

# **Albert Heijn Nederland**

Disclosure Report Date Submitted: October 30th, 2024

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### **Disclosure Materials**

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



## **Disclosure Questionnaire**

#### **Industries and Products**

#### Yes No Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\overline{\mathbf{A}}$ **Biodiversity Impacts** Chemicals $\boxed{}$ **Disclosure Alcohol Disclosure Firearms Weapons Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ Disclosure Tobacco **Energy and Emissions Intensive** $\boxed{}$ Industries Gambling $\square$ **Genetically Modified Organisms** $\square$ Illegal Products or Subject to $\square$ **Phase Out** Industries at Risk of Human $\overline{\mathbf{A}}$ **Rights Violations Monoculture Agriculture Nuclear Power or Hazardous** $\square$ **Materials** Payday, Short Term, or High $\overline{\mathbf{A}}$ **Interest Lending** Water Intensive Industries $\square$ **Tax Advisory Services** $\square$

#### **Outcomes & Penalties**

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior		<b>✓</b>
Breaches of Confidential Information		N
Bribery, Fraud, or Corruption		<b>∑</b>
Company has filed for bankruptcy		N.
Consumer Protection	V	
Financial Reporting, Taxes, Investments, or Loans		$\supset$
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		K
Labor Issues		N.
Large Scale Land Conversion, Acquisition, or Relocation		K
Litigation or Arbitration	$\checkmark$	
On-Site Fatality	✓	
Penalties Assessed For Environmental Issues		$\searrow$
Political Contributions or International Affairs		K
Recalls	✓	
Significant Layoffs		V
Violation of Indigenous Peoples Rights		N
Other		$\checkmark$



#### **Practices**

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		$\checkmark$
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		V
Company prohibits freedom of association/collective bargaining		$\searrow$
Company workers are prisoners		$\searrow$
Conduct Business in Conflict Zones	$\searrow$	
Confirmation of Right to Work		>
Does not transparently report corporate financials to government		$\searrow$
Employs Individuals on Zero-Hour Contracts		K
Facilities located in sensitive ecosystems		N
ID Cards Withheld or Penalties for Resignation		\
No formal Registration Under Domestic Regulations		V
No signed employment contracts for all workers		V
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		V

	Yes	No
Sale of Data		$\checkmark$
Tax Reduction Through Corporate Shells		
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		V
Workers paid below minimum wage		$\checkmark$
Workers Under Bond		$\checkmark$
Other Bottled Water Breastmilk Substitutes Gambling	<b>V</b>	

### Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		$\checkmark$
Child or Forced Labor		$\checkmark$
Negative Environmental Impact		$\checkmark$
Negative Social Impact		$\checkmark$
Other		$\checkmark$



**Disclosure Questionnaire Category: Alcohol** 

Issue Date	Ongoing
Topic	Company sells alcoholic beverages
Summary of Issue	The company earns revenue from the sale of alcoholic beverages.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In FY2022, <10% of Albert Heijn's revenue was earned from the sale of alcohol.
Impact on Stakeholders	Alcohol may have a negative impact on the health and well-being of people.
Implemented Management Practices	Albert Heijn complies with all the regulations and laws related to the sale of alcohol. Albert Heijn voluntarily adheres to the ""Advertisement regarding alcoholic beverages"" code of practice, and aligns with the ""Alcohol-free and low-alcohol variants of alcoholic beverages"" (RvAVA) code of practice (see links below).
	Policies and documentation The company has an internal document called ""Responsible sale of alcohol"" that serves as a practical manual for all employees at Albert Heijn, AH to go and E-commerce that are responsible for the procurement, marketing, and presentation of alcoholic beverages in stores as well as online. The document outlines relevant legislation, rules, and agreements that need to be complied with in the responsible sale of alcohol and is updated annually. Every quarter, a meeting is held with relevant employees to discuss alcohol sales and review the document. In addition, as part of their legal obligations, the company has an internal document which sets out all roles, responsibilities, obligations and operating procedures to ensure that alcohol is not sold and supplied to minors online. The relevant document is updated twice a year and is available to all stakeholders who are involved with the online sale of alcohol.  All guidelines and procedures on the sale of alcohol products are set out in Albert Heijn's management tool for guidelines,



planning and communication.

