

# Addendum to the Ahold Delhaize Group Speak Up Policy

## Entity: Belgium

Title	Ahold Delhaize Group Speak Up Policy - Addendum Entity: Belgium (Delhaize Le Lion/De Leeuw NV/SA and its subsidiaries excluding Delhaize Luxembourg SA – Delhaize distribution Luxembourg SA)
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
Version no	Addendum Belgium v1.2
Effective date	January 1, 2025

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

- Breaches related to the fight against tax fraud;
- Breaches related to the fight against social fraud;
- Breaches relating to the internal market, including breaches of European Union competition rules and Member State aid rules.

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

Additionally, Belgian associates can consult with confidential counsellors about (potential) concerns/misconducts concerning harassment, violence and sexual unacceptable behavior. Also, for all psychosocial matters such as discrimination, racism and conflict, psychosocial advisors are available. More information can be found in the local Speak up policy of Delhaize or on the Wellbeing@Work boards. Please note that the confidential counsellors and psychosocial advisors are not considered reporting resources.

Alternatively, you can also use the Group Speak Up resources:

- The Group Ethics team
  - Via email or in person (on your specific request), send an email to [ethics@aholddelhaize.com](mailto:ethics@aholddelhaize.com)
- The Group Speak Up line
  - Online or by phone, go to the [Ahold Delhaize Speak Up page](#) for contact details
  - Anonymous reporting is possible

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 Belgian 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 Belgian Whistleblower Protection Act.

## Reporting externally to local or European Union authorities

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

Locally, as per the Belgian Whistleblower Protection Act: any reporter who has become aware of a suspected violation in a work-related context. This includes at least:

- Any individual having worked or working for Delhaize, or whose work relationship has yet to begin;
- Self-employed persons or employees of other companies working or having worked for Delhaize;
- (Former) consultants;

- Anyone working under the supervision and direction of contractors, subcontractors, and suppliers;
- Shareholders and persons belonging to the administrative, management or supervisory body (current and former);
- Volunteers and paid or unpaid interns (current as well as former).

In addition, reporters who have obtained information in financial services, products and markets, and the prevention of money laundering and terrorist financing, regardless of whether this information was obtained in a work-related context.

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

- Breaches related to the fight against tax fraud;
- Breaches related to the fight against social fraud;
- Breaches affecting the financial interests of the European Union;
- Breaches relating to the internal market, including breaches of European Union competition rules and Member State aid rules.

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 Belgian Whistleblower Protection Act, reports can be made externally to the following Belgium authorities:

- Federale Overheidsdienst Economie, K.M.O., Middenstand en Energie;
- Federale Overheidsdienst Financiën;
- Federale Overheidsdienst Volksgezondheid, Veiligheid van de voedselketen en Leefmilieu;
- Federale Overheidsdienst Mobiliteit en Vervoer;
- Federale Overheidsdienst Werkgelegenheid, Arbeid en Sociaal Overleg;
- Programmatie Overheidsdienst Maatschappelijke Integratie, Armoedebestrijding, Sociale Economie en Grootstedenbeleid;
- Federaal Agentschap voor Nucleaire Controle;
- Federaal Agentschap voor Geneesmiddelen en Gezondheidsproducten;
- Federaal Agentschap voor de veiligheid van de voedselketen;
- Belgische Mededingingsautoriteit;
- Gegevensbeschermingsautoriteit;
- Autoriteit voor Financiële diensten en Markten;
- Nationale Bank van België;
- College van toezicht op de bedrijfsrevisoren;
- Authorities as mentioned in article 85 of the law of 18 September 2017 on the prevention of money laundering and the financing of terrorism and on limiting the use of cash;
- Nationaal Comité voor de beveiliging van de levering en distributie van drinkwater;
- Belgisch Instituut voor postdiensten en telecommunicatie;
- Rijksinstituut voor ziekte- en invaliditeitsverzekering;
- Rijksinstituut voor de Sociale Verzekeringen der Zelfstandigen;
- Rijksdienst voor Arbeidsvoorziening;
- Rijksdienst voor Sociale Zekerheid;
- Sociale Inlichtingen en Opsporingsdienst;
- Autonome dienst Coördinatie Anti-Fraude (CAF);
- Scheepvaartcontrole.

In the absence of designation or if no authority considers itself competent to receive a report, the Federal Ombudsman shall act as the competent coordinating authority for the purposes of this law.

The Federal Institute for the Protection and Promotion of Human Rights (FIRM) will provide whistleblowers with professional legal and psychological support. This can be done through the institute itself or third parties such as law firms or psychologists who specialize in the matter.

On European Union level, the relevant European Union authorities.