



# Human Rights Report 2024

July 2024



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Dear reader,

**I am delighted to introduce the Ahold Delhaize 2024 Human Rights Report, including an update on the progress on our Roadmap on Human Rights. This report comes just after we launched the Growing Together strategy and introduced Ahold Delhaize's new purpose: 'Inspiring everyone to eat and live better, for a healthier future for people and planet.' As a purpose-led company, with people at the heart of our business, this report demonstrates how our responsibility to respect human rights comes to life.**

Since the publication of our last report in 2022, our world has continued to encounter significant challenges. War, political and social unrest, inflation, natural disasters and increasing polarization in society make it all the more important that our companies focus on respecting and advancing fundamental human rights. In this report, we reflect on our achievements in such challenging conditions, while also recognizing that there are salient social – and also environmental – impacts that need addressing. For example, the International Labour Organisation (ILO) estimates that nearly 28 million people across the world are trapped in forced labor, including more than 3 million children. We also recognize that migrant workers in global supply chains are especially vulnerable to exploitation. While we transitioned our approach from human rights due diligence to sustainability due diligence more broadly, forced and child labor remain priority salient impacts for Ahold Delhaize. The full list of salient social and environmental impacts is shared in this report, and we are committed to addressing those impacts and reporting on our progress.

In the face of adversity, Ahold Delhaize and each of its brands demonstrated resilience and agility in adapting to the evolving landscape and consistently going above and beyond to support their customers, communities and broader supply chains. Collaboration is key, especially in addressing systemic issues across global supply chains. Throughout this report, you can find many examples of how Ahold Delhaize and its brands work with suppliers, peers, governments and civil society to address adverse social impacts.

There have also been positive developments in our work on human rights and sustainability. Awareness of human rights issues continues to increase, and meaningful conversations about diversity, equity and inclusion drive further progress. As Ahold Delhaize, we recognize the importance of transparency and accountability in reporting and are in

the process of implementing the requirements and guidance set forth by the European Union, such as the Corporate Sustainability Reporting Directive (CSRD) and the European Union Pay Transparency Directive. We also recognize the importance of sustainability due diligence, so we were pleased to see the Corporate Sustainability Due Diligence Directive (CSDDD) approved.

Ahold Delhaize and its brands are in the people business. The relationships our colleagues foster with supply chain partners, the customers they assist and communities they serve are paramount. It is our responsibility to support human rights everywhere our companies do business, even when confronted with global challenges, by conducting our business the right way, every day. By doing so, we believe we can continue to mitigate negative impact and drive positive impact toward a more equitable society that recognizes and respects human rights.

Ahold Delhaize and its great local brands took several steps on the Roadmap on Human Rights. Together, we thoroughly reviewed and updated our Standards of Engagement and embarked on a journey towards sustainability due diligence. While we further integrate our reporting on human rights in our Annual Report, in line with the CSRD, Ahold Delhaize showed progress on the social dimensions in the World Benchmarking Alliance's 2023 Food and Agriculture Benchmark and upgraded its MSCI ESG rating to AAA, the highest scoring range.

Our brands remain committed to providing customers and communities access to affordable, sustainable and healthy products while also creating a more sustainable supply chain. Our commitment to human rights is integral to this work, and so are the external partnerships Ahold Delhaize and its great local brands are engaged in. We will continue to reflect on our progress, assess the effectiveness of our actions and develop programs and partnerships to address our salient impacts, globally and locally. The broader challenges in global food supply chains can only be addressed if we work together with – and consider the interests of – our stakeholders. As we continue our journey, we invite you to engage with us on our Roadmap on Human Rights and help us create positive impact.

Frans Muller  
Chief Executive Officer



# welcome and introduction

Welcome to our 2024 Human Rights Report. We are proud of this report because it represents progress across Ahold Delhaize and each of its brands. It is the result of hard work and perseverance of the diverse associates who make each of our brands great places to work and who help our brands' customers make healthier and more sustainable choices.

A significant development since we published our last Human Rights Report is the introduction of the European Corporate Sustainability Reporting Directive (CSRD). With this new piece of legislation, part of the broader European Green Deal, you will see most of the content of our Human Rights Report shift into our Annual Report as of next year and become an integrated part of our broader ESG reporting. The CSRD also influences other aspects of our Roadmap on Human Rights, for example how we conduct due diligence and how we report on social compliance. Although this will likely be our last stand-alone report, we will continue to provide regular updates through our integrated reporting as well as through our website and other external communications.

The legislative framework was not the only thing that changed. Inflation, social unrest and a changing workforce continued to put pressure on our company and our customers. The geopolitical situation also remains uncertain. Wars in Ukraine and the Middle East are having a devastating effect on human life, disrupting food and energy markets and impacting supply chains. In uncertain times, Ahold Delhaize and its brands continue to do what is right, and that also applies to our continued implementation of the Roadmap on Human Rights. To help you navigate this report, we have divided our content into eight chapters:



letter from the CEO

welcome and introduction

**01.** Ahold Delhaize's Growing Together strategy

**02.** strengthening our governance

**03.** our approach to due diligence

**04.** human rights in our own operations

**05.** human rights in the supply chain

**06.** monitoring and reporting on progress

**07.** access to remedy

**08.** next steps on our roadmap

**01. leverage our strategy**

This includes Ahold Delhaize's new Growing Together strategy and how that strategy intersects with the Roadmap on Human Rights.

**02. strengthening our governance**

In this chapter, we share how we engage our senior leaders, including the Executive Committee and Supervisory Board, relevant global functions and each of our great local brands, as well as the updates we have made to our policy and guidance framework.

**03. our approach to due diligence**

We share our approach to due diligence and how we translated the global Roadmap on Human Rights to each of our brands. This includes how we identified vulnerable groups as part of our global due diligence process, how we identify and manage risks, and how we ensure social compliance and certification of critical areas.

**04. human rights in our own operations**

In this chapter, we explore the salient social impacts identified for our own operations and use case studies to highlight the specific focus areas of our brands.

**05. human rights in the supply chain**

We discuss our progress on the salient impacts most relevant to our brands' supply chains and use case studies to share examples from across Ahold Delhaize and its brands. We also make a connection between the vulnerable groups in supply chains we identified as part of the global due diligence process and the salient impacts, including forced and child labor.

This report closes out an important period of developing and further maturing our work on human rights, from our first ever Position on Human Rights in 2017 and through two consecutive Roadmaps on Human Rights [published in 2020 and 2022]. This report is also the start of aligning our reporting on human rights with the requirements outlined in the relevant standards of the CSRD. If there is anything we have learned from the last two years, it is that our Roadmap on Human Rights was – and remains – fit for purpose. It aligns well with what is required of us in current and upcoming legislation, and we are convinced that our Roadmap contains all the right steps to help us drive further impact. Ahold Delhaize is ready, and so are its great local brands. It has been very rewarding, again, to engage with so many colleagues and leaders within Ahold Delhaize's great local brands, and experience their true dedication and commitment to doing what's right, every day.

On a personal note, we thank everyone in our extended human rights and ethics communities, both internally at Ahold Delhaize and outside of our company. It would not be possible to do this work without you, and we look forward to the next steps on this journey, together.

**06. monitoring and reporting on progress**

Monitoring and reporting on progress are critical steps in our approach to due diligence. In this chapter, we discuss how we will integrate reporting on Human Rights in the context of Ahold Delhaize's environmental, social and governance (ESG) performance, in line with the CSRD.

**07. access to remedy**

Another important component of due diligence is to provide access to remedy. We focus on our internal grievance mechanism – our Speak Up lines for each brand – and provide an update on how we promote grievance mechanisms in supply chains. We also address human rights defenders.

**08. next steps on our roadmap**

In our final chapter, we update our priorities, reflect on the last two years of implementing our human rights due diligence process and address some of our challenges. We provide an update on collaborations and partnerships and how we have engaged with stakeholders since 2022. And finally, we share the next steps on our Roadmap on Human Rights.



**Karin van den Houten-Bogaers**

Director Ethical Engagement & Human Rights



**Nathan Prater**

VP Global Compliance & Ethics

**where to find related documents and information on our website**

|   |  |
|---|--|
| <b>Code of Ethics</b>   | <b>Annual Report</b> (and related documents)           |
| <b>Position on Human Rights</b> (and previous Human Rights Reports) | <b>Standards of Engagement</b> (and related documents) |
| <b>Speak Up Policy</b>  | <b>Sustainability Policy</b>                           |
| <b>Growing Together strategy</b> (and related documents)            | <b>Stakeholder Policy</b> (and related documents)      |
| <b>Diversity, Equity &amp; Inclusion</b>                            | <b>Key Positions on Societal Topics</b>                |

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# 01. Ahold Delhaize's Growing Together strategy

**On May 23, 2024, Ahold Delhaize launched its Growing Together strategy with an updated purpose and a new growth model that places innovation and own-brand products at the heart of delivering a healthy, affordable and sustainable assortment for our customers.**

Ahold Delhaize is one of the world's largest food retail groups, but the Growing Together strategy puts all of its efforts into being small. Because by being small, we can be part of our local communities. We can see the needs of our neighborhood customers and the people we work with, while understanding the responsibility of our scale. That's how we can make a difference. Upon the launch of the Growing Together strategy, Frans Muller, President and CEO of Ahold Delhaize said: "We have taken a multi-stakeholder approach to developing this new strategy, ensuring we balance the needs of our customers, the people we work with, and broader societal dimensions. "Growing

Together" ensures we will stay at the forefront of innovation in healthy foods, omnichannel experiences and supply chain transformation, serving customer needs through a well invested and future focused foundation."

The Growing Together strategy is also very closely aligned with Ahold Delhaize's commitment to respect human rights, which is anchored in the Code of Ethics and further outlined in the Position on Human Rights. Our commitment to human rights is a foundational commitment towards our associates, our customers and communities, and the people in our supply chains. Throughout this report, and in our broader approach to sustainability due diligence, you will see the Growing Together strategy reflected. More information about Ahold Delhaize's strategy is available on our [website](#).

our growing together strategy

our purpose

inspiring everyone to eat and live better, for a healthier future for people and planet

our vision

together, we are your trusted local food retailer

our values

**teamwork**

Together we take ownership, collaborate and win.

**care**

We care for our customers, our colleagues, and our communities

**humor**

We are humble, down-to-earth, and don't take ourselves too seriously.

**integrity**

We do the right thing and earn customers' trust.

**courage**

We drive change, are open minded, bold and innovative.

strategic priorities

**thriving people**

We create a caring place to work inspiring **growth and collaboration, where everyone is heard, valued and finds purpose** in serving our communities.

**healthy communities & planet**

We lead the transition to a **healthy and sustainable food system** and create a brighter future for our communities.

**vibrant customer experiences**

We serve our **customers' life needs** through our core, and an **expanding ecosystem** of integrated products, services, channels and data.

**trusted product**

We translate our passion for food into **healthy, fresh and affordable products that are accessible** for our customers.

**driving customer innovation**

We drive further growth by building profitable **complementary businesses** and through **innovation** to support our customers of tomorrow.

**portfolio & operational excellence**

We use **technology and data**, we **save for our customers** every day and we leverage **scale** to become the most operationally efficient in our industry.

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# 02. strengthening our governance

## board-level engagement

Our commitment to human rights is established and supported in our company through our **Executive Committee and our Supervisory Board**, and implemented locally by each of our brands. Ahold Delhaize's Executive Committee directly monitors the implementation of our Roadmap on Human Rights through a quarterly progress report and one or more annual in-person review(s). Within the Executive Committee, Ahold Delhaize's Chief Legal Officer is accountable for the Roadmap on Human Rights, and several of the salient impacts are functionally managed by other Executive Committee members, including Human Resources (HR), represented by the Chief Human Resources Officer, and Health & Sustainability, represented by the Chief Sustainability Officer (CSO). In addition, the Chief Financial Officer (CFO) is accountable for financial and non-financial reporting, which includes ESG reporting and the implementation of the CSRD.

These board members possess relevant knowledge, skills and competencies for their functional areas in relation to health, sustainability, human resources, non-financial reporting and human rights. To further embed health and sustainability in the way our senior leaders "think, feel and do", we developed a "Grounded in Goodness" program for Ahold Delhaize's senior leadership, including the Executive Committee, with the Cambridge Institute for Sustainability Leadership.



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### case study: Grounded in Goodness learning program for senior leadership

To ensure our leadership teams can create a culture of innovation and lead the company into a sustainable future, four cohorts representing the entire SVP+ leadership group from Ahold Delhaize and its brands participated in a

four-day Grounded in Goodness learning program at – and developed in partnership with – the Cambridge Institute for Sustainability Leadership. The program explored topics focused on climate science, sustainable development in the

food sector, systems thinking, bio-dynamic farming, business model transformation, social impact and more. All senior executives completed the program by February of 2024, after three cohorts of leaders participated in 2023.



In 2023, the Executive Committee's annual human rights review focused on our progress on the Roadmap and the importance of effective due diligence. The Executive Committee has reviewed and approved this report and remains committed and engaged on our work on human rights. They are also directly involved on related issues and initiatives, including – but not limited to – the updated Growing Together strategy, broadening our approach to social and environmental due diligence and the diversity, equity and inclusion strategic framework. You can read more about those strategies

and frameworks throughout this report.

The Human Rights Quarterly, which was introduced in 2021, is both an internal newsletter and a Roadmap progress update. The Quarterly includes internal and external news articles relating to human rights and the salient impacts as well as updates on the steps we've taken on the Roadmap. The Quarterly is provided to the Executive Committee and the Supervisory Board and is shared with a broad community of leaders and practitioners to share knowledge and build further expertise on human rights at Ahold Delhaize and each of its brands.

### engaging on human rights at Ahold Delhaize

Our global Ethics and Compliance team leads our global engagement on human rights. Within this team, the Director of Ethical Engagement & Human Rights has day-to-day responsibility for leading and supporting our human rights strategies and efforts, and she is supported by a Human Rights Manager. This work is coordinated through the Ahold Delhaize Working Group on Human Rights. The Working Group brings together the various functional areas at the Ahold Delhaize level who are responsible for supporting the brands in their efforts to address salient impacts in their own operations (such as HR, Occupational Health & Safety and Legal) and in supply chains (such as Health & Sustainability and Product Safety) and those who help to advance the Roadmap (for example, Finance, Public Affairs and Communications). The Director of Ethical Engagement & Human

Rights reports to the VP of Global Compliance & Ethics, who is also a Working Group member and reports to the Chief Legal Officer, who is a member of the Executive Committee.

Each member of the Working Group supports their counterparts in the brands on a regular basis. Although each of our brands is organized differently, and functional titles and roles may vary, each brand has dedicated resources who have day-to-day responsibility for managing their brand's programs and activities shared in this Report. Ahold Delhaize's approach to human rights is built on cross-functional collaboration at the group level and works through existing networks to connect with each of our great local brands. Each brand's leadership team is responsible for translating the global Human Rights Roadmap to their respective brand through their local or regional approach to due diligence and for ensuring

compliance with applicable laws and internal policies in their own operations in line with the global Governance, Risk Management and Compliance Framework. Working conditions within supply chains for own-brand products and critical commodities are monitored at the brand or regional level, in line with our diversified supply chain approach. In **our approach to due diligence**, you can read how the brands are directly supporting Ahold Delhaize's global Roadmap on Human Rights.

General meeting of Shareholders

Supervisory Board

Management Board

Executive Committee

Chief Legal Officer

Functional Leadership

Human Rights Working Group

VP Compliance & Ethics

Director Human Rights

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## policy and guidance framework

Ahold Delhaize's Position on Human Rights defines our commitment to respect human rights in our own operations and in our supply chains, and it is built on our Code of Ethics and the Standards of Engagement. Our commitment to human rights is drafted in accordance with the UN Guiding Principles on Business and Human Rights and further informed by the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. The Ahold Delhaize Code of Ethics defines our Ethical Principles that guide our actions toward customers, communities, suppliers, business partners and each other. Our shared values – integrity, courage, teamwork, care and humor – and ethical principles provide the framework for the decisions we make and are the foundation of our commitment to conduct our business the right way, every day.

Annual training on our Code of Ethics is mandatory for more than 35,000 manager-level and above associates at Ahold Delhaize and its brands. In 2024, Ahold Delhaize introduced a new format for the Code of Ethics training, which explored four real-life situations to ignite critical thinking and test the knowledge of participants. One of those situations reflected on what to do if a supplier has an increased risk of human rights violations and addresses the importance of due diligence and the Standards of Engagement. Other topics addressed include conflicts of interest, sexual harassment and inappropriate behavior on the work floor.

In addition, the Code of Ethics and our ethical principles are communicated through our website, the intranet pages on ethics and human rights, leaflets, posters, videos, local campaigns and during a global Ethics Week. The Code of Ethics provides guidance on when and where to ask for advice or report a compliance or ethics breach. In [access to remedy](#), you can read more about our Speak Up lines and other grievance mechanisms. You can find the Ahold Delhaize Code of Ethics on our [website](#).

Ahold Delhaize's commitment to human rights and the environment is not limited to our own operations. We believe that we have the opportunity to create positive change that extends to the communities in which our brands operate and the supply chains that our brands depend upon. Our Standards of Engagement is one of the ways in which we aim to ensure that the products our brands sell reflect this commitment to respect human rights and nature. The Standards of Engagement define our expectations and ensure that our brands' suppliers maintain the same high level of business ethics and regard for human rights and the environment as Ahold Delhaize and its brands. The Standards of Engagement are an integral part of the contractual relationships with these suppliers.

In 2023, we conducted a thorough review of the Standards of Engagement. One aspect of the review included the updates made to the Position on Human Rights in 2022. The review also focused on how to better align the Standards of Engagement with the broader approach to due diligence that was in the making to address both social and environmental impacts. As a result, we aligned version 4.0 of the Standards of Engagement, which came into effect on January 1, 2024, more closely with the Position on Human Rights and we addressed environmental requirements in more detail. Another important aspect is that we require suppliers to report – and allow Ahold Delhaize to investigate – allegations or reports of serious non-compliances. We also updated the list of high-risk countries in line with amfori Business Social Compliance Initiative (BSCI).

To further support implementation of the Standards of Engagement, the Ahold Delhaize website now includes a video introduction and a Guidance Document for suppliers, which contains more detail and additional resources for suppliers to learn more about specific requirements. At the request of suppliers, the website also lists the key changes made to the Standards of Engagement. Version 4.0 of the Standards of Engagement will be implemented over a three-year period with each new contract or contract renewal.



## Code of Ethics

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



### We respect each other

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



### We follow the law

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



### We act ethically in all our relationships

We act ethically in all our relationships, both within the company and in our interactions with our customers, communities and suppliers.



### 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 the Code of Ethics or other external laws and regulations and internal policies and standards.

## Standards of Engagement

Ahold Delhaize and each of its local brands are committed to our shared values and ethical principles and to conducting our business the right way, every day. This means that we respect human rights and the environment and comply with all applicable laws and regulations. We expect our suppliers to do the same. The Standards of Engagement are designed to ensure that Ahold Delhaize has visibility into all aspects of its supply chain and to meet these objectives.

