

Speak Up Policy



Title	Speak Up Policy
Business/functional owner	Vice President of Global Compliance & Ethics
Applicable to	All Associates
ExCo owner	Chief Legal Officer
Version no	2.0
Effective date	June 1, 2019

1. Introduction

Ahold Delhaize and each of its local brands are committed to conducting business in an ethically responsible manner that is based on integrity and in compliance with all applicable external laws and regulations. To support this commitment, Ahold Delhaize and the local brands maintain resources, including a reporting line (the “Speak Up Line”) which can be used to report potential misconduct or to get additional guidance regarding ethical or compliance issues. These resources are available to all associates and third parties.

The Ahold Delhaize Code of Ethics further supports this commitment by outlining four ethical principles that can be applied to our everyday work:

- We respect each other
- We follow the law
- We act ethically in all our relationships
- We have the courage to speak up

Our shared commitment to Integrity and Courage may require that we Speak Up about potential wrongdoing. If you become aware of a situation that may involve a violation of the Ahold Delhaize Code of Ethics 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 are encouraged to report the potential violation.

2. Purpose of this policy

The Ahold Delhaize Speak Up Policy explains how to report ethical misconduct or any violation of external laws and regulations or internal policies. This Policy is not intended to conflict with any local or EU legal or regulatory mandates or directives. To the extent that such a conflict may exist, the local or EU requirements shall apply.

3. Who can Speak Up?

This Speak Up Policy applies to everyone working for or on behalf of Ahold Delhaize or one of its brands. The Speak Up process is also available to any external person who wishes to raise a concern about possible misconduct within Ahold Delhaize.

4. Types of misconduct covered by this policy

The Speak Up Line enables you to report violations of the Ahold Delhaize Code of Ethics or any other internal policy or external legal requirement. Examples¹ of conduct that may be reported include:

- Fraud
- 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, product integrity and safety issues
- Insider trading
- Disclosure of confidential information and violations of our Privacy Policies

The Speak Up Line should not be used for the following:

- With malicious intent (as this may lead to disciplinary measures imposed on you);
- Issues or grievances that you may have in relation to HR matters (e.g. your terms of employment or performance related issues);²
- To settle personal disputes;
- To make accusations which you know are false or cannot be substantiated.

5. When to Speak Up

Doing the right thing sometimes requires that we speak up about issues that may involve a violation of the law or ethical principles, even though we may not be directly involved in the situation. If you observe any misconduct or become aware of a situation that may involve a violation of the Ahold Delhaize Code of Ethics or any other internal policy or external legal requirement, you have a responsibility to report the issue. Associates are encouraged to Speak Up as soon as possible so that the situation can be promptly addressed before it escalates.

6. How to Speak Up

Our Speak Up Policy allows you to report issues or concerns and to seek guidance regarding compliance and ethics questions. If you are aware of any potential or actual misconduct, you are encouraged to reach out to one of the following resources:

¹ In addition to these examples, the Netherlands has additional specific regulations based on the Dutch legislation known as House for Whistleblowers. The applicable regulations are set out in Annex 2 of this policy.

² For HR related matters, your direct manager and/or HR contact are the primary points of contact.

- **Your direct manager;**
- **Your local Human Resources representative;**
- **Your local Compliance & Ethics resource; or**
- **the Speak Up Line.³**

In most situations, the first reporting resource you should consider when reporting a concern or misconduct is your direct manager. If this is not possible or you do not feel comfortable doing so, please feel free to report the matter to your local Human Resources representative (especially in case of HR related matters), your local Compliance & Ethics resource or any of the available resources described below.

Speak Up Line

If you are uncomfortable discussing your concern with your manager, human resources, or your Compliance & Ethics resource, you can use the Speak Up Line. This line gives you the opportunity to raise concerns confidentially and remain anonymous if you choose to do so.

The Speak Up Line is administered by Navex Global, an independent service provider, and is available 24 hours a day, 365 days a year. The Speak Up Line can receive reports in languages spoken by associates of Ahold Delhaize or its brands around the world.

