

**Company Name** Ahold Delhaize  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 18.7 out of 100

Theme Score	Out of	For Theme
2.1	10	A. Governance and Policies
3.4	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
1.5	20	D. Performance: Company Human Rights Practices
3.7	20	E. Performance: Responses to Serious Allegations
3.8	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in its Human rights position that 'We are committed to respecting the human rights of associates, customers, communities and the people who work throughout our supply chains.' [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs: The Company indicates in the Human Rights Statement that 'this commitment is based on our own collective belief that all people should be treated with dignity and respect, and is derived from international principles, such as the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.' In addition, in its website section 'Human Rights', it states: 'We aligned our Human Rights commitment with the UN Global Compact principles'. However, none of these statements count as a formal commitment to the UN Guiding Principles following CHRB wording criteria. [Annual report, 2017: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Human rights, Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company is participant to the UN Global Compact [UNGC Participant website, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> <li>Met: Explicitly list All four ILO for AG suppliers: The Company's standards of engagement contain commitments in all ILO Core areas. In relation to Freedom of Association and Collective Bargaining, it indicates that 'rights of personnel to form</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and join trade unions of their choice and to bargain collectively shall be respected'. [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: The Company embraces 'clear standards on human rights, such as prevention of forced and child labour and non-discrimination, and we are committed to the principles of freedom of association, and respecting legal rights to collective bargaining'. However, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects 'legal rights' to collective bargaining. [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: Respect H&amp;S of workers: 'We are committed to providing safe and secure working environments for all associates and customers everywhere Ahold Delhaize companies operate'. [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: Suppliers shall adhere to all applicable laws and regulations on occupational health and safety. A clear set of procedures must be established and followed regarding occupational health and safety, including the provision and use of personal protective equipment, clean toilets, access to potable water and, if appropriate, sanitary facilities for food storage shall be provided" [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and natural resources</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's rights (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Women's rights: The Company signed the UN Women Empowerment Principles. On its website, the Company disclosed an article about the event where its CEO signed the statement: 'Women empowerment and gender parity are of crucial importance to Ahold Delhaize. It's simply the right thing to do and it's also good for business', said CEO Frans Muller. [Signature moment: Frans Muller signs UN statement supporting gender equality, Mar 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Children's rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expects suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: The Company has signed the UN Women Empowerment Principles. In its website, the Company disclosed an article about the event where its CEO signed the statement: 'Women empowerment and gender parity are of crucial importance to Ahold Delhaize. It's simply the right thing to do and it's also good for business', said CEO Frans Muller. [Signature moment: Frans Muller signs UN statement supporting gender equality, Mar 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: According to its Annual Report 2018, the Company commits 'to transparency and high integrity with a broad list of stakeholders who have a strong interest in our company, including shareholders, global and local supplier.' However, CHRB could not find a commitment to engage with its potentially and actually affected stakeholders. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Regular stakeholder engagement: In its Annual Report 2018, the Company indicates: 'In 2018, we engaged with stakeholders on various topics including human rights, sustainable agriculture practices, sustainable protein, plastic waste reduction and animal welfare improvements. We are committed to promptly and thoughtfully responding to requests and feedback from stakeholders on these complex issues'. However, the engaging activities described show no</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			evidence of direct engagement, meaning a dialogue with potentially and actually affected stakeholders such as suppliers' workers, their families, local communities, unions, community representatives. Though they do have a community charity like food banks, it is not through community engagement. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company has provided evidence to CHRB. However, this document or its content has not been found in publicly available sources.</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): No Retaliation: 'We encourage Associates to raise concerns about improper behaviour or possible violations of law or policy. We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation of the law, Our Code or any other Company policy. Any form of retaliation is a serious violation of Our Code and may result in disciplinary action, up to and including termination of employment' However, no evidence found of a commitment to not tolerate nor contribute to threats , or intimidations to people who oppose to Company's operations or raises questions about the Company's activities such as human rights defenders. [Code of Ethics Handbook, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; ahold delhaize whistleblower line report, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments: Suppliers are expected to establish adequate complaint mechanisms for employees who believe they have been mistreated, and to ensure no retaliation against employees who raise complaints in good faith." However, no evidence found of a commitment for suppliers in relation to not tolerate threats or attacks to people who oppose to Company's operations or raises questions about the Company's activities in relation to human rights. [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The CEO signed the Code of Ethics which explains their commitment to HR [Code of Ethics Handbook, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: Board level responsibility for HRs: The Company indicates in its human rights position that 'our commitment to human rights is established and supported globally through our Supervisory Board (Sustainability and Innovation Committee) and Executive Committee'. [Human rights- Stakeholder interests, 1 May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs: Though the company makes references to their annual report in their submission, Safety at Work KPIs do not qualify as HR ones</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member: There is a non financial incentive which is linked to The Dow Jones Sustainability Index (the external target) measures how the Company performs on sustainability against peers in the sector, and to 'The percentage of healthy own-brand food sales as a proportion of total own-brand food sales (the internal target) is the measure we use to drive</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>performance in pursuit of our company objective to facilitate healthier eating'. However, the incentive needs to be related to at least one key industry risk related to human rights for at least one board member. