

Corporate Human Rights Benchmark 2022 Company Scoresheet



Company Name Ahold Delhaize

Industry Agricultural Products (Supply Chain only)

Overall Score 22.4 out of 100

Theme Score	Out of	For Theme
3.6	10	A. Governance and Policies
9.3	25	B. Embedding Respect and Human Rights Due Diligence
7.0	20	C. Remedies and Grievance Mechanisms
2.5	25	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states in its Position to Human Rights document: 'In accordance with the UN Universal Declaration of Human Rights, we respect the human rights of each of the associates, customers, communities and the people who work throughout the supply chains of Ahold Delhaize and its brands'. [Position on Human Rights, 2022: media.aholddelhaize.com] Score 2 • Met: Commitment to the UNGPs: The Company also states in its Position to Human Rights document: '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.' [Position on Human Rights, 2022: media.aholddelhaize.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Company has a commitment to the ILO Core: The Company's position on Human Rights states: '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.' However, 'informed by' is not considered a formal statement of commitment to the initiative according to CHRB wording criteria. [Position on Human Rights, 2022: media.aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Company has a explicit commitment to All four ILO Core: The Human rights position states: 'All associates deserve a workplace where they are treated with dignity and respect. Each of our brands complies with applicable laws and Company policies relating to equal opportunity and non-discrimination. [] Our commitment to human rights prohibits forced labor, child labor and human trafficking in any form. [] We respect the principles of freedom of association and the legal right 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, 2022: media.aholddelhaize.com] Score 2 Not Met: Company expect suppliers to commit to ILO Core: See below [Standard of Engagement (Website), N/A: aholddelhaize.com] & [Standard of Engagement (Website), N/A: aholddelhaize.com] & [Standard of Engagement (Website), N/A: aholddelhaize.com] & [Standard of Engagement (Website), Indicates in the second of Engagement (Website), Indicates in the second of Engagement explicitly list All four ILO for suppliers: On its website section about Human Rights, the Company indicates: 'We expect all of our suppliers to demonstrate a high standard of business ethics and a commitment to respect human rights. [] Our Standards of Engagement define the minimum human rights protections that we expect our suppliers to support and implement. The Standards of Engagement are an integral part of the contractual relationships with these suppliers.' Its Standards of Engagement includes provisions regarding all ILO Core. With respect the rights of freedom of association and collective bargaining it reads: 'The legal rights of personnel to form and join trade unions of their choice and to bargain collectively shall be respected.' However, it is not clear
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The Company states in its Code of Ethics: 'We are committed to providing safe and secure working environments. We comply with relevant safety and health laws and regulations and we follow applicable health and safety policies and procedures'. [Code of Ethics Handbook, N/A: media.aholddelnaize.com] • Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: According its Position to Human Rights: 'Each brand complies with all applicable laws on working hours, including maximum allowable working hours and days and payment for overtime hours at a premium rate, and has regular work weeks that do not exceed 48 hours per week'. [Position on Human Rights, 2022: media.aholddelhaize.com] Score 2 • Met: Expect suppliers to commit to H&S of their workers: The Company indicates in its Standards of Engagement: '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. 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), N/A: aholddelhaize.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect working our, the Standards of Engagement indicates: 'The Supplier shall comply with all applicable laws on working hours, including maximum allowable working hours and days, and payment for overtime hours at a premium rate'. However, no formal commitment about respecting
A.1.3.a.AG	Commitment to respect human rights particularly	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Respect land ownership and natural resources as set out in VGGT

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry – land, natural resources and indigenous peoples' rights (AG)		Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: The Company indicates in its Position to Human Rights: 'we commit to respect the rights of groups or individuals who are vulnerable or marginalized, including, but not limited to, [] and indigenous peoples, and we expect our suppliers to do the same'. [Position on Human Rights, 2022: media.aholddelhaize.com] Not Met: Expecting suppliers to make these commitments: See above. The Human Rights position includes a requirement to respect the rights of indigenous peoples. In addition, the Company indicates: 'We expect all of our suppliers to demonstrate a high standard of business ethics and a commitment to respect human rights [] The Standards of Engagement are an integral part of the contractual relationships with these suppliers'. However, no requirement to land rights as set out in the VGGT or the IFC performance standards was found. Score 2
			 Not Met: Respecting the right to water: The Company indicates in its Human Rights Report 2022: 'Ahold Delhaize and each of its brands recognize and support the right of every individual to an adequate standard of living, including access to safe, sufficient, acceptable and affordable water for personal and domestic uses, including in the workplace.' However, a report is not considered a suitable source for policy statements under CHRB's revised approach, which expects policy commitments to be placed in formal policy documents. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Company's policy commits to obtain FPIC [Position on Human Rights, 2022: media.aholddelhaize.com] Not Met: Expecting suppliers to make these commitments: The Company indicates in its Human Rights Report 2022: 'We expect our suppliers to respect community land rights and free, prior and informed consent (FPIC) of local communities. Certifications we leverage, including the RSPO and the Forest Stewardship Council, also include land rights requirements.' However, this document is not considered a suitable source for policy statements under CHRB's revised approach, which expects policy commitments to be placed in formal policy
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	1.5	documents. [Human Rights Report 2022, 2022: media.aholddelhaize.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Women's rights: The Company states in its Position to Human Rights document: 'We are a signatory to the United Nations Global Compact and to the Women's Empowerment Principles. [] we commit to respect the rights of groups or individuals who are vulnerable or marginalized, including, but not limited to, women, members of the LGBTQ+ community, children, persons with disabilities, minorities, refugees, migrant workers and indigenous peoples, and we expect our suppliers to do the same.' [Position on Human Rights, 2022: media.aholddelhaize.com] • Met: Children's rights: See above [Position on Human Rights, 2022: media.aholddelhaize.com] • Met: Migrant worker's rights: See above [Position on Human Rights, 2022: media.aholddelhaize.com] • Met: Expects suppliers to respect at least one of these rights: As indicated above, the Company indicates in its Position to Human Rights document: 'we commit to respect the rights of groups or individuals who are vulnerable or marginalized, including, but not limited to, women, [], children, [], migrant workers and indigenous peoples, and we expect our suppliers to do the same.' [Position on Human Rights, 2022: media.aholddelhaize.com] Score 2 • Met: CEDAW/Women's Empowerment Principles: The Company states in its Position to Human Rights document: 'We are a signatory to the United Nations Global Compact and to the Women's Empowerment Principles.' [Position on Human Rights, 2022: media.aholddelhaize.com]
A.1.4	Commitment to remedy	1	Not Met: Expecting suppliers to respect these rights The individual elements of the assessment are met or not as follows: Score 1 Met: The Company commits to remedy: The Company states in its Position to Human Rights document: 'We commit that any findings of violations or improper behavior, as well as adverse human rights impacts that we cause or contribute to, will be remedied in good faith through legitimate processes, and we expect our suppliers to do the same.' [Position on Human Rights, 2022: media.aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 Met: Company expect suppliers to make this commitment: As above [Position on Human Rights, 2022: media.aholddelhaize.com] Score 2 Not Met: Collaborating with other remedy initiatives
			Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates in its Code of Ethics: 'No Retaliation: We encourage Associates to raise concerns about improper behavior 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 Ethical Principles or any other Company policy. [] Any form of direct or indirect retaliation is prohibited and may result in disciplinary action, up to and including termination of employment'. However, no evidence found in a suitable policy document 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. On the other hand, in its Human Rights Report 2022, it indicates: 'Human rights defenders are sometimes subject to retaliation, intimidation, threats, physical violence and other forms of illegal mistreatment. At Ahold Delhaize, we do not tolerate such behavior and we expect the same from our suppliers. Human rights defenders should be able to work safely under all circumstances and in environments that enable them to do so.' However, this document is not considered a suitable source for policy statements under CHRB's revised approach. [Code of Ethics Handbook, N/A: media.aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] & Not Met: Company expect suppliers to make this commitment: According its Standards of Engagement: '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 states in