The Speak Up Line provides two ways to report a concern or misconduct:

Online: To file a concern or misconduct online, please visit your local Speak Up Line website as noted in **Annex I**. You should follow the instructions on the web page.

By phone: To report your concern or misconduct by phone, please call your local Speak Up Line in your country (free of charge). The Speak Up Line operator will guide you in reporting your concern.

Please find contact details for the Speak Up Line in **Annex I**.

After you complete your report (online or by phone), you will receive a unique report number. You can use this number to call back or access the website to check the progress of your report. You can see whether the person dealing with your report has feedback for you or further questions and you also have the ability to provide additional information. Your report number is particularly important if you choose to remain anonymous, as your Speak Up report is the only way we can communicate additional questions or comments with you.

When you file a report (in person, in writing, online or by phone), please provide as much detailed information as you have to enable the Company to assess and investigate your concern or misconduct, such as:

- The background, history and reason for the concern or misconduct

³ The Speak Up Line is referred to as the Signaalijn in the AHOU (Netherlands) and the Fair Play line in Albert (Czech Republic).

- Names, dates, places and other relevant information
- Any documents that may support your report

Although you have the option of reporting anonymously, we encourage you to identify yourself so that we can follow up with you in the event that further information is needed. A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

In the Netherlands, specific legal obligations of the Company apply. These legal obligations are discussed further in Annex II to this Policy.

What can you expect if you Speak Up?

Ahold Delhaize and its brands take every report of possible misconduct seriously. When you submit a report, it will undergo an initial review by the Compliance and Ethics team or the local resource assigned to review these reports. If further investigation is appropriate, the report will be assigned to an investigator and case manager for follow up. On average, investigations are completed in less than 30 days.

The investigation of a concern or misconduct will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and Company policies. Details of the complaint, your identity and the identity of anyone else mentioned in the complaint, are kept confidential throughout and after the investigation and are shared only on a need-to know basis.

What if I believe that my report is not handled appropriately?

If you believe that your complaint is not handled in accordance with this Policy, please report your concern directly to the Ahold Delhaize Vice President of Global Compliance & Ethics.

Confidentiality and Privacy

All concerns or allegations of misconduct (including the suspicions of wrongdoings set out in **Annex 2** that are being reported in the Netherlands) and Compliance & Ethics complaints are treated confidentially.

Our Company is committed to protecting the privacy of everyone involved. We will safeguard personal data from unauthorized access and processing. Any personal data obtained as part of this Speak Up policy will only be used for the purposes explained in this policy or to comply with the law or an important public interest. For more information regarding the protection of your personal data, please contact your local Compliance & Ethics resource.

Non-retaliation

Anyone who in good faith reports issues or concerns will be protected from retaliation as a result of such reports. Any form of retaliation is a serious violation of the Ahold Delhaize Code of Ethics and may result in disciplinary action, up to and including termination of employment. Retaliation may include, but is not limited to harassment, discharge, or other

types of discrimination, including but not limited to changes in compensation or terms and conditions of employment. 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. Any person who engages in retaliation, directly or indirectly, or encourages others to do so, may also be subject to corrective action.

7. Additional Information

For more information about this Policy, the Speak Up Line, or the Ahold Delhaize Code of Ethics, please contact the Global Compliance & Ethics team at ethics@aholddelhaize.com.