#### Promotion of non- or low alcohol beverages

Albert Heijn promotes the consumption of non- or low alcoholic beverages. It sells an assortment of alcohol-free beers, wines and spirits which are presented next to the alcoholic drinks. When alcoholic beverages are on discount, Albert Heijn ensures that (when available) a similar variant with non- or low- alcohol content is also on discount and displayed on the shop floor. In addition, the company offers a free app called "My Lifestyle Coach" (Mijn Leefstijl Coach) designed to encourage healthier living and eating habits, including refraining from alcohol.

#### Mitigation of the risk of selling to minors

Albert Heijn has a set of controls in place to mitigate the risk of selling to minors, called "NIX18". This is a joint Code of Practice developed in collaboration with the Dutch Retail Association (Centraal Bureau Levensmiddelen, CBL) to establish standards for the responsible sale of alcohol. The Code of Practice, called "Responsible Sale of Alcohol" includes training for store personnel. "NIX18" establishes the requirement of ID verification for all purchases of alcohol (and tobacco) for all shoppers under the age of 25 at each attempt of purchase (more information in CBL related link below).

All new employees receive mandatory training on "NIX18" through the company's learning platform. Employee compliance with "NIX18" is evaluated in the following ways:

- Weekly, employees aged 18 -19 from one store act as mystery shoppers at other stores within the same district. The store manager evaluates the outcomes and acts accordingly (i.e. by issuing a warning).
- Quarterly, there is an inspection by an independent third party (Secret View) executed by young adults (18+).
- Stores that fail two out of the last three inspections, get an additional inspection by Secret View, but this time with an underage youth (18-). This is linked to a sanction policy. Additionally, these stores get an inspection from the Store Audit department, who check if all processes are in place. After each of the above inspections, if a store fails, the Store Manager is expected to provide an action plan.

Throughout the year, various initiatives are implemented to promote awareness of "NIX18". Industry-wide awareness campaigns emphasize the significance of "NIX18". Annually, the Trimbos Institute organizes a campaign during "NIX without ID week", educating minors about the risks of alcohol and tobacco



	use. This campaign is endorsed by all supermarkets in their stores and internal communications.
Report	Albert Heijn NIX 18
	Advertisement regarding alcoholic beverages
	Advertisement regarding alcohol free and low alcohol beverages
	Central Bureau of Food Trade and Responsible alcohol sales in supermarket
Management Comments	Albert Heijn played an important role in the introduction of "NIX 18" at CBL.



**Disclosure Questionnaire Category: Tobacco** 

Topic	The company sold tobacco and related products in its stores.
Summary of Issue	In the past, the company sold tobacco and related products in its stores.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Prior to 2024, <10% of Albert Heijn's annual revenue was from the sale of tobacco. As of 1/1/2024 the company no longer earns revenue from tobacco-related products.
Impact on Stakeholders	Tobacco has a negative impact on the health and well-being of people.
Resolution	Albert Heijn ceased tobacco sales in its own stores on January 1st, 2024, and urged its franchisees to do the same by that date. On July 1st, 2024, a ban on tobacco sales in grocery stores came into force. Tobacco products are no longer available for purchase at Albert Heijn grocery stores in the Netherlands.
Implemented Management Practices	Albert Heijn supports the transition towards a smoke-free generation.
	Ceased sales ahead of the government's ban Effective January 1st, 2024, the company ceased tobacco and related product sales in all of its own stores in the Netherlands, six months ahead of the legislation coming into force on tobacco sales in grocery stores. Online sales were stopped on July 1st, 2023.
	Campaigning for a smoke-free movement Albert Heijn is a participant in a campaign by the nonprofit organization Smoke-Free Generation (Rookvrije Generatie), with the aim of inspiring others to join the smoke-free movement. See the link under 'report'.
	Compliance with local laws and regulations Albert Heijn complied with all laws and regulations related to the sale of tobacco.
	Discouraging sales by covering the display of tobacco Prior to 2024, when Albert Heijn still sold tobacco in its stores (excl. online), it adhered to guidelines and implemented procedures aimed at discouraging tobacco purchases by consumers. Before the introduction of the display ban, Albert