The Standards of Engagement contain the principles that we believe are necessary to support human rights and protect the environment:

- Compliance and monitoring
- Grievance mechanisms
- Ethical business practices

### Human rights, including:

- Prohibition of discrimination, violence and harassment
- Freedom of association and collective bargaining
- Working hours
- Compensation
- Health & safety
- No child labor
- Protection of young workers
- No precarious employment
- No bonded, forced labor or human trafficking
- Land rights

### Environment, including:

- Climate change
- Biodiversity and ecosystems
- Water
- Animal welfare
- Resource use and circular economy
- Pollution

# Code of Ethics



## The Right Way



Our Code of Ethics supports a strong policy and guidance framework, which is essential to successfully incorporate the UN Guiding Principles on Business and Human Rights across Ahold Delhaize and each of its brands. Our policy framework helps us set clear and consistent expectations and ensures our business processes and activities are aligned with our ethical commitments. Our positions on key social and environmental topics, as well as our Anti-Corruption and Bribery Policy, can be found on our [website](#).

# 03. our approach to due diligence

The publication of our Position on Human Rights in 2017 first introduced our approach to due diligence, which we have continued to develop and execute. Our approach to due diligence is cross-functional and leverages the processes and expertise of functions such as HR, Compliance & Ethics, Operations, Health & Sustainability, Safety, Finance and Legal. Our approach to due diligence is consistent with the OECD Due Diligence Guidance for Responsible Business Conduct.

With the European Corporate Sustainability Due Diligence Directive (CSDDD) approved, a development that we have publicly supported, we recognize that the steps of an effective due diligence process are already reflected in the European Sustainability Reporting Standards (ESRS) of the Corporate Sustainability Reporting Directive (CSRD), including the expectation that a company should assess, address and report on its material impacts, risks and opportunities, as well as have a grievance mechanism in place.

Ahold Delhaize concluded its previous global human rights due diligence assessment early in 2020, just before the global

pandemic and before the current geopolitical crises. It was time for an update. Although we did not know exactly if and when the CSDDD would be approved, we believed that the direction of both the CSRD and the CSDDD was clear: integrated sustainability due diligence that considers both social and environmental salient impacts. For that reason, we decided to first implement a global sustainability due diligence process that identifies the salient social and environmental impacts. This process would then be the starting point for – and reflect the “do no harm” or “negative impact” side of – a double materiality assessment.

In the summer of 2023, we engaged Enact, a consultancy based in Sweden and the Netherlands, to support us with broadening our approach to due diligence from human rights to broader social and environmental impacts. You can read more about the process below. In the final chapter of this Report, we will share the next steps on human rights and an updated Roadmap that reflects our priorities for the next few years. Due diligence remains a continuous process, and we learn as we go along.



## a. towards sustainability due diligence

Once we engaged Enact to support the process, we set out to identify Ahold Delhaize's global salient social and environmental impacts and to identify any gaps in how we mitigate those salient impacts and develop a Due Diligence Roadmap that helps us meet the requirements of the Corporate Sustainability Due Diligence Directive (CSDDD). In this report, we focus on the social impacts.

An important aspect of sustainability due diligence is to engage with affected stakeholders. Ahold Delhaize recognizes that impacts on people often occur locally, in the day-to-day operations of our great local brands and in their supply chains. Throughout the global sustainability due diligence process, we engaged with more than 40 internal regional and local experts across our brands, who represented commercial, legal, sustainability and HR-related functions. These experts participated in individual and group interviews and were invited to attend three interactive sessions: one kick-off session at the beginning of the process, one session to validate the social and environmental salient impacts identified, and a co-creation session to provide input for the Due Diligence Roadmap. In addition, we conducted a survey that was completed by more than 70 associates in key roles across all regions and brands.

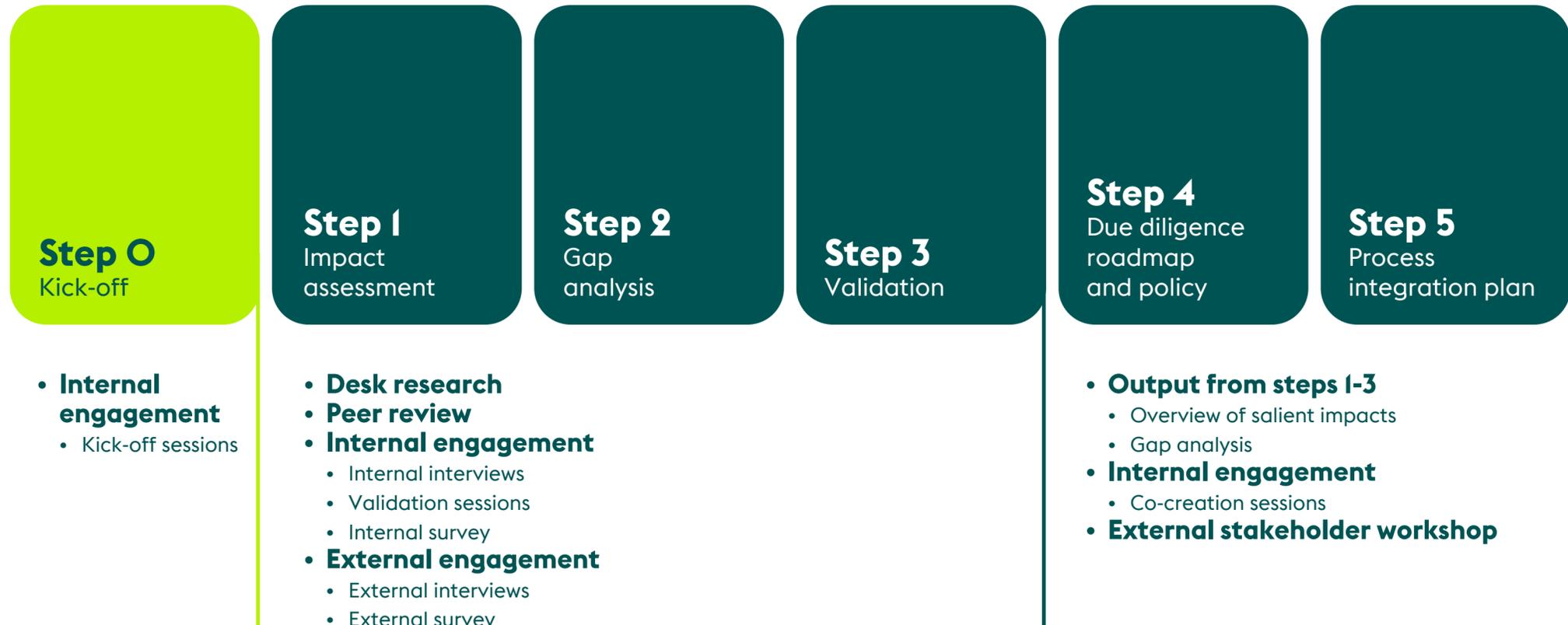
As part of the process, we also engaged with external representatives of potential affected stakeholders (in our own operations and our supply chains). Thirteen organizations, including Boston Common AM, Oxfam, the Milken Institute, UN Global Compact NL, Women Win, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF), were interviewed, on the potential salient social and environmental impacts and perceived gaps of Ahold Delhaize, and those same organizations were then invited to participate in a stakeholder workshop to discuss their recommendations for a Due Diligence Roadmap. In addition, a survey was completed by more than 30 external stakeholders. We also leveraged input from the human rights impact assessments conducted by Albert Heijn to get a perspective from workers in the supply chain. In addition, Ahold Delhaize is in the process of setting up global human rights impact assessments in 2024 that will directly engage with workers in the

supply chain. We believe that input from workers in the supply chain is important and that it is best gathered in the specific context of such an assessment. That way, we can also ensure that those workers are engaged in a meaningful way. This correlates to two elements of our due diligence framework: how we identify and assess adverse impacts and how we engage with stakeholders while doing so. You can read more about our progress in [human rights impact assessments](#).

The first outcome of the sustainability due diligence process is the overview of salient social and environmental impacts presented on the next page. There are no major changes to the salient social impacts as they were identified in the 2020 Human Rights Report, but we did organize the salient impacts slightly differently. For example, we chose to more clearly focus on the impact rather than the vulnerable group,

and therefore now specifically call out gender inequality as part of discrimination (instead of women's rights) and the impacts related to child labor and insufficient access to healthy food (instead of children's rights).

Although privacy remains an important topic for us, it is no longer considered a priority salient issue as it relates to human rights. Water and sanitation is now divided into access to water as a community impact, water scarcity and overuse as an environmental impact and sanitation as part of the broader topic of unhealthy and unsafe working conditions. Harassment and violence is now a separate impact from discrimination (including gender inequality).



### Overview of Salient Impacts

On the social side, we no longer define higher or lower priority impacts, but throughout this report, we continue to flag the impact of forced labor and child labor and how those often fall on the most vulnerable and defenseless, including children, young workers, women and migrant workers. Consequently, the risks related to these issues within our supply chains are consistently prioritized across our brands. We are also focused on migrant workers as a vulnerable group in global supply chains, particularly in agriculture. You can read more about our work on these salient social impacts in [human rights in the supply chain](#) and how we intend to further assess these social impacts in [human rights impact assessments](#).

### Due Diligence Roadmap

The second outcome of the sustainability due diligence process is the Due Diligence Roadmap pictured below. When it comes to addressing the salient social impacts, the Due Diligence Roadmap is in line with – and complementary to – the Roadmap on Human Rights. However, the Due Diligence Roadmap is broader, as it also covers the required steps to address salient environmental impacts.



#### Social

- Child labor
- Forced labor
- Community impacts, incl. land rights, access to water
- Inadequate wages
- Freedom of association and collective bargaining
- Discrimination (incl. gender inequality)
- Harassment and violence
- Insufficient access to healthy food
- Inadequate working time
- Unhealthy and unsafe working conditions

#### Environmental

- Greenhouse gas emissions
- Water scarcity and overuse
- Ecosystem conversion, incl. deforestation
- Overfishing and depletion of fish stocks
- Plastic pollution
- Soil degradation
- Food waste
- Inadequate animal welfare



## b. in focus: identifying vulnerable groups

Ahold Delhaize's first human rights due diligence process published in 2020, which was also guided by external experts from Enact and Human Rights@Work, identified potentially affected stakeholders broadly and vulnerable groups for each of the salient impacts. In this latest sustainability due diligence process, a similar overview was created, which called out vulnerable groups for each of the salient social impacts, recognizing that this overview is not exhaustive.

### vulnerable groups related to salient social impacts

Most of these vulnerable groups are referenced directly or indirectly in our Position on Human Rights, in the Standards of Engagement and/or in our broader reporting on human rights. However, in this report, we provide a general overview of how the key categories of products we source are potentially linked to certain salient social impacts, and which groups are most vulnerable in relation to those impacts.

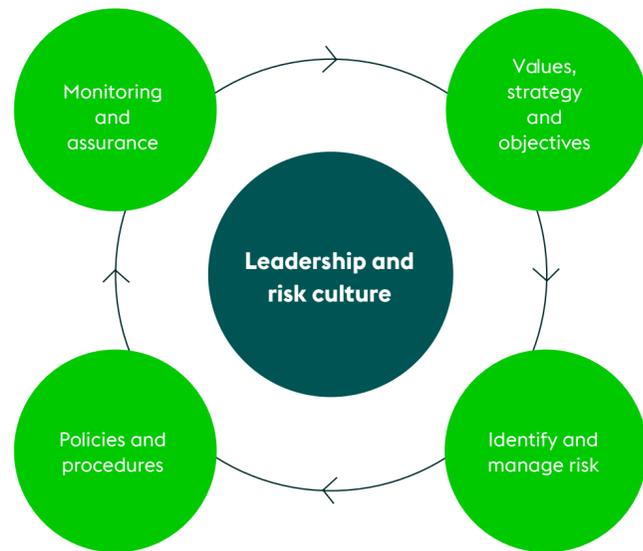
In Ahold Delhaize's Position on Human Rights, we distinguish three broader groups of potentially affected stakeholders, including i) associates, ii) customers and communities, and iii) workers and communities in supply chains. In this report, where relevant, we will make the connection more specific between particular vulnerable groups and the salient impacts. You can also read more in [vulnerable groups in supply chains](#).



## c. identifying and mitigating risks

Ahold Delhaize's Enterprise Risk Management (ERM) assessment is designed to identify, assess and take action on general risks and opportunities in line with our strategic, operational, financial and regulatory business objectives. The risks identified through the ERM process include risks and topics related to human rights. You can read more about how Ahold Delhaize identifies and manages risk in our [Annual Report 2023](#).

### Governance, Risk Management and Compliance Framework



### sustainability risk assessment in the supply chain

Ahold Delhaize introduced the sustainability risk assessment (SRA) for supply chains in 2020. The SRA is based on the Organisation for Economic Co-operation Development (OECD)-Food and Agricultural Organization (FAO) Guidance for Responsible Agricultural Supply Chains, which encourages enterprises with large numbers of suppliers to identify general areas where the risk of adverse impacts is most significant, and based on this risk assessment, prioritize supply chains for action. Each year, annual risk assessments are conducted to assess product categories and the key raw materials used in the own-brand products of all brands against both environmental and social risks. In addition, each brand or region formulates actions on those prioritized supply chains.

The social risks are based on our salient impacts and combine information about the country of origin and the product category with publicly available sources of information based on likelihood and severity of risk. Each brand or region then determines the extent to which the risk is mitigated, the magnitude of the residual risk and available leverage to (further) mitigate the risk. Addressing the outcomes of this risk assessment process is an important part of our approach to due diligence. On the following pages you find an overview of the high-level combined outcomes of the supply chain risk assessments of the brands as they relate to the salient social impacts.

The sustainability risk assessment is a key feature in the Due Diligence Roadmap. Although we believe the existing tool has served us well until now, one of the steps on the Due Diligence Roadmap is to either update the tool ourselves, in line with the outcomes of the sustainability due diligence process, or to assess whether there are existing external tools that we could implement.



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| key product categories   | potential salient social impacts  | potential affected vulnerable groups   | examples of mitigating actions   |
|--|---|--|--|
| <p><b>coffee</b><br/>regions: South-America (incl. Brazil, Colombia), Asia (incl. Vietnam), Africa (incl. Kenya, Rwanda)</p> | <p>child labor<br/>forced labor<br/>inadequate wages / incomes<br/>discrimination (incl. gender inequality)<br/>harassment and violence<br/>freedom of association<br/>inadequate working time<br/>unhealthy, unsafe working conditions<br/>community impacts</p> | <p>children (incl. young workers), migrant workers, women, low-skilled worker, informal workers, smallholders, minorities, refugees, Indigenous Peoples, human rights defenders</p>                          | <ul style="list-style-type: none"> <li>certification (Rainforest Alliance, Fairtrade or equivalent)</li> </ul>   |
| <p><b>tea</b><br/>regions: Asia (incl. India, Sri Lanka), Africa (incl. Kenya)</p>   | <p>discrimination (incl. gender inequality)<br/>harassment and violence<br/>forced labor<br/>child labor<br/>inadequate wages / incomes<br/>freedom of association<br/>inadequate working time<br/>unhealthy, unsafe working conditions<br/>community impacts</p> | <p>women, children (incl. young workers), migrant workers, low-skilled workers, sub-contracted workers, informal workers, smallholders, minorities, refugees, Indigenous Peoples, human rights defenders</p> | <ul style="list-style-type: none"> <li>certification (Rainforest Alliance, Fairtrade or equivalent)</li> </ul>   |
| <p><b>cocoa</b><br/>regions: Africa (particularly Ivory Coast, Ghana), South-America</p>                                     | <p>child labor<br/>forced labor<br/>inadequate wages / incomes<br/>freedom of association<br/>discrimination (incl. gender inequality)<br/>harassment and violence<br/>inadequate working time<br/>unhealthy, unsafe working conditions<br/>community impacts</p> | <p>children (incl. young workers), women, migrant workers, informal workers, smallholders, minorities, refugees, Indigenous Peoples, human rights defenders</p>  | <ul style="list-style-type: none"> <li>certification (Rainforest Alliance, Fairtrade or equivalent)</li> <li>partnerships (i.e. DISCO (IDH), Beyond Chocolate (IDH), Tony's Open Chain)</li> </ul> |
| <p><b>seafood</b><br/>regions: South-America, Asia (incl. Thailand, India)</p>   | <p>forced labor<br/>child labor<br/>inadequate wages<br/>freedom of association<br/>discrimination (incl. gender inequality)<br/>harassment and violence<br/>inadequate working time<br/>unhealthy, unsafe working conditions<br/>community impacts</p>           | <p>migrant workers, sub-contracted workers, women, children (incl. young workers), low-skilled workers, informal workers, minorities, refugees, Indigenous Peoples, human rights defenders</p>               | <ul style="list-style-type: none"> <li>certification (in line with GSSI benchmark)</li> <li>partnerships (i.e. Seafood Task Force, Global Tuna Alliance)</li> </ul>                                |

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| key product categories  | potential salient social impacts  | potential affected vulnerable groups   | examples of mitigating actions   |
|---|---|--|--|
| <p><b>palm oil</b><br/>regions: Asia (incl. Malaysia, Indonesia)</p>  | <p>community impacts<br/>inadequate working time<br/>inadequate wages<br/>freedom of association<br/>harassment and violence<br/>forced labor<br/>child labor<br/>discrimination (incl. gender inequality)<br/>unhealthy, unsafe working conditions</p> | <p>women, migrant workers, children (incl. young workers), low-skilled workers, sub-contracted workers, smallholders, minorities, refugees, Indigenous Peoples, human rights defenders</p>         | <ul style="list-style-type: none"> <li>certification (RSPO or equivalent)</li> </ul>   |
| <p><b>soy</b><br/>regions: South-America (incl. Brazil)</p>   | <p>community impacts<br/>inadequate working time<br/>inadequate wages<br/>freedom of association<br/>harassment and violence<br/>forced labor<br/>discrimination (incl. gender inequality)<br/>unhealthy, unsafe working conditions</p>                 | <p>women, migrant workers, children (incl. young workers), low-skilled workers, sub-contracted workers, minorities, refugees, Indigenous Peoples, human rights defenders</p>                       | <ul style="list-style-type: none"> <li>certification (RTRS or equivalent)</li> </ul>   |
| <p><b>fruit and vegetables (incl. flowers and plants)</b><br/>regions: Americas, Mediterranean, Africa, Asia, Middle-East</p> | <p>forced labor<br/>child labor<br/>harassment and violence<br/>discrimination (incl. gender inequality)<br/>inadequate wages<br/>freedom of association<br/>inadequate working time<br/>unhealthy, unsafe working conditions<br/>community impacts</p> | <p>children (incl. young workers), migrant workers, women, low-skilled workers, informal workers, sub-contracted workers, smallholders, minorities, Indigenous Peoples, human rights defenders</p> | <ul style="list-style-type: none"> <li>social audits (amfori BSCI or equivalent)</li> <li>partnerships (i.e. Solidaridad for the AH Foundation, SIFAV (IDH), Floriculture Sustainability Initiative (IDH), National Dairy FARM Program, Rodale Institute)</li> </ul> |
| <p><b>non-food</b><br/>regions: all high-risk countries (incl. China, Turkey)</p>   | <p>inadequate working time<br/>inadequate wages<br/>freedom of association<br/>harassment and violence<br/>forced labor<br/>child labor<br/>discrimination (incl. gender inequality)<br/>unhealthy, unsafe working conditions</p>                       | <p>low-skilled workers, sub-contracted workers, informal workers, migrant workers, women, children (incl. young workers), minorities</p>   | <ul style="list-style-type: none"> <li>social audits (amfori BSCI or equivalent)</li> </ul>  |

## d. social compliance

Ahold Delhaize's social compliance program focuses on the "last stage of production." For social compliance, that means that we look beyond direct, first-tier suppliers and focus our requirements on the stage that involves labor to produce or process the final product. For unprocessed fruit and vegetables, the last stage of production is both at the packing station and (second- or third-tier) farm levels. The last stage of production excludes (re-)packing in a non-high-risk country. In the case of the critical commodities, we focus on the farms, fisheries and forests where we source those commodities. You can read more under [certifying commodities](#).