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board level responsibility for HRs: The Company indicates in its human rights website that its 'commitment to human rights is established and supported globally through our Supervisory Board (Sustainability and Innovation Committee) and Executive Committee []. The position on human rights states that 'Our commitment to human rights is established and supported globally through our Executive Committee and our Supervisory Board and implemented locally by each of our brands'. [Position on Human Rights, 2022: media.aholddelhaize.com]
			Not Met: Describe HR expertise of Board member

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Speeches/letters by Board members or CEO: The Company 's CEO states in its introduction letter to the Human Rights Report 2022: 'atrocities on a scale that seems unimaginable in the 21st century. Our world is in a geopolitical crisis that threatens the most fundamental of human rights. [] All of these developments, both positive and negative, deeply affect our brands' associates and customers, the communities we serve, and the people who work throughout our supply chains. There is no more powerful reminder to do what is right, every day. It is our responsibility, as one of the world's largest retailers, to respect human rights and to confront these global challenges, every day. [] Over these past two years, our great local brands have made significant progress on human rights. [] But there are many challenges still ahead of us, and we continue to develop plans and partnerships to address them. We hope that you read this report as an invitation to engage with us and help us implement our Roadmap on Human Rights'. The letter contains additional information on the Company's approach to human rights. [Human Rights Report 2022, 2022: media.aholddelhaize.com]
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board/Committee review HRs strategy: The Company indicates in its Position to Human Rights: 'The Supervisory Board reviews the GRC [Governance Risk & Compliance] reports quarterly. Additionally, all Supervisory Board members actively participate in the Sustainability Committee which addresses specific topics and reviews overall progress on a semi-annual basis.' The GRC includes 'key organizational risks related to human rights'. [Position on Human Rights, 2022: media.aholddelhaize.com] • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Incentives for at least one board member: The Company indicates in its Annual Report 2021: 'The Management Board members participate in the Company's long-term share-based incentive plan: Global Reward Opportunity (GRO). Under the GRO program, performance shares are granted as a three-year program. The vesting of these performance shares is subject to performance over three years. As of 2019, the GRO program employs three financial measures: [] In addition, a non-financial performance measure (15%) related to sustainability targets is included. [] non-financial performance measures (combined weight: 15%) are included in support of the Company's Healthy and Sustainable ambitions. For the 2021 share grant, Healthy and Sustainable is measured based on three equally weighted performance measures: healthy products, food waste and carbon emissions (see the table on page 168 for definitions).' However, the incentive needs to be related to at least one key industry risk related to human rights for at least one board member. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Evidence of an incentive mechanism that linked human rights performance to remuneration of Board level members is necessary, including the consideration of at least one key industry risk, such as: child labour, Forced labour, Freedom of association and collective bargaining, Health and safety, Land rights, Water and sanitation, Discrimination, Women's rights. [Annual Report 2021, 2021: media.aholddelhaize.com] Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board process to review bussiness model and strategy: Although the Company discloses detailed information about its ERM in its Annual Report 2021 and in its Human Rights Report 2022, no description was found of the process(es) it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. [Human Rights Report 2022, 2022: media.aholddelhaize.com] & [Annual Report 2021, 2021: media.aholddelhaize.com] Not Met: Describe frequency and triggers for reviewing Score 2 Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Example of actions decided