Heijn initiated a trial covering the display of tobacco products in 2015. Following Dutch legislation, since July 2020, tobacco products in Albert Heijn stores have not been visibly displayed, requiring consumers to inquire proactively. Mitigation of the risk of selling to minors Albert Heijn had a set of controls in place to mitigate the risk of selling tobacco to minors, called "NIX18". This is an industry wide agreement, together with the Dutch Food Retail Association (Centraal Bureau Levensmiddelen, CBL). "NIX 18" established the requirement of ID verification for all purchases of tobacco for all shoppers under the age of 25 at each attempt of purchase. All new employees received mandatory training on "NIX18" through the company's learning platform. Employee compliance with "NIX18" was evaluated in the following ways: - Weekly, employees from one store acted as mystery shoppers at other stores within the same district. The store manager evaluated the outcomes and acted accordingly (i.e. by issuing a warning). - Quarterly, there was an inspection by an independent third party (Secret View) executed by young adults (18+). - Stores that failed two out of the last three inspections, got an additional inspection by Secret View, but this time with an underage youth (18-). This was linked to a sanction policy. Additionally, these stores got an inspection from the Store Audit department who checked if all processes were in place. After each of the above inspections, if a store failed, the Store Manager was expected to provide an action plan. Throughout the year, various initiatives were implemented to promote awareness of "NIX18". Industry-wide awareness campaigns emphasized the significance of "NIX18". Annually. the Trimbos Institute organized a campaign during "NIX without ID week", educating minors about the risks of tobacco use. This campaign was endorsed by all supermarkets in their stores and internal communications. - Display Ban [NOS] Report - Ban on Tobacco Sales [NOS] - Ban on Tobacco Sales [AH] - Campaign Smoke Free Generation **Management Comments** Collective action: "To achieve lasting behavioral change and a smoke-free generation, it is important that all parties, including the remaining selling parties, and other involved players, large and small, work together. Together with other organizations we



participated in a campaign to stimulate the smoke free movement."



**Disclosure Questionnaire Category: Fatalities** 

Issue Date	2020 and 2023
Торіс	Fatality involving an employee and a non-employee
Summary of Issue	The company reported two fatalities in the last five years. In 2020, involving a non-employee, and in 2023, involving an employee of Albert Heijn. (see NOS news article for more information).
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The company reported two fatalities in the last five years. 2020: In the case of the collision with an Albert Heijn delivery van, the court imposed a 2 year prison sentence on the accused, and a 4 year driving ban.
	2023: During the 2023 incident in which an employee died after being stabbed by a third-party individual in a non-work related event, there were no other individuals injured. The court imposed a 10-year prison sentence and subsequent mandatory psychological detention and mandatory psychological treatment.
Impact on Stakeholders	Fatalities and accidents have emotional, mental and financial implications to family members, friends and colleagues of the people involved in the occurrence.
Resolution	At Albert Heijn there is a protocol for handling severe incidents. As described in the protocol, severe incidents require immediate contact with Albert Heijn's Safety and Aftercare department. In the security system used by Albert Heijn, all actions undertaken in reaction to an incident are documented. Albert Heijn offers aftercare to the colleagues involved or exposed to the incident, both to its own employees and temporary workers. Families of the victim receive support by the organization Slachtofferhulp.
Implemented Management Practices	Albert Heijn continuously works on improving the safety of their colleagues, and offers practical, real-world training sessions and e-learnings. These are accessible through the Albert Heijn intranet.  The store manager is responsible for monitoring the safety of the store. The store manager receives tools and guidance for this purpose. As an example, the store manager (together with colleagues) completes the Risk Inventory and Evaluation (Risico Inventariatie & -Evaluatie (RI&E)) to assess the safety risks of



	the store to ensure that appropriate action can be taken. In addition, Albert Heijn recently introduced a collective name tag "team Albert Heijn" instead of displaying the individual employee names on name tags. This measure was taken to increase the safety of Albert Heijn colleagues during and after working hours.
Report	Public articles stabbing incident - NOS News article on incident - AD News article on incident Rechtspraak: - 10 jaar cel en tbs na doodsteken supermarktmedewerker in Den Haag  Public articles collision incident - RTL News article on incident Rechtspraak: - Celstraf en rijontzegging na veroorzaken dodelijk ongeval [Rechtspraak.nl] - Details case verdict [Rechtspraak.nl]
Management Comments	Albert Heijn takes the safety of their employees and customers very seriously, and takes measures to ensure that Albert Heijn is a safe place to work and shop for all. Albert Heijn deeply regrets impactful events like this. Albert Heijn supports those involved when such tragic events occur and take measures to prevent them. For instance in week 25 AH launched the 'We are Team Albert Heijn' campaign, in which AH draws attention to the social safety of in-store employees. Every employee must be able to work safely. Part of the campaign includes bringing our 'house rules' to the attention of customers.
Related Incidents (Yes/No)	No.



