



# Guidelines for Engaging with Public Policy Makers

Title	<b>Guidelines for Engaging with Public Policy Makers</b>
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Applicable to	<b>Company Public Affairs Activities</b>
ExCo owner	<b>CLO</b>
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## Introduction

Ahold Delhaize (the “Company”) and its subsidiaries (“brands”) are committed to conducting business in a transparent and ethically responsible manner while complying with the law in all countries and jurisdictions in which they operate. The Ahold Delhaize Code of Ethics is based on this commitment, which is referred to as “doing what’s right, every day.” Our brands have to adhere to our internal policy when conducting any political activity or outreach. We find transparency and public disclosure of our internal policy relevant for all our stakeholders.

## General Approach on Engaging with Public Policy Makers

In line with our Leading Together strategy and our aim to make healthy and sustainable choices accessible and available to all, Ahold Delhaize and its brands engage with public authorities in view of working towards positive outcomes for both business and society. Ahold Delhaize and its brands are committed to a healthy and informed democracy. Each Ahold Delhaize brand is subject to policies and regulations that may be at the international, national, regional and local level. Changes to these policies and regulations as well as new policy and regulatory initiatives can (significantly) affect our businesses, both in terms of opportunities and of challenges. We (are invited to) engage with public policy makers - politicians and government officials - to share our views, strengthen the reputation of the Company and its brands and, where deemed appropriate, of our sector, and to create a favorable policy and regulatory framework for both the Company and society, its brands, and for our sector in the long term. Central to our efforts in engaging with public policy makers is our Ahold Delhaize strategy.

Ahold Delhaize and its brands only engage with political parties and officials on the basis of issues that affect our businesses and our associates and not on the basis of preferring one political party over another. Our political engagement reflects our interests as a business and not the personal preferences of any individual director, officer or associate. While we work to find consensus in many areas, we recognize that we cannot expect that there will be agreement on every issue. Nevertheless, our continued engagement, even with those with different views, is important so that we can inform policymakers about our business and our principles so that we may find solutions to issues facing our industry.

Each Ahold Delhaize brand, either directly or indirectly through an affiliated entity, is responsible for addressing relevant public policy matters in a structured manner and coordinating its overarching public affairs agenda globally. The goals of Ahold Delhaize and its brands are to work with public officials, stakeholders and other groups to achieve policies that help them meet Ahold Delhaize’s business objectives while improving the communities where we work and live.

## Engaging (Indirectly) via Industry Associations and Chambers of Commerce

Ahold Delhaize and its brands are members of various industry associations that engage with public policy makers. These associations represent a broad array of industry interests and help to combine our efforts and coordinate with other companies on issues impacting Ahold Delhaize.

The Company or its brands are also active in various Chambers of Commerce and other associations as a means to promote economic development in the jurisdictions and communities in which our brands operate. We routinely review our trade association memberships to ensure that our corporate values and business objectives align on the issues most important to us, though the Company may not always agree with all of the positions taken by organizations of which we are a member.

Associates and officers who represent the Company or its brands on boards or committees of industry and/or other associations may take positions on behalf of the Company, provided that they respect applicable competition rules, are well informed about the Company's interests at stake and act within their mandate. Position taken externally by associates on behalf of the Company or its brands on public policy related matters should be aligned with Brand or Ahold Delhaize Group (GSO) Public Affairs. As a general rule, an Associate or Officer of a retail Brand may only represent the interests of that Brand, and may not speak for or represent other brands. Any retail Brand Associate or Officer that sits on any Board or Committee in a role that is representative of any other retail Brand or Ahold Delhaize entity must first get approval from the relevant Ahold Delhaize Group (GSO) SVP Legal and Public Affairs or regional CLO.

### Engaging (Directly) as a Company

Ahold Delhaize and its brands may express their views on international, national, regional and local public policy developments and issues that affect the business. In such cases, Company resources and funds may be used and/or contributed, but only to the extent consistent with relevant internal policies and guidelines, such as the Company's Anti-Corruption and Bribery Policy, and in accordance with applicable law. Company funds will never be used to reimburse a political contribution by an associate.