Our Standards of Engagement are one of the ways in which we aim to ensure that the products we sell reflect this commitment to respect human rights and regard the environment. The Standards of Engagement define our expectations and ensure that our suppliers maintain the same high level of business ethics and regard for human rights and the environment as Ahold Delhaize and its brands.

Ahold Delhaize brands focus their social compliance programs on their own-brand suppliers, because that is where they have most leverage. Our brands require either amfori Business Social Compliance Initiative (BSCI) audit reports or audit reports or certificates that are equivalent to amfori BSCI from all last stage of production locations in high-risk countries that supply own-brand products

In 2023, 78% of those locations were audited against a standard considered equivalent to amfori BSCI. Our brands are making steady progress towards auditing and certifying production units in high-risk countries against acceptable standards, but in specific countries or as a first, temporary step for suppliers towards an acceptable standard, we also accept stepping-stone standards. If we include stepping-stone standards, we are approaching 96% of production locations audited or certified on social compliance. Our ambition remains to audit 100% of the own-brand production locations in

high-risk countries by 2025, and as many as possible against acceptable standards. Our brands also work closely with national-brand suppliers on human rights and social compliance programs. One example of this continued collaboration is the Consumer Goods Forum's Sustainable Supply Chain Initiative to mutually recognize auditing, monitoring and certification programs through comprehensive benchmarking. Currently, 23 CGF members are participating in the SSCI, including Unilever, Danone, Pepsico, Coca-Cola and Nestle. We are working to improve labor standards in the supply chain together with our suppliers. Because we have resources and expertise that may not be available to smaller suppliers, our brands work with selected suppliers to support them in improving their processes and working conditions. Examples include Albert Heijn's collaboration with suppliers in the Albert Heijn Foundation and programs established by Alfa Beta, Delhaize Serbia, Mega Image and Super Indo to help their local suppliers meet our global requirements. The Guidance Document on the Standards of Engagement also includes several resources to help suppliers meet our requirements.

While Ahold Delhaize recognizes the limitations of social audits, we still believe that those audits and certifications are an important, scalable tool to monitor working conditions in complex, global supply chains. The amfori BSCI approach focuses on improving working conditions in supply chains through continuous improvement. Each audit report comes with a Corrective Action Plan (CAP) that addresses any non-compliances, which is then followed by a progress report. Through the implementation of these CAPs, working conditions should continuously improve. We continue to work closely with standard-setting organizations and other stakeholders to address the credibility and effectiveness of social audits and find ways to improve working conditions and address adverse human rights impacts throughout the supply chain.

You can read more about these efforts in [collaborations and partnerships](#). In addition, as part of the next phase of our Roadmap on Human Rights, Ahold Delhaize will continue to explore and develop additional mitigating actions to address our salient impacts. You can read specific examples of how some of our brands already take such actions throughout this report.

## e. in focus: deal-breakers

If a social compliance audit identifies a serious compliance issue such as child labor, forced or bonded labor, or life-threatening health and safety situations, our brands will initially suspend orders from that supplier and work with the supplier to get the violation or adverse impact remediated. If a supplier is unable or unwilling to remediate its non-compliance within a reasonable timeframe, the brand could ultimately terminate its relationship with that supplier. In practice, most of the deal-breaker cases involve occupational health and safety situations. In its [Sustainability Report](#), Albert Heijn reported that it identified deal-breakers in thirteen social audits (less than 2% of all inspections) in 2023. In all cases, Albert Heijn and the suppliers were able to remediate the violation. We are in the process of introducing a new KPI on deal-breakers in our ESG reporting process. We intend to start reporting on the number of deal-breakers, and how many were resolved in the reporting period, for Ahold Delhaize globally. It is important to note that deal-breakers are monitored for all of the social audit programs we implement, including amfori BSCI and Sedex. All certification programs we accept have a set of minimum requirements that cover the deal-breakers, which means that a supplier could not be certified if deal-breakers were identified. Regardless of whether a supplier is audited or certified, if a serious allegation of a deal-breaker is raised at a supplier (or elsewhere in our supply chain), Ahold Delhaize conducts a thorough investigation. Several examples are included in the section on [supply chain grievance mechanisms](#).



## f. certifying commodities

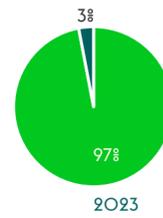
Our brands focus their efforts on seven commodities in own-brand supply chains with elevated social and environmental risks: tea, coffee, cocoa, palm oil, soy, wood fiber and seafood. While the risks differ between the commodities and their sourcing locations, these commodities have been designated as high risk for potential impacts such as deforestation, land conversion, overfishing and human rights violations. Since then, the brands have focused on certifying against recognized standards, and engaging in partnerships to drive progress.

Our brands have global targets for seven commodities in our own-brand supply chains. By 2025, our brands aim to have 100% of own-brand products containing soy, palm oil, cocoa, coffee, wood fiber, tea and seafood certified against an accepted standard or otherwise assured<sup>1</sup>. An overview of the guidelines and standards for these commodities is available on Ahold Delhaize's [website](#). The certifications we work with include Fairtrade, Rainforest Alliance, the Roundtable for Sustainable Palm Oil (RSPO) and others, all of which are committed to continuous improvement in those supply chains. In addition, our European brands are in the process of implementing the European Regulation on Deforestation Free Products. We define no deforestation or land conversion in line with the Accountability Framework Initiative or the Forest Resources Assessment. The cut-off date we use is December 31, 2020, or the date of the applicable certification, whichever is earlier. Progress on the certification or other type of assurance of each of the commodities, including definitions, is shown in the overview on this page.



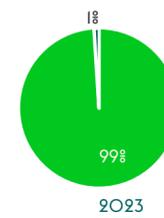
<sup>1</sup> For wood fiber and seafood we take a three-pronged approach. We aim for 100% all own-brand products and packaging containing wood fiber to be certified against an accepted standard, low risk or recycled. We aim for 100% of own-brand seafood sales to be either certified against an accepted standard, in a credible fishery or aquaculture improvement project or assessed by a third-party as low or medium risk.

**Certified<sup>1</sup> own brand products containing coffee**



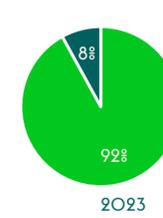
- Percentage of own brand coffee products certified
- Percentage of own brand coffee products not certified\*

**Certified<sup>1</sup> own brand products containing tea**



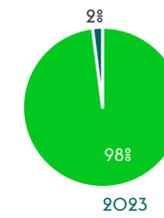
- Percentage of own brand products containing tea certified
- Percentage of own brand products containing tea not certified\*

**Certified<sup>1</sup> own brand products containing cocoa**



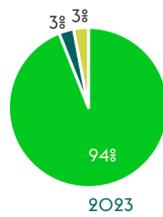
- Percentage of own brand products containing cocoa certified
- Percentage of own brand products containing cocoa not certified

**Own brand seafood products aligned to Ahold Delhaize Seafood Sourcing approach<sup>2</sup>**



- Percentage of own brand seafood product sales certified
- Percentage of own brand seafood product sales not certified

**Certified<sup>3</sup> palm oil volume in own brand products**



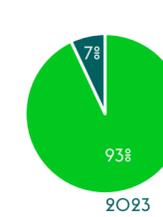
- Percentage of palm oil volume in own brand products certified (Mass Balance or Segregated supply chain option)
- Percentage of palm oil volume in own brand products offset by purchase of Roundtable on Sustainable Palm Oil (RSPO) Book & Claim
- Percentage of palm oil volume not certified

**High priority soy volume<sup>4</sup> in the supply chain of own brand products certified or covered by credits<sup>5</sup>**



- Percentage of soy volume in the supply chain of own brand products certified or covered by credits
- Percentage of soy volume in the supply chain of own brand products not certified or covered by credits

**Certified, low risk or recycled<sup>6</sup> own brand wood fiber products**



- Percentage own brand wood fiber products certified low risk or recycled
- Percentage own brand wood fiber products not certified low risk or recycled

**More information on these commodities can be found on Ahold Delhaize's [website](#).**

1. Certified against an accepted standard (see Glossary for details)
2. Certified against an accepted standard, from sources assessed by an accepted third party, or from accepted Fishery/Aquaculture Improvement Programs
3. Certified to an accepted standard or to RSPO Book & Claim
4. High priority (South American) direct and embedded (tier 1, 2 and 3) soy volumes
5. Certified or covered by credits purchased through the RTRS or CRS
6. Certified against an accepted standard, classified as low risk<sup>ii</sup>, or recycled<sup>iii</sup>

<sup>ii</sup> Low risk: the direct supplier (tier 1) is not chain of custody certified. However, the supplier's supplier (tier 2) is chain of custody certified, and uses certified sustainable wood fiber, to accepted standards. <sup>iii</sup> Recycled: the direct supplier provides a self-declaration that more than 70% of product is made of recycled content.

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### case study: Dutch Initiative on Sustainable Cocoa (DISCO)

The Dutch Initiative on Sustainable Cocoa is a public-private partnership active in the Dutch cocoa and chocolate sector working to sustainably improve the livelihoods of current and future cocoa farming families. Together, the signatories of the Dutch Initiative on Sustainable Cocoa (DISCO), which includes retailers, chocolate brands, traders and processors, certification organizations and civil society, are working towards three goals:

- Farming families with cocoa as their main livelihood activity will be enabled to earn a living income by 2030;
- Cocoa-related deforestation and forest degradation in producing regions where the Dutch cocoa industry and their trade partners are sourcing from will have ended in their supply chains by 2025;
- Effective measures and necessary actions contributing to ending all forms of child labor by 2025 are taken.

For three years, Albert Heijn has been representing the retail sector on the board of DISCO and leading the way in a joint retail strategy and approach to ensure that retailers source more sustainable cocoa. DISCO's latest progress report is available [here](#).



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## g. human rights impact assessments

In addition to the sustainability risk assessment, the social compliance program and the commodity certification programs, there is another important tool that is part of a broader approach to sustainability due diligence. That is a human rights impact assessment (HRIA). HRIA's can help companies understand where and how people are negatively impacted, and establish and implement action plans to address those impacts.

In the last three years, Albert Heijn has published reports and action plans of ten human rights impact assessments focused on specific suppliers, and several more assessments are still in progress. However, Albert Heijn acknowledged in its latest 2023 Sustainability Report that this approach of conducting human rights impact assessments at the level of individual suppliers is time-consuming, requires significant resources and is not easily scalable.

With the learnings from Albert Heijn in mind and together with the other brands, Ahold Delhaize is in the process of setting up global human rights impact assessments in 2024 focused on the most salient impacts in the supply chain. These HRIA's will be conducted by external experts and assess supply chains for multiple Ahold Delhaize brands. The human rights impact assessments in supply chains will assess relevant adverse impacts, including the salient social impacts shared earlier. We believe that this approach will help us assess impacts more broadly and establish global action plans that allow us to address impacts collectively. An important aspect of a human rights impact assessment is the dialogue between a business, rightsholders and other stakeholders. We selected three expert organizations that we believe can help us meaningfully engage and ensure that rightsholders are heard and considered.



### case study: Albert Heijn's Human Rights Impact Assessments

In their [Sustainability Report](#), Albert Heijn published links to their latest three human rights impact assessments (in English) on page 67, as well as a reflection on the HRIA's conducted so far and lessons learned. More information about Albert Heijn's broader approach to due diligence and previous HRIA's is available in Albert Heijn's [Human Rights Due Diligence Update](#) (in Dutch), which was published in 2023.



# 04. human rights in our own operations

## a. in focus: diversity, equity and inclusion

In 2023, as we dove deeper into what it would take to create a sense of belonging and community for our brands' customers, we took clear steps towards engaging our leadership teams on what it takes to be sustainable leaders, including understanding the role health equity plays in addressing systemic inequities in our brands' communities. DE&I creates a fabric of trust and reliability when we show actionable steps and continuous positive change in communities both within and outside our operations. At Ahold Delhaize, we pride ourselves on being open for everyone. We want every associate to thrive, and every customer to feel a sense of belonging and community in our brands. In addition, we want to role model how the innovation that comes from DE&I can pivot

business practices and positively impact the trajectory of our brands' communities and the planet.

As an international company, our agile DE&I framework ensures our approach is relevant to our local brands. Globally, we have a common focus on inclusion, using the strength of different perspectives to grow our brands; locally, our brands design, implement and drive DE&I strategies tailored to the communities where they live, work and serve. Our global DE&I framework includes three pillars critical to this work: people, community and culture. You can read more about our diversity, equity and inclusion framework in our [Annual Report 2023](#).

### Ahold Delhaize's Diversity, Equity & Inclusion 100, 100, 100 aspiration



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### case study: Gender Transition Policy

In 2023, Ahold Delhaize introduced the Gender Transition Policy, which is applicable to all Netherlands-based associates within Ahold Delhaize and its Dutch brands. This policy has been created to support associates in the process of gender transition. It includes benefits available for associates who start the transition process and guidance on what steps should be followed. The policy includes:

- Roles and responsibilities of everyone involved
- Guidelines for managers on how to provide caring support
- Guidelines for transitioning associates on how to seek support
- Up to 33 weeks paid leave
- Associate profile changes (such as name change)
- Useful resources

Gender transitioning can be a challenging and emotional process but also a deeply personal life-changing experience. We want to ensure that all of our Netherlands-based associates have access to resources to feel supported and comfortable during their transition so that they can work as their true selves. By doing so, we contribute towards a welcoming, supportive and inclusive environment for all our colleagues.



### case study: Giant Food's Second Chance Program

Giant Food's new Second Chance Program gives incarcerated individuals at the Dorsey Run Correctional Facility an opportunity to begin reintegrating into society through career opportunities at the Jessup warehouse. The partnership began in May 2022, when staffing opportunities prompted Giant Food to contact the correctional facility and learn about their work release program.

To be accepted, individuals must be infraction-free, have 18 months left on their sentence and have a high school diploma, GED or record of participation in a work readiness program. Dorsey Run also provides transportation to and from the Jessup facility. Brandi Petway herself vets and interviews applicants who go through the normal interview process and undergo a background check and drug test before their first day. Participants have the same opportunities as our union associates, including the same pay, overtime options and shift availability.

Giant Food continues to be a Better Neighbor for the communities it serves through innovative programs and initiatives like Second Chance. So far, the program is a foundation that has built a brighter future and offered financial stability for its 27 success stories.



## I. discrimination (incl. gender inequality)

**Ahold Delhaize and each of its brands recognize and support the rights of their associates to a workplace free from discrimination and for women to be treated fairly and equally to men.**

Ahold Delhaize's Code of Ethics and Position on Human Rights include clear commitments and expectations on equal employment opportunities and respect in the workplace. Our brands comply with applicable laws and their internal policies relating to equal opportunity and non-discrimination. Ahold Delhaize and each of its brands seek to create a culture of mutual trust that values the inherent diversity among associates and their communities. We value diversity of thought, and we define diversity broadly as all the ways in which individuals are unique, inclusive of thoughts and skills, generational differences,

gender, race and ethnicity, disabilities, sexual orientation, nationalities and more. We accept all people for who they are and their ability to make positive contributions to the business.

Globally, our aspiration is to have a workforce that is 100% gender balanced at all levels. Compared to 2022, our overall proportion of women in management increased from 40% to 41%, while our director-level representation increased from 35% in 2022 to 36% in 2023. We saw the biggest increase at executive level (VP+), where we moved from 33% to 37% this year.

In 2023, we evolved our interpretation of what it means to be gender balanced. Because we are open for everyone, we want to ensure our gender representation includes all employees, including those who do not identify in binary terms.

Therefore, our aspiration is not limited to a 50/50 split between men and women, but more representative of all people. We are implementing ways to offer associates avenues toward self-identification across our geographies in 2024 so we can update our metrics in this space.

There are several focus areas within our diversity, equity and inclusion strategic framework that are aimed at promoting equity in our practices and preventing discrimination in hiring, training and promotion. Our commitment to balanced slates continues to be an important part of company and brand diversity, equity and inclusion strategies. Balanced slates are one tangible way we can source the very best talent and bring our DE&I aspirations to the forefront – through minimizing unconscious bias in hiring, promotions and job assignments

by ensuring equitable access to opportunities. Studies have shown that ensuring underrepresented groups have fair representation in candidate pools provides the best opportunity for hiring managers to diversify teams and select the best-qualified candidates. At Ahold Delhaize, we review and audit our senior-most leadership balanced slate outcomes, and each brand determines locally through what job level they apply balanced slates.

Ahold Delhaize and its brands support a culture where all associates are respected and we engage with associates to measure this culture through each brand's associate engagement survey, in which we used three new essential indices: engagement (78% favorable), growth (75% favorable) and inclusion (81% favorable).

### case study: Mega Ability

In 2023, Mega Image started preparations for the 2024 launch of a new program to empower lives through inclusion. Set up to provide people with disabilities with access to meaningful opportunities, this project fosters an inclusive environment where everyone can thrive and contribute to their fullest potential. The program focuses on empowering those with hearing impairments, autism spectrum disorders, and limited access to education. During the pilot phase Mega Image will develop employment opportunities for several individuals with disabilities in various roles within its stores. These roles leverage their unique strengths and capabilities, ensuring a supportive and productive work environment. By integrating these talented individuals into their workforce, Mega Image aims to demonstrate the valuable contributions they can make to the organization and society as a whole.



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### case study: Corporate Equality Index

In 2023, each of our U.S. brands (Food Lion, Giant Food, Hannaford, Stop & Shop, The GIANT Company and Ahold Delhaize USA, including formerly Peapod Digital Labs and Retail Business Services) were again independently recognized as a Best Place to Work for LGBTQIA+ Equality. Each brand's unique policies, practices and benefits offerings, supportive of LGBTQIA+ associates, was assessed on the Human Rights Campaign Foundation's 2023-2024 Corporate Equality Index, a benchmarking survey and report measuring corporate policies and practices related to LGBTQIA+ workplace equality. The Corporate Equality Index rates companies on detailed criteria falling under four central pillars:

1. Non-discrimination policies across business entities
2. Equitable benefits for LGBTQIA+ workers and their families
3. Supporting an inclusive culture
4. Corporate social responsibility

The full report is available online at [www.hrc.org/cei](http://www.hrc.org/cei).



### case study: dialogue across generations

There are currently up to four generations working together at Albert, so you might see a granddaughter and her grandmother work together in one of Albert's stores. This is nothing new – working in a store is a traditional profession, and that profession is often passed on from generation to generation. Intergenerational dialogue is one of the important aspects of diversity, equity and inclusion at Albert. Diversity brings many advantages and benefits for the company and for the teams in Albert's stores, distribution centers and headquarters. The Young (Ahold Delhaize) Albert and Experience Albert business resource groups also work together, for example by organizing a joint visit to introduce more than 100 Albert associates to food banks.