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	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a Net: Senior responsibility for HR implementation and decision making: The Company indicates in its Human Rights Report: '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'. In addition, it states in its Position to Human Rights: 'The Executive Committee oversees the implementation of our Roadmap on Human Rights and monitors its progress through a quarterly progress report and at least an annual in-person review. Progress against our Roadmap is also reported to the Health & Sustainability Steering Committee, consisting of Executive Committee and regional leadership team members, and the global Governance Risk & Compliance (GRC) Committee is informed of key organizational risks related to human rights. [] The leadership team of each brand is ultimately responsible for supporting the Roadmap on Human Rights within their respective brand and ensuring compliance with applicable laws and internal policies in their own operations. Working conditions within supply chains for own brand products and critical commodities are monitored at the brand or regional level.' [Human Rights Report 2022, 2022: media.aholddelhaize.com] & [Position on Human Rights, 2022: media.aholddelhaize.com] Score 2 Net: How it assigns Day-to-day responsibility: It also states that 'Much of this work is coordinated through the Ahold Delhaize Working Group on Human Rights. The Working Group brings together the different functional areas at the group level who are responsible for helping the brands address salient issues in own operations (such as Product Integrity, Product Safety and Social Compliance) and those who help to advance the Roadmap (for example, Finance, Public Affairs and Communications). The Director of E
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Senior manager incentives for human rights: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Evidence of an incentive mechanism that linked human rights performance to remuneration of senior managers is necessary, including the consideration of at least one key industry risk, that is: child labour, Forced labour, Freedom of association and collective bargaining, Health and safety, Land rights, Water and sanitation, Discrimination, Women's rights, etc Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2021, the Company discloses a table with its 'Principal risks and uncertainties', included in risk systems. One of these risks is the following: '[] Changes in, or failure to comply with, the expectations of our external stakeholders, or laws and

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			regulations, could impact the operations and reduce the profitability of Ahold Delhaize or its businesses, affecting its financial condition, reputation or results of operations. [] Howe we manage the risk: [] Since publishing our Human Rights Report in 2020, we've developed a methodology that helps each brand explore how it impacts associates, customers, communities and people in its supply chains, while engaging a broad range of internal (and sometimes external) stakeholders across functions and roles.' [Annual Report 2021, 2021: media.aholddelhaize.com] • Met: Provides an example: See above how the Company manages the risk. In addition, the Human Rights Report 2022: 'The ESG materiality assessment evaluates our environmental and social trends to identify ESG topics. Ahold Delhaize mainly focuses on those ESG topics that stand out as being most likely to bring about the materialization of principal risks, now or in the future. 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. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	 Not Met: Audit Ctte or independent risk assessment The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a: See A.1.2.a Met: Communicates its policy to all workers in own operations: The Company indicates that 'In 2021, we updated our Code of Ethics by clarifying and simplifying the text and amplifying evolving topics such as human rights and data privacy. You can find the Ahold Delhaize Code of Ethics on our website. We also launched a global intranet page on ethics and human rights and published a video and other resources summarizing our Position on Human Rights. [] Annual training on our Code of Ethics is provided to all associates at Ahold Delhaize and each of its brands at manager level and above. In addition, the Code of Ethics and our ethical principles are communicated to all associates through our website, local intranet pages, leaflets, posters, videos, local campaigns and in a global Ethics Week that was introduced in 2021. 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 Line and other grievance mechanisms'. it is assumed that training, leaflets and local campaigns take place in local language. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Communication of policy commitments to stakeholder: In addition, the Company reports: 'Our Standards of Engagement define the minimum human rights protections that we expect our suppliers to support and implement. The Standards of Engagement are an integral part of the contractual relationships with these suppliers.' Although the Company discloses information about its engagement activities with different stakeholders, including communities, no information was found describing how it communicates its human rights commitments. The Company has provided comments to CHRB regarding this
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	indicator. However, this information has not been found in publicly available sources. [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Not Met: How policy commitments are made accessible to audience The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Company states in its Human Rights Report 2020: 'Our expectations are outlined in the Standards of Engagement, which are part of every buying agreement.' The Standards of Engagement indicates: '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), N/A: aholddelhaize.com] & [Human Rights Report 2020, 06/2020: aholddelhaize.com] Score 2 • Met: How HR commitments made binding/contractual: The Company, in its Standards of Engagements, explicitly indicates that all suppliers need to meet these
		0.5	connection with providing goods or services to Ahold Delhaize, the Supplicates the subcontractor to comply with these Standards of Engagement Delhaize entered into an agreement with the subcontractor directly'. [St Engagement (Website), N/A: aholddelhaize.com] & [Human Rights Report O6/2020: aholddelhaize.com] Score 2 • Met: How HR commitments made binding/contractual: The Company,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			connection with the foregoing, each of Ahold Delhaize's Suppliers agrees to the following'. [Standard of Engagement (Website), N/A: aholddelhaize.com] • Met: Company requires suppliers to cascade down to their 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), N/A: aholddelhaize.com]
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Scores at least 1 on A.1.2.a: See A.1.2.a Not Met: How workers are trained on HR policy commitments: The Company indicates in its Annual Report 2021: 'All associates at the level of manager and up are assigned to complete the annual Code of Ethics training. The principles in the Code apply to all associates of Ahold Delhaize and its businesses. Associates of certain defined grade levels are trained in compliance with the Code on an annual basis. The full Code is available in the corporate governance section of our website'. In addition, in its Human Rights Report 2022: 'Annual training on our Code of Ethics is provided to all associates at Ahold Delhaize and each of its brands at manager level and above.' However, it is not clear whether training is spread across its workforce, as it seems that it focuses at the level of manager (and up). [Annual Report 2021, 2021: media.aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Trains relevant managers including procurement [Annual Report 2021, 2021: media.aholddelhaize.com] Score 2 Not Met: Score of 2 on A.1.2.a: See A.1.2.a Not Met: Meets both requirements under score 1 Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Scores at least 1 on A.1.2.a: See A.1.2.a Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates: 'Each brand's leadership team is ultimately responsible for translating the global Human Rights Roadmap to their respective brand through their local approach to due Ahold Delhaize's approach to human rights is built on cross-functional collaboration at the group level and works through existing networks that connect each of our great local brands 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.' However, no details found about the actual type of actions conducted as a monitoring process. With respect its supply chain, the Company indicates: 'Our Standards of Engagement require that suppliers observe all applicable laws and regulations of their countries of operation and observe and conform to the amfori 3 BSCI Code of Conduct. 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 production locations in high-risk countries that supply own-brand products'. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Proportion of supply chain monitored: In addition, the Company reports: 'Each brand's leadership team is ultimately responsible for translating the global Human Rights Roadmap to their respective brand through their local approach to due Ahold Delhaize's approach to human rights is built on crossfunctional collaboration at the group level and works through existing networks that connect each of our great local brands 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'. Howev

