



Duurzaamheidsverslaggeving en de rol van de accountant

Dr. Kavita Nandram RA



Agenda



RECENTE ONTWIKKELINGEN - NIET-FINANCIËLE VERSLAGGEVING: ESG, CSRD, OMNIBUS



PRAKTIJKVOORBEELDEN CSRD
VERSLAGGEVING EN DUBBELE
MATERIALITEIT



DE ROL VAN DE ACCOUNTANT BIJ
DE CONTROLE VAN NIET-FINANCIËLE
VERSLAGGEVING



Limperg Instituut

Recente ontwikkelingen - ESG, CSRD, Omnibus





Professor Johan Rockström

Director, Stockholm Resilience Centre, Stockholm University





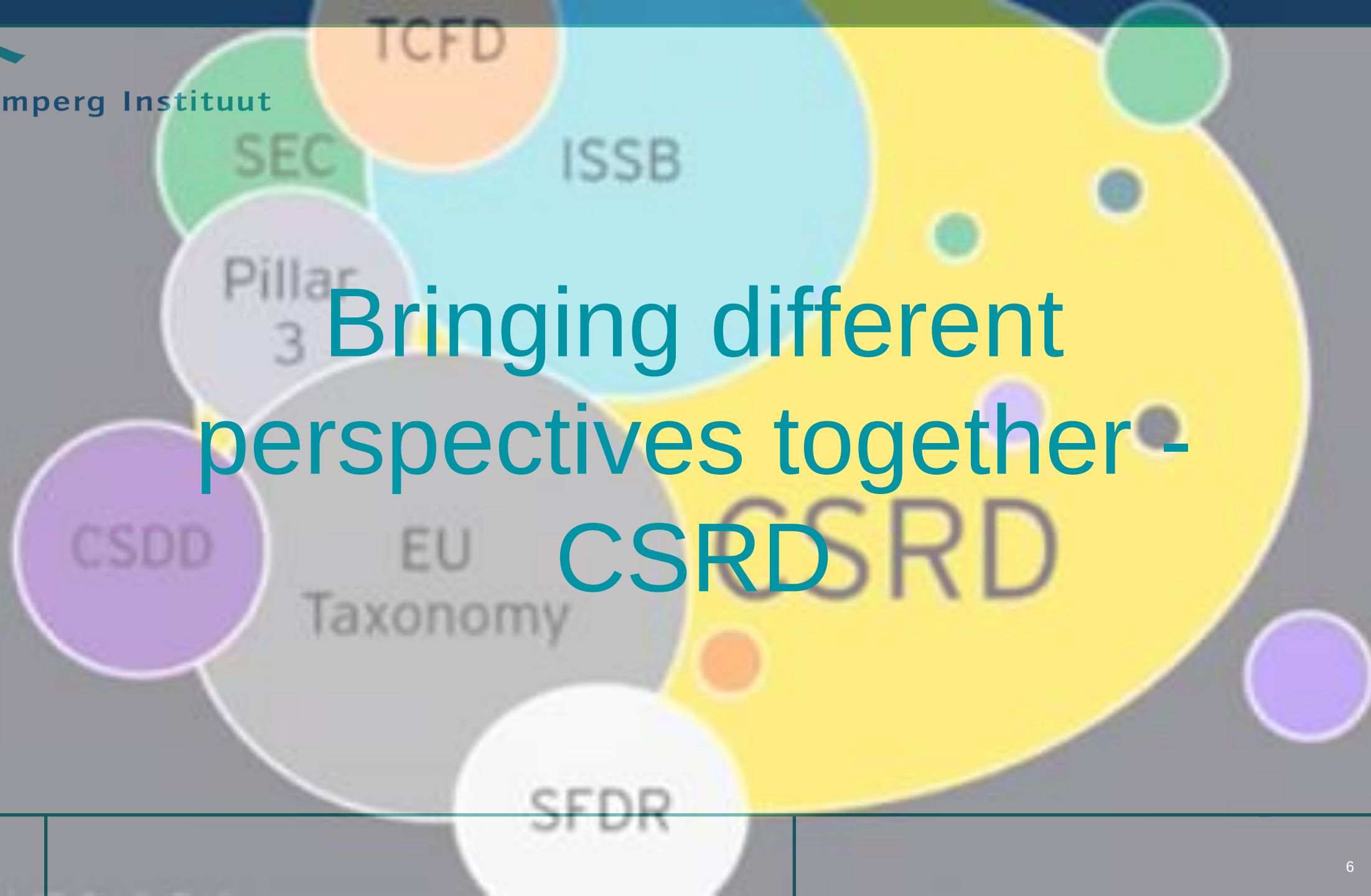
Limperg Instituut

The ESG reporting soup!





