

Date: June 23, 2023

Subject: Ahold Delhaize's response to the Business and

Human Rights Resource Centre

Ahold Delhaize recognizes migrant workers as a vulnerable group in supply chains worldwide, particularly in agriculture, and takes reports of abuse very seriously. Ahold Delhaize's commitment to address issues and support human rights is outlined in the <u>Position on Human Rights</u>, available on the <u>website</u>. In response to reports of human rights issues in their dairy supply chain, Hannaford engaged in a thorough due diligence review. You can find more information about their actions and findings in Hannaford's separate response.

Ahold Delhaize's <u>Human Rights Report 2022</u> (and the previous <u>Human Rights Report 2020</u>) give a detailed insight into its approach to human rights due diligence. Ahold Delhaize recognizes that driving positive impact and mitigating negative impact for people is most effectively accomplished locally through its brands. That is why Ahold Delhaize developed an internal methodology to help its brands assess how they impact human rights. The U.S. brands chose to engage Business for Social Responsibility (BSR) to identify and assess adverse human rights impacts through an assessment of key commodities relevant to the U.S. market. BSR's assessment identified that risks are not limited to specific commodities or locations, per se. Rather, risks are predominantly associated with undocumented immigrants who work with a variety of commodities based on the harvest season. The assessment resulted in the development of a commodity prioritization framework for the U.S. brands and a human rights governance model that supports more proactive identification and mitigation of human rights risks. You can read more about how Ahold Delhaize has undertaken human rights due diligence at the brands in the <u>Human Rights Report 2022</u> (page 11-16).

Ahold Delhaize and each of its brands expect all suppliers to demonstrate a high standard of business ethics and commitment to respect human rights and to provide products that are safe and produced in clean and safe facilities with good working conditions. Ahold Delhaize's <u>Standards of Engagement</u> define the minimum human rights protections that the company expects its suppliers to support and implement and are an integral part of the contractual relationships with these suppliers. Ahold Delhaize's Standards of Engagement require that suppliers observe all applicable laws and regulations of their countries of operation. Ahold Delhaize ensures compliance with the Standards of Engagement through its social compliance and critical commodity programs. In the <u>Human Rights Report 2022</u> (page 13-16), Ahold Delhaize describes in



detail how those programs use social audits and certifications to monitor working conditions in high-risk countries, how the programs address minor non-compliances and what the Ahold Delhaize brands do when they find *deal-breakers*. Whenever there are allegations or reports of non-compliance with the Standards of Engagement, the Ahold Delhaize brands follow up on those. That is why Hannaford has been, and continues to be, engaged in a thorough due diligence review across its dairy supply chain.

Access to remedy is an important aspect of an effective human rights due diligence process. Ahold Delhaize's grievance mechanism is called the Speak Up Line, and 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 the brands operate through a confidential and secure service hosted by a third party, NAVEX. It is effectively used by thousands of associates on an annual basis, and Ahold Delhaize continuously improves the system based on user engagement and feedback. You can read more about the Speak Up Line in the Human Rights Report 2022 (page 37-39). While the Speak Up Line is also accessible to third parties, Ahold Delhaize recognizes that it is more difficult for those working in supply chains to find and access these resources. That is why Ahold Delhaize also expects suppliers to establish adequate complaint mechanisms and to ensure no retaliation, as outlined in its Standards of Engagement. Ahold Delhaize also works with industry organizations and standard's committees, including amfori BSCI and others, to promote the provision of effective grievance mechanisms by its suppliers.

On a final note, Ahold Delhaize identified the vulnerability of migrant workers in global (agricultural) supply chains as a priority issue in its latest Human Rights Report. Ahold Delhaize and/or the brands already engage in multiple initiatives that address this issue, from IDH's Sustainability Initiative for Fruit and Vegetables (SIFAV) to the Global Tuna Alliance. Those programs have a broad focus geographically and engage the right stakeholders to address such complex, systemic issues. Ahold Delhaize continues to address its priority issues and looks forward to providing an update on its progress in its next Human Rights Report (to be published in 2024).