### **Disclosure Questionnaire Category: Animal Products and Services**

Topic	The company sells and distributes meat and other animal products.
Summary of Issue	Albert Heijn sources its fresh chicken, pork, dairy and eggs from dedicated Dutch farmers all certified to the Better For Nature & Farmer (Beter voor Natuur & Boer) standards.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Albert Heijn sells animal food products such as meat, poultry and fish and dairy, cheese and eggs accounting for <25% of its revenue.
Impact on Stakeholders	The sale of animal products can pose a risk to the treatment of animals if adequate management practices are not in place.
Implemented Management Practices	Albert Heijn has the following practices in place to address the risk of negative impacts on animals across its supply chains:
	<ul> <li>The company developed its approach to animal welfare based on Five Freedoms of Animal Welfare:</li> <li>Freedom from Hunger and Thirst,</li> <li>Freedom from Discomfort,</li> <li>Freedom from Pain, Injury, and Disease,</li> <li>Freedom to Express Normal Behavior,</li> <li>Freedom from Fear and Distress.</li> </ul>
	<ul> <li>"Better for Nature &amp; Farmer" Programs: Albert Heijn has developed this initiative to enhance sustainability and animal welfare in its supply chains. The programs cover pork, poultry (eggs and chicken), and dairy, setting standards and requiring certification beyond basic legal requirements. For example: <ul> <li>Diary: farmers provide pasture to allow cows to engage in natural grazing behavior, all cows are grass-fed following the weidegang principles and are given GMO-free and locally sourced pellets as a supplement when needed. Cows are provided with appropriate housing. Livestock does not exceed the amount of land available for feeding. Nearly 350 farmers are involved in this program.</li> <li>Broiler: Farmers raise chickens following the 1 star certification from the Beter Leven Keurmerk (BLK) label scheme as a minimum. The Better For Nature &amp; Farmer – Broiler program offers enhanced welfare standards that go beyond BLK (Beter Leven Keurmerk) certification by providing better living conditions, such as more outdoor access and natural behavior</li> </ul> </li> </ul>



opportunities, contributing to improved animal well-being and environmental sustainability. 200 farmers and the broiler processor are involved. - Pork: Farmers raise pigs following the 1 star certification from the Beter Leven Keurmerk (BLK) label scheme as a minimum. The Better For Nature & Farmer program – Pigs goes beyond BLK certification by offering higher animal welfare standards. including more space for the pigs, better living conditions, and a focus on sustainability, thereby enhancing both animal well-being and environmental stewardship. 90 farmers and the meat processor are involved. - Eggs: The Better for Nature & Farmer – Egg program is also based on BLK certification as a basis, but goes beyond as it provides hens with better living conditions, such as increased outdoor access and more space, promoting higher animal welfare and greater environmental sustainability. Albert Heijn works with 50 egg farmers and a processor. Certification and Auditing: All programs are based on minimum certification levels (e.g., BLK 1 star) and are audited by third parties to ensure compliance with welfare standards. Premiums and Innovation: Albert Heijn provides premiums to farmers to support long-term investments in animal welfare and sustainable practices. And on beyond the Better for certification programs: • Fish and seafood: All seafood is certified with a certification benchmarked by the Global Sustainable Seafood Initiative (GSSI). • Fish and Seafood: Albert Heijn promotes welfare through research and partnerships, improving conditions for both farmed and wild-caught fish. • Tropical Shrimp: Albert Heijn established a transparent and more sustainable tropical shrimp supply chain together with supply chain partners ensuring better welfare practices (non-eyestalk ablation, more space and electric stunning before slaughter) • Protein Transition: The company aims to shift 50% of its protein sales to plant-based by 2025 and 60% by 2030, further reducing reliance on animal products Please see the company's annual sustainability reports for more Report information "Better for Nature & Farmer Foundation" "Better for Nature & Farmer" - Dairy "Better for Nature & Farmer" - Broiler



<u>"Better for Nature & Farmer" – Pork</u> <u>"Better for Nature & Farmer" – Eggs"</u>

Overview of all minimum sustainability requirements

#### More sustainable tropical shrimp:

https://nieuws.ah.nl/tropische-garnalenketen-bij-albert-heijn-duur zamer-entransparanter/

https://www.wakkerdier.nl/persberichten/albert-heijn-stopt-met-afknippengarnalenogen/