Bringing different perspectives together - CSRD





Europese Sustainability Reporting Standaarden (ESRS)

Opbouw van de ESRS:

SECTOR-AGNOSTIC STANDARDS					
Cross cutting standards	Topical standards			SECTOR-SPECIFIC STANDARDS (coming later) ✗	
	Environment	Social	Governance		
	ESRS 1 General requirements	ESRS E1 Climate change	ESRS S1 Own workforce		ESRS G1 Business conduct
	ESRS 2 General disclosures	ESRS E2 Pollution	ESRS S2 Workers in the value chain		
		ESRS E3 Water and marine resources	ESRS S3 Affected communities		
		ESRS E4 Biodiversity and ecosystems	ESRS S4 Consumers and end-users		
ESRS E5 Resource use and circular economy					
				SME-PROPORTIONATE STANDARDS	

Kwalitatieve informatie
zoals bijv. klimaat beleid
en betalingsvoorwaarden

Kwantitatieve informatie
zoals hoeveelheid plastic
afval en gelijke beloningen.



Limperg Instituut

Laatste updates Omnibus voorstel

Invoeren duurzame regels kan beter goed dan snel



Koninklijke Nederlandse
Beroepsorganisatie
van Accountants

Maart, 2025

CSRD alleen nog voor grootste bedrijven

Europese Commissie publiceert Omnibus-pakket

De Europese Commissie heeft het 'Omnibus-vereenvoudigingspakket' gepresenteerd, waarmee de regels voor duurzaamheidsrapportages (CSRD) worden versoepeld. De rapportageverplichtingen gaan alleen nog gelden voor de grootste ondernemingen. Met deze maatregelen wil de EC de administratieve lasten verlagen en een gunstiger ondernemingsklimaat creëren.

Volgens de Europese Commissie zorgt dit pakket voor een besparing van ruim zes miljard euro aan administratieve lasten en mobiliseert het extra investeringscapaciteit. De voorstellen worden nu voorgelegd aan het Europees Parlement en de Raad en krijgen prioriteit bij de behandeling.

De NBA volgt deze ontwikkelingen op de voet en analyseert de impact op accountants en hun werkzaamheden.



AFM

Maart, 2025

Omnibusvoorstel beperkt CSRD-verplichtingen, AFM handhaaft ingroeipad

In het kort

- Omnibusvoorstel: verkleinde reikwijdte en inperking rapportageverplichtingen
- AFM benadrukt belang transparantie en betrouwbaarheid
- Duurzaamheidsverslagen 2024 zijn onderdeel van CSRD-ingroeipad
- Geplande onderzoeken dragen bij aan learning curve
- Oproep AFM: blijf inzetten op transparante duurzaamheidsinformatie



Limperg Instituut

‘Stop-the-clock’ goedgekeurd

Uitstel van CSRD- rapportageplicht voor grote ondernemingen naar boekjaar 2027 definitief

De Europese Commissie, de Europese Raad en het Europese Parlement hebben ingestemd met de ‘stop-the-clock’ directive als onderdeel van de Omnibus-voorstellen. Daarmee is het uitstel van de rapportageverplichting onder CSRD voor grote ondernemingen die vanaf boekjaar 2025 zouden gaan rapporteren op basis van CSRD definitief.

Dit levert voorlopig de volgende rapportageverplichting op:

	Organisatie van Openbaar Belang > 500 medewerkers	Grote onderneming	Beursgenoteerde mkb- onderneming	Niet-EU onderneming omzet > € 450 miljoen
	<i>CSRD-rapportageplicht vanaf boekjaar:</i>			
Oude CSRD	2024	2025	2026	2028
Stop the Clock	2024	2027	2028	2028



Wat verandert er door het Omnibus voorstel?

Ongeveer 80% van de bedrijven die onder de reikwijdte van de CSRD vallen, wordt naar schatting vrijgesteld van rapportageverplichtingen

Onderwerp	Huidige vereisten	Voorgestelde wijziging
Scope	- Beursgenoteerde, grote en beursgenoteerde MKB ondernemingen	- Beursgenoteerde en grote ondernemingen met meer dan 1.000 medewerkers blijven binnen de reikwijdte. - Beursgenoteerde MKB hoeven niet te rapporteren volgens de standaarden voor beursgenoteerde MKB, maar kunnen vrijwillig rapporteren volgens VSME (Vrijwillige ESRS voor MKB's) zoals elke andere MKB.
Waardeketen	- Beperking van wat de ESRS van entiteiten kan vereisen om van hun partners in de waardeketen op te vragen.	- Rapporterende ondernemingen mogen geen aanvullende duurzaamheidsinformatie van MKB's in hun waardeketen vragen, anders dan wat is gespecificeerd in de vrijwillige ESRS voor MKB's.
Assurance	- In de eerste jaren beperkte assurance en later zal dit overgaan naar reasonable assurance - In 2026 wordt er een assurance standaard aangenomen door de EC	- Tegen 2026 zullen verdere richtlijnen voor beperkte assurance beschikbaar worden gesteld. - De vereiste om standaarden voor redelijke assurance aan te nemen is verwijderd om hogere zekerheidskosten te vermijden.
Standaarden	- ESRS - Sector-specifieke standaarden	- ESRS zal worden herzien met minder datapunten - Geen sector-specifieke standaarden



Het is een voorstel – Next step is goedkeuring EU en implementatie in nationale wetgeving

Het ESG Omnibus-voorstel werd gepubliceerd op 26 februari 2025.