Annex I: Speak Up Line Contact Information

Ahold Delhaize GSO 0800-020-1006 aholddelhaize.ethicspoint.com	bol.com 0800-020-1006 bol.ethicspoint.com
Ahold Delhaize Switzerland 0800-561-163 aholddelhaize.ethicspoint.com	Delhaize Belgium 0800-81432 delhaizebelgium.ethicspoint.com
Albert Czech Republic 800-142-643 albert.ethicspoint.com	Delhaize Luxembourg 800-85215 delhaizeluxembourg.ethicspoint.com
Albert Heijn 0800-020-1006 albertheijn.ethicspoint.com	Delhaize Serbia 0800-191-076 delhaizeserbia.ethicspoint.com
Albert Heijn Belgium 0800-81432 albertheijn.ethicspoint.com	Mega Image 0800-40-0942 megaimage.ethicspoint.com
Alfa Beta 00-800-11-003-6689 alfabeta.ethicspoint.com	Super Indo Dial: 001-801-10 Then when prompted, dial: 888-866-9203 superindo.ethicspoint.com
AD USA Distribution 888-866-9203 adusadist.ethicspoint.com	Giant / Martin's 888-866-9203 giantmartins.ethicspoint.com
AD USA Transportation 888-866-9203 adusatrans.ethicspoint.com	Hannaford 888-866-9203 hannaford.ethicspoint.com
Ahold Delhaize USA 888-866-9203 adusa.ethicspoint.com	Peapod 888-866-9203 peapod.ethicspoint.com
Ahold Delhaize USA Corporate Support 888-866-9203 aholddelhaizeusa.ethicspoint.com	Peapod Digital Labs (PDL) 888-866-9203 pdl.ethicspoint.com
Food Lion 888-866-9203 foodlion.ethicspoint.com	Retail Business Services 888-866-9203 retailbusinessservices.ethicspoint.com
Giant Food 888-866-9203 giantfood.ethicspoint.com	Stop & Shop 888-866-9203 stopandshop.ethicspoint.com

Annex II – Additional Rules for the Netherlands

In the Netherlands, the procedures described herein applies to the reporting of suspected misconduct to the extent that (1) the presumption is based on reasonable grounds, and 2) the public interest is at stake is (i) violation of the law, (ii) a danger to public health, (iii) endanger the safety of persons, (iii) a threat to the environment, (iv) a threat to the proper functioning of the public service or (v) an enterprise as a result of an improper mode of action or inaction.

Specific rules for making an external reporting of suspected misconduct

After making a report of misconduct, the reporter can still file an external report if:

- a. the detector does not agree with the position of the Company and considers that the presumption is wrongly set aside;
- b. the reporter did not receive any opinion within the period referred to in in the Policy.

Such complaints will only be admissible if it has been dealt with in a timely and adequate manner in accordance with the company's internal whistleblower/ reporting procedure, such as this Policy, unless you cannot reasonably be expected to first submit an internal report or an internal report was not adequately followed-up by Ahold Delhaize. More information on external reporting can be given by our Compliance & Ethics representatives, via the Compliance & Ethics intranet site or via <https://www.adviespuntklokkenluiders.nl>.

The external report can be made by an external authority that to your reasonable opinion is the most appropriate. Examples of external authorities include:

- a. an authority that is focused on the investigation of criminal offenses;
- b. an authority charged with monitoring compliance with the provisions under or pursuant to the law;
- c. another authorized organization where the suspected misconduct can be reported, including the Department of the House for Whistleblowers.

Associates with a suspicion of a wrongdoing within the company can report this to every supervisor within the organization, with higher position than the reporter. In case the supervisor himself/herself is involved in the concern or misconduct, the associate is able to report the concern or misconduct to the highest level within the company or the Compliance & Ethics representative.

Within 30 days of the notification, the Company will inform you in writing about the substantive position with regards to the reported misconduct.

If it becomes clear that no position can be given within the time limit, you will be informed and provided an estimate of time within which the reporter can expect an answer. If the total period exceeds twelve weeks, it shall also indicate why a longer period is necessary.

Confidential and anonymous reporting

Your information will only be shared with your consent and with a limited number of people that are involved in dealing with your report on a strict need-to-know basis, under full confidentiality.

The individuals dealing with your report will only disclose your identity after having obtained your prior written consent and will treat any information regarding the report confidentially. Information will only be disclosed outside this small group if we are required to do so by law.

In principle, we are obliged to inform the implicated person(s) that a Compliance & Ethics complaint has been filed against him/her, but your identity will not be disclosed.

Non Retaliation

In accordance with clause 7:658C BW, we will not tolerate any form of retaliation against you should you report alleged misconduct/a wrongdoing. If you report a case of alleged misconduct or wrongdoing in good faith and in accordance with this policy, you will not suffer adverse consequences.