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			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'. [Human Rights Report 2020, 06/2020: aholddelhaize.com] & [Standard of Engagement (Website), N/A: aholddelhaize.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR affects 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), N/A: aholdelhaize.com] • Met: HR affects on-going supplier relationships: The Company indicates in its Human Rights Report 2020: 'If a supplier is unable or unwilling to remedy their noncompliance, we will terminate our relationship with that supplier'. [Human Rights Report 2020, 06/2020: aholddelhaize.com] Score 2 • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company states that: 'Because we recognize that improving labor standards in the supply chain is a responsibility we share with our suppliers, and because our brands 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
B.1.8	Approach to		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'. [Human Rights Report 2022, 2022: media.aholddelhaize.com] The individual elements of the assessment are met or not as follows:
	engagement with affected stakeholders	0.5	• Met: Discloses stakeholders that HRs may be affected: The Company indicates in its Annual Report 2021: 'We engage with stakeholders in both formal and informal ways throughout the year. Their feedback drives our annual materiality assessment, which identifies the areas that are important to them and where they believe we can make an impact. This helps us to ensure that our strategy and reporting are in line with their expectations and our most significant impacts.' It discloses information about the expectation of each stakeholder, how it engages with the group and the topics discussed. In addition, in its Human Rights Report 2022: 'Ahold Delhaize's global due diligence process, which was guided by external experts from Enact and Human Rights@Work, identified potentially affected stakeholders and vulnerable groups for each of the salient issues. Potentially affected stakeholders identified through this process include associates, customers and communities, and the people who work throughout supply chains'. 'As indicated above, the Company reports: 'Potentially affected stakeholders identified through this process include associates, customers and communities, and the people who work throughout supply chains'. [Human Rights Report 2022, 2022: media.aholddelhaize.com] & [Annual Report 2021, 2021: media.aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Provides two examples of engagement with stakeholders: The Human
			Rights Report states that 'As part of our global due diligence process, we have
			consulted with a diverse group of stakeholders in Europe, the United States and
			Indonesia, and we continue to engage with affected stakeholders on these issues.
			[] We have established mechanisms to engage with many of our affected
			stakeholder groups, and their experiences inform our Roadmap on Human Rights
			and how we address the salient issues. [Example 1] Examples include the associate
			engagement survey, an annual survey of all associates that includes questions
			about their perception of, among others, inclusiveness, diversity, health and
			safety.' However, no other specific example was found. [Human Rights Report
			2022, 2022: media.aholddelhaize.com]
			Score 2
			Not Met: Analysis of stakeholder views on company's HR issues: The Company
			discloses information about the key topics discussed with each stakeholder. For
			instance, with NGOs it indicates: 'Opportunities to improve our performance and
			transparency on topics including human rights, climate change, deforestation and
			animal welfare; In some cases, NGOs expect us to change policies or work with our
			brands' suppliers to improve their ESG performance.' However, it is not clear
			whether it engages with affected or potentially affected stakeholders, including
			suppliers' workers or local communities. [Annual Report 2021, 2021:
			media.aholddelhaize.com]
			Not Met: Describe how views influenced company's HR approach