Stap 1

Stap 2

Het wetgevingsproces van de Omnibus duurt naar verwachting ongeveer 3-4 maanden (versnelde procedure) als het voorstel van de Commissie voldoende steun vindt in de Europese Raad en in het Europees Parlement.

Stap 3

Het Omnibus-pakket moet dan worden goedgekeurd door beide medewetgevers en gepubliceerd in het Publicatieblad van de EU. De wijziging van de EU-taxonomieverordening, zodra deze is gepubliceerd, wordt rechtstreeks van toepassing op alle EU-lidstaten, zonder de noodzaak van omzetting.

Stap 4

Ondertussen - voor CSRD en CSDDD - is er vanaf publicatie een periode van twaalf maanden voor alle EU-lidstaten om deze in hun nationale wetgeving op te nemen (omzetting).

Stap 5

De Europese Commissie streeft ernaar de herziene ESRS uiterlijk zes maanden na de publicatie van het voorstel in het Publicatieblad van de EU aan te nemen.



Limperg Instituut

Praktijkvoorbeelden CSRD verslaggeving





Bestuursverslag - Sustainability statements

Limpe Contents

strategic report

our business	4	our strategic priorities	21
group highlights	5	thriving people	21
message from our CEO	7	healthy communities & planet	23
year in review	9	vibrant customer experiences	25
our great local brands	11	trusted product	27
our growing together strategy	16	driving customer innovation	29
introducing our growing together strategy	17	portfolio & operational excellence	31
		our value chain	33
		our value creation model	34
		performance review	35
		targets and results	36
		financial group review	37
		financial review by segment	58
		outlook	64
		information about Ahold Delhaize shares	66
		multiple year overview	69
		risks and opportunities	71
		ERM principal risk profile	72
		principal risks and uncertainties	74

sustainability statements

general information	84
environmental information	101
social information	145
governance information	171
sustainability notes	172

corporate governance

governance	208
our Management Board and Executive Committee	209
our Supervisory Board	211
corporate governance	213
message from the Supervisory Board Chair	218
Supervisory Board report	219
governance, risk and compliance	226
declarations	231
remuneration	233
message from the Remuneration Committee Chair	234
executive remuneration principles and procedures	236
Management Board remuneration	237
Supervisory Board remuneration	254

financial statements

financial statements	257
notes to the consolidated financial statements	263
parent company financial statements and notes	328

other information

audit report on the financial statements	339
assurance report on the sustainability statements	347
distribution of profit and shareholder rights	350
contact information	351
key dates	352
definitions and abbreviations	353
financial alternative performance measures	362
appendix to the sustainability statements	365
cautionary notice	381

compliance statement

This document is the PDF/printed version of Ahold Delhaize's Annual Report 2024 and has been prepared for ease of use. The Annual Report 2024 was made publicly available pursuant to section 5:25c of the Dutch Financial Supervision Act (Wet op het financieel toezicht), and was filed with Netherlands Authority for the Financial Markets in European single electronic reporting format (the ESEF package). The ESEF package is available on the company's website at www.aholddelhaize.com and includes a human-readable XHTML version of the Annual Report 2024. In the case of any discrepancies between this PDF version and the ESEF package, the latter prevails.



Dubbele Materialiteitsanalyse

Financiële materialiteit: Wat is de impact van bijvoorbeeld klimaatverandering op de onderneming?



Impact materialiteit: Wat is de impact van de onderneming op bijvoorbeeld de omgeving of het klimaat?