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: On its website section 'Human Rights', the Company indicates: 'Our commitment to human rights is established and supported globally through our Supervisory Board (Sustainability and Innovation Committee) and Executive Committee, and implemented locally through our brands. Relevant functional leaders across the group and the brands (in areas such as Legal, Human Resources and Occupational Health and Safety, Sustainable Retailing and Product Integrity) are responsible for implementing the work relevant to their functions. These responsibilities include monitoring compliance with applicable laws and company policies in our own operations, and monitoring working conditions in our supply chains. Together, they are responsible for global reporting against our strategy, for engaging external stakeholders, and for monitoring related trends and managing issues and risks.' However, it is not clear if there's a senior management level body (more specific than the 'Executive Committee') or person in charge of human rights (or different topics including human rights). [Human rights, Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for AG in supply chain</li> </ul> </li></ul>
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights: The Company has provided comments to CHRB on this issue, however, evidence not found in public domain in relation to senior managers' performance incentives linked to human rights policy commitments.</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2018, the Company discloses a table with its 'Principal risks and uncertainties'. One of these risks is the following: '[...] negative impacts on human rights or the environment during the production of our products (e.g., human rights violations by suppliers) may negatively impact the reputation or results of Ahold Delhaize and / or its brands.' [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions</li> <li>• Not met: Communicates its policy to all workers in own operations: Though it is on the website, there is no evidence on how the company communicates it</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy down the whole AG supply chain</li> <li>• Met: Requiring AG suppliers to communicate policy down the chain: The company, in its self assessment, explains that their 'standard of engagement' are</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	to business relationships		<p>shared with each supplier before signing the contract. The Standard of Engagement also mentions that this is applicable for the supply chain. "If a Supplier hires a subcontractor in connection with providing goods or services to Ahold Delhaize, the Supplier shall cause the subcontractor to comply with these Standards of Engagement as if Ahold Delhaize entered into an agreement with the subcontractor directly."</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The company, in its Standards of Engagements, explicitly says that all suppliers need to meet these standards " These Standards of Engagement (each a "Standard") set minimum standards for Suppliers that are designed to ensure that Ahold Delhaize has visibility into all aspects of its supply chain and meets these objectives. In connection with the foregoing, each of Ahold Delhaize's Suppliers agrees to the following" [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: Including on AG suppliers: The Standard of Engagement also mentions that this is applicable for the supply chain. "If a Supplier hires a subcontractor in connection with providing goods or services to Ahold Delhaize, the Supplier shall cause the subcontractor to comply with these Standards of Engagement as if Ahold Delhaize entered into an agreement with the subcontractor directly." [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: Though the company says on its self assessment form that they train workers, the Form is not public and therefore cannot be used</li> <li>• Not met: Trains relevant AG managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: In its Annual Report 2018, the Company discloses information about the outcomes of its engagement survey to associates related to 'Healthy workplace', 'Inclusive workplace', 'Associate development'. However, it is not clear that the Company monitor the implementation of all its human rights commitments. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: Monitoring AG suppliers: In its Annual Report 2017, the Company indicates: 'We require our suppliers in high-risk countries to be audited against the amfori BSCI Standard to ensure good working conditions within our supply chain. [...] Business Social Compliance Initiative [BSCI]: 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.' The amfori BSCI includes the following aspects: Working hours and fair compensation; Occupational health and safety; Child labor and protections for younger workers; Forced/bonded labor and precarious employment; Freedom of association and collective bargaining; Ethical business behavior; Discrimination; Environmental protection. No new relevant evidence found in latest Report. [Annual report, 2017: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AG supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects AG selection of suppliers: Suppliers must adhere to the company's Standard of Engagement and some need an independent assessment before becoming a supplier [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: HR affects on-going AG supplier relationships: In its HR policy, it explicitly says that if the supplier is unwilling or unable to remedy problems, they will suspend relationship with that supplier [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: See above.