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

T-		
Indicator Code B.2.1	Indicator name Identifying human rights risks and impacts	 Explanation The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifying risks in own operations: The Company describes in its Human Rights Report 2020 its due diligence process: 'The starting point is to consider all human rights, which includes labor and employment rights, civil & political rights, economic, social and cultural rights, and the rights of groups of individuals or vulnerable groups. We then looked at the potential human rights impacts resulting from the types of activities we are involved in as a global retailer. Our salient human rights issues are those human rights that stand out because they are inherently at risk, based on the likelihood and the potential severity of their negative impact on people, through our activities or business relationships'. Below are described consultation steps. In addition, in its Human Rights Report 2022, the Company indicates: 'Following our global due diligence process, Ahold Delhaize implemented a methodology in 2021 to help each brand assess the human rights impacts in its own operations and supply chains. Each brand also conducted a supply chain risk assessment that included a review of our salient issues.' [Human Rights Report 2020, 06/2020: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Met: Identifying risks through relevant business relationships: As indicated above, the due diligence process cover both own operations and supply chain: 'Our salient human rights issues are those human rights that stand out because they are inherently at risk, based on the likelihood and the potential severity of their negative impact on people, through our activities or business relationships.' In addition, in its Human Rights Report 2022: 'Risk Assessment (SRA) for supply chains in 2020. The SRA is based on the Organisation for Economic Cooperation Development (OECD)-Food and Agricultural Organization (FAO) Guidance for Responsible Agricultural Supply Chains, which encourages enterprises with large n
		addition, in its Human Rights Report 2022: 'Risk Assessment (SRA) for supply chains in 2020. The SRA is based on the Organisation for Economic Cooperation 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 deep dives. Each of our European brands and Ahold Delhaize USA (on behalf of the U.S. brands) have conducted risk assessments to assess product categories and the
		about the country of origin and the product category with publicly available sources of information based on likelihood and severity of risk.' [Human Rights Report 2020, 06/2020: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company states on its website: 'The report is based on the UN Guiding Principles Reporting Framework and is the result of a global human rights due diligence process that began in 2018. This due diligence process was designed to increase engagement on human rights — both internally and externally — and to assess current human rights management policies, processes and governance. The Human Rights Report outlines the outcome of this due diligence and provides a roadmap for future actions.' [Publication of Human Rights Report (website), 15/06/2020: aholddelhaize.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1 Met: Describe process for assessment of HR risks and discloses salient HR issues: In its Human Rights Report, the Company describes its due diligence process: 'Prioritizing for a global retailer with such a variety of products, made by suppliers all over the world, working with numerous brands in several countries, is a challenge. We used both internal data from our existing Human Resources and Product Integrity programs and external data (known country and industry risks) to identify potential risks. Finally, internal and external stakeholders provided valuable input through their participation in the webinars, surveys and workshops. Based on the steps described above, the working group then undertook a final validation step with the support from Enact and Human Rights@Work to validate the salient issues and place them onto two heat maps based on their severity and likelihood: one map for our own operations and one map for our supply chains. That final validation step led us to the six most salient issues at the center of the visual in bold as our initial priorities, followed by the other six salient issues.' [Human Rights Report 2020, 06/2020: aholddelhaize.com] • Met: How process applies to supply chain: See above. In addition, in its Human Rights Report 2022: 'Risk Assessment (SRA) for supply chains in 2020. The SRA is based on the Organisation for Economic Cooperation 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 deep dives. Each of our European brands and Ahold Delhaize USA (on behalf of the U.S. brands) have conducted risk assessments to assess product categories and the raw materials used in own-brand products against both environmental and social risks. I
B.2.3	Integrating and acting on human rights risks and impact assessments	1	Not Met: How it involved affected stakeholders in the assessment The individual elements of the assessment are met or not as follows: Score 1 Not Met: Action Plans to mitigate risks: The Company discloses information about its due diligence process in its Human Rights Report, including its salient human rights issues, their definition and a Roadmap. Each human rights issue has a section where the Company describes its position and its priorities. The Roadmap includes 5 steps including: 'Strengthen the governance of human rights', 'Address Salient Issues and Establish Positions', 'Develop local roadmaps that address, as a minimum, all salient issues for own operations and supply chains' and 'Report progress transparently and communicate internally (incl. training) and externally'. It also indicates: 'One of our first priorities is to review each salient issue and determine our global positions on that issue []. We plan to develop a system, tools and processes to help our brands perform an assessment against the outcomes of the due diligence process and the global positions. This will result in the translation of our global roadmap into local roadmaps.' In its Human Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Report 2022, the Company reports on its commitments and situation with respect its salient human rights issues in its own operation and supply chain. In addition, it summarizes the next steps in its Roadmap: Formalize our approach to due diligence, Review social compliance program, Implement programs on priority issues, Develop metrics and monitor progress and Engage stakeholders along the way. However, it seems that action plans are yet to be implemented. [Human Rights Report 2020, 06/2020: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Not Met: Description of how global system applies to supply chain: As indicated above, one step of the Company's Roadmap is 'Develop local roadmaps that address, as a minimum, all salient issues for own operations and supply chains'. The Company states: 'We plan to develop a system, tools and processes to help our brands perform an assessment against the outcomes of the due diligence process and the global positions. This will result in the translation of our global roadmap into local roadmaps.' However, this global system is still a work in progress. [Human Rights Report 2020, 06/2020: aholddelhaize.com] • Met: Example of actions decided on at least 1 salient HR issues: With respect its salient human rights issue 'Health and Safety', the Company states: 'With our work safety strategy and roadmap, we aim to create a safety mindset throughout the brands. Cross-functional safety committees in all brands will drive visibility, awareness and trainings, and promote safe methods of working. Our ambition for 2020 is to reduce our Workplace Injury Absenteeism Rate across all brands (work injuries resulting in lost days per 200,000 labor hours). In 2019, it stood at 2.1, and we will continue our critical ongoing efforts to reduce this further.' [Human Rights Report 2020, 06/2020: aholddelhaize.com] • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: System for tracking or monitor if actions taken are effective: The Company indicates in its Human Rights Report 2020: 'We plan to develop a system, tools and processes to help our brands perform an assessment against the outcomes of the due diligence process and the global positions. This will result in the translation of our global roadmap into local roadmaps.' In its Human Rights Repot 2022, the Company indicates that it is 'committed to report publicly and transparently on our human rights commitments, and we have done so in our Annual Report, communications with external stakeholders and relevant benchmarks, and in this 2022 report to demonstrate progress on our Roadmap.' In this document it reports on its performance in ESG through key metrics. However, no evidence found of a system for tracking the actions taken in response to its salient human rights issues. [Human Rights Report 2020, 06/2020: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Lessons learnt from checking system effectiveness Score 2 Not Met: Meets both requirements under score 1 Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders: The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. Although the Company discloses information about several engagement action with affected stakeholders in its Human Rights Report 2022, no examples of communication with affected stakeholders regarding specific human rights impacts raised by them or on their behalf was found. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	2	The individual elements of the assessment are met or not as follows: Score 1 • 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. It indicates in its Human Rights Report: The Ahold Delhaize whistleblower line. While our brands strive to keep an open dialogue with all associates and other stakeholders such as suppliers and customers, we realize it may not be possible to be aware of every incident that may conflict with our Code of Ethics and Standards of Engagement. Therefore, our brands provide whistleblower lines. To ensure confidentiality, our whistleblower lines are administered by a third-party and are available via an online portal or by telephone 24 hours a day, 7 days a week, 365 days per year.' [Code of Ethics Handbook, N/A: media.aholddelhaize.com] & [Human Rights Report 2020, 06/2020: aholddelhaize.com] Score 2 • Met: Channel is available in all appropriate languages and workers aware: The Company states that 'The Speak Up Line is free and accessible online and by phone, 24 hours per day, seven days per week, in the local languages of the countries in which we operate. It is communicated to all associates on our website, our brands' intranets, on posters throughout our offices, distribution centers and stores and in our annual Code of Ethics training and communications'. [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: In its Standards 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 faise complaints in good faith'. Standards also state that '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 the Comp
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	1.5	• Met: Grievance mechanism for community: The Company indicates that 'We expanded the use of our Speak Up line to include reporting for third parties and workers within our supply chain. We wanted to create a way for issues to be reported directly to us so that we can proactively address them rather than reactively respond to them. As a global retailer, our supply chains span the globe, with many of our products originating in geographies far removed from our operating footprint. The global availability of our Speak Up line provides workers the opportunity to raise issues, wherever they may occur'. [Annual Report 2021, 2021: media.aholddelhaize.com] Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness: The hotline service is available in different locations and is free to use (accessible) in different languages. In addition, the Company indicates in its Annual Report 2021: 'We continue to promote this availability on our external website and communications as well as within the supply chain'. No further details found on how it makes external stakeholders actively aware of the mechanism. [Code of Ethics Handbook, N/A: media.aholddelhaize.com] • Met: Communities access mechanism direct or through suppliers: The Company states in its Position to Human Rights: 'One of the Principles in our Code of Ethics is that we have the courage to Speak Up. Our established, local ethics helplines are free, accessible, confidential and secured services administered by a third party that 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. This reporting capability includes the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			opportunity to report on potential human rights issues or abuses and we investigate allegations that human rights are not properly respected.' In addition, in its Human Rights Report 2022: 'why we also expect suppliers to establish adequate complaint mechanisms and to ensure no retaliation. Those expectations are outlined in our Standards of Engagement'. As indicated, it covers 'third parties within and connected to our supply chains and the public'. [Position on Human Rights, 2022: media.aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Engages users to create or assess system: 'The Company indicates in its Human Rights Report 2022: 'Ahold Delhaize and its brands conduct an annual Ethical Culture Survey among associates. The survey includes questions about the accessibility, potential barriers, implementation, performance and outcomes of the Speak Up lines. Ahold Delhaize also conducted a survey in 2022 of a sample of users of the system and works with NAVEX to continuously improve the system.' [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 • Not Met: Engages with potential or actual users on the improvement of the mechanism
C.4	Procedures related to the mechanism(s)/c hannel(s) are equitable, publicly available and explained	0	Not Met: Provides user engagement example (at least two) on improvement The individual elements of the assessment are met or not as follows: Score 1 Not Met: Response timescales and how complainants will be informed: The Company indicates in its Human Rights Report 2022: '41.2%) of the reports were made anonymously in 2021. On average, reports were investigated and resolved within 18 days.' However, no further information about how complainants are informed was found. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Describe support (technical, financial,etc) available for equal access by complainants Score 2 Not Met: Describe types of outcome to complainant through use of mechanism Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 • 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'. The annual report indicates that 'We expanded the use of our Speak Up line to include reporting for third parties'. [Code of Ethics Handbook, N/A: media.aholddelhaize.com] & [Whistleblowerline Report 2019, 2020: aholddelhaize.com] • 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, N/A: media.aholddelhaize.com] Score 2 • Not Met: Company indicate it will not retaliate against workers/stakeholders: The Company states in its Code of Ethics: 'We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation of the law, our Code of Ethics or any other Company policy'. In addition, in its Position to Human Rights, it indicates: 'We encourage raising concerns about improper behavior or possible violations of law or policy. 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 prohibited'. However, this subindicator requires a commitment to not retaliate through different specific ways: 1) legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegatio