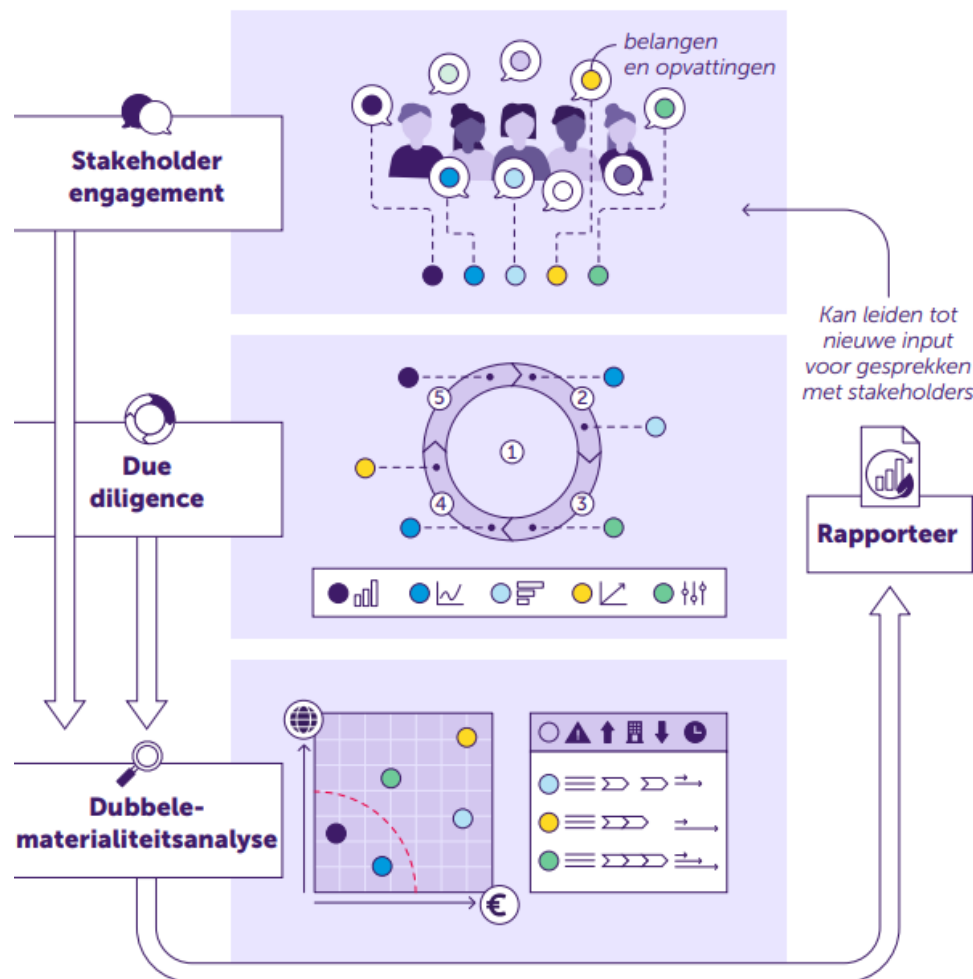


Het is van belang dat de uitkomsten van de dubbele materialiteitsanalyse gedeeld en gedragen worden door de organisatie en onderdeel uitmaken van strategische beleid en beslissingen



Limperg Instituut

10 Navigatiepunten CSRD – AFM, juli 2024



10 navigatiepunten



Stakeholder engagement: laat zien hoe stakeholders worden meegenomen

- 1 Wees transparant over de representativiteit van stakeholder engagement.
- 2 Laat de ontvangen input van stakeholders zien.



Due diligence: inventariseer de duurzaamheidseffecten

- 3 Inventariseer duurzaamheidseffecten via due diligence.
- 4 Gebruik internationale handvatten, zoals OESO-richtlijnen.
- 5 Geef de relatie weer tussen due diligence en de dubbele materialiteitsanalyse.



Dubbele materialiteitsanalyse: licht analyse transparant toe

- 6 Maak de rol van de waardeketen inzichtelijk.
- 7 Koppel de bedrijfsactiviteiten aan geïdentificeerde materiële onderwerpen.
- 8 Geef inzicht in de materialiteitsbepaling van duurzaamheidsonderwerpen.
- 9 Breng de materialiteit van impact, kansen en risico's in beeld.
- 10 Geef de relatie weer tussen impact en risico op korte en lange termijn.

Our material sustainability matters, including the related impacts, risks and opportunities

Impact, risk or opportunity	— Impact materiality: Negative impact	+ Impact materiality: Positive impact	! Financial materiality: Risk	☆ Financial materiality: Opportunity
Value chain ¹	← Upstream	○ Own operations	→ Downstream	
Time horizon ¹	S Short-term	M Medium-term	L Long-term	