#### Catch Welfare Platform:

https://catchwelfareplatform.com/

https://www.wur.nl/en/show-longread/collaborating-on-fish-welfare.htm



**Disclosure Questionnaire Category: Bottled Water** 

Topic	The company earns revenue from the sale of bottled water
Summary of Issue	The company sells private-label and branded bottled water.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Albert Heijn sells bottled water that accounts for less than 1% of annual revenue.
Impact on Stakeholders	B Lab recognizes the production and sales of bottled water as a material business issue and has a Framework for Evaluating Bottled Water Companies for B Corp Certification. As the company does not reach the 1% revenue threshold for the sale of its own brand of bottled water, B Lab's specific Bottled Water Industry Certification Requirements do not apply at this time.  Water plays a vital role in our society and on the planet. Its significance spans various crucial areas including human rights, public health, food sources, the environment, biodiversity, and climate change.
	The sale of bottled water may impact several stakeholders:  • The source where the water is coming from is often shared with local communities and biodiversity,  • Local municipalities/communities near water extraction sites may experience consequences of the extraction process,  • The water source has extraction limits to maintain a sustainable water level,  • Bottled water is often packed in plastic bottles which can end up as waste and litter.
Implemented Management Practices	These are the company's practices addressing risks related to the Bottled Water Industry:
	Water access Albert Heijn is not responsible for the extraction of water. Its suppliers need to comply with local regulations regarding water rights, including paying taxes upon withdrawal of water when required. Albert Heijn sets minimum sustainability requirements for all of its own brand suppliers and requires them to comply with legislation at all times (see link under "Report"). In addition, the company requires all suppliers (national and own brand) to sign the Standards of Engagement as part of the standard supplier contracting process. Those standards contain principles



	related to human rights and environmental protection (see link under "Report").  Sustainable usage The volume of water withdrawal is below the renewal capacity of the water source / catchment areas. Suppliers monitor the quality and quantity of the water withdrawn. This is overseen by local authorities and documented in an extraction permit. Suppliers monitor efficient water use by measuring their Water Use Ratio (Liter of water used for 1 Liter of end product). Suppliers implement practices to minimize the Water Use Ratio by implementing water-saving technologies and reusing water where possible.
	Distribution The company sources water for its Albert Heijn private label bottled water as locally as possible. The maximum number of kilometers between the source of the water and Albert Heijn's distribution centers is 500 km, and the majority of the water is sourced from within 200 km.
	Waste management Albert Heijn has introduced 'statiegeld' a deposit system on all its plastic water bottles to minimize the potential for littering and ensure a clean recycling process. In addition, all plastic water bottles are made from at least 50% rPET and are fully recyclable.
Report	Minimum sustainability requirements Standards of Engagement Waste management Sustainability reports



### Disclosure Questionnaire Category: Marketing of Breastmilk Substitutes

Topic	The company sells Breastmilk Substitutes
Summary of Issue	The company sells infant formula and complementary foods for infants and children. While selling these products, Albert Heijn follows national and international regulations and guidelines.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Albert Heijn sells breast milk substitutes and complementary foods that represents <1% of its annual revenue.
Impact on Stakeholders	B Lab recognizes the marketing of Breastmilk substitutes as a controversial practice and as such has created additional risk standards for companies who are involved in these practices. While Albert Heijn is below the revenue threshold to meet these Risk Standards, they will be required to disclose practices they have in place to ensure the responsible marketing of breastmilk substitutes. These practices may include compliance with the WHO Code, practices to prevent special promotions on breastmilk substitutes, and clarity on the role of breast milk versus breast milk substitutes.
	WHO and UNICEF recommend exclusively breastfeeding infants until the age of 6 months, and thereafter to introduce safe and adequate complementary foods while continuing to breastfeed up to 2 years or beyond.
Implemented Management Practices	Albert Heijn adheres to WHO's international code of marketing of breastmilk substitutes for infant formula for infants aged 0-6 months and endorses the statement that breastmilk is the best nutrition for infants.
	Albert Heijn complies with the EU regulations 2016/127 and 609/2013 as translated for the Netherlands in the Food regulations manual for specific groups.
	Albert Heijn participates in the code of conduct for infant nutrition as described by the VNFKD [Vereniging van Nederlandse Fabrikanten van Kinder- en Dieetvoedingsmiddelen] as monitored by the KOAG KAG [Keuringsraad Openlijke Aanprijzing Geneesmiddelen (KOAG) en Keuringsraad Aanprijzing Gezondheidsproducten (KAG)] inspection board. In addition, the company adheres to the Dutch Advertising Code (Nederlandse Reclame code) as monitored by