Indicator Code	Indicator name	Score (out of 2)	Explanation
			livelihoods, careers or reputation of claimants or their lawyers [Code of Ethics Handbook, N/A: media.aholddelhaize.com] & [Position on Human Rights, 2022: media.aholddelhaize.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state- based judicial and non- judicial grievance mechanisms	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Complainants not asked to waive rights: The Company states in its Human Rights Report 2022: '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.' [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Not Met: Company does not require confidentiality provisions Score 2 • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes how remedy has been provided: The Company states in its Position to Human Rights: 'We commit that any findings of violations or improper behavior, as well as adverse human rights impacts that we cause or contribute to, will be remedied in good faith through legitimate processes, and we expect our suppliers to do the same.' However, no further information describing how remedy has been provided or would be provided in specific cases was found. [Position on Human Rights, 2022: media.aholddelhaize.com] Not Met: Says how it would provide remedy for victims if no adverse impact identified Score 2 Not Met: Changes to systems, processes and practices to stop similar impact Not Met: Describe approach to monitoring implementation of agreed remedy Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Number grievances filed, addressed or resolved and outcome achieved: In its Human Rights Report 2022, the Company reports: 'In 2021, our Speak Up lines received 5,724 reports (2020: 6,994), over 89.6% of which were related to issues that are typically handled by HR. These issues consist primarily of five broad types of issues: unfair treatment (24%), misconduct or inappropriate behavior (23%), sexual or other harassment (8%), discrimination (7%) and bullying (7%). None of these involved members of our senior management. After human resource-related issues, the five most frequently reported issues were workplace safety (3.4%), public/food safety (2.0%), employee theft/ dishonesty (1.7%), violation of a law (1.3%), and substance abuse (1.1%). All reports are forwarded to the appropriate internal resource for review and prompt response or investigation'. However, no clear figures found of complaints related to human/labour rights issues, including how many were filed and either addressed or resolved and outcome for the different groups of complainants. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: How lessons from mechanism improve management system Score 2 Not Met: Evaluation of the channel/mechanism and changes made as result: In addition, the Company reports: 'Ahold Delhaize and its brands review the reports from the Speak Up lines on a quarterly basis and discuss and incorporate learnings to improve the system and to ensure that processes are in place to address and prevent the reported issues. In addition, Ahold Delhaize and its brands conduct an annual Ethical Culture Survey among associates. The survey includes questions about the accessibility, potential barriers, implementation, performance and outcomes of the Speak Up lines. Ahold Delhaize also conducted a survey in 2022 of a sample of users of the system and works with NAVEX to continuously improve the system.' However, no further information