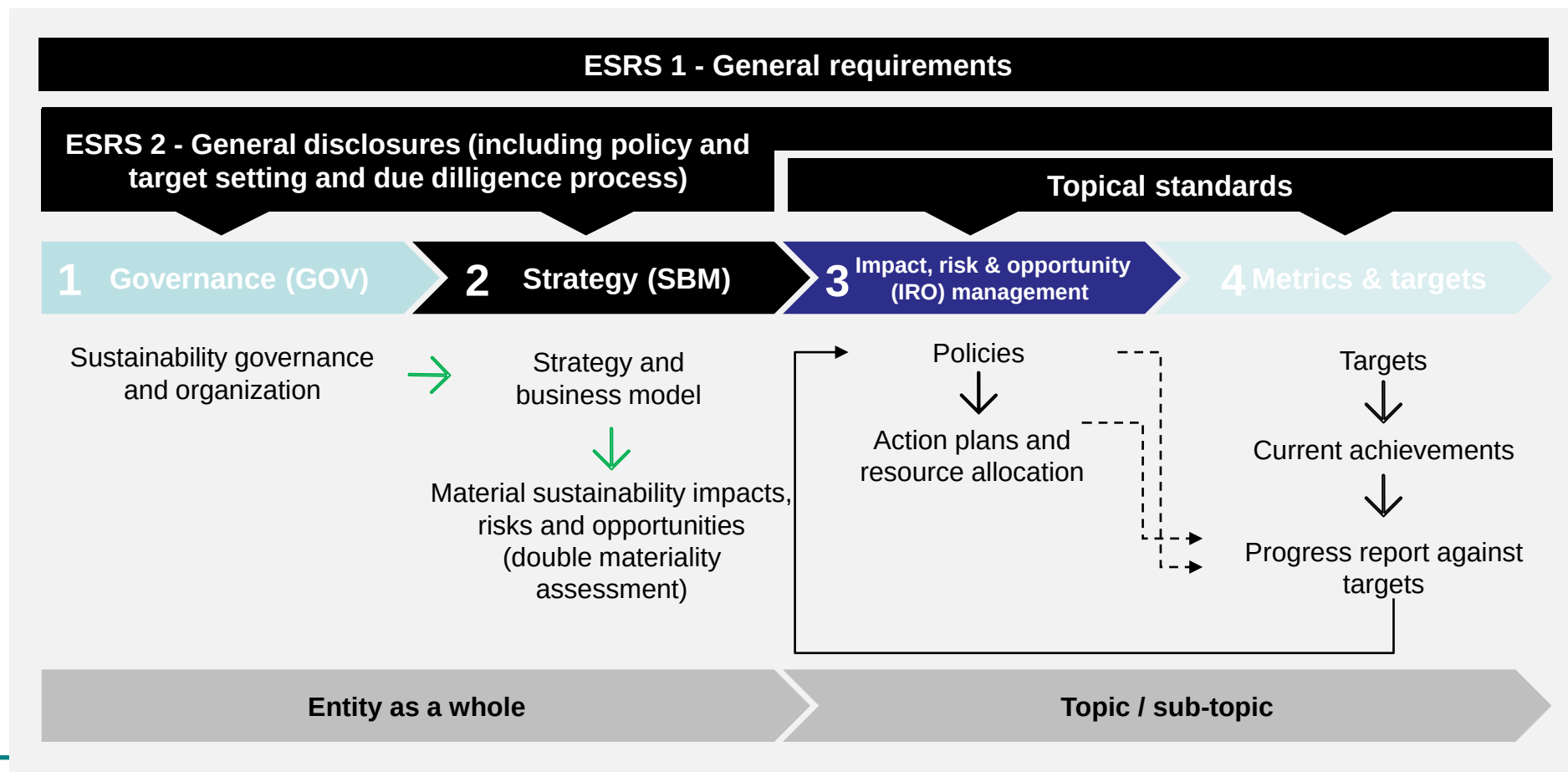
1. Dark green indicates applicability for the material sustainability matter/impact

Growing Together strategy	Descriptions and definition of material sustainability matter / impact, risk and opportunity	IRO	Value chain	Time horizon	Main SDG related to this topic
Environmental: Climate					
Healthy communities & planet 	Climate change: Understanding and mitigating business impacts on climate change by reducing scope 1, 2 and 3 GHG emissions across the value chain. This includes our approach to mitigating and adapting to potential physical and transition risks, as well as the identification of potential climate-related opportunities in the transition to a lower-carbon economy.				  
	Climate change mitigation (CCM) and energy use: Impact on the environment, nature and people through the direct GHG emissions from the own operations (scope 1) of Ahold Delhaize and its brands as well as the indirect GHG emissions from purchased electricity, heat, cooling and steam (scope 2)	—	← ○ →	S M L	
	CCM: The impact on the environment, nature and people through scope 3 GHG emissions. Scope 3 GHG emissions include those generated by farmers, producers and suppliers, mainly from activities related to the production of goods that are sold to customers.	—	← ○ →	S M L	
	CCM – transition risk: Transitioning to a lower-carbon economy may entail extensive policy, legal, technological and market changes, to address mitigation and adaptation requirements. These events can include the introduction of carbon pricing, product composition restriction, changes in customer preferences and energy price volatility, which may pose an economic risk to the Company.	!	← ○ →	S M L	
	Climate change adaptation (CCA) – physical risk: The risk of acute and chronic climate events due to extreme weather events, which can cause damage to own (vulnerable) assets (e.g., own office buildings, stores and warehouses) or to our distribution infrastructure, which can result in out-of-stock situations and subsequently store closures or impacts on our brands' ability to make home deliveries	!	← ○ →	S M L	
	CCA – physical risk: The risk of acute and chronic climate events due to extreme weather events, which can cause decreases in agricultural yields (e.g., yield volatility and yield loss) and commodity scarcity	!	← ○ →	S M L	
Environmental: Nature					
Healthy communities & planet 	Pollution: The pollution of air, soil, water and living organisms and food resources through the emissions of pollutants including nitrates, phosphates, pesticides, non-GHG air pollutants and microplastics, which may be harmful to human health and the environment. This occurs during the mining, cultivation, production or transport of products and services sold by Ahold Delhaize and its brands.				 
	Pollution of air, soil, water, living organisms and food resources: Impact on air quality, soil, water, living organisms and food resources through the emission of pollutants caused by the sourcing, production and transport of products and services sold by Ahold Delhaize and its brands	—	← ○ →	S M L	
	Microplastics: Impact on the environment and customers from the products sold and consumed by customers that contain microplastics and can have negative effects on the environment and human health. Pollution can also originate in the production and use of microplastics in health and beauty products and the associated plastic waste that leaks into ecosystems.	—	← ○ →	S M L	
	Microplastics – transition risk: Regulatory and reputational risks due to new or stricter regulations regarding the use and sale of (products containing) microplastics resulting in failure to meet stakeholder expectations. Regulatory requirements could impact product assortment, requiring reformulation or discontinuing of products.	!	← ○ →	S M L	



Wat moeten organisaties rapporteren op basis van ESRS 2?