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Working with AG suppliers to improve performance: In its annual report, the company provides examples on how it improves its supply chain "Even with multiple measures and controls in place, we realize that challenges remain for our industry, due to lengthy supply chains that often span the world and are not always fully transparent. For this reason, we joined the work of the Consumer Goods Forum on forced labour as well as the Seafood Task Force on human trafficking and forced labour in off-shore fishing. With respect to wages in our supply chain, we are analysing, in close collaboration with UTZ, the effects of introducing a living wage for coffee production workers in Kenya." However, no evidence found of direct work carried with suppliers to improve performance in the context of these collaborations (or other work carried out widely with suppliers to help them improve). No new evidence found in latest report. [Annual report, 2017: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: In the latest Annual Report the Company indicates: 'During 2018, we invited key internal and external stakeholders to give us their feedback on Ahold Delhaize's most material economic, social and environmental impacts. Stakeholders were selected to represent a broad range of perspectives, including those that challenge our business choices, while including a strong sample size from associates, customers, NGOs, investors and others.' The Company includes 'Suppliers' in the 'Communities' group. In its annual report the company describes the process of engaging stakeholders, including associates (employees) and supply chain. With employees it carries out an engagement survey and with suppliers face to face meetings, online communication and supplier events. [Annual report, 2017: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Frequency and triggers for engagement: Every year the Company engages with stakeholders including employees and supply chain to determine which are the material issues. Although some of the issues are related to human rights (employees topic include adequacy and equality of wages paid, and with suppliers one relevant topic is human rights in the supply chain), the trigger for the Company is not directly related to human rights, but to know which are the relevant/material issues to build the materiality matrix. [Annual report, 2017: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Workers in AG SC engaged: In its Annual Report 2018, the Company indicates: 'With our suppliers, we maintain multiple communication channels, including face-to-face meetings, online communication and supplier events'. However, no evidence found of direct engagement with workers in the supply chain triggered by human rights issues. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Communities in the AG SC engaged: In its Annual Report 2018, the Company indicates: 'Charitable contributions and community investments focus on promoting healthier eating, fighting hunger and strengthening communities. Our brands engage with local communities through a diverse set of programs, including partnerships with local food banks and sponsorship of educational programs on healthier eating for children'. However, no evidence found of direct engagement with communities in the supply chain triggered by human rights issues, as charity is not considered as an engagement to face human rights issues related to the Company's activities. [Annual report, 2017: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: In its Annual Report 2018, the Company states: 'In 2018, we began a human rights due diligence process based on the UN Guiding Principles on Human Rights.' Although the Company has provided evidence to CHRB in relation to this, the information couldn't be found in publicly available sources. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Identifying risks in AG suppliers: Although the Company audits its suppliers, it is not clear the process it follows to identify human rights risks and impacts in the supply chain. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification: The Company has provided evidence to CHRB. However, this document or its content has not been found in publicly available sources.</li> <li>• Not met: In consultation with stakeholders: The Company has provided evidence to CHRB. However, this document or its content has not been found in publicly available sources.</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company has provided evidence to CHRB. However, this document or its content has not been found in publicly available sources.</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: There is no system yet though the company plans to do that after its due diligence in 2018</li> <li>• Not met: Including in AG supply chain: as above</li> <li>• Not met: Example of Actions decided: as above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met: as above</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: Though the company follows up on the risks in its supply chain, there is not clear evidence for systems for its own HR risks</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The company has a ethics helpline which the HR policy refers to. The company's ethics helpline is accessible to all workers. [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: In its whistleblower document, the Company describes their number of complaints, and the number of cases that were resolved and the time taken. 81% were related to HR, diversity and workplace respect. [ahold delhaize whistleblower line report, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: The service is free and in different locations and languages. [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>Met: Expect AG supplier to have equivalent grievance systems: In its Standard of Engagement the Company indicates: 'Suppliers are expected to establish adequate complaint mechanisms for employees who believe they have been mistreated, and to ensure no retaliation against employees who raise complaints in good faith.' [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: The hotline service is available to the public as explained in the company's human rights position: "Our established, local "ethics helplines" are free, confidential and secure services that enable our associates and the public to raise concerns about improper behaviour or possible violations of law or policy. [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Describes accessibility and local languages: The hotline service is available in different locations and is free to use (accessible) [Code of Ethics Handbook, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>Met: AG supplier communities use global system: The company's ethics line are open to everyone as explained in the company's human rights position: "Our established, local "ethics helplines" are free, confidential and secure services that enable our associates and the public to raise concerns about improper behaviour or possible violations of law or policy. [Position on Human Rights: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Engages users to create or assess system</li> <li>Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Engages with users on system performance</li> <li>Not met: Provides user engagement example on performance</li> <li>Not met: AG suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Response timescales</li> <li>Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Public statement prohibiting