

Global Anti-Corruption, Bribery And Money Laundering Policy



Title :	Global Anti-Corruption, Bribery and Money Laundering Policy
Functional owner :	Head of Global Ethics
Applicable to :	Associates of Ahold Delhaize and its subsidiaries
ExCo owner :	Chief Legal Officer
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introduction

Ahold Delhaize, including each subsidiary, is committed to conducting its business with integrity and in compliance with all applicable laws, regulations and its own policies. This commitment includes compliance with laws relating to corruption, bribery and money laundering in the countries in which our local brands and support offices operate or conduct business, either directly or through third parties such as agents and representatives.

questions?

For more information about this Global Anti-Corruption, Bribery and Money Laundering Policy or the Ahold Delhaize Code of Ethics, please contact the Global Ethics team at ethics@aholddelhaize.com



The Ahold Delhaize Code of Ethics includes Ahold Delhaize's position and expectations about corruption, bribery and money laundering. Additional expectations, requirements and guidance around the prevention of corruption, bribery and money laundering can be found in this Global Anti-Corruption, Bribery and Money Laundering Policy.

Not complying with this Policy or any applicable laws can lead to serious consequences for both Ahold Delhaize but also, depending on the local laws, the individuals involved. Examples of such consequences include criminal prosecution as well as reputational and financial damage. Specific risks related to corruption, bribery and money-laundering are identified in Appendix I.

In this Policy, when 'company' is mentioned, it is intended to include Ahold Delhaize and/or each brand and subsidiary, as appropriate.

Only by **following the law** and showing **integrity**, each of us will continue **doing what's right, every day** for ourselves and our company.

1. who is this policy relevant to?

This Policy is relevant to every associate as well as anyone who acts for or on behalf of Ahold Delhaize, its brands and subsidiaries, and its joint ventures, affiliates, agents, consultants and other representatives.

what does 'action' or 'activity' include?

Please remember that every time this Policy says 'action' or 'activity' it also includes refraining from acting ('inaction') or not performing an activity.

2. what is the general rule?

All company business must be done in an ethical and legal way. This means that activity that violates any law or regulation related to corruption, bribery or money laundering is strictly prohibited. It is also never permitted by this Policy to knowingly act in a way that could create the appearance or suspicion of corruption, bribery or money laundering.

To ensure you comply with the above, you are required to:

- Have a clear understanding of what is prohibited by applicable anti-corruption, bribery and money laundering laws, and make sure you act accordingly.
- Have a clear understanding of what the Ahold Delhaize Code of Ethics and this Policy expect from you, and make sure you act accordingly.
- If processing a payment to an Official, ensure that the payment is properly recorded in the books and records of the company.
- If involved in cash management activities for the company, ensure to comply with any existing cash management policies.
- If engaging with third parties that act for or on behalf of the company, ensure that this third party is properly screened and managed in line with applicable company policies. For more information, please see the Ahold Delhaize Global Purchasing Policy.

what are examples of relevant anti-corruption, bribery and money laundering laws?

Relevant laws include articles 177, 178, 328ter, 363, 364 and Title XXXA of the Dutch Criminal Code, the US Foreign Corrupt Practices Act, Title IV, Chapter IV of the Belgian Criminal Code, the UK Bribery Act, and other local laws prohibiting corruption, bribery and money laundering.

what is meant by official?

In this Policy, an *Official* means any officer, elected official, employee, consultant or anyone else working in an official capacity for or on behalf of any of the following:

- Any local, regional or national governmental body.
- Any government-owned, government-controlled state entity or company.
- Public international organizations such as the United Nations or the World Trade Organization.
- Any political party or party official, or any candidate for political office.

does corruption and bribery only happen in connection with officials?

No, corruption and bribery can also happen in a commercial setting. For example, when procuring goods or services from third parties or when buying or selling real estate. Please see the next section for more details.

If you feel that you or others are pressured to reach business results that can only be achieved through actions that could be considered bribery, corruption or money laundering, please Speak Up immediately. For more information about Speak Up and Speak Up resources, please see the Ahold Delhaize Global Speak Up Policy or visit the [Ahold Delhaize Speak Up page](#).