the Dutch Advertising Code Committee (Reclame Code Commissie). Albert Heijn endorses that breastmilk is the best nutrition for an infant up to 6 months. For parents who cannot or choose not to breastfeed exclusively, Albert Heijn ensures that breastmilk substitutes are available. The company does not advertise or promote infant formula for children aged 0-6 months. This is monitored by the KOAG KAG. When customers shop online the following text is added to the product description of infant formula on the website: "Breastfeeding is the most natural and therefore the most suitable food for your baby. Consult with your doctor or health clinic before you decide to start using infant milk. If you no longer can or do not want to breastfeed, you can use infant milk standard 1. You can use this infant milk from birth to the age of 6 months. From 6 months you can switch to follow-on milk standard 2. Always follow the preparation method as stated on the label. There may be risks associated with improper food preparation." In addition, for design, labeling and safety purposes of breastmilk substitutes, all European regulations are followed. Report WHO & Unicef WHO international code of marketing of breastmilk substitutes EU regulations: • 2016/127 • 609/2013 **Dutch regulation - NVWA** Advertisement code Albert Heijn is in continuous dialogue with stakeholders on this **Other Management** topic. This means that we connect with the Dutch Nutrition Comments Center (Voedingscentrum) to adopt the correct communication on infant and child nutrition. We regularly convene with the Association of Dutch Infant and Dietetic Food Industries (Vereniging van Nederlandse Fabrikanten van Kinder- en Dieetvoedingsmiddelen (VNFKD)) and Keuringsraad Openlijke Aanprijzing Geneesmiddelen (KOAG) and Keuringsraad Aanprijzing Gezondheidsproducten (KAG) on this topic.



### **Disclosure Questionnaire Category: Consumer Protection**

Topic	Complaints regarding the company's claims
Summary of Issue	The company disclosed that it had complaints regarding some marketing claims from customers, competitors, and interest groups. The complaints were submitted to the Dutch Advertising Committee (Reclame Code Commissee (RCC)). The claims involve alleged issues with nutrition and sustainability claims, unclear nutritional labelling, and the use of images without proper consent.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the last 5 years, Albert Heijn reported 6 claims filed against them connected to consumer protection issues. No fines or penalties were paid related to these complaints.
Impact on Stakeholders	Misleading nutrition and sustainability claims could mislead consumers and erode trust. Unauthorized use of images may lead to privacy concerns. These issues can damage consumer confidence and create unfair competitive conditions.
Resolution	Albert Heijn stated that it always adheres to the recommendations of the RCC. While the RCC does not have the authority to impose fines, it can refer companies that do not comply with its recommendations to the Netherlands Authority for Consumers and Markets (Autoriteit Consument en Markt (ACM)), which does have the power to impose fines.
	The following are the specific actions taken by Albert Heijn in reaction to each complaint:
	1. Complaint regarding Nutri-Score  a. Complaint: the complainant believed that Albert Heijn should not use Nutri-Score in its advertising, as Nutri-Score was not yet an approved nutritional claim at that time.  b. Findings/Decision: as part of the preparations for the implementation of Nutri-Score, pilots were conducted by Dutch companies to evaluate Nutri-Score's practical application. This pilot was implemented under the condition that findings and information from the pilot would be shared with the Ministry of Health, Welfare and Sport, which Albert Heijn did. Despite the lack of a specific legal basis at the time for using Nutri-Score as a food-choice logo, the Dutch Advertising Committee (RCC) ruled that it could not oppose a practice permitted by the government. The RCC exercised its special authority (in Dutch:



bijzondere bevoegdheid) to declare the complaint valid but chose not to issue a recommendation.

#### 2. Complaint regarding "climate-neutral milk"

a. Complaint: the claim "climate-neutral milk" made by Albert Heijn was challenged for lack of sufficient supporting evidence. b. Findings/Decision: the RCC found that Albert Heijn violated the Environmental Advertising Code (Milieu Reclame Code) by making this claim without sufficient substantiation. The RCC recommended that Albert Heijn should not advertise in this manner anymore. The company adjusted the claim to reflect this.

#### 3. Complaint regarding "most sustainable supermarket"

- a. Complaint: the claim "most sustainable supermarket" was called misleading because the claim was based on perception-based research and only large supermarkets participated in the research supporting this claim.
  b. Findings/Decision: the RCC agreed that Albert Heijn's claim lacked transparency regarding the research details, and recommended Albert Heijn to remove this claim. Albert Heijn
- 4. Complaint regarding "Doe maar lekker duurzaam"

removed this claim nationwide.