retaliation: The Company states that "We encourage Associates to raise concerns about improper behaviour or possible violations of law or policy. We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation of the law, Our Code or any other Company policy. Any form of retaliation is a serious violation of Our Code and may result in disciplinary action, up to and including termination of employment." [Code of Ethics Handbook, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; ahold delhaize whistleblower line report, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>Met: Practical measures to prevent retaliation: The Company states that "When you make a report, you are encouraged to identify yourself. You may, however, choose to remain anonymous. If you choose to identify yourself, we will keep your identity confidential in a manner consistent with conducting a thorough and fair investigation." [Code of Ethics Handbook, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Has not retaliated in practice: Though there is a policy against retaliation, the company didn't explicitly say that never retaliated in practice.</li> <li>Not met: Expects AG suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Won't impede state based mechanisms: In its CoE, it does mention that it will fully cooperate with lawful requests for information or premises visits by government agencies and regulation authorities. It commits to provide 'truthful and accurate responses'. Also states that "Associates should never alter, withhold or destroy records related to litigation or an investigation involving the Company" which means impede. However, no evidence found of a commitment to not impeding access to state-based judicial or non-judicial mechanisms or any other for persons who make allegations on human rights. [Code of Ethics Handbook, May 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>Not met: Complainants not asked to waive rights</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: There were no cases which were substantiated in 2017</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

#### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts</li> <li>• Not met: Improving living wage practices of suppliers: Though there is a pilot project on the impact of living wage in Kenya, this is not enough to qualify as improving living wages practices.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing the supply chain	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to manufacturing sites (factories or fields): The Company states the following with regards to mapping its supply chain: 'Our local brands work to map and understand their supply chains and assess how natural resources are being used, or how good working conditions are monitored and ensured.' In addition, in the Standard of Engagement the Company indicates: 'Suppliers are required to inform Ahold Delhaize of (i) (changes of) the location of their operations or any information relevant thereto, and (ii) (changes of) the location of operations of their subcontractors involved in the production process or any information relevant thereto. ' [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a> &amp; Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why</li> </ul>
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: 'Suppliers must establish robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker. This principle aims to protect children from any form of exploitation.' However, no references found to remediation programmes in case child labour is found, which is a requirement for this subindicator. [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on child labour</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Debt and fees rules in codes or contracts: There is no explicit mention of debt or fees in the standard of engagement. [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on debt &amp; fees</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts</li> <li>• Not met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Standard of Engagement indicates: 'The legal rights of personnel to form and join trade unions of their choice and to bargain collectively shall be respected.' However, no reference found to non interference or prohibition of harassment of trade unionists. [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: In the standard of engagement, suppliers are required to adhere to H&amp;S standards: "A clear set of procedures must be established and followed regarding occupational health and safety, including the provision and use of personal protective equipment, clean toilets, access to potable water and, if appropriate, sanitary facilities for food storage shall be provided. Employees shall receive adequate training to ensure that they can perform their duties in a safe manner. Workplace practice and conditions and conditions in residential facilities provided by the Supplier which violate basic human rights are forbidden." [Standard of Engagement (Website), Jul 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Injury Rate disclosures: In its Annual Report 2018 the Company discloses information about its Rate of lost days due to accidents and its Occupational illness frequency rate. However, it is not clear whether these rates cover suppliers' workers. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Lost days or near miss disclosures: See indicator related to Injury Rate disclosure. [Annual Report 2018, 2018: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> <li>• Not met: Fatalities disclosure</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on land &amp; owners in codes or contracts</li> <li>• Not met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts</li> <li>• Not met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts</li> <li>• Not met: How working with suppliers on women's rights: The Company has signed the UN Women Empowerment Principles in March 2019. However, CHRB could not find evidence describing how the Company is currently working with suppliers to improve their practices in relation to women's rights. [Signature moment: Frans Muller signs UN statement supporting gender equality, Mar 2019: <a href="http://aholddelhaize.com">aholddelhaize.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 14.99 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.75 out of 20 points for theme E.

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.33 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Ahold Delhaize made data public that met one or more elements of the methodology in 14 cases, leading to a disclosure score of 1.33 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>Met: Company reports on GRI: The Company discloses its GRI Index for its Annual Report 2018. [GRI Index - Annual Report 2018, 2018: <a href="https://www.ahold.com/en/2018/05/2018-annual-report">results.aholddelhaize.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0.5 out of 4	Ahold Delhaize met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>Not met: Score 2 for A.2.2 : Board discussions</li> <li>Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.