

# Addendum to the Ahold Delhaize Group Speak Up Policy

## Entity: Luxembourg

Title	Ahold Delhaize Group Speak Up Policy - Addendum Entity: Luxembourg (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 Luxembourg 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.

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 Delhaize Luxembourg
  - 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 Luxembourg
  - Online or by phone, go to the [Ahold Delhaize Speak Up page](#) for contact details
  - Anonymous reporting is possible

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 Luxembourg 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 Luxembourg Whistleblower Protection Act.

## Reporting externally to local or European Union authorities

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

Locally, as per the Luxembourg 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).

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 Luxembourg Whistleblower Protection Act: all violations of national Luxembourg law can be reported. However an exception is made for reports of national security violations. Nor does it apply to reporting persons whose relations are covered by medical secrecy, lawyer-client secrecy,

the professional secrecy to which a notary is bound, the professional secrecy to which a bailiff is bound, the secrecy of judicial deliberations, or by the rules governing criminal proceedings.

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

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

As per Luxembourg Whistleblower Protection Act, reports can be made externally to the following Luxembourg authorities:

- The Luxembourg Financial Services Authority - CSSF
- The Luxembourg Insurance Commission - CAA
- The Luxembourg competition authority
- The Luxembourg Registration Duties, Estates and VAT Authority - AED
- The Luxembourg Inspectorate of Labour and Mines - ITM
- The Luxembourg Data Protection Commission - CNPD
- The Luxembourg Equal Opportunities Centre - CET
- The Mediator, as part of his mission to carry out external checks on places where people are deprived of their liberty
- The Ombudsman for children and youth
- Luxembourg Regulatory Institute - ILR
- Luxembourg Independent Regulator for Audiovisual Media Services - ALIA
- Luxembourg and Diekirch Bar Association
- Luxembourg Chamber of Notaries
- Luxembourg Medical Board
- Nature and Forest Administration - ANF
- Water Management Administration - AGE
- Air Navigation Administration - ANA
- National Consumer Ombudsman Service
- Order of Architects and Consulting Engineers - OAI
- Luxembourg Association of Chartered Accountants - OEC
- Luxembourg Institute of Auditors – IRE
- Luxembourg Direct Tax Administration – ACD

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