## II. harassment and violence

**Ahold Delhaize and each of its brands recognize and support the right of their associates to a workplace free from harassment and violence.**

The economic, geopolitical and social challenges we faced in recent years put increased pressure on associate health, safety and well-being. In particular, we saw an alarming increase in store-based violence and violent theft across both the U.S. and European brands, which necessitated an increased focus on both physical and psychological safety. At Ahold Delhaize, we believe that supporting well-being is critical to ensuring associates and our business can thrive. So, our brands have introduced and strengthened programs that improve associate safety, help associates build resilience in the face of change, reinforce positive coping mechanisms and work to eliminate any stigma or marginalization around mental health issues. One example is the OpenUp mental well-being platform that was made available to associates at the headquarters in the Netherlands.

Ahold Delhaize's Code of Ethics and Position on Human Rights include clear commitments and expectations on respect in the workplace. Our brands respect the human rights of all associates, including the right to a workplace free from harassment and violence. Our brands do not tolerate conduct by any associate or any other person that creates an intimidating, offensive or hostile work environment. This includes harassment based upon a person's legally protected status. Women, including during pregnancy, members of the LGBTQIA+ community, ethnic and religious minorities and migrant workers are generally more vulnerable to discrimination and harassment.

To ensure that all associates of Ahold Delhaize and each of its brands are able to work in an environment free from discrimination and harassment, Ahold Delhaize and its brands provide reporting options for associates, including the Speak Up lines. Approximately 5% of the reports received in 2023 were related to sexual or other harassment allegations. All of these reports were investigated by the responsible HR teams and, if necessary, corrective action was taken as appropriate. You can read more about the Speak Up lines in [access to remedy](#).

### case study: Alfa Beta in #SupportforWomen initiative

In 2024, Alfa Beta participated in the #SupportforWomen initiative and actively supports the "Independent Strong Free" campaign, supporting women who have suffered abuse to integrate into the labor market. The initiative, implemented by the Greek Public Employment Service with the support of the Ministries of Labor and Social Security, Social Cohesion and Family and Citizen Protection, aims to provide employment and economic independence to women who, although they want to leave an abusive environment, are unable to do so due to economic hardship.

#SUPPORTFORWOMEN



### III. pay equity

**Ahold Delhaize and each of its brands recognize and support the right of every individual to receive equitable compensation for their work.**

As a people business, at Ahold Delhaize, we pride ourselves on being open for everyone and we want every associate to thrive. We also believe it is important to compensate every associate equitably. To us, equity means that everyone has equal access to opportunities, regardless of background, and recognizes that we all have unique needs and experiences. We each have a role to play in this, as colleagues or as people leaders. We believe that associates' total value proposition is more than the wages and benefits they receive. It includes other factors, such as working conditions, opportunities to learn and refine skills, safety, and the diversity and inclusiveness of the workforce. All these aspects are important to associates' well-being and appreciation of their overall working experience and are measured through each brand's associate engagement survey.

Ahold Delhaize and each of its brands have adopted the following six overarching principles of fundamental "procedural justice" to guide fair compensation:

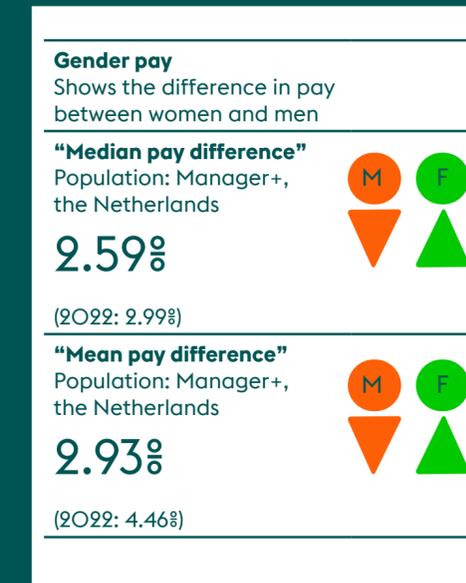
1. A solid base for comparing roles
2. Market-based compensation
3. Compensation in compliance with the law
4. Equal pay for equal work
5. Compensation aligned with individual performance and brand business strategy
6. Compensation that is transparent, consistent and explainable for the individual associate

Achieving pay equity is one of these principles, and an important mission for each brand. The two areas Ahold Delhaize and each of its brands focus on when assessing the performance on pay equity are equal pay for equal work and analyzing any difference in (average/median) earnings between men and women. While both deal with pay differences at work, there are important distinctions between the two.

We are committed to ensuring all associates at Ahold Delhaize brands and businesses are paid equally for doing the same or equivalent jobs, or work of equal value. In 2023, each brand finalized an equal pay for equal work analysis using the same methodology and by the same independent third party. Based on these pay equity analyses, each brand identified opportunities to improve pay differences and developed plans to meet its goals. When the brands find unexplainable pay differences, they will remediate these differences to improve equal pay for equal work. Ahold Delhaize and its brands are committed to continuing to perform pay equity analyses, refreshing them every three years and using the results to close any identified differences.

Ahold Delhaize is continuously committed to sharing gender pay difference figures, and we continue to conduct internal gender pay difference studies. In order to accurately track and report on our

progress, we share the analysis covering the same population as in our 2022 Annual Report; the gender pay difference analysis covers 1,966 associates (male and female) in management positions in the Netherlands. You can read more about pay equity in our [Annual Report 2023](#).



In addition to our focus on pay equity, market-based compensation and legal compliance, 59% of associates in our brands are covered by collective labor agreements (CLAs) through which wages are set. For associates outside of the CLAs, each brand has adopted an independent job evaluation methodology (Korn Ferry Hay) and has created policies and frameworks for determining job levels and titles, pay grades and bands, performance evaluation and wage increases.

Finally, Ahold Delhaize is in the process of preparing for the implementation of the Corporate Sustainability Reporting Directive (CSRD), which is a key priority for 2024.



## b. in focus: healthy communities and planet

At Ahold Delhaize, we believe there is an interplay between our own well-being and the well-being of the earth. The health crisis and the climate crisis are not separate issues, but inter-connected challenges. What we put on our plates has a direct impact on the world beyond our kitchen table. Therefore, we focus on healthy communities and planet.

Healthy communities and planet is one of the six strategic priorities in the Growing Together strategy. You can read more about Ahold Delhaize's Growing Together strategy and the strategic priority of healthy communities and planet on the [website](#).



inspiring everyone to eat and live better

### healthy communities and planet plan

#### customers & communities

inspire our customers and communities to engage in positive habits

#### assortment

offer the right assortment

#### associates

support our associates to be ambassadors for our mission and to eat and live better

#### healthy planet

#### climate

accelerate value chain decarbonization

#### nature

protect nature and biodiversity

#### circularity

scale circular models for packaging and unsold food

#### healthy communities

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## I. insufficient access to healthy food

**Ahold Delhaize and each of its brands recognize and support the right of every individual to feed themselves appropriately with food that is available and accessible, in sufficient quantities and of nutritional quality.**

Healthy food leads to healthy communities by reducing the risk of chronic disease and contributing to a community's overall resilience and vitality. Customers look to our brands for fresh, healthy inspiration to help them put delicious, nutritious family meals on the table every day. Each of our brands works to help make their customers (and associates) more aware of what they eat and how it impacts their health and the planet. They offer broad ranges of products that include affordable, nutritious choices, and continue to add healthier and more sustainable products to their assortments. In addition, they keep reformulating own-brand products to reduce salt, sugar and fat and increase vitamins, whole grains and fiber. And finally, our brands make eating healthier easier with recipes, support services and labeling through Nutri-Score in Europe and Guiding Stars in the U.S.

Each of our brands continues to find more ways to help their customers and associates make healthy and sustainable choices

through useful information and valuable incentives and rewards, such as through loyalty programs. In the stores, our brands inform customers about healthier options through shelf tags, product labels and prominently positioned health sections. Several brands have in-store nutritionists to help customers gain insight into their diets. Through their online platforms, some brands enable customers to apply filters when shopping, so they only see healthier, organic or vegetarian products. Our brands use well-established nutritional navigation systems to identify "healthier" products, such as Guiding Stars in the U.S. and Nutri-Score in some of our European brands. These systems are continuously updated to reflect the latest scientific advice and guidance.

As part of our ongoing commitment to promoting health, we engage in the Consumer Goods Forum (CGF), including its coalition **Collaboration for Healthier Lives**, bringing together manufacturers, retailers and other partners with the aim to empower individuals to lead healthier lives. In 2023, the coalition released a playbook on winning behavior change: a **Toolkit for Building Impactful Initiatives**, which showcases the data and key learnings from the coalition global initiatives and provides a view on how businesses can establish and execute impactful projects and strategies. We aim to take those learnings and integrate them into our internal knowledge sharing, to help us create impactful initiatives that move the needle on health.

### case study: Delhaize's SuperPlus program

Delhaize Belgium leverages its loyalty program to promote healthy options. Delhaize's SuperPlus program offers a 10% discount on fresh products with Nutri-Score A or B. And they're taking it up a notch with deeper discounts on promotions and personalized e-deals, making it even easier to make healthy choices.



### case study: The GIANT Company's Fresh Produce pilot

In 2023, The GIANT Company launched a pilot program in collaboration with a local health system. 109 households were enrolled in the pilot, all of which were classified as 'working poor'. This meant that they failed to qualify for government assistance programs such as Supplemental Nutrition Assistance Program (SNAP), but also had difficulties getting (healthy) food on the table. Every household got a 20-dollar voucher for Fresh Produce every two weeks. They received a digital coupon, logged-in to their GIANT Company account by using app or website, clicked on offers and either shopped with the voucher online or in-store. The health system funded the produce voucher, while The GIANT Company provided improved access to wellness resources on a dedicated webpage.

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## II. healthier planet

Climate change and the degradation of nature are global threats to the health of the planet and people's lives and livelihoods. A range of issues – such as deforestation, biodiversity loss, food waste and pollution – contribute to the climate crisis, and to the health and resiliency of the planet, which underpins the well-being of everyone who inhabits it. Ahold Delhaize contributes to a healthier planet through targeted initiatives on climate, biodiversity, sustainable packaging and food waste, in both our own operations and our supply chains.

In December 2023, we updated Ahold Delhaize's Climate Plan, building on our earlier Climate Plan from November 2022. In this updated Climate Plan, and in the most recent disclosures in the 2023 Annual Report, we refined our decarbonization levers, specifying potential reductions in GHG emissions, and refined the categories influencing our reduction target for the entire value chain (scope 3). Our focus is on working to address these challenges and adapting our actions to respond to them.

Food value chains can impact nature and biodiversity – for example, through land and sea conversion, soil degradation, overfishing and water use. Many of these impacts occur deep within the supply chain, during early production stages such as cultivation and harvesting. Unsustainable practices can compromise the production capacity of the land and sea, put pressure on the affordability of food and availability of land, and negatively affect both nature and biodiversity, and the many people and communities who value and rely on it.

You can read more about the intersection between climate, nature and human rights in **community impacts**. In addition, you can read more about Ahold Delhaize's comprehensive climate strategy and climate-related disclosures, as well as disclosures related to nature, food waste and plastics in the **Annual Report 2023**, as well as in the latest **Climate Update**.

## c. in focus: children

Ahold Delhaize is committed to respecting children's rights and we consider children a particularly vulnerable group for several of the salient impacts. One of the most salient impacts is child labor in the supply chain, which includes young workers, and you can read more about that under **child labor**. However, children's rights are also impacted through retail environments and in the communities our brands serve. Each of Ahold Delhaize's brands implements different programs to respect and promote children's rights through, for example, hunger relief, education on healthy diets, support for charitable organizations and more. In 2023, Albert supported children and young people through its charitable Foundation, Albert Heijn launched a fruit campaign for youth sports teams, Mega Image continued its 12 Acts of Kindness campaign and Alfa Beta supported the Amyoni Association with their Easter

campaign to ensure that children with disabilities have the right to education and a decent living. In the United States, The GIANT Company launched its third Feeding School Kids initiative, Stop & Shop continued its School Food Pantry program, Hannaford supported local hunger relief efforts with new Snack Pals Plates and Food Lion supported the Summers without Hunger campaign. In the case studies, you can find just a few additional examples. More information about our brands' programs is available on their websites and in their sustainability reports. You can find an overview under **reporting on progress**.

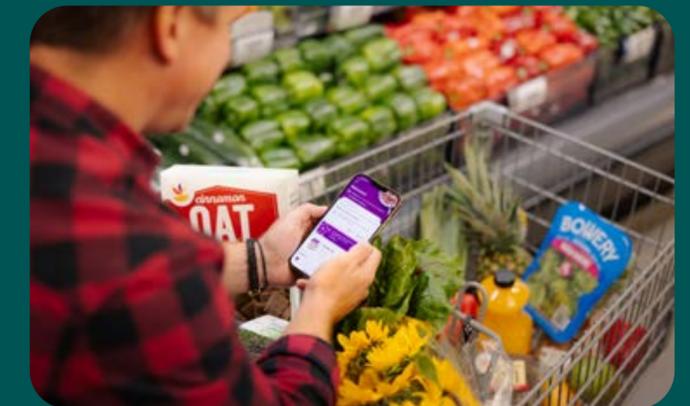
All products that our brands sell are covered by our product safety approach. For our own brands, we take additional steps to ensure they are legal, safe, produced in facilities that are fit for purpose and clearly and accurately labeled. Products are routinely tested to confirm compliance with specifications and safety requirements. When it comes to food or non-food products for children, we follow all relevant specific

legal requirements and safety precautions. In addition, we pay specific attention to own-brand food and non-food products that are consumed or used by and for children in the product risk assessments and risk mitigation measures. You can read more about our approach to – and performance on – product safety in our **Annual Report 2023**.

Ahold Delhaize and each of its brands also impact children through the parents they employ. We recognize that supporting associates during important and impactful moments in their lives demonstrates that we care about our people and that we have the courage to drive change. In 2023, Ahold Delhaize introduced the Life Events Framework (LEF) for its Netherlands-based associates, which brings together all that we do to continuously support associates during important moments in their lives. Whether it is childbirth, moving, bereavement, retirement, menopause – whatever the moment – we aim to understand and support our associates.

### case study: Giant Food's Nourishing Our Youth campaign

From June 16 through August 7 of 2023, Giant Food held its customer giving campaign, 'Nourishing Our Youth.' During the campaign, Giant Food customers were given the option to round up their grocery purchase to the nearest dollar to donate to their local public schools' food programs. 100% of the proceeds raised were donated to local school districts to support meal programs such as covering outstanding student meal debt, expanding food distribution programs and building on-campus food pantries.



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### case study: Delhaize's Wonderfood Adventure

In April 2024, Delhaize organized the Wonderfood Adventure, a food festival for young and old at the Expo in Brussels, with free access for children under twelve years old. The Wonderfood Adventure was set up as a giant kitchen with 5 universes, where visitors were able to taste, learn, and play. Visitors could also stop by the many different food stands, where they could ask questions to Belgian producers, play food games, earn SuperPlus points and thanks to main sponsor Delhaize, take home a goodie bag worth €25.



### case study: bol's Boekiebag

During the summer holidays, not all children have the chance to keep reading. For example, in some families there are not enough resources to purchase books. To help minimize the reading dip that can happen in summer, the Jeugdeducatiefonds and bol Bollebozen handed out 'Boekiebags' in the summer of 2023. Bol Bollebozen made these backpacks and filled them with a reading book and an activity book. The distribution took place at schools throughout the Netherlands, of which 50 percent of the students live below the poverty line. A total of 30,000 children received a Boekiebag, distributed in over 180 schools. But bol does more. In total, bol donated 273,630 books in 2023.



### case study: Maxi's Healthy Food Every Day educational caravan

Fourth-graders in 100 elementary schools across Serbia received basic knowledge about the principles of proper nutrition and why it is important to follow a balanced diet, eat fruit and vegetables every day, and choose a healthier snack. This was made possible through the MAXI educational program 'Healthy Food Every Day'. Approximately 9,000 schoolchildren have so far attended the lectures on healthier eating, and the plan for this educational caravan is to visit a total of 150 schools by the end of 2024. Additional incentive to make healthier choices was provided through the digital MAXI "Mini Cookbook", which is gifted to every student at the end of every lecture via the QR code on an educational puzzle. It offers more than 20 simple recipes adapted to their age, which encourages children's active participation in preparing healthier meals.





## d. other salient impacts

### 1. unhealthy and unsafe working conditions

**Ahold Delhaize and each of its brands recognize and support the right of their associates to work in a healthy and safe workplace.**

A comprehensive safety culture, processes and tools are the foundation of building awareness and engaging associates. Visible leadership commitment and associate participation in safety provide a strong foundation for a positive culture in an organization. Each Ahold Delhaize brand and business strives to maintain workplaces that are accident and injury free, recognizing that healthy and safe work environments reduce absences and improve business results. In 2023, we reinforced a global safety policy that formalizes the safety framework and establishes minimum requirements that each brand's safety programs must include for the safety and protection of

their associates and customers. The care for the health, safety and well-being of associates, customers, suppliers and vendors is one of our core company values. Each brand's leadership is responsible for establishing and resourcing implementation plans and monitoring performance around locally relevant health and safety topics. We work through a Global Safety network, which is comprised of the Safety leads from each brand and other relevant experts. The team collaborates on strategic priorities, mitigation of common risks, shared best practices, subject matter expertise and common guidelines and expectations. The Global Safety network also provides support and resources for developing and maintaining global or common safety management systems that manage organizational exposures to loss, including mitigating injury and regulatory risks.

In 2023, each brand focused on building leadership on safety

within their management teams. Leaders are highly influential in creating a safe workplace. Each brand trained its executives to ensure that safety remained a top focus and to learn best practices in safety engagement. Several brands – including bol, Albert Heijn, Ahold Delhaize USA and Mega Image – hosted workshops focused on how to be better safety leaders and advocates.

Each brand developed key performance indicators, with a particular focus on reducing serious injuries and fatalities. We were encouraged by the improvement in workplace absenteeism rates across the brands. When the rates are analyzed across all of our brands, the workplace absenteeism rate went from 2.00 in 2022 to 1.89 for 2023. Although the serious injury rate increased from 0.42 for 2022 to 0.47 for 2023, overall we had fewer serious injuries in 2023 and the rate is elevated as the result of fewer hours worked.

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## II. freedom of association and collective bargaining

**Ahold Delhaize and each of its brands recognize and support the right of their associates to form or join trade unions if they choose and have their legal rights to collective bargaining respected.**

In 2023, more than half (59%) of our brands' associates were covered by collective bargaining. In addition, each brand employs an annual associate engagement survey (AES) as well as other associate listening programs to actively measure cultural aspects of inclusion, as well as many other aspects of associate engagement, to see where they are today and identify remaining gaps. Ahold Delhaize and each of its brands appreciate and seek participation and feedback and encourage open dialogue between associates and management, whether it comes through direct communication with associates, through the associate engagement survey, through the works councils, or through their union representatives.

Our brands with collective bargaining agreements respect their long-standing relationships with the unions that represent their associates and work with the unions to forge the most effective solutions for their associates, customers and their businesses. Ahold Delhaize and each of its brands prohibit any form of intimidation, harassment, retaliation or violence against associates seeking to exercise the legal right to form or join a trade union of their choice.

