



## Speak Up – Frequently Asked Questions

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

You have many options:

1. Discuss with your direct supervisor or manager
2. Discuss with your local Human Resources, Legal or Compliance and Ethics representative
3. Access the **Speak Up** site as follows:
  - a. toll-free 24/7 by phone: 1-855-547-4273
  - b. on the web 24/7 at:
    - i. [www.foodlion.ethicspoint.com](http://www.foodlion.ethicspoint.com)
    - ii. [www.hannaford.ethicspoint.com](http://www.hannaford.ethicspoint.com)
    - iii. [www.delhaizeamerica.ethicspoint.com](http://www.delhaizeamerica.ethicspoint.com)
    - iv. [www.rbs.ethicspoint.com](http://www.rbs.ethicspoint.com)
  - c. through your specific banner's intranet page

Each of these reporting methods is secure, enabling anonymity of the reporter and confidentiality of the report.

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

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

### Can I report anonymously?

Yes, associates may choose to remain anonymous, and the information they report will be kept confidential. However, we would encourage associates to identify themselves when reporting their concerns. If an associate chooses to identify his or her self, the Company will keep their identity confidential in a manner consistent with conducting a thorough and fair investigation.

### What if I fear retaliation?

The Company will not retaliate or allow retaliation, harassment or intimidation against anyone who, in good faith, properly reports a potential violation of law, Our Code or any other Company policy. Good faith does not mean you have to be right, but it does mean you are providing all of the information you have and that you believe the information to be true.

### What happens when I make a report?

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

After reporting a concern through **Speak Up**, 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 Our Code or the law, appropriate disciplinary action may be taken.

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

If you become aware of a situation that may involve a violation of Our Code or any other internal or external law, regulation or policy, or if you are asked or instructed by management or your supervisor to do something that violates any law, regulation, company policy or the Code, you have a duty to your colleagues and the Company to properly report the potential violation.

A sample of concerns you might report through **Speak Up** are:

- Accounting, auditing and financial reporting concerns
- Workplace environment concerns, including, discrimination, retaliation, or reports of threats and violence
- Dishonesty, such as retail grazing
- Improper use or theft of corporate assets or information
- Inappropriate relationships with government agencies, vendors or business organizations
- Conflicts of interest, acceptance or giving of improper gifts, services or other benefits
- Other violations of laws, regulations or company policies