

# Delhaize

## Competition & Antitrust Policy

### Introduction

Delhaize is committed to conducting its business in an ethically responsible manner and complying with the law in all countries and jurisdictions in which it operates. The [Guide for Ethical Business Conduct](#) reflects this commitment, which is referred to as *“the right way, every day.”*

Delhaize has a policy of strict compliance with all applicable antitrust and competition laws (“competition laws”) wherever we do business. Competition laws (also referred to as “antitrust laws” in the United States) are designed to ensure a competitive market system that fosters business efficiency and innovation, and guarantees consumers the best possible choice of quality at the lowest possible prices.

### Application

This Policy extends to all of Delhaize’s business activity, including operations conducted by any of its subsidiaries, joint ventures, and operating companies. As used in this Policy, “Delhaize” or the “Company” includes Delhaize and all of its subsidiaries worldwide. Directors, officers and other associates of the Company are referred to collectively as “Associates.”

The Delhaize Guide for Ethical Business Conduct sets forth the Company’s position on ethical business conduct generally, including the Company’s position on competition and antitrust law issues. The aim of this Policy is to provide additional guidance to all Associates, wherever located, regarding competition laws, and the way these laws relate to our business, as well as to help Associates recognize potential competition law issues. Although most competition laws are similar in their approach, there is no single global competition statute. Therefore, in addition to this Policy, Associates must refer to regional and/or local Delhaize policies on competition laws, as applicable, for more specific guidance on this topic.

### Policy Statement

We believe in fair competition. We compete on the merits of our service, the prices we charge, and the customer loyalty we earn, and not on the basis of illegal or unfair business activity or tactics.

The purpose of this Policy is to provide the principles and rules every Associate must follow to ensure compliance of

our activities with competition laws, to protect Delhaize’s reputation and avoid potential criminal and civil penalties.

Therefore, all Associates of Delhaize are required to adhere to this Policy and violations of competition laws or this Policy will not be tolerated.

### Generally Prohibited Practices

Some of the most serious violations of competition and antitrust laws occur between competitors, such as agreements to fix retail prices or to divide customers, territories, or markets. Such agreements need not be formal and can be inferred from circumstantial evidence, such as the exchange of competitively sensitive information between competitors. Associates are therefore prohibited from having any discussions with competitors regarding competitively sensitive information.

Competitively sensitive information includes, but is not limited to, future retail prices, pricing strategy or methodology (including discounts, rebates, customer promotions or profit margins), terms and conditions of sale or purchase (including volumes purchased and sold, revenues, or costs), marketing, future business plans, information related to customers, and any other proprietary or confidential information of Delhaize or any of its businesses.

In addition, a wide range of other business activities can result in competition law violations, including but not limited to sharing competitively sensitive information with third parties such as vendors and suppliers, engaging in exclusive arrangements with suppliers, having category management arrangements with suppliers, accepting slotting allowances or upfront access payments from suppliers, or other conduct. Associates should consult their local Legal Department for additional guidance.

### Penalties

In the event of a competition law violation – even one that is unintentional – the Company may be exposed to substantial fines and penalties and/or damage claims from customers, as well as severe damage to its reputation. Further, in certain countries, Associates violating competition laws can be fined or subject to criminal penalties, fines and imprisonment.



# Compliance

## Responsibilities of All Company Associates

Every Associate whose duties are likely to lead to involvement in or exposure to any of the areas covered by competition laws is expected to become familiar with and comply with this Policy, related regional policies, as applicable, and all applicable competition laws. Associates must seek advice from the local Legal Department or the Office of Compliance and Ethics if they are uncertain about what the law or this Policy requires or allows.

When instructed by management, Associates must participate in periodic certifications of compliance and undertake mandatory competition compliance training.

## Enforcement and Discipline

Any Associate who knowingly violates any law related to anticompetitive practices, or who violates any related Delhaize policy or procedure may be subject to appropriate disciplinary action, up to and including termination in accordance with applicable laws. Any Associate who is aware of another Associate's violation of such laws, policies, or procedures, and does not timely report that violation, may also be subject to appropriate disciplinary action. If an Associate is involved in a violation, factors such as whether the Associate reported the violation and the degree of cooperation displayed in any related investigation may be given consideration when possible corrective action is considered.

## Implementation and Monitoring

The Office of the General Counsel and the Office of Compliance and Ethics are responsible for issuing and updating this Policy and related guidelines, ensuring the effectiveness of this Policy in collaboration with management, and implementing regular training programs and certification procedures as appropriate.

The Office of the General Counsel, the Office of Compliance and Ethics and the Delhaize Internal Audit Department are responsible for monitoring the Company's compliance with applicable competition laws and this Policy.

## Reporting Potential Violations

Associates who are or become aware of a potential violation or risk of violation of this Policy or any practice that may violate a competition law should report the matter promptly to their local Legal Department or to the Office of Compliance and Ethics. Associates may also make a report to the Office of Compliance and Ethics through the Company's [I Share Network](#), and such report may be made anonymously.

The Company shall protect any Associate who makes such report, in good faith, against any form of retaliation by his or her manager or other Associates. The Company does not tolerate harassment or intimidation of an Associate who reports in good faith a business conduct issue or suspected violation of law or policy, or reports or participates in a related investigation. Retaliation of any kind will lead to disciplinary action.

**If you have any questions or concerns regarding this Policy, please contact your local Legal Department or the Office of Compliance and Ethics in your region:**

### **For Associates in Europe and Asia:**

Ahold Delhaize Global Support Office  
Provincialeweg 11  
NL-1506 MA Zaandam  
[Compliance@AholdDelhaize.com](mailto:Compliance@AholdDelhaize.com)

### **For Associates located in the U.S.:**

Delhaize America  
PO Box 1330  
Salisbury, NC 28145-1330  
[Compliance@DelhaizeAmerica.com](mailto:Compliance@DelhaizeAmerica.com)