FOUR PILLARS





Limperg Instituut

Novo Nordisk, AR24

2.4 Water

Water is an essential natural resource in the manufacturing of Novo Nordisk’s pharmaceutical products and a key input to many commodities in our supply chain. Hence, water management is key to both our own operations and to our value chain, where we as part of our new nature roadmap, further described on page 68, are expanding actions and engaging suppliers to mitigate our negative impacts on water resources.

Material impacts, risks and opportunities (IROs)

Identified IRO	Category	Value chain
Availability and deterioration of water resources	–	• Upstream • Own operations • Downstream

Negative impacts on water availability occur when we source water for production purposes, especially in water-stressed areas, and at the end-stage of production, when water is discharged to water treatment plants, which can impact water quality. Resilience is assessed as part of our nature and biodiversity efforts and is further described in the transition plan in section 2.5 'Biodiversity and ecosystems' on page 68.

Processes to identify impacts, risks and opportunities

To assess water-related impacts, risks, and opportunities, we conduct screenings of our production sites for areas of water stress and risk using the tool Aqueduct 4.0 from the World Resource Institute (WRI). As part of our engagement in water stewardship, in 2024 we conducted stakeholder engagements with water management authorities and other industrial water users at our sites in Montes Claros, Brazil, and Hillerød, Denmark, and at our largest API production sites: Clayton, US, and Kalundborg, Denmark.



Water withdrawal, consumption and discharge

Policies

Novo Nordisk's environmental policy addresses water management and sets out our ambition to design less water-intensive processes by reusing and recycling water. We treat production-related water discharge onsite and/or offsite and avoid water pollution by discharging water in accordance with local regulations, and in case of any breaches, we take corrective actions.

In addition, our environmental policy also addresses our special focus on water withdrawal in areas of high water-stress or risk, both at our own sites and with suppliers of key commodities, for example through our water withdrawal savings programme and planned efforts to engage priority suppliers. The policy also addresses our support of water stewardship principles and collective actions in water basins that are under pressure, for example in our current efforts to establish district cooling in Kalundborg and planned efforts to enhance water quantity and quality as detailed in the key actions below.

Key action to address water	Description and year of completion	Scope of action	Target in place	Overall progress in 2024 and how we track effectiveness
Water withdrawal savings programme	Efficiency projects at production sites in scope, including optimisation of water use, creating systems for single and multiple reuse and recycling. We systematically map opportunities for water savings to create detailed savings plans, and the programme is planned to run until 2033.	Production sites with high water withdrawals and/or high water-risk/stress area	No	- To track the effectiveness, sites in scope forecast expected water withdrawals and implement water savings initiatives. Water savings are registered per initiative via an internal dashboard. - Total water savings in 2024 amounted to 105,600 m³, of which 51,000 m³ was in areas of high water-stress and/or water risk.
Engaging priority suppliers	Engaging priority suppliers on their water impacts through a capability-building programme. Planned for 2025-2033	Key suppliers to be identified	No	Action to be initiated in 2025, when processes for tracking effectiveness will be established.
Taking actions outside of sites	Enhancing water quantity and quality outside of our sites, including replenishing water. Planned for 2025-2033.	Upstream value chain	No	Action to be initiated in 2025, when processes for tracking effectiveness will be established.
Saving water through the establishment of district cooling in Kalundborg	Establishment of district cooling at our largest production site in Kalundborg, Denmark, which accounts for half of our total water withdrawals, including phasing out the use of water from Lake Tissø. Industrial collaboration with the Kalundborg Symbiosis, Kalundborg Utility, and Novonesis. Expected completion of construction during 2026.	Production site in Kalundborg, Denmark	No	- Progressed with the construction process, which is expected to be finalised during 2026, with surrounding factories connected from 2026 onwards. - Expected annual water withdrawal savings upon completion estimated at 400,000 m³.
Doubling wastewater treatment capacity in Kalundborg	Expansion of on-site wastewater treatment operated by Novonesis, doubling the industrial wastewater and biomass treatment capacity. Energy is recovered in the treatment process as part of the Kalundborg Symbiosis. To be completed in 2026.	Production site in Kalundborg, Denmark	No	Project launched and construction has started.

Actions

We implemented and planned several actions in 2024 to mitigate our impacts on water, as part of our Circular for Zero strategy and our new nature roadmap, described further on page 68. Key actions to mitigate negative impacts on water are listed in the table on this page.

Performance

We have not set external targets on water, but systematically track water withdrawals and water savings as part of our water withdrawal savings programme, as described in the table of key actions. In 2024, we experienced an increase in water withdrawal of 26% compared to 2023 due to our growth. Most of the increase is due to increased API production, as well as water used in expansion and construction projects. In 2024, the organisational scope of water withdrawal expanded to also include water withdrawals for offices and research facilities outside of Denmark, which increased the total water withdrawal by further 3%.