### case study: introducing the NextCo

Ahold Delhaize is one of the world's largest retail companies. When considered together, its companies employ over 400,000 associates, comprising five generations, 67% of which are Millennial or younger. To make sure the voice of the next generation is represented in the board room, Ahold Delhaize has taken a step towards the future by creating an advisory board to the Executive Committee (ExCo) called the "NextCo". The goal is to ensure that the ExCo has access to the viewpoints of the next generation in the strategy and decision-making process. Furthermore, we recognize the importance of providing leadership development and advisory opportunities for future leaders.



# 05. human rights in the supply chain

## a. in focus: vulnerable groups in supply chains

As part of Ahold Delhaize's sustainability due diligence process, we identified people in our brands' external supply chains as an important group of potentially affected stakeholders. We also linked salient impacts to specific vulnerable groups in supply chains. In our previous report, we focused on three vulnerable groups that particularly stand out in our brands' supply chains: i) children (including young workers), ii) women, and iii) migrant workers.

But there are more vulnerable groups in global supply chains, and they often overlap. Those include low-skilled workers, sub-contracted workers and informal workers, who are particularly at risk for inadequate wages, inadequate working times, forced labor and unhealthy and unsafe working conditions. It includes women, minorities and refugees, who are particularly at risk for discrimination and harassment. It includes smallholders, who are particularly at risk for inadequate incomes. You can read

more under **smallholders and small producers**. And it includes Indigenous Peoples and human rights defenders, who are particularly at risk for community impacts. In the chapters in this report, and in the table in **our approach to due diligence**, we attempt to make the link between global supply chains, potential salient impacts and vulnerable groups clearer.

Ahold Delhaize and its brands focus their baseline social compliance programs on own-brand suppliers in high-risk countries because that is where the most serious abuses, including forced and child labor, can occur when governments fail to protect workers' rights and when workers lack other basic protections. However, our Standards of Engagement apply to all workers in our supply chains, including individuals or groups who are vulnerable or marginalized, such as – but not limited to – women, members of the LGBTQIA+ community, children, persons with disabilities, minorities, refugees, migrant workers and

Indigenous Peoples. The Standards of Engagement specify that suppliers may not use subcontracting in a way that circumvents or avoids legal obligations related to the principles in these Standards.

We recognize that migrant workers are vulnerable throughout supply chains, and particularly in agriculture and fisheries. In 2024, we are commissioning global human rights impact assessments, which focus, among others, on migrant workers in global supply chains.

In the case studies throughout this report, we share additional examples of how our brands investigate allegations of human rights abuses and address adverse impacts in both non-high-risk and high-risk countries.



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### case study: update on Hannaford's dairy supply chain

Hannaford continues the implementation of the Farmers Assuring Responsible Management (FARM) assessment tool across its dairy supply chain in collaboration with its private label milk suppliers. The National Milk Producers Federation and the Innovation Center for U.S. Dairy jointly provide guidance and support for U.S. dairy farms under the FARM assessment tool on the topics of animal care, environmental impact and worker development.

So far, Hannaford's private label milk suppliers completed FARM Workforce Development assessments on 229 farms across Hannaford's entire geography, up from 70 by the end of 2022. In addition, three independent external assessments, including engagement with workers, took place in 2023, and several more are scheduled for 2024. Any findings of the FARM or external assessments are addressed with the respective farmers for remediation. To date, Hannaford has not uncovered any structural or serious violations of legal standards, or our own Standards of Engagement, related to migrant workers at any farm within Hannaford's private brand supply chain.

In 2023, Ahold Delhaize and Hannaford publicly responded to allegations at the request of the Business and Human Rights Resources Centre. Our responses are available [here](#). Hannaford remains fully committed to – and focused on – continuing its thorough due diligence in its dairy supply chain with the National Dairy FARM Program.



### smallholders and small producers

Ahold Delhaize and its brands strive to be inclusive of all farms and producers in their supply chains, regardless of size or scale of production, including small producers and smallholder farms. You can read more about the work with smallholder coffee and cocoa farms to increase their resilience and prosperity in the case studies in this chapter under **child labor** and **inadequate wages**. Ahold Delhaize supports credible group audit approaches, which enable smallholder farms to meet our social requirements and participate in global supply chains. In addition, Ahold Delhaize participates in multi-stakeholder initiatives that address issues concerning small-scale farmers, including Fairtrade, the Sustainable Rice Platform, the Roundtable for Sustainable Palm Oil and the Round Table for Responsible Soy.



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## I. forced labor

**Ahold Delhaize and each of its brands recognize and support the right of every individual to be free from forced labor, slavery and servitude.**

In 2023, Ahold Delhaize updated its Standards of Engagement, and one of the key changes was to more explicitly incorporate the three Priority Industry Principles for responsible recruitment:

- Every worker should have freedom of movement
- No worker should pay for a job (Employer Pays Principle)
- No worker should be indebted or coerced to work

Our commitment to human rights prohibits all forms of forced, bonded or trafficked labor. In addition, our Standards of Engagement continue to require that suppliers act with special diligence when engaging and recruiting migrant workers, both directly and indirectly. In

global supply chains, migrant workers are not the only group that is potentially vulnerable to forced labor. So are informal, sub-contracted, low-skilled and illiterate workers, minorities, women and children and young workers. You can read more in the section on **vulnerable groups in supply chains.**

All social compliance and commodity programs and standards that we work with apply similar requirements when it comes to forced, bonded and trafficked labor, including requirements that reflect CGF's Priority Industry Principles. The Sustainable Supply Chain Initiative established benchmark criteria on forced and bonded labor, including requirements for the use of recruitment agencies and the Employer Pays Principle. Those requirements are also reflected in amfori BSCI's Code of Conduct. Ahold Delhaize continues to work in partnership with those

organizations to ensure the implementation of the Priority Industry Principles and monitor and eliminate forced, bonded and trafficked labor.

In October 2022, Ahold Delhaize hosted two internal webinars with Matt Friedman from the Mekong Club as a speaker on forced labor and human trafficking. The first webinar was open to anyone within Ahold Delhaize and meant to raise broader awareness on forced labor. The second webinar focused on the human rights experts working across Ahold Delhaize's brands and gave them the opportunity to engage with Matt and learn from his expertise. In 2024, forced labor will be one of the salient impacts that will be assessed in the global human rights impact assessments that we are conducting.

### case study: community event on forced labor

In addition to the internal webinars on forced labor, Ahold Delhaize and local leaders hosted a community event in Salisbury, North Carolina with Matt Friedman from the Mekong Club as a distinguished speaker. We invited a range of local stakeholders, from community organizations to other companies, at the Meroney Theater for a presentation, followed by a discussion on how to address forced labor and human trafficking, locally and in global supply chains.



## II. child labor

**Ahold Delhaize and each of its brands recognize and support the right of every child to be free from work that deprives them of their childhood, their potential and their dignity, or that is harmful to their physical and/or mental development.**

Ahold Delhaize and its brands prohibit all forms of child labor and the rights of young workers (under 18) must be protected, in line with the definitions and requirements outlined by the International Labour Organisation (ILO). Ahold Delhaize's requirements are clear and specific as they are outlined in the latest version of the Standards of Engagement.

All the programs and standards that we work with – from amfori BSCI to Rainforest Alliance – apply similar requirements to child labor and young workers, and clear benchmark criteria on child labor are established by the Sustainable Supply Chain Initiative. We continue to work in partnership with those organizations and others to eradicate, and, where found, remediate child labor. If a child is found working in violation of these standards, their best interests are protected through effective remediation.

We continue to strive to have 100% of our own-brand coffee, tea, cocoa and palm oil certified against an accepted standard by 2025, which includes stringent requirements on child labor in line with international standards. The certification systems that our brands use for cocoa, coffee and tea focus on improving yields, increasing farmer incomes, and decreasing environmental and social risks, such as deforestation and child labor. In 2023, over

90% of the own-brand products containing cocoa were certified against Rainforest Alliance or Fairtrade.

In addition to our social compliance and critical commodity programs, our brands engage in several partnerships, also with national brand suppliers, that address child labor and its root causes, particularly in the cocoa supply chain where there are still cases of child labor, despite all efforts. For example, Albert Heijn is a member of the Dutch Initiative on Sustainable Cocoa (DISCO), and Delhaize is a member of the Beyond Chocolate Initiative, both of which are run in partnership with the Dutch Sustainable Trade Initiative. In addition, our European brands source their Delicata chocolate brand in line with the principles of Tony's Open Chain. For a good perspective on where we are, collectively with our partners, we recommend the latest progress reports published by DISCO and the Beyond Chocolate Initiative. In addition, we share more information from Tony's Open Chain's latest impact report in the case study on this page.

We recognize that young workers, especially young migrant workers, are a vulnerable group in agriculture and global food supply chains. The New York Times recently reported about several cases of young, migrant workers working in agriculture, processing plants and construction. In 2024, child labor (including impacts on young workers) will be one of the salient impacts that will be assessed in the human rights impact assessments that we are conducting.

You can read more about our response to cases of child labor, or deal-breakers, in [our approach to due diligence](#), and you can read more about our general approach to remediation in [access to remedy](#).

### case study: progress on child labor with Tony's Open Chain

Ahold Delhaize's European brands source cocoa for their Delicata brand chocolate as part of Tony's Open Chain, together with the other Tony's mission allies. In the [Tony's Open Chain Mission Report 2022/2023](#), there is more information on the progress made on eliminating and remediating child labor at the partner cooperatives where all Tony's mission allies source.

Tony's Open Chain focuses on children's rights, emphasizing protection and access to resources for their well-being. The supply chain is 100% covered by the Child Labor Monitoring and Remediation System, a tool to combat child labor in cocoa supply chains. Child labor prevalence remains under 5% at the long-term partner cooperatives of Tony's Open Chain.



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## b. salient impacts

### I. inadequate wages and incomes

**Ahold Delhaize and each of its brands recognize and support the right of every worker to receive equitable compensation for their work.**

We require suppliers to pay workers at least the minimum wage reflecting time worked and in compliance with all applicable legal requirements and collective agreements, as outlined in the latest version of our Standards of Engagement. In addition, we expect our suppliers to provide equal pay for equal work for all genders and categories, including women, migrant workers, minorities and other vulnerable groups. Suppliers must also ensure that wages and benefits are detailed transparently and regularly for workers.

At Ahold Delhaize, we recognize that workers and smallholders in supply chains can experience poverty even when local legal minimum standards are complied with. We also recognize that poverty is a root cause of many social and environmental issues, from child labor to deforestation. As part of our sustainability due diligence process, we identified women, migrant workers, children and young workers, and informal, sub-contracted and low-skilled workers as vulnerable to inadequate wages, and (women) smallholders as vulnerable when it comes to inadequate incomes.

Ahold Delhaize brands are engaged in multiple initiatives that focus on progress towards living wage and living income in the supply chain, including the Dutch and Belgian Commitments to Living Wages in the Banana Sector, the Sustainability Initiative for Fruit and Vegetables (SIFAV), the Dutch Initiative for Sustainable Cocoa (DISCO) and the Belgian Beyond

Chocolate Initiative, all of which are in partnership with the Dutch Initiative on Sustainable Trade (IDH) and are built on IDH's Roadmaps on Living Wages and Living Income. Each of these initiatives publish their own reports that demonstrate progress across each partnership, but **IDH's Annual Report 2023** provides good insight generally on progress towards living wage and living income through collective action. We are also mission allies of Tony's Open Chain for the Delicata chocolate brand. You can find a link to their Mission Report, which includes progress towards living income, in the case study under **child labor**.

Progress towards living wage and living income is also covered by Rainforest Alliance and Fairtrade in their standards, as well as in the amfori BSCI Code of Conduct and by many of the other social standards and certifications that our brands implement in their supply chains.

In addition, the human rights impact assessments conducted by Albert Heijn include an assessment of the living wage gap. You can read more about those assessments in their latest Sustainability Report and in the case study under human rights impact assessments. And finally, Ahold Delhaize is in the process of setting up global human rights impact assessments that will also include an assessment of the living wage gap. Considering the wide range of initiatives across different sectors and supply chains, and the importance of context, it is a challenge to report progress on all of our living wage and living income initiatives in one simple overview. For that reason, we include a list of resources and reports from key partnerships in **reporting on progress**.

#### case study: supporting smallholder coffee farmers in Rwanda

In 2024, Albert Heijn launched a pilot project in Rwanda with the Ahold Delhaize Coffee Company and a coffee trader to increase coffee yields and support smallholder farmers to work towards a living income.

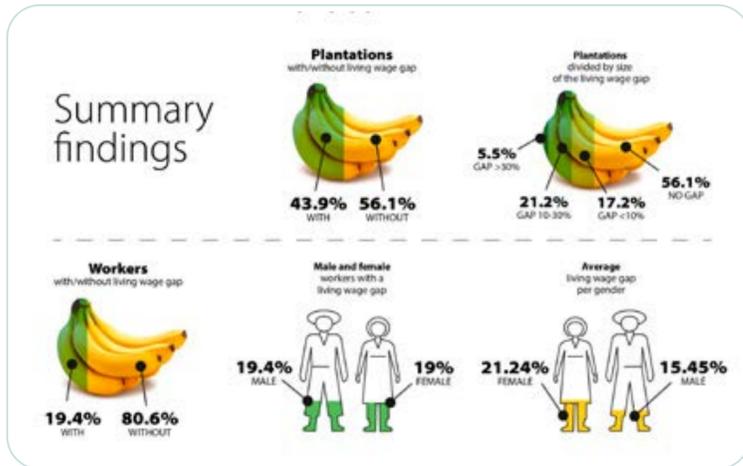
One way for farmers to increase their yield is by rejuvenating old coffee trees through 'stumping': cutting off the main stem to let new productive shoots grow. This makes the trees responsive to inputs, like (organic) fertilizers, again, boosting the yield. However, it takes 1-2 years before the new shoots are in full production, and cash-constrained smallholder farmers often cannot wait that long.

This pilot focuses on a direct cash transfer model developed by **IOOWEEKS**. Smallholder farmers will receive a conditional direct cash transfer every week for 100 weeks (~2 years), which contributes to the household income during the period when farmers are not obtaining any yield from their trees. Weekly trainings provided by IOOWEEKS support participating households in more effective financial management and more equal decision-making between women and men.



### case study: Belgian commitment on living wages in the banana sector

In late 2022, Delhaize was one of the Belgian retailers that committed to work towards the realization of living wages for workers in their banana supply chains in partnership with the Sustainable Trade Initiative (IDH). Together, the retailers take a proactive role to develop and implement responsible business conduct related to living wages and strive to close the living wage gap by the end of 2027 for their banana volumes. Albert Heijn is part of a similar commitment in the Netherlands. In 2023, the Belgian retailers aimed to measure the existing wage gaps of their banana producers. The results of the study are available [here](#).



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## II. discrimination (incl. gender inequality)

**Ahold Delhaize and each of its brands recognize and support the rights of workers to a workplace free from discrimination and for women to be treated fairly and equally to men.**

Our Standards of Engagement require each supplier to ensure that all workers enjoy equal opportunities and treatment, and that all workers, including vulnerable or marginalized persons or groups, are free from discrimination in the workplace.

Women in supply chains were identified as a vulnerable group in the sustainability due diligence process and Ahold Delhaize recognizes that their specific needs differ from those of men, for example, when it relates to protection during pregnancy and nursing and sanitary conditions. We also recognize that women are more often subjected to discrimination and inequality, which often coincides with other forms of discrimination, including on the basis of ethnicity, sexual orientation and social status. For women, that often results in more unpaid care responsibilities, lack of access to education or training and being less likely to be considered for better paying jobs. There is still a significant wage gap between women and men globally.

Discrimination is not limited to women. Minorities, refugees, members of the LGBTQIA+ community, persons with disabilities, Indigenous Peoples and others can also be subject to discrimination or harassment.

Ahold Delhaize is a signatory of the Women's Empowerment Principles. In addition, gender inequality is increasingly being addressed in and by social standards and certifications. amfori BSCI references the Gender Dimensions of the UN Guiding Principles on Business and Human Rights and Rainforest Alliance promotes gender equality and women's empowerment as an integral part of its 2020 Sustainable Agriculture Standard. In 2023, amfori teamed up with Women Win to launch a new online training series on gender-responsive due diligence for their members. amfori BSCI, Ahold Delhaize and its brands will continue to work in partnership with these and other organizations to support women's rights and address discrimination in supply chains.

### case study: Albert Heijn's supplier brochure on gender equality and women's rights

In 2023, Albert Heijn published a **brochure** for suppliers to raise awareness on gender equality and women's rights. Gender equality means that all genders are equally able to access economic opportunities and resources. In the brochure, Albert Heijn expresses the importance of all genders having equal rights and opportunities and being treated equally. It is proven that enhancing gender equality can benefit a company in terms of productivity, profitability and efficiency. The brochure shares best practices, inspires and provides new insights that can be applied to businesses in the right context. Albert Heijn's brochure is also highlighted as a resource for suppliers in Ahold Delhaize's Guidance Document on the Standards of Engagement.



### case study: supplier diversity at Ahold Delhaize USA

Through the dedication and efforts of the Ahold Delhaize USA (formerly Peapod Digital Labs) team, the U.S. brands are developing mutually beneficial and successful partnerships with a talented group of diverse-owned, including women- and minority-owned, suppliers that offer quality products and services, excellent customer service and competitive costs. These relationships are developed by incorporating the national and local businesses into the everyday process of category reviews and product or service bids. Each quarter in 2023, Ahold Delhaize USA (formerly Peapod Digital Labs) ran Supplier Diversity Matchmaking events and gave selected suppliers free pitch coaching classes to prepare them for the meetings.



### III. harassment and violence

**Ahold Delhaize and each of its brands recognize and support the right of every worker to a workplace free from harassment and violence.**

Ahold Delhaize's Standards of Engagement specify that Ahold Delhaize expects each Supplier to ensure that all workers, including vulnerable or marginalized persons or groups, are free from discrimination, violence and harassment in the workplace. Appropriate disciplinary procedures should be in place and effectively communicated to the workers. All social compliance and commodity programs and standards include provisions that strictly prohibit harassment and violence. In Ahold Delhaize's global sustainability due diligence process, we identified women, minorities, refugees, members of the LGBTQIA+ community, persons with disabilities and Indigenous Peoples as more vulnerable to discrimination, harassment and violence. We address these concerns in this report in the sections **discrimination (incl. gender inequality)** and **vulnerable groups in supply chains** as well as through the programs and standards we implement in our supply chains.

### IV. freedom of association and collective bargaining

**Ahold Delhaize and each of its brands recognize and support the right of workers in the supply chain to form or join trade unions if they choose and have their legal rights to collective bargaining respected.**

Ahold Delhaize and each of its brands work with amfori BSCI and other social compliance and commodity programs and standards to ensure that the rights of workers to form and join trade unions and their legal rights to bargain collectively are respected by our suppliers. We prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the legal right to form and join a trade union of their choice.

International and local trade unions are represented as key civil society representatives in several collaborations and partnerships on human rights in supply chains, including the Beyond Chocolate Initiative, and on the amfori Stakeholder Advisory Council. In addition, we engaged a confederation of workers representing supply chains as part of the sustainability due

diligence process, and we intend to engage with relevant worker representatives in the context of the global human rights impact assessments. You can read more about those collaborations and partnerships throughout this report.

