



# Guidelines for Engaging with Public Policy Makers

Title	<b>Guidelines for Engaging with Public Policy Makers</b>
Business / functional owner	<b>VP Global Public Affairs and Public Affairs Leads</b>
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 (“our brands”) are committed to conducting business in an ethically responsible manner and 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.”

## **General Approach on Engaging with Public Policy Makers**

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, our revenues and the costs we incur. We engage with public policy makers – politicians and government officials – to protect and 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 the Company, its brands, and for our sector in the long term.

Ahold Delhaize and its brands engage with political parties on the basis of issues that affect the Company and not on the basis of preferring one political party over another.

Each Ahold Delhaize brand is responsible for addressing relevant public policy matters in a structured manner and coordinating its public affairs agenda globally.

## **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. 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. The Company may not always agree with positions taken by industry associations, Chambers of Commerce or other organizations of which we are a member.

Those who represent the Company or its brands in boards or committees of industry and/or other associations may take positions on behalf of the Company, provided that they respect applicable competition rules and are well informed about the Company’s interests at stake and act within their mandate.

## **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 and in accordance with applicable law.

The Company or its brands may create and maintain Political Action Committees (PAC) or other such organizations as permitted by local law for the purpose of making contributions to support specific candidates or issues.

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 Public Affairs 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.

### **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. Associates should not 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, copiers and office supplies for any personal political purposes.

### **Sponsoring of Political Activities**

Neither the Company nor its brands sponsors 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. Subject to any applicable law or other legal limitations, Associates are free to join a PAC established by the Company<sup>1</sup>.

### **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.

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<sup>1</sup> In the United States, Delhaize America has established a PAC. This is a separate segregated fund that supports candidates with varying political affiliations who best represent the interests of our Company and the retail grocery industry. The PAC's contributions are wholly supported by voluntary contributions from eligible associates and are not supported by Company funds.