D. Performance: Company Human Rights Practices (25% 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 Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company indicates in its Human Rights Report 2022: 'We require suppliers to pay workers at least the minimum wage reflecting time worked and in compliance with all applicable legal requirements, as outlined in our Standards of Engagement. In addition, the Standards of Engagement specify that illegal deductions or deductions for disciplinary purposes from wages for time worked are forbidden.' However, no reference to living wage was found in its Standards of Engagement or contract agreements with suppliers. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Improving living wage practices of suppliers Score 2 Not Met: Assessment of number affected by payment below living wage Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Avoids business model pressure on HRs (purchasing practices): The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No information was found describing the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights, or the practices it adopts to pay suppliers in line with agreed timeframe(s) and for the amount(s) agreed in the payment terms. [Human Rights Report 2022, 2022: media.aholddelhaize.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): 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.' No new relevant evidence found in last reports. [Standard of Engagement (Website), N/A: aholdelhaize.com] Score 2 • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of 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 Not Met: Child Labour rules in codes or contracts: According the Company's Standards of Engagement: 'Suppliers shall not employ directly or indirectly, children below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than 15 years, unless the exceptions recognized by the ILO apply. Any forms of exploitation of children are forbidden. Working conditions resembling slavery or harmful to children's health are forbidden. 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 in its Standard of Engagement or other contract agreement with suppliers to remediation programmes in case child labour is found. [Standard of Engagement (Website), N/A: aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: How working with suppliers on child labour: In addition, it indicates in its Human Rights Report 2022: '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. []'. However, it is not clear if the work conducted consists in monitoring compliance or whether it entails proactive work to improve suppliers practices in relation to child labour prevention and improving working conditions for young workers. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Assessement of number affected by child labour in supply chain Not Met: Analysis of trends in progress made
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Debt and fees rules in codes or contracts: The Company indicates in its Standards of Engagement: 'Suppliers shall not engage in any form of forced, bonded, or trafficked labor. Suppliers will risk allegations of complicity if they benefit from the use of such forms of labor by their business partners. Suppliers shall act with special diligence when engaging and recruiting migrant workers both directly and indirectly. Suppliers shall ensure that workers are not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse'. However, no explicit mention found to debt or fees rules. [Standard of Engagement (Website), N/A: aholddelhaize.com] Not Met: How working with suppliers on debt & fees: The Company indicates in its Human Rights Report 2022: '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.' However, no further information describing how the Company proactively works with its suppliers to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Assessment of the number affected by payment of recruitment fees
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	 Not Met: Analysis of trends in progress made The individual elements of the assessment are met or not as follows: Score 1 Not Met: Suppliers to pay workers in full and on time in codes or contracts: According its Standards of Engagement: 'Employees shall be paid in compliance with all applicable legal requirements and reflecting the time worked. [] Suppliers shall ensure that wage and benefits composition are detailed clearly and regularly for workers; the Supplier shall also ensure that wages and benefits are rendered in full compliance with all applicable laws and that remuneration is rendered in a manner convenient to workers.' However, no requirement to pay workers both in full and on time was found. [Standard of Engagement (Website), N/A: aholddelhaize.com Not Met: How working with supply chain to pay workers regularly and on time: The Company indicates in its Human Rights Report 2022: '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.' However, no further information describing how the Company proactively works with its suppliers to pay workers regularly and in full. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Assessment of the number affected by failure to pay directly Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Free movement rules in codes or contracts: The Company states in its Human Rights Report 2022: 'Our commitment to human rights prohibits all forms of forced, bonded or trafficked labor. [] Ahold Delhaize is a signatory of the Consumer Goods Forum's Forced Labor Resolution, which includes three Priority Industry Principles for Responsible Recruitment: Every worker should have freedom of movement' However, no provision to prohibits suppliers from retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use company provided accommodation was found in its Standards of Engagement (or contractual agreements with suppliers). [Standard of Engagement (Website), N/A: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: How working with suppliers on free movement: The Company indicates in its Human Rights Report 2022: '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.' However, no further information describing how the Company proactively works with its suppliers to eliminate retention of workers' documents or other actions to physically restrict movement. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	 Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Not Met: FoA & 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 in its Standards of Engagement or other contract agreement with suppliers to non interference or prohibition of harassment of trade unionists. Also, in these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Standard of Engagement (Website), N/A: aholddelhaize.com] Met: How working with suppliers on FoA and CB: The Company indicates in its Human Rights Report 2022: 'We 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 of their choice 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. Our brands have worked together with international and local trade unions as key civil society representatives in several collaborations and partnerships on human rights in supply chains'. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Met: Sets out clear Health and Safety requirements: In the standard of engagement, suppliers are required to adhere to H&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), N/A: aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: In its Annual Report 2021 and in its Human Rights Report 2022 the Company discloses information about its Number of injuries that result in lost days per 100 full-time equivalents and its Occupational illness frequency rate. However, it is not clear whether these rates cover suppliers' workers. [Annual Report 2021, 2021: media.aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Fatalities rate for lasting reporting period
			Not Met: Occupation disease rate for last reporting period Score 2 Not Met: How working with suppliers on H&S
			Not Met: Assessment of the number affected by H&S issues in the SP Not Met: Provides applying of trouds demonstrating progress.
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	 Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Not Met: Rules on land & owners in codes or contracts: The Company indicates in its Human Rights Report 2022: 'Our requirement that suppliers observe all applicable laws and regulations of their country of operation includes laws and regulations relating to land rights. We expect our suppliers to respect community land rights and free, prior and informed consent (FPIC) of local communities. Certifications we leverage, including the RSPO and the Forest Stewardship Council, also include land rights requirements.' However, no evidence found of specific requirements to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use land, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation. [Standard of Engagement (Website), N/A: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: How working with suppliers on land issues Score 2 Not Met: Includes resettlement requirements that the supplier provides financial compensation Not Met: Assessment of the number affected by land rights issues in its SP
D.1.9.b	Water and sanitation (in the supply chain)	0	Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Not Met: Rules on water stewardship in codes or contracts: The Company states in its Human Rights Report 2022: 'There is increasing pressure on the availability of potable water, also in areas of agricultural production, which affects local and indigenous communities and small farmers. As part of the Sustainability Risk Assessment, each brand assesses the social and environmental impacts in their supply chains. One of those impacts is water. Ahold Delhaize works with various organizations, including GlobalGAP and SAI-Platform, on the implementation of sustainable agriculture. GlobalGAP's certification standard and SAI Platform's Farm Sustainability Assessment include requirements on hygiene, health and safety, worker welfare and water management, each of which address water and sanitation. Both the perspective of water availability for agricultural production and a potential pressure on water quantity and quality for human needs are taken into account. All of the standards and certification programs we work with for our commodity supply chains include requirements relating to water and sanitation. The Rainforest Alliance standard, which is widely used by our brands, emphasizes adverse effects on water quality and availability by agriculture production activities.' However, no access to water and sanitation requirements, including refraining from negatively affecting access to safe water, was found in its contractual arrangements with its suppliers or in its supplier code of conduct. [Human Rights Report 2022, 2022: media.aholddelhaize.com] & [Standard of Engagement (Website), N/A: aholddelhaize.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: How working with suppliers on water stewardship issues: As indicated above, the Company indicates: 'Ahold Delhaize works with various organizations, including GlobalGAP and SAI-Platform, on the implementation of sustainable agriculture. GlobalGAP's certification standard and SAI Platform's Farm Sustainability Assessment include requirements on hygiene, health and safety, worker welfare and water management, each of which address water and sanitation. Both the perspective of water availability for agricultural production and a potential pressure on water quantity and quality for human needs are taken into account. All of the standards and certification programs we work with for our commodity supply chains include requirements relating to water and sanitation.' However, it is not clear whether it works directly with suppliers to improve their practices in relation to access to water and sanitation. [Human Rights Report 2022, 2022: media.aholddelhaize.com] Score 2 Not Met: Assessment on the number affected by lack of access to water and sanitation.
D.1.10.b	Women's rights (in the supply chain)	0	Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Not Met: Women's rights in codes or contracts: Its Standards of Engagement prohibit discrimination in hiring, remuneration, access to training, promotion or retirement based on gender, and forbid any physical, sexual, psychological or verbal harassment. However, no provisions requiring its suppliers to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and eliminate health and safety concerns that are particularly prevalent among women workers were found in its contractual arrangements with suppliers or supplier code of conduct. [Standard of Engagement (Website), N/A: aholddelhaize.com] Not Met: How working with suppliers on women's rights: The Company signed the UN Women Empowerment Principles in March 2019. In addition, the Human Rights Report indicates that 'Our Standards of Engagement prohibit discrimination in hiring, remuneration, access to training, promotion or retirement based on gender, and forbid any physical, sexual, psychological or verbal harassment. Gender inequality is not always sufficiently addressed in social standards and certifications, but progress is being made. In its 2021 Code of Conduct, amfori BSCI references the Gender Dimensions of the UN Guiding Principles on Business and Human Rights. Rainforest Alliance promotes gender equality for all of its Certificate Holders, and the promotion of gender equality and women's empowerment is an integral part of its 2020 Sustainable Agriculture Standard. Ahold Delhaize will continue to work in partnership with these and other organizations to support women's rights. [Signature moment: Frans Muller signs UN statement supporting gender equality, 03/2019: aholddelhaize.com] & [Human Rights Report 2022, 2022: media.aholddelhaize.com] Not Met: Assessment on the number affected by discrimination or unsafe working conditions