In 2022, Albert Heijn received a complaint about Eurosol, a fruits and vegetables supplier for over 35 years, from a labor union on false disciplinary procedures. Albert Heijn conducted a human rights impact assessment, which did not find any evidence that justified the accusations that were made. In the meantime, the case also has been handled by the Spanish court, which ruled in favor of Eurosol on all complaints filed by the labor union. The case is explained in more detail in the case study under **supply chain grievance mechanisms**



## V. unhealthy and unsafe working conditions

**Ahold Delhaize and each of its brands recognize and support the right of every worker to healthy and safe working and living conditions.**

Our Standards of Engagement specify that suppliers must comply with applicable occupational health and safety legislation or relevant standards, and that they should establish and follow a

clear set of procedures regarding occupational health and safety, including the provision and use of personal protective equipment, adequate training, clean toilets, access to potable water and, if appropriate, sanitary facilities for food storage. These requirements are also covered in the amfori BSCI Code of Conduct and by all other social standards and certifications that our brands

implement in their supply chains. That also includes the standards of Rainforest Alliance and Fairtrade.

Ahold Delhaize expects suppliers to respect the right to healthy and safe working and living conditions of all workers and we prohibit workplace practices and conditions which violate basic human rights, including in residential facilities as provided to workers. In the latest revision of the Standards of Engagement, we underlined the importance of special protections for vulnerable groups, for example due to pregnancy or disability, as appropriate and in line with applicable laws, regulations, standards and collective agreements.

Ahold Delhaize and its brands consider life-threatening health and safety situations, like obstructed or locked emergency exits, a deal-breaker. If there is a finding of a life-threatening health and safety situation in a social audit report, our brands follow the appropriate procedures to address the situation. You can read more about how we deal with such findings under **deal-breakers**.



## VI. inadequate working time

**Ahold Delhaize and each of its brands recognize and support the right of every worker to just and favorable conditions of work, including the right to rest, and to have legal limits on working hours and excessive overtime respected.**

As part of our Standards of Engagement, Ahold Delhaize expects each supplier to promote working hours practices that enable a healthy work-life balance for workers, and working hours must comply with all applicable laws and regulations, industry standards or, where relevant, collective agreements.

In the latest revision of the Standards of Engagement, we further aligned the requirements with the Position on Human Rights: regular working hours will not exceed 48 hours per week.

Ahold Delhaize and its brands work with amfori BSCI and other social compliance and commodity programs and standards to monitor compliance with the Standards of Engagement. You can read more about our approach to social compliance and continuous improvement in **our approach to due diligence**.

## VII. community impacts (including land rights, access to water)

### Ahold Delhaize and each of its brands recognize and support the rights of Indigenous Peoples and local communities to land and natural resources, including access to water.

We recognize that Indigenous Peoples, local communities and smallholders, including women in particular, are often dependent on the use of or access to land or natural resources, including water, for their livelihoods. Land rights are essential in tackling environmental and climate-related issues, including deforestation, the protection of carbon reservoirs and natural resource management. Ahold Delhaize and each of its brands respect those rights and do not tolerate land grabbing. There is also increasing pressure on the availability of potable water, often in areas of agricultural production, which can affect local and Indigenous communities and small farmers.

In the recent revision of the Standards of Engagement, we included a requirement on land rights that requires suppliers involved in the acquisition, leasing or disposal of land to respect the rights and title to and the use of property, land and natural resources of individuals and local communities. In addition, suppliers must actively seek and document the effective implementation of free, prior and informed consent (FPIC). Furthermore, we require suppliers to comply with all applicable environmental legislation and maintain relevant permits related to water management.

Our brands aim to mitigate potential negative impacts on nature, biodiversity and communities through programs supporting sustainable and regenerative agriculture and through a focus on sustainable sourcing of critical commodities

in our own-brand supply chains. Some farmers in our supply chains work with initiatives and approaches which contribute to sustainable and/or regenerative agriculture. While the approach varies across our brands, examples include working with initiatives such as Global G.A.P., the SAI Platform Farm Sustainability Assessment and Rainforest Alliance. In addition, some of our brands have established their own initiatives which aim to increase the uptake of sustainable and/or regenerative principles in farming chains. Examples of this include Albert Heijn's Better For Nature and Farmer program and the establishment of ADUSA's regenerative agriculture strategy in late 2023.

In addition, we are working towards certification of six critical commodities in own brand supply chains, including palm oil, soy, wood fiber, tea,

coffee and cocoa because of the risks of deforestation and land degradation and how those connect to the livelihoods of local communities and Indigenous Peoples. Several of the certification standards we work with, including the Roundtable for Sustainable Palm Oil (RSPO), the Round Table for Responsible Soy (RTRS) and the Forest Stewardship Council (FSC), include requirements on topics such as land rights, free, prior and informed consent (FPIC) and access to water.

In 2023, we started work to update our nature approach. This work will continue over the coming years. We will continue to provide updates on this work and enhanced disclosure of our nature-related impacts, dependencies, risks and opportunities in our future annual reporting, in alignment with the requirements of the CSRD.

### case study: implementing water standards through SIFAV

Albert Heijn, Delhaize and Albert (via strategic supplier Bakker Barendrecht) are now in the process of implementing water standards for fruit and vegetables. This implementation process is part of the environmental program of IDH's Sustainability Initiative Fruit and Vegetables, of which Albert Heijn, Delhaize and Bakker Barendrecht are members. SIFAV also has a social and an environmental due diligence program. All SIFAV partners commit to implementing approved good water management standards for at least 70% of volumes coming from high-water-risk regions by 2025. To reach this target, SIFAV has developed the Basket of Water Standards as well as a list of regions that are considered high water risk regions. You can read more about the program and progress on SIFAV's [website](#).



# 06. monitoring and reporting on progress

Ahold Delhaize recognizes the importance of transparency and accountability in reporting, and since our last Human Rights Report, we took steps to further improve our reporting on progress on the Roadmap on Human Rights. We continued to evolve our reporting on human rights in our Annual Reports and we engaged with external stakeholders and relevant benchmarks, who also shared with us what they consider best practice in reporting on human rights. We are also well on our way on the CSRD implementation journey, and we are in the process of adding a metric on deal-breakers. You can read more in [our approach to due diligence](#).

In this chapter, we share Ahold Delhaize's approach to environmental, social and governance (ESG) performance generally, and some of the key metrics shared in Ahold Delhaize's [Annual Report 2023](#). We will continue to report on these metrics on an annual basis in the Annual Report as part of our ESG reporting, in line with the CSRD.

## a. in focus: ESG performance

At Ahold Delhaize, we use the term environmental, social and governance (ESG) to explain our impact on the world around us and how we work on eliminating, avoiding or reducing our negative impacts, mitigating risks and harnessing opportunities.

Our approach to ESG starts with our efforts to better understand the world we live in, the challenges we face in the short, medium and long term, and what our stakeholders expect of us. Using this knowledge, we determine the topics where we have, or can have, the most impact or that impact us the most. Our ESG ambitions are further shaped by the UN Sustainable Development Goals, relevant ESG benchmarks, such as MSCI and Sustainalytics, and input received through stakeholder engagement. We also look at future developments and how these could potentially impact Ahold Delhaize – for example, the implementation of the CSRD. You can read more about our CSRD implementation journey in the [Annual Report 2023](#).

In 2023, we continued to improve our data collection, controls and processes: we increased the involvement of the Finance team in the data collection and reporting process and are now branching out to other indicators, utilizing the knowledge we have gained to date to bring improvements in other areas. As we embark on the CSRD implementation journey, we are also using this knowledge to capture the new data requirements and set up processes and controls to ensure we are able to deliver reliable data going forward.

The ESG materiality assessment referenced in the Annual Report 2023 helped us identify and prioritize our most relevant ESG topics. We aim to create sustainable long-term value for our

stakeholders and conducted this assessment to ensure that our strategy on ESG remains in line with stakeholder expectations and external trends.

Ahold Delhaize is in the process of completing a double materiality assessment, in line with the CSRD. The key starting point of a double materiality assessment is impact materiality, which mirrors the first step of sustainability due diligence. By setting the impact materiality assessment process as the starting point in the double materiality process and aligning it with the first step of our sustainability due diligence process, we support a coherent and integrated relationship between impact materiality and financial materiality. It also helps us ensure that the resources we apply to the implementation of effective sustainability due diligence are an investment in good reporting under the ESRS, and vice versa.

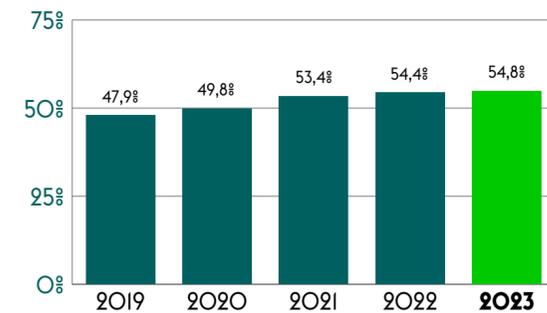
Our Enterprise Risk Management (ERM) assessment is designed to identify, assess and take action on risks and opportunities in line with our strategic, operational, financial and regulatory business objectives. The most significant “principal” risks identified are considered to present a material financial risk. Several of the principal risks are linked to human rights generally, as well as some of the salient impacts specifically. The UN Guiding Principles focus on saliency rather than on the materiality of a business issues, which – in practice – means to identify the risks for people, and not for the company. That is why we use the term “salient impacts” in this report.

# b. key human rights data from the Annual Report 2023

## Associate engagement score



## Healthy own-brand food sales



## Workplace injury absenteeism rate

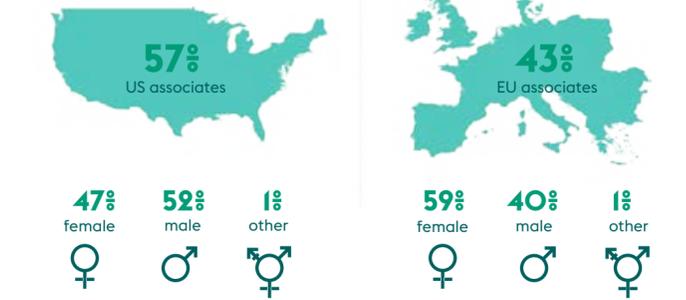


| Performance indicator description            | 2023 | 2022 |
|--|------|------|
| <b>100% Gender balanced</b>                  |      |      |
| % of female associates: Total Ahold Delhaize | 52%  | 53%  |
| % of female Supervisory Board members        | 44%  | 33%  |
| % of female Management Board members         | 25%  | 25%  |
| % of female Executive Committee members      | 29%  | 29%  |
| % of females at VP+ level 3                  | 37%  | 33%  |
| % of females at director level               | 36%  | 35%  |
| % of females at manager level                | 41%  | 40%  |
| % of females below manager level             | 53%  | 54%  |
| % of male associates: Total Ahold Delhaize   | 47%  | 47%  |

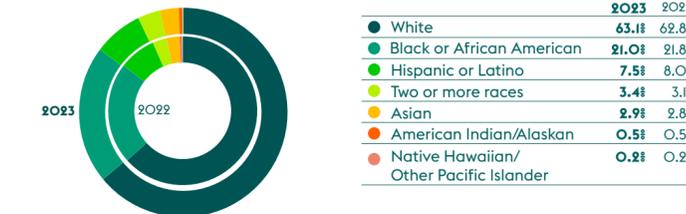
## Associate population diversity



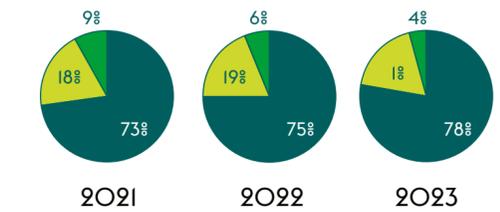
## Gender diversity by region



## US associates: Racial and ethnic diversity

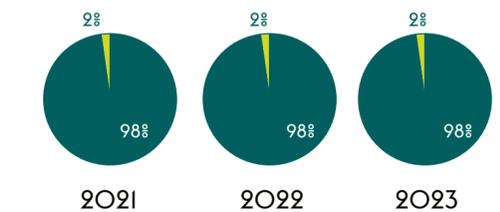


## Percentage of production sites of own-brand products in high-risk countries audited on social compliance



■ Audited against an acceptable standard  
 ■ Audited against a stepping stone standard  
 ■ Not audited

## Percentage of production sites of own-brand food products that are GFSI-certified or comply with an acceptable level of assurance standard

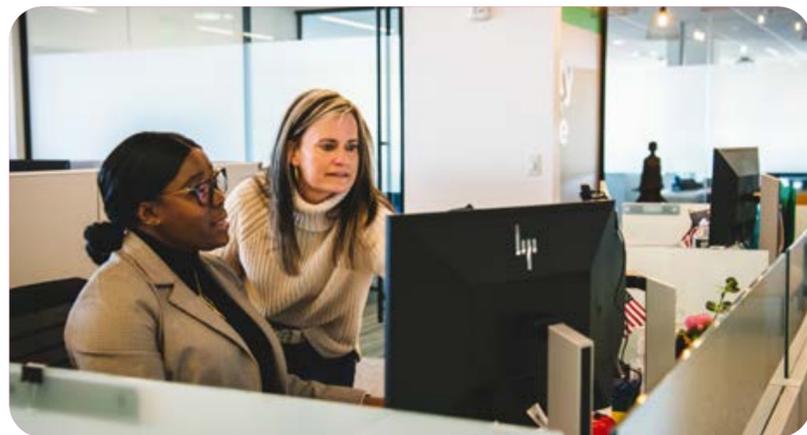


■ Certified or compliant  
 ■ Not certified or compliant

More information on these and other metrics can be found in **Ahold Delhaize's 2023 Annual Report.**

# 07. access to remedy

Remediation and access to remedy are important aspects of an effective human rights due diligence process and Ahold Delhaize is committed to addressing allegations that human rights are not being properly respected. Ahold Delhaize and each of its brands are committed to remedying adverse human rights impacts we cause or contribute to in good faith through legitimate processes, and we expect our suppliers to do the same.



## a. Speak Up lines

One of the Principles in our Code of Ethics is that we have the courage to Speak Up. Our Speak Up lines – local ethics reporting lines – enable each of our brand's associates, third parties within and connected to our supply chains and the public to raise concerns about improper behavior or possible violations of law or policy, including our Position on Human Rights and Standards of Engagement.

Ahold Delhaize and its brands provide multiple ways to raise concerns. Our Speak Up lines enable associates and third parties, including individuals in our supply chains, to report misconduct, including irregularities, and raise concerns. The Speak Up lines are free and accessible online and by phone, 24 hours per day, seven days per week, in the local languages of the countries in which our brands operate. It is a confidential and secure service hosted by an external provider, NAVEX. The reported information is kept confidential to the maximum extent possible consistent with the need to take appropriate corrective action, in line with local legislation and there is also an option to remain anonymous throughout the process. If someone chooses to raise a concern, all information regarding that person's identity is handled confidentially. The numbers for the Speak Up lines are communicated to associates on our website, on the brands' intranets, on posters

and in our annual Code of Ethics training and communications. You can find the contact details and more information about the process, including a response timeline, as well as the detailed Speak Up Policy, on our [website](#). In 2023, we updated our Speak Up Policy and related process to address the expectations of the EU Whistleblower Directive.

In 2023, our Speak Up lines received 4,741 reports (2022: 5,128). The top ten issue types reported were:

1. Unfair treatment (27%)
2. Misconduct or inappropriate behavior (26%)
3. Bullying, violence or threats (8%)
4. Discrimination (6%)
5. Request for guidance (6%)
6. Sexual or other harassment (5%)
7. Other violations of company policy (3%)
8. Retaliation (3%)
9. Workplace safety (3%)
10. Substance abuse (2%)

All reports are forwarded to the appropriate internal brand resource for review and investigation and if misconduct is substantiated, appropriate corrective action is taken and remedy provided. We do not require affected individuals or communities to waive their legal rights to bring a claim through a judicial or non-judicial process as a condition of participating in the grievance process. Approximately 64.2% of reports were

made anonymously in 2023 and on average, reports were investigated and resolved within 30 days. Approximately 31% of investigated reports were substantiated. In 2023, there were no substantiated reports of significant financial reporting, accounting, fraud or ethical violations and there were no substantiated reports involving senior management.

Ahold Delhaize and all of its brands strongly encourage raising concerns and speaking up. We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation. Any form of direct or indirect retaliation is strictly prohibited, as stated in our Position on Human Rights and in the Standards of Engagement.

Every quarter, the Ethics team of Ahold Delhaize and its brands review the reports from the Speak Up lines and incorporate learnings to further improve the system. That includes a review of the processes to address and prevent the reported issues. In addition, the brands conduct an bi-annual Ethical Culture Survey that includes questions about the accessibility, potential barriers, implementation performance and outcomes of the Speak Up lines. In 2023, Ahold Delhaize also conducted a survey of a sample of users and continued to work with NAVEX to further improve the system.

## b. supply chain grievance mechanisms

Ahold Delhaize's Speak Up lines are also accessible to third parties within and connected to our supply chains and the general public, but we recognize that it remains more difficult for those working in our supply chains to find and access these resources.

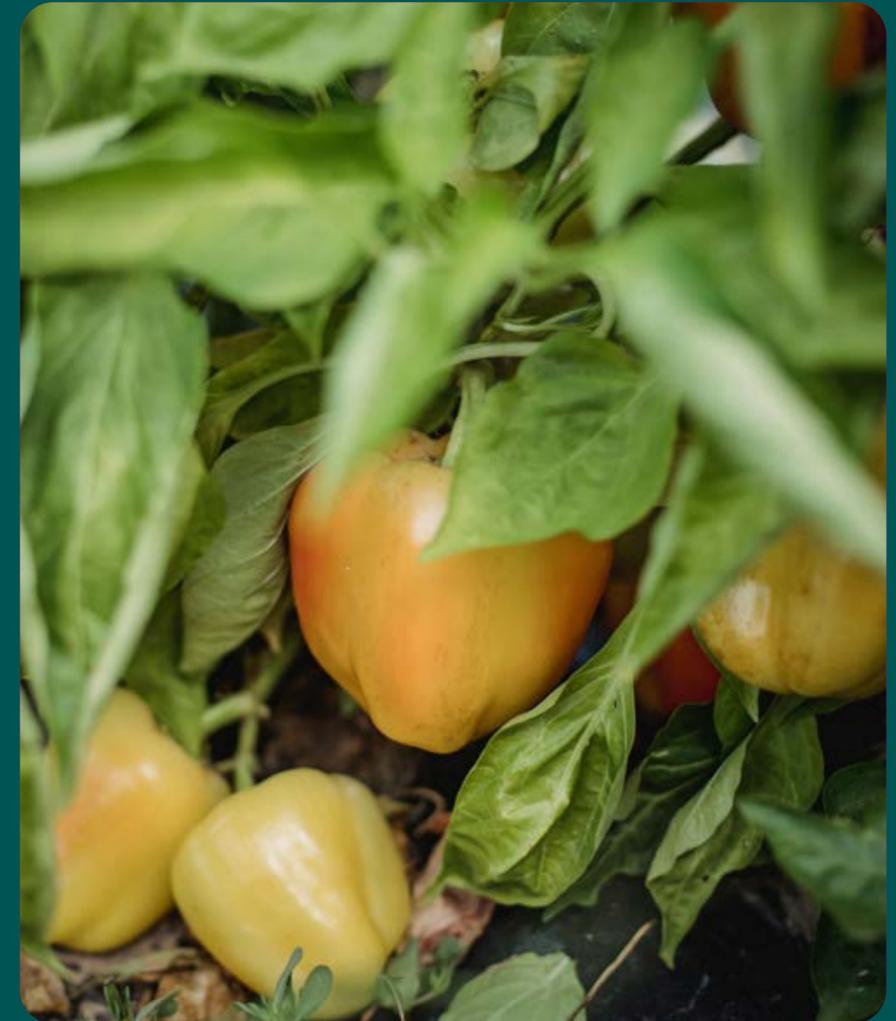
In the latest version of the Standards of Engagement, we updated our requirements of suppliers on grievance mechanisms and the strict prohibition of retaliation. We also specified that human rights defenders should be able to work safely under all circumstances. We continue to work with industry organizations and standard's committees, including amfori Business Social Compliance Initiative (BSCI) and others, to promote the provision of effective grievance mechanisms by our suppliers.