Most of water drawn into the boundaries of Novo Nordisk is used for cooling and the fermentation process, and is subsequently discharged, making the actual water consumption relatively low. The largest share of water consumed comes from evaporation, water waste (sludge) and water in our products. We estimate that, in 2024, over 400 thousand m³ of water were reused or recycled at our production facilities.

Production sites in China (Tianjin), US (Clayton and Durham), Iran (Tehran) and Algeria (Blida) are located in areas with high or extremely high water-stress and/or water risk. These sites account for approximately 23% of the total water withdrawal, with the biggest withdrawal occurring in the US and China.

2.4.1 Water consumption	Unit	2024	2023	2022
Total water consumption	1,000 m ³	630	-	-
• Water withdrawal ¹	1,000 m ³	5,213	4,150	3,918
• Water discharge	1,000 m ³	4,583	-	-
Total water consumption in areas at water risk, including areas of high water stress	1,000 m ³	191	-	-
• Water withdrawal	1,000 m ³	1,217	-	-
Total water recycled and reused	1,000 m ³	416	-	-
Water intensity ratio	m ³ /mDKK	2.17	-	-

1. Water withdrawal was previously reported as 'Water consumption'.



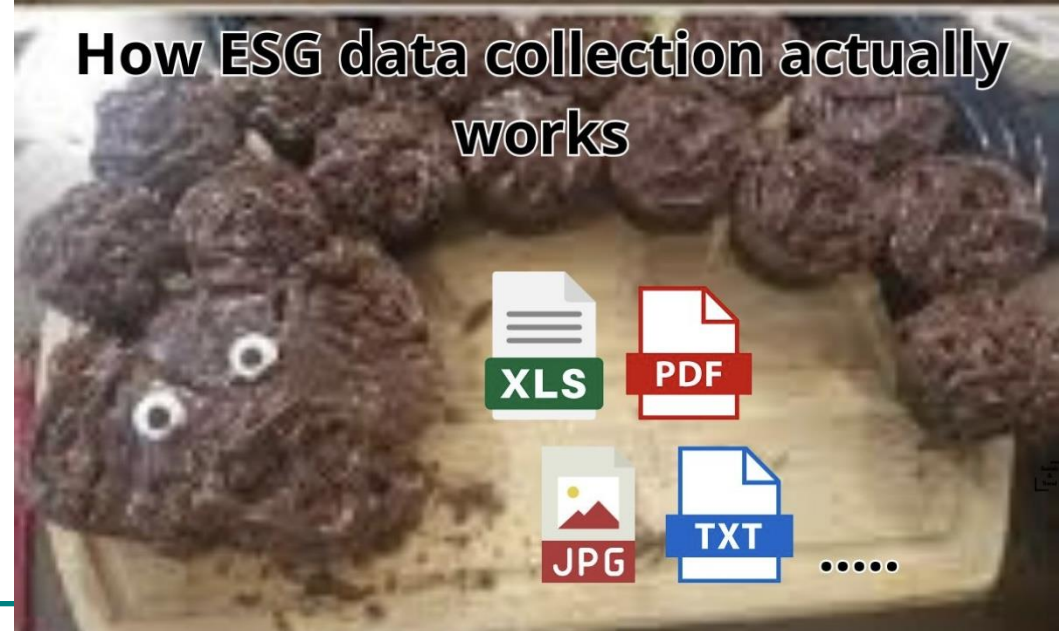
Limperg Instituut

ESG Data collection toch ingewikkeld...!

How ESG data collection is
envisioned



How ESG data collection actually
works





Limperg Instituut

De rol van de accountant bij de controle van niet-financiële verslaggeving





Wat verandert er door het Omnibus voorstel?

Onderwerp	Huidige vereisten	Voorgestelde wijziging
Assurance	- In de eerste jaren beperkte assurance en later zal dit overgaan naar reasonable assurance - In 2026 wordt er een assurance standaard aangenomen door de EC	- Tegen 2026 zullen verdere richtlijnen voor beperkte assurance beschikbaar worden gesteld. - De vereiste om standaarden voor redelijke assurance aan te nemen is verwijderd om hogere zekerheidskosten te vermijden.



Greenwashing in ESG Verslaggeving: De Rol van de Accountant en het Belang van Assurance





Voorbeeld: limited assurance rapport

Limited assurance report of the independent auditor

To: the Supervisory Board of Koninklijke Ahold Delhaize N.V.

Limited assurance report on the sustainability statements 2024 included in the annual report

Our conclusion

We have performed a limited assurance engagement on the sustainability statements 2024 of Koninklijke Ahold Delhaize N.V. (Ahold Delhaize or the Company) based in Zaandam, the Netherlands. The sustainability statements include the sections general-, environmental-, social- and governance information, and the notes and the appendix to the sustainability statements, including the information incorporated in the sustainability statements by reference (sustainability statements).

Based on the procedures performed and the assurance evidence obtained, nothing has come to our attention that causes us to believe that the sustainability statements are not, in all material respects:

- prepared in accordance with the European Sustainability Reporting Standards (ESRS) as adopted by the European Commission and in accordance with the double materiality assessment process carried out by Ahold Delhaize to identify the information reported pursuant to the ESRS; and
- compliant with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation).