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious		Area: Working hours; Health & safety; discrimination; FoA/ CB
	allegation No 1		Headline: Giant's supplier subject of a report over labour rights violations in the Honduran melon fields
			• Story: On April 24, 2020, the International Labor Rights Forum, Fair World Project, and the International Union of Food Workers (IUF) Latin America Regional Secretariat jointly published a report which illustrates labour rights violations by Fyffes, a supplier for Albertsons, Kroger, Walmart, and Giant, an Ahold Delhaize subsidiary. In 2019, Costco and Whole Foods stopped buying Fyffes' Honduran melons due to the ongoing allegations.
			The report reviews the alleged history of Fyffes labour rights violations in Honduras, the ongoing abuses and the responses from Fyffes, which includes silencing workers' lived experiences by employing futile corporate social responsibility programmes that distract supermarkets and consumers from the reality on the farms.
			Fyffes employs over 6,500 melon workers in Honduras, the majority of whom are women and seasonal workers. In 2016 the workers decided to address their longstanding issues by organizing a union with el Sindicato de Trabajadores de la Agroindustria y Similares (STAS). In response, local bosses fired and blacklisted dozens of outspoken union leaders and launched a violent union-busting campaign - physically, verbally and psychologically harassing union members.
			During the 2019-2020 growing season, workers at Fyffes farm in Honduras reportedly continue to experience blatant violations of their legally guaranteed rights, including the dangerous misuse of toxic pesticides, denial of sick leave, the company's failure to enrol its seasonal workers in the national healthcare and pension system, and coercion to force them to leave STAS and to join a company-controlled union that was founded by management, in order to destroy genuine
			worker organizing. [Business and Human Rights Resource Centre, 21/04/2020, "Honduras: Report reveals labour abuses faced by 6,500 workers on Fyffes' melon plantations, incl. union-busting, harassment & toxic pesticides exposure": business-humanrights.org] [International Labor Rights Forum, 21/04/2020, "Fyffes Farms Exposed: The Fight for Justice in the Honduran Melon Fields": laborrights.org]
E(1).1	The company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Public response: A response by the company is not publicly available. [Business and Human Rights Resource Centre, 21/04/2020: business-humanrights.org] Score 2 Not Met: Detailed response: A response by the company is not publicly available.
E(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Engaged with stakeholders Not Met: Identified cause Score 2 Not Met: Identified and implemented improvements Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Provided remedy Not Met: Evidence for lack of Impact or link Score 2 Not Met: Remedy satisfactory to stakeholders Not Met: Remedy delivered Not Met: Independent remedy process used

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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