



Our Code of Ethics

Doing what's right, every day

Our Code of Ethics and You

Our Code of Ethics (“**Our Code**”) defines the way we live Ahold Delhaize’s values (“**Values**”) and ethical principles (“**Ethical Principles**”) every day.

Our Code of Ethics is based on ethical principles that apply to all associates.

You must understand and apply the ethical principles described in Our Code. We expect you to make Our Code an integral part of your daily work.

Compliance & Ethics contacts

Our Code does not anticipate every situation you may encounter nor does it remove the need for using common sense or professional judgment. If you are unsure about the best course of action, ask yourself if the business decision is ethical, legal and respects the values of the Company. If your answer is ‘No’, you should not take action. If you are still uncertain about the decision, contact an ethics resource.

- your manager, or
- your HR representative, or
- your local Compliance & Ethics representative (ethics@aholddelhaize.com) or
- the Speak Up Services (toll-free ethics helpline, available 24 hours a day, 7 days a week). See below for contact details.

Speak Up Services

Ahold Delhaize GSO
Ahold The Netherlands
0800-0222169
www.aholdsignaallijn.nl

Our commitment to Ethics

At Ahold Delhaize, our shared Values support an ethical culture and are the foundation of our commitment to conduct our business by doing what's right, every day. Our Code supports this commitment by outlining **four ethical principles** that can be applied in our everyday work.

1 We respect each other

People are our most valuable assets. We are committed to provide a safe, secure and inclusive environment where all Associates and customers are respected and appreciated.

2 We follow the law

We comply with applicable laws and regulations everywhere we do business and do not tolerate violations of the law.

3 We act ethically in all our relationships

We act ethically in all our relationships and avoid conflicts of interest.

4 We have the courage to speak up

We have the courage to speak up when misconduct or ethical violations are observed, or when there are questions regarding the interpretation or application of Our Code or other external laws and regulations and internal policies and standards.