Basis for our conclusion

We performed our limited assurance engagement on the sustainability statements in accordance with Dutch law, including Dutch Standard 3810N 'Assurance-opdrachten inzake duurzaamheidsverslaggeving' (Assurance engagements relating to sustainability reporting) which is a specified Dutch standard that is based on the International Standard on Assurance Engagements (ISAE) 3000 (Revised) 'Assurance engagements other than audits or reviews of historical financial information'. Our responsibilities under this standard are further described in the section 'Our responsibilities for the assurance engagement for the sustainability statements' section of our report.

We are independent of the Company in accordance with the 'Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence). Furthermore, we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics for Professional Accountants).

We believe the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Emphasis of matter

We draw attention to section 'basis of preparation' as included in chapter 'General information' of the sustainability statements starting on page 85. This section sets out that the sustainability statements have been prepared in a context of new sustainability reporting standards requiring entity-specific and temporary interpretations. The 'Data collection and considerations' paragraph for the sustainability indicators address inherent measurement or evaluation uncertainties. These paragraphs identify the quantitative metrics and monetary amounts that are subject to a high level of measurement uncertainty and discloses information about the sources of measurement uncertainty and the assumptions, approximations and judgements the Company has made in measuring these in compliance with the ESRS.

The comparability of sustainability information between entities and over time may be affected by the lack of historical information in accordance with the ESRS. This allows for the application of different, but acceptable, measurement techniques, especially in the initial years.

The section 'Impact, risk and opportunity management', also included in chapter 'General information', explains the ongoing due diligence and double materiality assessment process, including robust engagement with affected stakeholders. Due diligence is an on-going practice that responds to and may trigger changes in the Company's strategy, business model, activities, business relationships, operating, sourcing and selling contexts. The sustainability statements may not include every impact, risk and opportunity or additional entity-specific disclosure that each individual stakeholder may consider important.

Our conclusion is not modified in respect to this emphasis of matter.

Limitations to the scope of our assurance engagement

Limited assurance has been provided on selected ESG information reported in the prior year annual report, however, not in the context of the new sustainability reporting standards (ESRS). Consequently, the comparative information 2023 has not been subject to limited assurance procedures in the context of the ESRS.

In reporting forward-looking information in accordance with the ESRS, the Management Board of the Company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Company. The actual outcome is likely to be different since anticipated events frequently do not occur as expected. Forward-looking information relates to events and actions that have not yet occurred and may never occur. We do not provide assurance on the achievability of this forward-looking information.

The references to external sources or websites in the sustainability information are not part of the sustainability information as included in the scope of our assurance engagement. We therefore do not provide assurance on this information.

Our conclusion is not modified in respect to these matters.

Assurance report on the sustainability statements continued

Description of responsibilities regarding the sustainability statements

Responsibilities of the Management Board and Supervisory Board for the sustainability statements

The Management Board is responsible for the preparation of the sustainability statements in accordance with the ESRS, including the double materiality assessment process carried out by the Company as the basis for the sustainability statements and disclosure of material impacts, risks and opportunities in accordance with the ESRS. As part of the preparation of the sustainability statements, the Management Board is responsible for compliance with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation). The Management Board is also responsible for selecting and applying additional entity-specific disclosures to enable users to understand the Company's sustainability-related impacts, risks or opportunities and for determining that these additional entity-specific disclosures are suitable in the circumstances and in accordance with the ESRS.

Furthermore, the Management Board is responsible for such internal control as it determines is necessary to enable the preparation of the sustainability statements that is free from material misstatement, whether due to fraud or error.

The Supervisory Board is responsible for overseeing the sustainability reporting process including the double materiality assessment process carried out by the Company.

Our responsibilities for the assurance engagement for the sustainability statements

Our responsibility is to plan and perform the assurance engagement in a manner that allows us to obtain sufficient and appropriate assurance evidence for our conclusion.

Our assurance engagement is aimed to obtain a limited level of assurance to determine the plausibility of sustainability information. The procedures vary in nature and timing from, and are less in extent, than for a reasonable assurance engagement. The level of assurance obtained in a limited assurance engagement is therefore substantially less than the assurance that is obtained when a reasonable assurance engagement is performed.

A further description of our responsibilities for the assurance engagement on the sustainability statements is included in the appendix of this assurance report. This description forms part of our assurance report.

Amstelveen, February 25, 2025

KPMG Accountants N.V.

E.J.L. van Leeuwen RA

Appendix:
Description of our responsibilities for the assurance engagement on the sustainability statements.



Limperg Instituut

Questions?





Limperg Instituut

dr. Kavita Nandram RA

*Programme Director ESG Academy – Amsterdam
Business School, Universiteit van Amsterdam*

*ESG Reporting Manager – Koninklijke Ahold Delhaize
N.V.*

E-mail: p.k.nandram@uva.nl

LinkedIn: [Linkedin Kavita Nandram PhD RA](#)

*Interesse in een ESG opleiding voor professionals? Neem
eens een kijkje op de website van de [ESG Academy -
Amsterdam Business School - University of Amsterdam](#)
(uva.nl)*



Thanks!