3. what are specifically prohibited practices?

corruption and bribery

You are never allowed to:

1. Promise, offer, authorize or give to a recipient anything of value or an unfair advantage, directly or indirectly, so that the recipient:
 - (i) Abuses or misuses their (official or other) duties, with the goal of the company or you getting new business, keeping existing business or receiving anything of value or any other unfair advantage.
 - (ii) Abuses or misuses their actual or assumed influence for the benefit of the company or you receiving anything of value or an unfair advantage.
2. Abuse or misuse your position with the company by requesting or accepting from any individual, directly or indirectly, anything of value or an unfair advantage for yourself, the company or any other recipient.

Keep in mind that:

- It does not matter if the thing of value or unfair advantage is promised, offered, authorized or given directly to the recipient themselves or to any other person or entity with direct or indirect ties to the recipient.
- Using third parties, such as sub-contractors, consultants, or agents to do what is prohibited by law or our policies is not allowed.
- Providing anything of value or an unfair advantage is not allowed even when requested by the recipient.
- Facilitation payments are a form of bribery and as such are not allowed.

what does corruption, bribery, and money laundering mean?

Corruption - any abuse or misuse of entrusted duties or power for private gain, which can be initiated by individuals, including Officials, or organizations. It includes practices such as bribery, fraud, extortion, collusion and money laundering related to the underlying corruption.

Bribery - any attempt to persuade someone to act in your favor by offering or giving them anything of value or any other unfair advantage.

Money laundering - the process to hide the true source of money or assets that has been obtained by illegal means by passing it through legitimate company resources or business.

what could be an unfair advantage?

Anything of value can be an unfair advantage. This could be:

Monetary - for example cash or cash equivalents, loans, fees, awards, making donations to charities on behalf of or on request of the recipient, kickbacks, facilitation payments.

In kind - for example offering any goods or services (including free of charge), gifts, holidays, other type of entertainment.

what are facilitation payments?

Facilitation payments are typically small payments made to an Official to speed up or secure the performance of routine, non-discretionary actions or approvals.

money laundering

You are never allowed to use any company resources or business, to:

1. Convert or transfer any money or assets, knowing that this money or these assets are the result of crime, in order to:
 - (i) hide or disguise the illegal nature or origin of the money or assets.
 - (ii) help any person who is involved in the crime to avoid the legal consequences of their actions.
2. Do anything else to hide or disguise the true origins or nature of any money or assets, knowing that the money or assets are the result of crime.
3. Obtain, possess or use any money or assets, knowing, at the time of receipt, that this money or these assets are the result of crime.

other prohibited practices

Additionally, you are never allowed to:

1. Use any company resources or business (including money and assets) for any unlawful, improper or other unethical purposes.
2. Embezzle any company money, assets or any other thing of value.
3. Do anything that will interfere with any internal or external investigation into a potential breach of this Policy or applicable laws and regulations.
4. Do anything such as participate in, associate with, facilitate or advise to commit any of the prohibited.

4. what about payments to officials?

As a rule, payments to Officials are not allowed. Two exemptions exist: a) reimbursement for reasonable and actual expenses in cases as described here below, and b) health and safety payments. These exempted payments require prior approval.

questions?

If you have any questions about these approval processes or what is allowed under this Policy in relation to Officials, you can contact your local Ethics representative or local legal department.

reimbursement

A reimbursement is a payment done directly to an Official for reasonable and actual expenses incurred by that Official because of a) the promotion or demonstration of company services, or b) the execution or performance of a contract.

However, such reimbursement is only allowed if you inform the company's local Ethics representative or local Head of Legal by providing in writing:

1. A detailed description of the name, title and affiliation of the Official; and
2. The monetary value of the payment and its business purposes; and
3. Any available documentation related to the actual expense which is being reimbursed.

health and safety payment

A health and safety payment is not permitted under this Policy but may be required in cases of extortion or duress involving an immediate danger to a person's health or safety.

A health and safety payment is only permitted if the payment is:

1. Approved by the Ahold Delhaize subsidiary's management and the regional Head of Legal, before the payment is made; and
2. Reported in writing to the Ahold Delhaize Chief Legal Officer, the Ahold Delhaize Head of Internal Audit, the Ahold Delhaize Head of Global Compliance & Ethics, and the Ahold Delhaize Chief Financial Officer, before the payment is made. If not possible before, it must be reported no later than one (1) business day following the payment.
3. The Ahold Delhaize Chief Financial Officer will confirm that the payment is accurately reflected in the company books.
4. The Ahold Delhaize Head of Asset Protection, in consultation with the Ahold Delhaize Chief Legal Officer, should consider whether relevant law enforcement should be consulted or notified.

what are the requirements around record-keeping, accounting & payments processes?