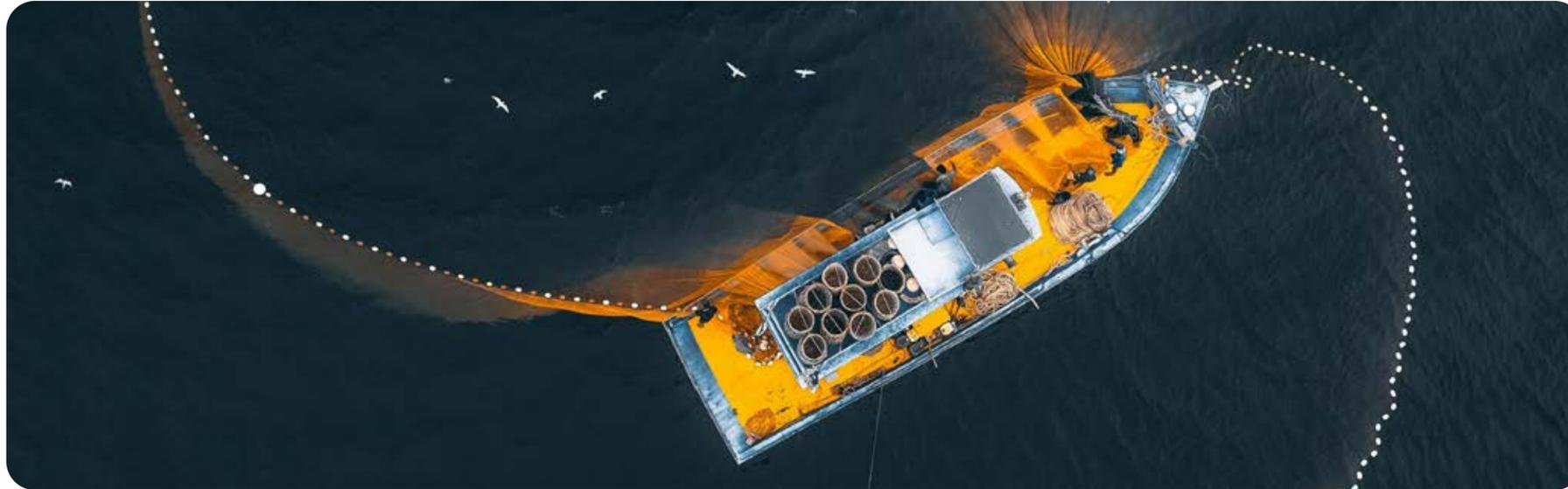
One example is amfori's Speak For Change supply chain grievance mechanism program. The program is set up in line with the UN Guiding Principles to receive complaints from workers, communities and their representatives who believe that they have been negatively impacted by amfori members and their business partners. Since our last report, the Speak for Change program has been expanded from Vietnam to Turkey, Bangladesh, India and Cambodia, and additional countries will be added in 2024. It is now an integral part of the amfori membership, and no longer a pilot project. More information and aggregated data and case reports are available on the amfori [website](#).

### case study: investigating a complaint through a human rights impact assessment

In 2022, Albert Heijn received a complaint about Eurosol, a fruits and vegetables supplier they worked with for over 35 years. Eurosol was accused by a labor union of false disciplinary procedures, which allegedly led to the cancellation of the works council and the dismissal of labor union members. This allegedly resulted in abuses, including non-payment of overtime. Following the complaints, Albert Heijn commissioned ImpactBuying, a service provider and consultant, to conduct a human rights impact assessment at Eurosol in 2022, and the report was finalized in April 2023. The research did not find any evidence that justified the accusations that were made. In line with the law, Eurosol has in place one farm works council and one packhouse works council. Working conditions were found to be decent and working hours and overtime were within legal boundaries and payments were made on time. In the meantime, the case also has been handled by the Spanish court, which ruled in favor of Eurosol on all complaints filed by the labor union.

The research did reveal that the functioning of the farm works council was weak and counterproductive. Its functioning had not been in favor of the direct interests of farm workers and induced a degree of distrust and disunity amongst workers. In response to the recommendations in the research report, Eurosol decided to start up a collaboration with an expert from the University of Alicante to address the sense of discord and disunity amongst farm workers. More information and the action plan related to the human rights impact assessment is available [here](#).





### case study: The Outlaw Ocean Project

In 2023, Ahold Delhaize and several of its brands were approached with allegations of human rights violations at supplier facilities by journalists from the Outlaw Ocean Project. It is a non-profit organization based in the U.S. that produces investigative stories about human rights, labor, and environmental concerns in and on oceans. The Outlaw Ocean Project has published articles

and reports on their [website](#) and in various news outlets.

In response to the allegations brought to our attention, Ahold Delhaize and the brands immediately followed up with their direct suppliers, regardless of whether they supplied national or own brand products, and asked them to conduct a full investigation, determine whether the brands receive products from the facilities mentioned, and take appropriate action. The supplier

facilities covered in these investigations that indirectly provided own brand seafood to Ahold Delhaize brands had valid social compliance audits on file that did not show evidence of forced labor. So far, all suppliers conducted investigations and took appropriate action to address the allegations. In some cases, we determined that we did not source from the supplier facilities listed, and in one case, we decided to remove the affected own brand products, of which one

ingredient was sourced from a facility with alleged forced labor, from our shelves pending the investigation.

We are also actively engaging with the social audit and seafood programs involved, including amfori BSCI, Sedex, ASC and BAP, to follow up on these cases and on the general concerns about human rights violations in global seafood supply chains.

## c. human rights defenders

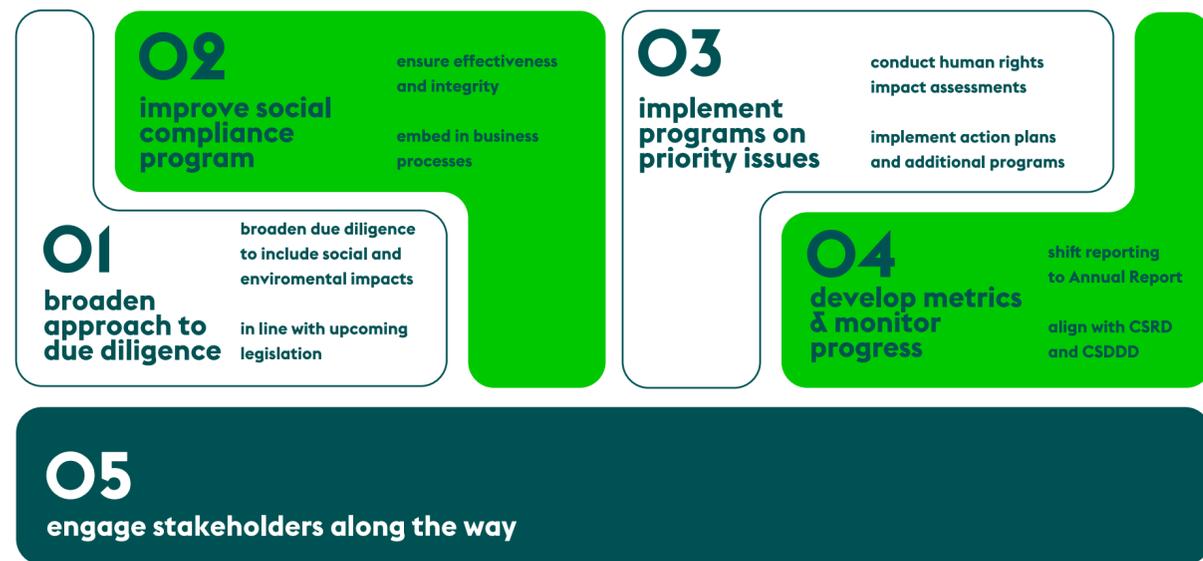
Human rights defenders (HRD) are individuals and groups that work peacefully towards the protection and promotion of human rights and they should be able to work safely under all circumstances and in environments that enable them to do so. Our Standards of Engagement now include an explicit reference to human rights defenders.

At Ahold Delhaize, we do not tolerate retaliation, intimidation, threats, physical violence and other forms of illegal mistreatment against any individual or representative who raises a complaint or concern, and that includes human rights defenders. We expect the same from our suppliers.



# 08. next steps on our roadmap

## a. confirming our priorities and next steps



In **our approach to due diligence**, we shared some of the key developments in the past two years, including a significant update of the Standards of Engagement, broadening our approach to sustainability due diligence and commissioning global human rights impact assessments. Although we believe those are important steps in the right direction, and in line with the Roadmap on Human Rights, there is still more work to do.

The graph below summarizes the next steps on our Roadmap on Human Rights that will guide our work over the next two years:

### 1. Broaden our approach to due diligence

Ahold Delhaize took the first step in broadening its approach to sustainability due diligence, with support from Enact, a consultancy, but that is just the beginning. Ahold Delhaize and its brands started implementing the Due Diligence Roadmap in 2024 to address the salient social and environmental impacts and work towards closing the gaps to help us meet future European and Dutch sustainability due diligence requirements.

### 2. Improve the social compliance program

While we recognize the limitations of social audits and certifications, we believe that our social compliance program is an important tool for monitoring working conditions in global supply chains. As a next step, we will work on effectively incorporating social compliance audits in our broader approach to due diligence, engage with social standards, such as amfori and Sedex, to drive progress on integrity, and continue to further improve our social compliance program.

### 3. Implement programs on priority issues

As discussed in **our approach to due diligence**, the most salient impacts for our own operations were related to discrimination, gender inequality, harassment, violence and unhealthy and unsafe working conditions. Those are addressed as part of our aspiration for diversity, equity and inclusion and as part of our comprehensive global safety policy and culture.

For supply chains, the most salient impacts were forced labor and child labor, mostly from the perspective of severity, as well as community impacts from the perspective of likelihood. Although not a salient impact, we remain concerned about the vulnerability of migrant workers in global (agricultural) supply chains. Ahold Delhaize will address these salient impacts through global human rights impact assessments and engagements, and each of our brands will also continue to engage locally with relevant partners to address its salient impacts, including through the examples shared in this report.

As part of Ahold Delhaize's broader strategy, we will continue to address and mitigate the other salient impacts as well.

### 4. Develop metrics and monitor progress

Ahold Delhaize has an established history of ESG reporting and is well on its way on its CSRD journey. By next year, we will integrate our reporting on human rights in the Annual Report in line with the CSRD and further develop our reporting process. In addition, we will prepare for upcoming reporting requirements on sustainability due diligence.

### 5. Engage stakeholders along the way

As part of our latest global due diligence process, we have consulted with a diverse group of stakeholders in Europe, the Americas and Asia, and we continue to explore new ways to engage with affected stakeholders on these issues. Examples include the human rights impact assessments we are conducting, and the introduction of the **NextCo**.

Collaborative action is crucial to drive positive impact. We see most progress in the partnerships that leverage the expertise and experience of different stakeholders across a sector or supply chain. We must collaboratively build and implement effective and transparent solutions for the challenges ahead of us. Our ambition is to make the shift from compliance to impact. And we simply cannot do it without constructive – and, where needed, critical – partners.

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## b. collaboration and partnerships

Throughout this report, we highlighted many of our key partnerships and collaborations, as they play an important role in our work on human rights and in driving broader impact in our operations, in our communities and in our supply chains.

One of our key global partnerships is with the Consumer Goods Forum. In 2023, Frans Muller, CEO of Ahold Delhaize, was appointed as the CGF Co-Chair, together with Dirk van de Put, Chairman and CEO of Mondelēz International. Providing leadership of the global network for two years. The pair are working to mobilize even greater progress among its membership – focusing on key topics including deforestation, plastics, human rights in the supply chain and net-zero. On the day of the announcement, the new Co-Chairs spoke about their desire to accelerate a greater combined impact for people and planet by driving action at scale across CGF's broad membership.

Other important collaborations include the many initiatives supported by the Dutch Initiative on Sustainable Trade (IDH) on cocoa, coffee, fruit and vegetables and flowers and plants (among others). These initiatives allow our European brands to work with their peers, suppliers and other stakeholders, including civil society, to drive progress in global supply chains. We are also proud of being a mission ally of

Tony's Open Chain for the Delicata chocolate brand. Other key partners in the supply chain globally are amfori BSCI, Sedex, Fairtrade, Rainforest Alliance, RSPO, RTRS, MSC, ASC, FSC, the Seafood Task Force, PEFC (and there are many more).

A key partnership on diversity, equity and inclusion is with the LEAD Network. In 2023, Ahold Delhaize hosted a LEAD Network event on navigating gender diversity at our Zaandam office. The event was opened by Natalia Wallenberg, CHRO of Ahold Delhaize, and Tanya Kopps, CHRO for Europe and Indonesia. The pair reflected on gender diversity and Ahold Delhaize's partnership with the LEAD Network.

Last but not least, while Ahold Delhaize and its local brands support organizations in the Netherlands, each of our great local brands work with – and support – partners locally to benefit their wider communities. Those partnerships include charities, food banks, sports clubs, schools, local community organizations and many others. While we cannot possibly list every organization Ahold Delhaize and its brands partner with in this report, we recommend the resources listed in **reporting on progress**. In our brands' sustainability reports, you can find many more examples of regional and local partnerships that drive positive impact.

### case study: Ahold Delhaize sponsors the Global Foodbanking Network

In 2024, Ahold Delhaize announced a sponsorship of The Global FoodBanking Network (GFN), an international non-profit organization dedicated to hunger relief while reducing food loss and waste. Starting in July 2024, Ahold Delhaize will contribute to GFN's mission of supporting community-led food banks, which play a crucial role in redirecting surplus, nutritious food to those who need it most. A substantial part of Ahold Delhaize's daily work evolves around food. By working together with GFN, Ahold Delhaize can contribute and build on the quality of its local brands' numerous community initiatives. Ahold Delhaize will provide financial support and share expertise to help GFN build capacity, offer technical assistance, and drive innovation, making food banks more effective and resilient in the nine countries where Ahold Delhaize's brands operate.

### case study: B Corp certification for bol

In 2023, bol announced that it may now call itself a B Corp. This certification shows bol is on the right track towards a more sustainable and socially responsible organization. Bol is proud to be an e-commerce platform of this size to achieve the certification. A B Corp must meet high, verified standards in terms of social and environmental impact, accountability and transparency. During the certification process, bol was assessed on all aspects of the business; from employees to suppliers and customers. Bol sees the certification as a milestone and means to assess, set targets and further improve more sustainable and socially responsible business practices.



## reporting on progress

Ahold Delhaize and its brands are engaged and involved in many different partnerships and it would be a challenge to report on the progress of every partnership and every local brand in this report. That is why we focus in this report on the global metrics that are part of our ESG reporting. However, that is not the whole story. That is why we include this overview of progress and sustainability reports, both of the key partnerships we are involved in, as well as from our local brands with more details on their work. Note: some of these reports or websites are only available in the local language of a brand.

| Progress with our partners   | Progress from our brands                                |   |
|--|---|---|
| Tony's Open Chain Mission <b>Report</b> 2022/2023                        | Albert Heijn's 2023 Sustainability <b>Report</b>        | Stop & Shop's 2023 Corporate Responsibility <b>Report</b> |
| Beyond Chocolate Annual <b>Report</b> 2022                               | Albert Heijn's 2023 Due Diligence <b>Update</b>         | The GIANT Company Impact <b>Report</b> 2023               |
| DISCO Annual <b>Report</b> 2022  | Delhaize's <b>website</b>                               | Gall & Gall's <b>website</b>                              |
| Living Wage Banana Project <b>Report</b> 2023 (NL)                       | Albert's Sustainability <b>Report</b> 2022              | Etos' <b>website</b>                                      |
| Living Wage Banana Project <b>Report</b> 2023 (BE)                       | Alfa Beta's Corporate Responsibility <b>Report</b> 2022 | Maxi's Sustainability <b>Report</b> 2022                  |
| Sustainability Initiative Fruit and Vegetables Annual <b>Report</b> 2023 | bol's Sustainability <b>Report</b> 2022                 | Giant Food's Better Neighbor <b>Report</b> 2023           |
| Amfori Annual <b>Report</b> 2022   | Food Lion's <b>website</b>                              | Hannaford's <b>website</b>                                |
| CGF 2023 Annual <b>Report</b>  |   |   |

## c. engaging internal and external (affected) stakeholders

Ahold Delhaize is uniquely positioned to engage with internal and external affected stakeholders. Collectively, our family of great local brands serves 63 million shoppers every week in the United States, Europe and Indonesia. Our brands understand and serve the unique needs of local customers and communities. They engage with them through daily interactions, surveys, consumer studies, focus groups and through more informal channels, like social media. In addition, Ahold Delhaize and each of its brands collaborate closely with local community organizations and charities, in some cases through brand-owned foundations like the AH Foundation and the Albert Foundation. Engaging with customers and community stakeholders on a regular basis is second nature to our brands and the unique needs of those customers and communities form the basis of our Growing Together strategy. In the sustainability due diligence process, we built on existing consumer research and insights from community partnerships and we consulted external stakeholders through interviews and a stakeholder workshop. We also consulted additional stakeholders, including consumer organizations, through an external survey.

We have established mechanisms to engage with our more than 400,000 associates. At Ahold Delhaize, more than half of our brands' associates were covered by collective labor agreements in 2023. In addition, several brands have formal works councils in place that represent and engage on behalf of associates. The works councils in the Netherlands are informed ahead of major human rights publications, and so is the NextCo. Other forms of engagement include each brand's associate engagement survey (AES), an annual survey of brand associates that consults associates about their perception of, among



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among others, inclusiveness, diversity, health and safety. The results, including steps to address the findings, of the associate engagement survey are reviewed and followed up by each brand. The Business Resource Groups are another important form of regular engagement with participating associates, and so are the Speak Up lines. The HR functions at each of our brands are generally responsible for engaging with their brand's associates, except for the Speak Up lines, which are managed by the Compliance and Ethics function. You can read more under [Speak Up lines](#).

In the sustainability due diligence process, we engaged with a group of more than 70 associates across the Global Support Office and the brands through interviews and three workshops, and we consulted a wider group of associates through a survey that was posted on our intranet, in the Ahold Delhaize News Update and in the Human Rights Quarterly. Through our website, social media, intranets and other internal communication channels, we share – and engage on – a wealth of information on programs related to the

salient impacts and human rights in general. We share the Human Rights Quarterly on Ahold Delhaize's intranet and in the Ahold Delhaize internal newsletter each quarter, and we conduct at least one, but usually more, interactive expert sessions every year that are open to everyone. These engagements are managed by Ahold Delhaize's human rights function.