- a. Complaint: Albert Heijn's flyer promoting a shopping bag with eight "more sustainable" products was criticized for being vague about how these products were more sustainable.
- b. Findings/Decision: the RCC ruled that Albert Heijn should clarify which ingredients contributed to the sustainability claims rather than implying that the products as a whole were sustainable. The RCC recommended Albert Heijn to stop advertising in this manner. The following year, the campaign was adjusted to "Doe maar lekker vega" and now focuses on products that support the protein transition.

#### 5. Complaint Foodwatch "without added sugar"

- a. Complaint: the claim "No added sugars" on the packaging of the product "AH Knijpfruit Appel & Peer" was disputed. The complainant argued that this claim was misleading because the product contained pear puree concentrate, which had been added for its sweetness.
- b. Findings/Decision: the RCC dismissed the complaint, agreeing with Albert Heijn that the addition of pear puree concentrate did not significantly contribute to the product's sugar content, and the claim was compliant with the Claims Regulation.
- 6. Complaint of pineapple grower that Albert Heijn allegedly



	used his portrait in a commercial (instore poster) without his consent. The matter was settled amicably.
Management Practices	The company shared that it engages with stakeholders through various departments: the Public Affairs department interacts with the government and industry associations; the Quality and Sustainability area collaborates with NGOs; Labour Relations works with trade unions; and Communications handles relations with the media.  Albert Heijn shared that the company has a public grievance mechanism available at https://www.ah.nl/algemene-voorwaarden. This page includes the terms and conditions for online shopping and provides contact details for customer service.  The company has taken steps to ensure that all employees are aware of ACM guidelines regarding sustainability communications and claims.  Since 2016, the company has refrained from marketing unhealthy private-label products to children. The purpose of Albert Heijn, "Together, we make eating better the easy choice", underscores this commitment.  To reduce price-related complaints, the company introduced electronic price labels which reduce errors.  Albert Heijn has a clear claims policy in place for healthy and sustainability related claims. This policy is shared widely and is fully in line with the ACM guidelines. Additionally, linked to the claims policy is a process via which all health and sustainability related claims (on pack, online, in the magazine, or via other channels) are checked and approved by the Health team or the Sustainability team within the Sustainability & Quality department of Albert Heijn. In case of complex claims or claims with a large reach, the legal department is asked for a second opinion.
Report	<ul> <li>RCC complaint regarding Nutriscore</li> <li>RCC complaint regarding claims of "climate neutral milk"</li> <li>RCC complaint regarding claims of "most sustainable supermarket"</li> <li>RCC complaints regarding "Doe Maar Lekker Duurzaam" campaigns and 2 and 3</li> <li>RCC complaint Foodwatch 'without added sugar'</li> <li>RCC Complaint of pineapple grower on portrait right</li> </ul>



### Disclosure Questionnaire Category: Operations located in Conflict Zones

Topic	Company has suppliers located in Conflict Zones
Summary of Issue	One of Albert Heijn's own brand tier-one suppliers is located in Israel, a country identified by the Global Conflict Tracker as being a conflict zone (https://www.cfr.org/global-conflict-tracker). The nature of the conflict ranges from war, to economic and political instability.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In 2024 (year to date), <1% of Albert Heijn's total revenue from own brand products came from the supplier located in Israel.
Impact on Stakeholders	Business activities located in conflict zones are considered high-risk due to ongoing conflicts and sociopolitical instability.
	Countries classified as conflict zones are more likely to have a weak rule-of-law or a corrupt judicial system, which could undermine the effectiveness of operational grievance mechanisms for these businesses and their suppliers. In addition, the safety of the company's workers and other potential human rights violations are at risk.
Implemented Management Practices	All suppliers to Albert Heijn must adhere to national and international laws and regulations concerning product labeling. Albert Heijn ensures compliance with Dutch and European labeling standards and indicates the country of origin on products where required by law. For products where country-of-origin labeling is not mandated, customers can contact Albert Heijn to inquire about the product's origin. Albert Heijn can provide this information using its internal product specification database. Albert Heijn also requires certification (including but not limited to Fairtrade, Rainforest Alliance, Global Organic Textile Standard (GOTS), Roundtable on Sustainable Palm Oil (RSPO), Beter Leven Keurmerk (BLK), and Forest Stewardship Council (FSC)) for many own brand food and textile products and for packaging.  At management level, there is a working group that discusses issues related to products from disputed regions and it translates these discussions into policies and actions. Identification and mitigation of the risks related to countries of origin are also included in Albert Heijn's standard due diligence



	are taken seriously. Social compliance is ensured through Amfori BSCI Audit in high-risk countries.
Report	Minimum sustainability requirements