Based on international accounting standards and applicable laws, the company is legally required to ensure its books, including its records and accounts, are a) sufficiently detailed, b) accurate and c) correctly reflect all transactions.

Mischaracterization or excluding any transaction in the company's books is never allowed.

more information?

For more information about record-keeping, accounting and payment processes, please see the Ahold Delhaize Global Financial Reporting and Accounting Policy and the Ahold Delhaize Accounting Manual.

If you are involved in record keeping, accounting, payment processes or financial reporting for or on behalf of the company, you are required to:

- 1) Comply with all Ahold Delhaize policies and procedures, and all applicable standards, principles, laws relating to accounting and financial reporting.
- 2) Prepare all financial and accounting reports in a timely and accurate manner.
- 3) Prior to paying or authorizing a payment to an Official, ensure that the payment will be fully and accurately described in the company's books;
- 4) Not create or keep any undisclosed or unrecorded accounts, money or assets of the company for any purpose.
- 5) Not make any false or artificial entries in the company's books for any reason.
- 6) Use personal accounts, money or assets to do what is not allowed by Ahold Delhaize policies and procedures.

5. how will this policy be enforced ?

As an associate, if you violate any law related to corruption, bribery and money laundering, or violate any related Ahold Delhaize policy or procedure, you may be subject to appropriate disciplinary action by your employing entity, up to and including termination in accordance with applicable laws.

Please keep in mind that if you violate any applicable criminal law, you may also be subject to prosecution and penalties under applicable laws. The company may be required or may choose to report the misconduct to the appropriate authorities. If the company suffers harm because of the misconduct, the company may seek reimbursement, compensation or any other remedy as available under applicable laws, from you.

6. how will this policy be implemented and monitored?

To ensure compliance with this Policy, the Ahold Delhaize Head of Global Compliance & Ethics will implement a training and communications program as appropriate.

The Ahold Delhaize Global Compliance & Ethics and Ahold Delhaize Global Risk & Control teams are responsible for monitoring the company's compliance with applicable anti-corruption, bribery and money laundering laws and this Policy.

7. how to report potential violations of this policy?

how can you speak up and report misconduct?

For more information about how to report misconduct through the available Speak Up resources and all the existing safeguards, please see the Ahold Delhaize Global Speak Up Policy. You can find it on the [Ahold Delhaize Speak Up Page](#).

If you become aware of a violation or potential violation of this Policy or applicable laws, you should report the misconduct through the available Speak Up resources.

Anyone who reports misconduct will be protected against any form of retaliation. Any form of retaliation, including any indirect retaliation or encouraging others to retaliate, is a violation of the Ahold Delhaize Code of Ethics and the Ahold Delhaize Global Speak Up Policy and may result in

disciplinary action, up to and including termination of employment.

If you become aware of another associate's violation of Ahold Delhaize policies or procedures, or any applicable laws and regulations, and you do not report the misconduct in a timely manner, you may also be subject to appropriate disciplinary action.

epilogue

Ahold Delhaize, including each subsidiary, is committed to **Doing what's right, every day.** Regardless of any pressure from third parties, including Officials, the company will always conduct its business using only legal and ethical means and will not use business resources for any criminal activity.

If you have any questions, about this Global Anti-corruption, Bribery and Money Laundering Policy, the Ahold Delhaize Code of Ethics or the Ahold Delhaize Global Speak Up Policy, please contact the Global Ethics team at ethics@aholddelhaize.com or your local Ethics representative.

appendix I

risks related to corruption, bribery and money-laundering

The following risks have been identified by Ahold Delhaize associated with corruption, bribery and money laundering:

- 1) Individuals acting for or on behalf of Ahold Delhaize not having a clear understanding of what is prohibited by anti-corruption, bribery and money laundering laws.
- 2) Individuals acting for or on behalf of Ahold Delhaize not having a clear understanding of what Ahold Delhaize expects of them when it comes to anti-corruption, bribery and money laundering laws.
- 3) Individuals acting for or on behalf of Ahold Delhaize not reporting when they feel pressured to achieve business results that are impossible without breaching laws or company policies.
- 4) Payments to Officials not being properly recorded in the company's books and records.
- 5) Existing cash management policies being ineffective.
- 6) Relationships with third parties acting for or on behalf of the company not being effectively screened or managed.