

# Addendum to the Ahold Delhaize Group Speak Up Policy

Entity: Ahold Delhaize Group &  
Ahold Delhaize Europe &  
Indonesia (Netherlands)

Title	Ahold Delhaize Group Speak Up Policy - Addendum Entity: AD Group & AD EU&I (Netherlands)
Business/functional owner	Vice President of Group Compliance & Ethics
Applicable to	Associates of Ahold Delhaize, its brands and support offices and third parties
ExCo owner	Chief Legal Officer
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## Introduction

Ahold Delhaize, including all of its local brands and support offices, is committed to conducting its business with integrity and in compliance with all applicable laws, regulations and its own policies. We believe in a Speak Up culture where everyone feels comfortable and encouraged to share their concerns and issues, ask questions and report any potential misconduct.

As an associate of Ahold Delhaize, you have several ways to Speak Up:

- 1) If you have a question, concern or issue you want to discuss, please reach out to your manager, local HR representative, local or Group Ethics representative or use the Speak Up line.
- 2) If you wish to report misconduct, you should do that through your local or Group Ethics representative or by using the Speak Up line.

If you are not an associate of Ahold Delhaize, we encourage you to report any misconduct by contacting a local or Group Ethics representative or by using the Speak Up line.

The Ahold Delhaize Group Speak Up Policy provides information about how to Speak Up, the available reporting resources, the reporting process and the safeguards. However, the local brands and support offices located in the EU comply with mandatory local whistleblowing laws, resulting from the transposition of the European Union Directive (EU) 2019/1937. Each Addendum to the Group Speak Up Policy contains additional information based on those local law requirements, in so far these requirements deviate from the Ahold Delhaize Group Speak Up Policy.

**This Addendum is applicable only when the reported misconduct falls under the scope of the mandatory local whistleblowing laws, resulting from the transposition of the European Union Directive (EU) 2019/1937.**

This Addendum is intended to provide you with additional information as explained above, but is not intended to contradict any applicable (whistleblowing) laws and regulations. In case of contradictions, the applicable laws and regulations will apply.

For more information about this Addendum or if you need additional guidance regarding ethical or compliance issues and concerns on local level, please contact the local Ethics representative as identified in this Addendum. For more information about the Ahold Delhaize Group Speak Up policy, the global Speak Up line, the Ahold Delhaize Code of Ethics, or if you need additional guidance regarding ethical or compliance issues and concerns, you can contact the Group Ethics team at [ethics@aholddelhaize.com](mailto:ethics@aholddelhaize.com).

It is up to each of us individually to show **Integrity** and **Courage** and do what's right, every day, by reporting any potential misconduct.

## Reporting misconduct locally using the Ahold Delhaize reporting resources

Who can use the local Ahold Delhaize reporting resources?

Please see the Group Speak Up Policy.

What type of misconduct can be reported using the local Ahold Delhaize reporting resources?

As per the Dutch Whistleblower Protection Act, all violations as mentioned in Appendix I of the Group Speak Up Policy about European Union laws and regulations and additionally:

An act or omission which jeopardizes the public interest in connection with:

- a breach or risk of a breach of 1) a statutory regulation or of 2) internal rules that impose a specific obligation and have been established by the employer based on a statutory regulation; or
- a risk to public health, public safety or the environment, or an improper act or omission that jeopardizes the proper functioning of the undertaking.

A public interest is in any event at stake if the act or omission affects more than just personal interests and is either part of a pattern or structural in nature or is serious or broad in scope.

### When should you report misconduct using the local Ahold Delhaize reporting resources?

Please see the Group Speak Up Policy.

### What are the local Ahold Delhaize reporting resources?

Locally, the following reporting resources can be used:

- Ethics representative of AD Group and AD EU&I
  - Via phone, email or in person (on your specific request), go to the [Ahold Delhaize Speak Up page](#) for contact details
- Speak Up line of AD Group and AD EU&I
  - Online or by phone, go to the [Ahold Delhaize Speak Up page](#) for contact details
  - Anonymous reporting is possible

Additionally:

- For AD Group and AD EU&I associates who want to consult with someone about the suspected violation, a confidential counselor will be made available. Please note, the confidential counselor is not a reporting resource. More information can be found in the Reporting procedure Whistleblowers Protection Act for associates, available on the intranet.
- For AD Group and AD EU&I associates who want more guidance on what to do when confronted with inappropriate behavior (sexual harassment, discrimination, bullying, aggression and violence in the workplace), please see the Procedure on inappropriate behavior, available on the intranet.

More information on how the Speak Up line works can be found in the Group Speak Up Policy.

### What to expect when you report misconduct using the local Ahold Delhaize reporting resources?

Please see the Group Speak Up Policy.

## Local Ahold Delhaize safeguards

### Who is protected?

Please see the Group Speak Up Policy.

### Confidentiality

Please see the Group Speak Up Policy and in any event in line with the Dutch Whistleblower Protection Act.

### Processing of personal data

Please see the Privacy Policy [here](#).

### Non-retaliation

Please see the Group Speak Up Policy and in any event in line with the Dutch Whistleblower Protection Act.

## Reporting externally to local or European Union authorities

### Who can report to local or European Union authorities?

Locally, as per the Dutch Whistleblower Protection Act: any natural person who has become aware of a suspected violation in a work-related context. Work-related context means future, current or past work-related activities in the public or private sector through which, irrespective of the nature of those activities, a natural person obtains information about a violation and in which this person could suffer a detriment as referred to in section 17da of the Dutch Whistleblower Protection Act if they reported such information.

On European Union level, please see Appendix I of the Group Speak Up Policy.

### What can be reported to local or European Union authorities?

Locally, as per the Dutch Whistleblower Protection Act, all violations as mentioned in Appendix I of the Group Speak Up Policy about European Union laws and regulations and additionally:

An act or omission which jeopardizes the public interest in connection with:

- A breach or risk of a breach of 1) a statutory regulation or of 2) internal rules that impose a specific obligation and have been established by the employer based on a statutory regulation; or
- A risk to public health, public safety or the environment, or an improper act or omission that jeopardizes the proper functioning of the undertaking.

A public interest is in any event at stake if the act or omission affects more than just personal interests and is either part of a pattern or structural in nature or is serious or broad in scope.

On European Union level, please see Appendix I of the Group Speak Up Policy.

### Which local or European Union authorities can you report to?

Locally, as per the Dutch Whistleblower Protection Act, the following authorities are appointed to receive and follow up on reports, as far as they are competent in the areas set out under “What can be reported to local or European Union authorities?” above:

- the Netherlands Authority for Consumers and Markets;
- the Dutch Authority for the Financial Markets;
- the Data Protection Authority;
- De Nederlandsche Bank N.V.;
- the Whistleblower Authority;
- the Health and Youth Care Inspectorate;
- the Dutch Healthcare Authority;
- the Authority for Nuclear Safety and Radiation Protection; and
- organizations and administrative authorities, or units thereof, appointed by an order in council or a ministerial order which have tasks or powers in one of the areas referred to in Appendix I of the Group Speak Up Policy about European Union laws and regulations.

On European Union level, the relevant European Union authorities.

More information about the Dutch Whistleblower Protection Act can be found here:

<https://www.huisvoorklokkenuiders.nl/>.