speak Up Line** enables you to report any violation of the Code of Ethics or any other Ahold Delhaize companies' internal policy or external legal requirement. If you observe any misconduct or become aware of a situation that may involve a violation of the Code of Ethics or other Ahold Delhaize companies' internal policies or external legal requirement, you have a responsibility to report the issue. You are encouraged to **Speak Up** as soon as possible so that the situation can be promptly addressed before it escalates.

Examples of conduct that should be reported include:

- Fraud
- Discrimination or harassment
- Legal and regulatory violations
- Violation of competition laws and rules
- Conflicts of Interest
- Bribery and corruption
- Inadequate or inaccurate financial reporting or recordkeeping
- Environmental, health and safety issues
- Improper use of company resources
- Insider Trading
- Disclosure of confidential information and violations of Privacy Policies
- Violations of gifts and entertainment policies

The **Speak Up Line** should not be used:

- With malicious intent (as this may lead to disciplinary measures by your employer imposed on you)
- For issues or grievances you may have in relation to HR matters (e.g. your terms of employment or performance related issues)<sup>1</sup>
- To settle personal disputes

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<sup>1</sup> For HR related matters, your direct manager and/or HR contact are the primary points of contact.