At Ahold Delhaize, we often seek out collaborative programs and partnerships to address salient impacts, usually with the active participation of civil society organizations who serve as representatives or proxies. As part of the sustainability due diligence process, we invited several civil society organizations to participate in interviews and a stakeholder workshop who represent or serve as proxies for workers in the supply chain and Indigenous Peoples and local communities. We ultimately decided that human rights impact assessments, which focus much more specifically on a supply chain and/or geography, are a more suitable tool – and provide better context – for directly engaging with affected stakeholders, including rightsholders. You can read more

about Albert Heijn's experience with human rights impact assessments under human rights impact assessments in [our approach to due diligence](#).

Ahold Delhaize and its brands engage with many stakeholders through regular dialogue. In 2023, Ahold Delhaize published its Policy on Stakeholder Engagement, which outlines our approach to engaging with stakeholders on sustainability and, together with the Health & Sustainability Stakeholder Engagement Guidelines, can be found on our [website](#). At the global level, stakeholders include investors and relevant benchmarks, including the Corporate Human Rights Benchmark and the Platform Living Wage Financials, as well as NGOs and other organizations. Locally, each brand regularly interacts with local stakeholders, including some of the same organizations we engage with globally but also other community organizations and local governments. The human rights function, which reports into Compliance & Ethics, is responsible for global stakeholder engagement on human rights generally and for the global approach to

engagement with affected workers and affected communities in supply chains. In addition, the Human Rights function also leads the sustainability due diligence process, and is therefore responsible for the engagement of affected stakeholders as part of that process. The Health & Sustainability and Communications functions at our brands are generally responsible for engaging with stakeholders on their brands' own operations and supply chains.



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### case study: Super Indo's urban farming project

Super Indo has implemented a unique urban farming initiative that utilizes unused land at select stores to create a community-driven program that promotes healthy eating habits, fosters a sense of community and serves as a space for education on sustainable food production. This project benefits customers, employees, the local community, and the environment, making it a strong example of implementing Environmental, Social, and Governance (ESG) principles. With four urban farming groups already established across four cities, Super Indo is on the right track. This pilot program allows for refinement and optimization before potentially expanding to additional stores. Overall, Super Indo's urban farming project is a commendable initiative that offers a unique blend of customer engagement, community development, and environmental responsibility.

### case study: Business Resource Groups

Each brand promotes Business Resource Groups (BRGs): voluntary, associate-led groups that serve as a valuable resource for brand associates and our brand businesses. BRGs foster a diverse, inclusive workplace aligned with each brand's mission, values, goals, business practices and objectives. Each brand values and empowers this continuous channel of collaboration between the brand and its associates and our brands actively engage in insightful discussions to ensure they are listening to and serving their communities in a relevant and respectful way. BRGs vary by brand and country, but collectively include groups such as empowering women, veterans, the LGBTQIA+ community, people with disabilities, young people, and much more. In 2024, Ahold Delhaize Europe and Indonesia introduced a BRG Governance Framework that addresses different types of BRGs, their governance, and budget and resource considerations.



## d. reflecting on our progress and challenges

The only thing that is constant in life is change. Although the key steps on the Roadmap on Human Rights remain the same, the context in which we implement the Roadmap looks different than it did two years ago. War, political and social unrest, inflation, natural disasters and increasing polarization in society all create risks to human rights. But, especially in Europe, we see increasing agreement that a level playing field on sustainability due diligence is the best way forward, including at the political level. That means that more companies will be taking action and collaborating to address their salient impacts and fulfill their commitment to respect human rights.

While the Roadmap evolves, we recognize that the work is never done. There will always be another supply chain to explore or salient impact to address. However, the major milestones of the last two years, including the implementation of sustainability due diligence in

line with CSRD, confirmed three important things: i) our Roadmap on Human Rights is fit for purpose, ii) change is constant, and iii) collaboration is key. Together with the Due Diligence Roadmap, Ahold Delhaize has many relevant programs and partnerships in place to address salient impacts and engage with affected stakeholders. Even, or especially, if unforeseen events require a shift in perspective.

As part of our strong ethical culture, we believe that our values and ethical principles should guide everything we do. That also applies to how each and every one of us impact human rights. Over the last two years, we had the privilege to interact with many internal stakeholders in meetings, events, webinars and workshops to review the Standards of Engagement, to co-create a Due Diligence Roadmap or to discuss the implementation of the CSRD. Many of these processes are new. They are complex. But despite the obvious challenges,

we aim, collectively, to do what is right, every day.

We sincerely thank everyone involved in the many initiatives described in this report. We could not have gotten here without you. The same applies to everyone who contributed content and case studies and helped review the 2024 Human Rights Report. This is truly a joint effort, and we appreciate everyone's contributions to another insightful report. In addition, we are grateful to our partners and all other stakeholders who have supported the due diligence process and engaged with us on the topic of human rights. We believe that constructive engagement and collaboration are key to fulfill our commitment to respect human rights and we truly appreciate your willingness to engage and help us improve. We look forward to continuing this dialogue as part of our broader sustainability due diligence process. And so our Roadmap continues!



# glossary

The definitions, terms and abbreviations outlined below add context to the content and metrics shared in this report.

## accepted standards and certifications for commodities

Ahold Delhaize defines accepted standards as multi-stakeholder initiatives or standards supported by multiple stakeholders. They include third-party verification and focus on mitigating the main environmental and/or social issues associated with a commodity's production. Accepted standards are globally consistent and focus on continuously improving production and supply chain practices. Accepted standards for tea, coffee and cocoa include Rainforest Alliance / UTZ, Fair Trade USA / Fairtrade / FLO-CERT / Fairtrade Sourcing Program or equivalent standards. Accepted standards for palm oil include RSPO Principles & Criteria, Fairtrade / FLOCERT and equivalent standards. Accepted standards for wood fiber are the Forest Stewardship Council (FSC) Chain of Custody, Program for Endorsement of Forest Certification (PEFC) and Sustainable Forestry Initiative (SFI) or equivalent standards. Accepted standards for soy are RTRS standard for Responsible Soy Production and ProTerra, or equivalent standards. The majority of credits we purchase are area-based RTRS credits from the Cerrado Region. Accepted standards for seafood products include certification against a program that is recognized by the Global Sustainable Seafood Initiative (GSSI) and cover all Aquaculture Stewardship Council (ASC) farm standards.

## amfori BSCI

The amfori Business Social Compliance Initiative (BSCI) is a non-profit organization that supports more than 1,000 international companies in the process of monitoring and improving working conditions in the global supply chain through its own auditing program.

## associate

Associates with a legal contract or active pay status (U.S.-specific) with Ahold Delhaize or one of its brands. This excludes external and contingent workers and includes expats counted in their home country. Associates include seasonal workers, student workers (including summer season students), part-time and full-time associates, both short-term and long-term contracted associates and associates with an active pay status (U.S.- specific) as well as associates whose contract is currently suspended (e.g., for time credit or long-term illness). Workers who have an employment contract with independent operators of affiliated or franchised stores and students who are on a nonremunerated internship are excluded from the reported figures in this section.

## associate engagement benchmarks

We use two global benchmarks for brand associate engagement surveys: Global Retail, which comprises companies in the 5300 Retail industry classification benchmark that operate in multiple countries and have both a brick-and-mortar and online presence, and High Performance Norm, which comprises companies in the top quartile (75th percentile) of the Perceptyx Global normative benchmark database.

## associate engagement survey

Associate engagement is measured through an annual survey conducted by each brand of its associates employed by Ahold Delhaize and its brands. Each brand selects different questions for its survey, but a number of items in the survey are used to derive and calculate an associate engagement score:

- **Healthy workplace:** Associates are asked about the support they receive to have healthier lives.
- **Inclusive workplace:** Associates are asked about the support they receive to have a more inclusive workplace.
- **Associate development:** Associates are asked about the support they receive to develop their skills and careers with Ahold Delhaize. Our U.S. brands are excluded from this metric.
- **Engagement:** Associates are asked about how they feel about Ahold Delhaize.

## associate turnover

This metric expresses the number of people lost through resignation, attrition and other means compared to the total number of people in the organization. It includes all turnover, regardless of reason, and is reported as a percentage. Associate turnover is defined as the number of people who left the company compared to the average number of associates during that time period. It includes all terminations regardless of reason.

## balanced candidate slates (50/50)

In a balanced candidate slate, 50% of the final candidates must be from a diverse/ underrepresented population (female, person of color/ethnic/ multinational) and at least two of the candidates in the final slate must be diverse.

## Business Resource Group (BRG)

BRGs are groups of brand associates who join together in their workplace based on shared characteristics, life experiences, etc. to provide support, enhancing career development and contributing to personal development and the feeling of belonging / inclusiveness in the work environment.

## CGF

Consumer Goods Forum

## ESG

Environmental, Social and Governance

## full time

Associates who work full time (= one FTE), as measured by contract hours/standard weekly working hours, are considered full time.

## GFSI

Global Food Safety Initiative: a Consumer Goods Forum Coalition of Action that enables continuous improvement of food safety management across the supply chain, through benchmarking, collaboration and harmonization of food safety certification programs.

**Global Reporting Initiative (GRI)**

An independent international not-for-profit organization that developed the GRI Sustainability Reporting Standards and works to support their implementation.

**Global Support Office (GSO)**

The name of Ahold Delhaize's headquarters, based in Zaandam, the Netherlands. The company also has regional offices in Brussels and Geneva, and some GSO associates work out of the U.S. brands.

**GRC**

Governance, Risk Management and Compliance

**healthy products**

Own-brand healthy food sales include all own-brand products that earn one, two or three Guiding Stars (in the U.S. market) or an A or B score from Nutri-Score (in Europe). Total own-brand food sales include food sales from company-operated stores as well as to franchise / affiliate stores. More information on Guiding Stars can be found at [www.guidingstars.com](http://www.guidingstars.com).

**inclusive workplace: associate perception**

Associates' perception of the inclusivity of their workplace. The metric shows the percentage of associates who strongly agree or agree with the following index questions in the associate engagement survey:

- My manager treats all associates with respect.
- At my company, diversity is valued.
- My team members work well together.
- I am encouraged to share my ideas around improving our work environment.
- There are career opportunities for me at my company.

**last-stage of production (LSOP) unit**

The entity that performs the last stage of production or processing in the supply chain where food and non-food safety and/or working conditions are impacted. The LSOP is:

- For social compliance: the location where labor is involved in producing or processing the final product, excluding (re-)packing in a non-high-risk country.
- For unprocessed produce: the location / farm where primary production takes place and the location where unpacked product is handled.
- For food safety: the location where the final consumer product (including packing) is handled.
- For non-food safety: the location where the final consumer product (excluding packing) is assembled.

**national brands**

Products that are distributed nationally under a brand name owned by the producer or distributor.

**NGOs**

Non-governmental organizations

**number of injuries that result in lost days**

Number of injuries that result in days lost that are directly related to work-related accidents per 200,000 hours worked. The number of days lost are days scheduled to be worked according to each associate's schedule. An injury is a non-fatal or fatal injury arising in the course of work.

**own brands**

Own-brand products at Ahold Delhaize company operated and -affiliated stores include: private labels, fancy brands (proprietary private labels that are a fantasy name owned by Ahold Delhaize), exclusive brands (brands that are not international, national or regional brands), store-prepared products (in-store food preparation, even if derived from branded stock), non-branded products (such as bulk fruit and vegetables or no name non-food products) and promotional items related to the non-branded products. In short, every product that is not an international, national or regional brand is considered to be an own-brand product.

**part time**

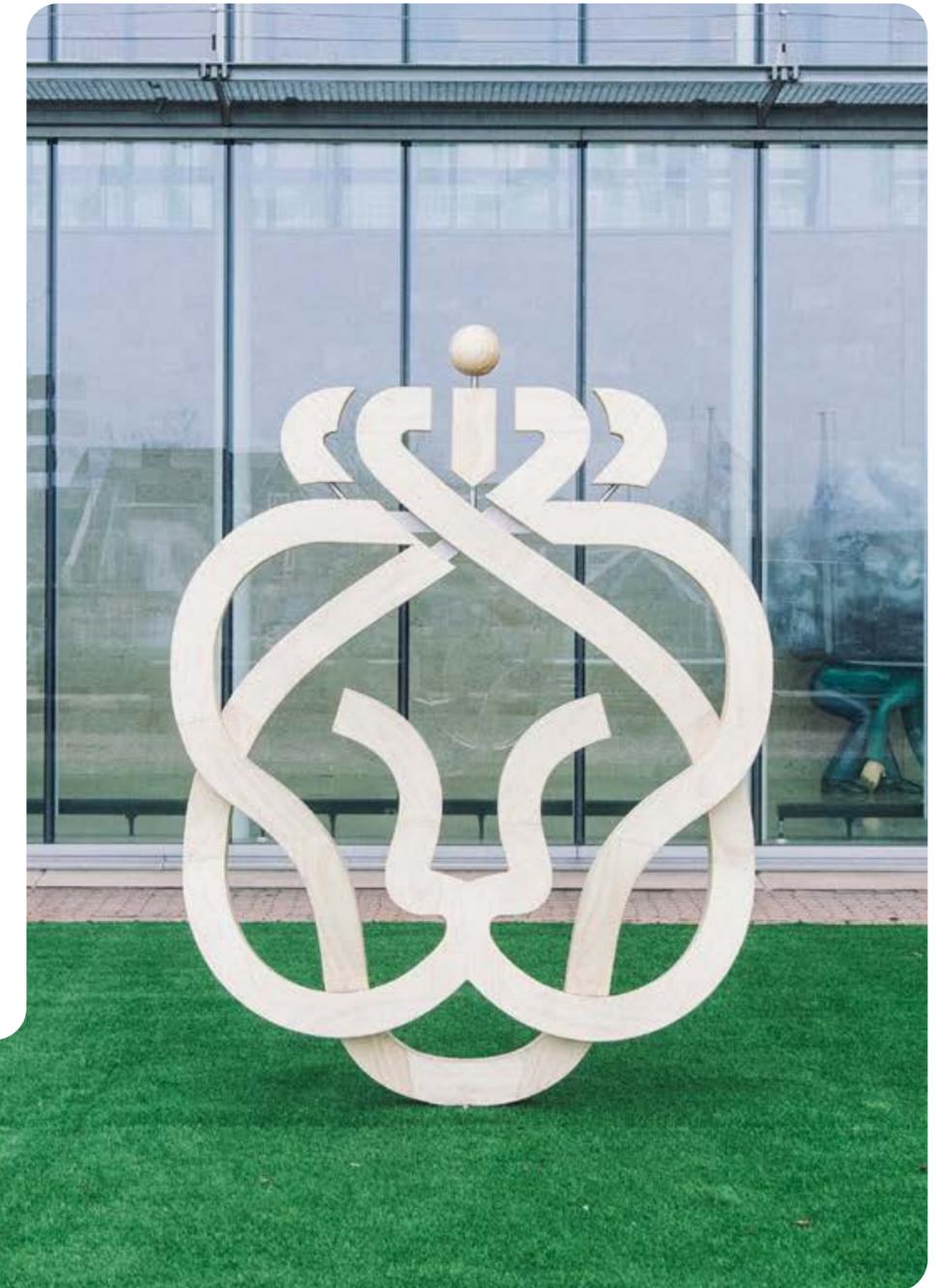
Associates who work less than full time (< one FTE), as measured by contract hours/standard weekly working hours, are considered part time.

**private label products**

Private label products are a sub-set of Ahold Delhaize own brands, consisting of products with a visible proprietary label from an Ahold Delhaize brand.

**sustainable development goals (SDGs)**

The United Nations SDGs are a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity. The 17 goals replace the Millennium Development Goals and are set on a 2016-2030 time frame.



### cautionary notice

This communication includes forward-looking statements. All statements other than statements of historical facts may be forward-looking statements. Words and expressions such as update, progress, encounter, important, achievements, challenging, developments, continu(e)/(es)/(ing)/(ously), meaningful, recognize, process, paramount, responsibility, believe, can, drive, impact(s), significant, thoroughly, journey, further, remain(s), commit(ted)/(ment), will, together, help(s), create, see, influences, provide(s), through(out), applies, engage, share, explain, identify, manage, risks, ensur(e)/(es)/(ing), explore, align(s)/(ed), convinced, ready, strateg(y)/(ic), purposes, growth, largest, understanding, approach, towards, broader, monitors, functionally, developed, responsible, respect, in accordance with, actions, value(s), conduct, opportunit(y)/(ies), aim(s), expect(at)ions, strong, consistent, key, priorit(ies)/(y), learn, leverage, in the process, focus(ed), consequently, connection,

objectives, assess, determines, beyond, ambition(s), working to, improve, should, intend, conducts, pride, want, agile, clear, support, brings, initiative, right, perform, preparing for, sufficient, by, reduc(ing)/(e), offer, keep, easier, advice, guidance, ongoing, contributes, refined, potential, target, adapting, consider, implement(s), steps, follow, strive(s), maintain(s), often, commissioning, thorough, participates, specific, require, increase, effectively, prohibit, affect, enable, allows or other similar words or expressions are typically used to identify forward-looking statements.

Forward-looking statements are subject to risks, uncertainties and other factors that are difficult to predict and that may cause the actual results of Koninklijke Ahold Delhaize N.V. (the "Company") to differ materially from future results expressed or implied by such forward-looking statements. Such factors include, but are not limited to, risks relating to the Company's inability to successfully implement its strategy, manage the growth of its business or realize the anticipated benefits

of acquisitions; risks relating to competition and pressure on profit margins in the food retail industry; the impact of economic conditions, including high levels of inflation, on consumer spending; changes in consumer expectations and preferences; turbulence in the global capital markets; political developments, natural disasters and pandemics; wars and geopolitical conflicts; climate change; energy supply issues; raw material scarcity and Human Rights developments in the supply chain; disruption of operations and other factors negatively affecting the Company's suppliers; the unsuccessful operation of the Company's franchised and affiliated stores; changes in supplier terms and the inability to pass on cost increases to prices; risks related to environmental, social and governance matters (including performance) and sustainable retailing; food safety issues resulting in product liability claims and adverse publicity; environmental liabilities associated with the properties that the Company owns or leases; competitive labor markets, changes in

labor conditions and labor disruptions; increases in costs associated with the Company's defined benefit pension plans; ransomware and other cybersecurity issues relating to the failure or breach of security of IT systems; the Company's inability to successfully complete divestitures and the effect of contingent liabilities arising from completed divestitures; antitrust and similar legislation; unexpected outcomes in the Company's legal proceedings; additional expenses or capital expenditures associated with compliance with federal, regional, state and local laws and regulations; unexpected outcomes with respect to tax audits; the impact of the Company's outstanding financial debt; the Company's ability to generate positive cash flows; fluctuation in interest rates; the change in reference interest rate; the impact of downgrades of the Company's credit ratings and the associated increase in the Company's cost of borrowing; exchange rate fluctuations; inherent limitations in the Company's control systems; changes in accounting standards;

inability to obtain effective levels of insurance coverage; adverse results arising from the Company's claims against its self-insurance program; the Company's inability to locate appropriate real estate or enter into real estate leases on commercially acceptable terms; and other factors discussed in the Company's public filings and other disclosures.

Forward-looking statements reflect the current views of the Company's management and assumptions based on information currently available to the Company's management. Forward-looking statements speak only as of the date they are made, and the Company does not assume any obligation to update such statements, except as required by law.

If you have any questions regarding this report, please contact [ethics@aholddelhaize.com](mailto:ethics@aholddelhaize.com).

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