In the U.S., the Company maintains a Political Action Committee (PAC) as permitted by U.S. law. The PAC is a separate segregated fund that pools voluntary contributions from eligible U.S. associates to support specific candidates or issues. It is operated in accordance with bylaws to ensure accountability and oversight by U.S. citizens and lawful permanent residents in accordance with U.S. federal campaign finance laws. As an additional layer of oversight, input and recommendations related to the operation of the PAC are provided by an advisory panel established through the PAC bylaws and empowered under a separate panel charter. As a general rule, the Company does not make direct contributions to U.S. federal, state or local candidates using corporate funds even where legally permitted to do so. Political contributions are made through the PAC to support candidates who best represent the interests of our Company and the retail grocery industry. The Ahold Delhaize USA Inc. PAC carefully evaluates each candidate supported based on uniform internal contribution criteria.

The Company or its brands may host visits of public policy makers, both in and outside times of elections. All such visits should be organized by or together with the relevant Public Affairs<sup>1</sup> department. Those who engage on behalf of the Company or its brands with public policy makers must be well informed about the Company's interests and position relative to the issue(s) being addressed and must consult with Public Affairs prior to

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<sup>1</sup> For U.S. entities Public Affairs should be construed to equate to Government Affairs

engagement to ensure policy continuity and uniformity of effort.

### **Charitable and Other Giving**

In addition to supporting candidates through PACs and membership in industry associations, Ahold Delhaize and its brands may also directly support charitable, social welfare and other organizations when it determines that such engagement is in the best interests of the Company and aligned with the Company's values. Financial support for these organizations is made in line with the Company's Anti-Corruption and Bribery Policy and in accordance with all applicable national, regional and local laws.

### **Engaging as an Associate**

Participating in political activities unrelated to corporate endeavors is entirely personal and must be conducted in the associate's own time and not on Company premises or Company communications channels. Associates should never hold themselves out as representatives of Ahold Delhaize while engaging in political activities in their own capacity, nor should associates use their authority or position to coerce other associates to support or oppose any candidate or issue for personal purposes. Associates may not use Company or brand facilities or resources, including telephones, computers, company communication channels, copiers and office supplies for any personal political purposes. Additionally, associates shall not make or promise to make a political contribution for the purpose of obtaining or retaining business for the Company.

### **Sponsoring of Political Activities**

Neither the Company nor its brands sponsor, in cash or in kind, any political parties, individual politicians or activities related to specific political parties. Other activities that can be linked to general political activities (not linked to one specific political party) are assessed on a case-by-case basis. All such support should be in line with the overall interests of the Company and in accordance with applicable law. The Company will not reimburse or compensate associates for their personal political activities.

### **Compliance with the Law**

Ahold Delhaize and its brands are committed to ensuring that any public affairs or political activity is done in full compliance with all laws and regulations, in accordance with our zero-tolerance approach to bribery and corruption as set out in the Ahold Delhaize Code of Ethics and the Ahold Delhaize Global Anti-corruption and Bribery Policy.

The use of Company funds or assets for any unlawful, improper or unethical purpose is prohibited. Associates are strictly prohibited from directly or indirectly promising, offering, authorizing or providing any benefit, payment, or anything of value (referred to collectively as an "improper payment") to anyone in order to improperly influence a government official, to induce an action or forbearance by a government official, or to secure any improper advantage in obtaining or retaining business.

## Reporting Potential Violations

Anyone who is or becomes aware of a potential violation or a risk of violation or any practice that may violate anti-corruption and bribery laws should report the matter promptly to their local Legal department or Compliance and Ethics resource. Associates may also make a report to the Global Compliance and Ethics team through the Speak Up line, and such report may be made anonymously. The [link](#) to the Speak Up line can be found on our website.

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