**Disclosure Questionnaire Category: Litigation** 

Issue Date	Ongoing since 2014
Topic	Franchise-related litigation
Summary of Issue	240 franchisees of Albert Heijn have filed a lawsuit against the company. The claims revolve around differing interpretations of the Albert Heijn franchise agreement. The interpretation upheld by the franchisees is more favorable to them than the historically and currently upheld position by Albert Heijn.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The franchisees involved in this lawsuit represent over 90% of Albert Heijn's total franchise network.
Impact on Stakeholders	The primary impact related to the litigation is the interpretation of the franchise agreement between Albert Heijn and the franchisees.
Resolution	This lawsuit is still pending.
Implemented Management Practices	Discussions are currently ongoing to investigate whether the case can be resolved between the parties without the intervention of the court.
Report	Hoge Raad



### **Disclosure Questionnaire Category: Other Disclosure Industries**

Issue Date	Ongoing
Topic	The company sells lottery tickets in its stores
Summary of Issue	Albert Heijn has partnered with the Nationale Loterij (the Netherlands National Lottery) to support various promotional activities and offers. As part of this collaboration, Albert Heijn sells lottery tickets in its stores. The Netherlands National Lottery is a charity lottery and supports charities on various social and environmental topics.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In 2023, the company reported that <1% of its annual revenue came from lottery ticket sales.
Impact on Stakeholders	Selling lottery tickets can pose significant risks, including the potential for addiction to gambling. Problem gambling may lead to various negative consequences, such as personal distress, strained relationships, vocational challenges, financial instability, and even legal issues.
Implemented Management Practices	To support employees involved with the sale of lottery tickets, Albert Heijn actively shares the Code of Conduct of the Nederlandse Loterij. This Code of Conduct is an essential component of the e-learning modules.  Additionally, through their Intranet, Albert Heijn provides guidance to its employees regarding the sale of lottery tickets. The company also educates employees on recognizing gambling addiction and implements measures to mitigate this risk, such as limiting customers to purchasing no more than €200 worth of lottery tickets at a time.  According to Albert Heijn, the Dutch Lottery places a strong emphasis on responsible gambling. A lot of attention is given to mandatory learning. In addition, regional managers regularly visit stores to share knowledge and answer questions.  Albert Heijn does not include lottery products in its magazines or promotional folders.



**Disclosure Questionnaire Category: Recalls** 

Issue Date	2018-2022
Topic	Recalls related to food safety
Summary of Issue	The company has had 181 recalls in the last five years due to food product safety. Issues include pathogens detection, labeling issues, deviation from recipe, packaging, shelf-life indication, foreign bodies and content weight.
	There was an increase in recalls in 2020 and 2021 due to recalls on sesame seeds which contained ethylene oxide. Ethylene oxide is used as a disinfectant. Multiple batches of sesame seeds contaminated with ethylene oxide were discovered in the EU from a country of origin where treatment with ethylene oxide is allowed. Ethylene oxide concentration exceeded the maximum residue limit of 0.05 mg/kg.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The company has had 181 recalls in the last five years. The value of recalled products was less than 1% of the revenue in the last fiscal year (0.0058%).
Impact on Stakeholders	Customers and suppliers are the impacted stakeholders. No injuries or illnesses were reported due to the recalls.
Implemented Management Practices	The company shared the following practices to remediate/avoid the issues from happening again:
	1. The recalls were communicated to consumers via the Albert Heijn website, a press release, and on social media (Facebook and X). Local authorities were also informed. The press release was also shared with the Dutch General Press Agency (Algemeen Nederlands Persbureau), and in case of a recall linked to allergens it was shared with voedselallergie.nl.
	2. Albert Heijn requires suppliers of private-label products that have been recalled to conduct a Root Cause Analysis. They must also outline corrective actions and measures to prevent future recalls. If there are concerns about the effectiveness of these measures or any doubts regarding the supplier, Albert Heijn employs a system to assess the supplier's risk category, as well as that of the product. Should the supplier be rated at a higher risk level, the quality manager will collaborate with the supplier to develop an improvement plan. This plan will be



monitored, and if necessary, additional audits or laboratory tests will be conducted.

3. The company collaborates closely with suppliers and universities to develop innovative practices for controlling pathogens. Products and suppliers are classified into low, medium, and high-risk categories. Based on the level of risk identified, the company implements appropriate control measures.