

Global Vendor Code of Business Conduct & Ethics



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Introduction

The Vendor Code of Business Conduct & Ethics (the “Code”) is a guide to Albertsons Companies, Inc. and its subsidiaries’ (collectively “Albertsons Companies”) expectations of how our vendors conduct their business practices. The policies summarized in this Code are not exhaustive, and there may be other conduct not specifically described that will be considered unacceptable for a vendor or its representatives. We expect our vendors to adhere to the letter and spirit of this Code.





Business Practices

It is essential that all vendors and representatives understand and uphold the requirements of this Code when doing business with or on behalf of the Albertsons Companies. In addition to any specific obligations under each vendor's agreement(s) with Albertsons Companies, all vendors must comply with the following:

Anti-Bribery/Anti-Corruption

Vendors cannot offer or provide anything of value to secure an improper advantage or to obtain or retain business and we expect that all of our vendors will comply with all anti-corruption laws, including the US Foreign Corrupt Practices Act. Vendors are expected to notify Albertsons Companies of any non-compliance ([see "Reporting Non-Compliance" section](#)).

Anti-Competitive Conduct

All business must be conducted in full compliance with all applicable competition laws to ensure equal opportunities.

Anti-Money Laundering

Vendors must comply with all applicable money laundering monitoring and reporting requirements.

Business Integrity

We expect that our vendors are honest, candid, respectful, and truthful in discussions with Albertsons Companies, regulatory agencies, and government officials.



Business Records

Vendors must honestly and accurately record and report all business information and comply with all applicable laws regarding the completion and accuracy of business records. Additionally, vendors must create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Company Assets

Vendors must protect and responsibly use both the physical and intellectual assets of Albertsons Companies (whether owned, leased, or licensed), including tangible property, intellectual property, supplies, consumables, and equipment, when authorized by Albertsons Companies to use such assets.

Confidentiality and Data Privacy

Vendors must safeguard the confidential and proprietary information of Albertsons Companies, including but not limited to financial data and results, trade secrets, and business relationships, in compliance with all applicable laws. This obligation includes personal data (including sensitive personal data, Protected Health Information, Consumer Health Data, and cardholder data) of our customers, patients, guests, and associates. Vendors must properly secure, store, transmit, and destroy all Albertsons Companies data as appropriate to the nature of the data processed. Vendors are prohibited from storing or transferring Albertsons Companies data outside of the United States or its territories without Albertsons Companies prior written consent.

Conflicts of Interest

Vendors must avoid actual and perceived conflicts of interests. A conflict of interest may arise when personal and outside relationships, activities, or incentives between vendors and Albertsons Companies' employees influence or appear to influence business decisions at Albertsons Companies. Vendors and their representatives may not knowingly deal directly with any Albertsons Companies' employee if that employee or their family member or relative holds a financial interest with the vendor or their representatives. This does not apply to employees who own securities if those securities are traded on a public exchange, unless the employee's duties include conducting or supervising business with that vendor or activities in competition with it. Vendors are required to disclose to their business contact any actual or potential conflicts of interest as soon as reasonably possible upon learning of the conflict.

Consumer Protection

Vendors are expected to source responsibly and must comply with all applicable consumer protection and food safety laws and regulations relevant to the vendor's business practices.

Environmental Protection

Vendors must comply with all applicable environmental laws and regulations relevant to the vendor's business practices and provide a safe and clean environment.

Gifts and Entertainment

Vendors are prohibited from offering or giving gifts, discounts, tickets to sporting events, charity events/fundraisers, travel and lodging, or other items of value (e.g., cash or cash equivalents, including gift cards) to Albertsons Companies employees. Any meals provided to an employee of Albertsons Companies should be moderate and provided only in the normal course of the vendor's business with Albertsons Companies. Vendors and their representatives are strictly prohibited from offering or giving a bribe, kickback, or any other incentive to an Albertsons Companies' employee (other than incentives provided directly to Albertsons Companies).



Insider Trading

Vendors are prohibited from buying, selling, or taking any future position in Albertsons Companies' stock or other securities, while in possession of information about Albertsons Companies that is not generally available to the investing public and that could influence an investor's decision to buy or sell Albertsons Companies' stock.

Licenses and Permitting

Vendors must operate with valid and all legally required permits and business operating licenses.

Media Relations

Vendors may not speak to the press on behalf of Albertsons Companies unless expressly authorized in writing to do so by Albertsons Companies. Media requests should be sent to media@albertsons.com.

Non-Solicitation

Vendors are prohibited from distributing or causing to be distributed on Albertsons Companies owned or leased property any form of literature, materials or other information (such as brochures, publications, advertisements, surveys, announcements, or flyers) unrelated to Albertsons Companies' business.

Sustainability

Vendors must comply with any vendor sustainability policies that have been set by Albertsons Companies. Albertsons Companies expects vendors and their representatives to share our commitment to reducing our carbon footprint.

Trade Controls

Vendors must comply with all applicable trade control laws as well as all export, re-export and import requirements. Vendors may not participate in international boycotts that are not sanctioned by the United States government.



Employment Practices



At the Albertsons Companies, we support equal access, opportunity, and treatment without regard to race, color, religion, age, sex, national origin, ancestry, physical or mental disability, veteran status, sexual orientation, gender expression, pregnancy, gender identity, marital status or any other status protected by law. Albertsons Companies expects vendors and their representatives to share our commitment to a safe and harassment-free workplace. Albertsons Companies' vendors must conduct their employment practices in full compliance with all applicable laws and regulations.

In addition to any specific obligations under the vendor's agreement with Albertsons Companies, all vendors must comply with the following:

Anti-Discrimination, Anti-Harassment, and Non-Retaliation

Vendors must comply fully with all anti-discrimination, anti-harassment, and no retaliation laws in effect in their locations and any Albertsons Companies locations. They must cooperate with Albertsons Companies' commitment to a workforce free of harassment and unlawful discrimination, including participating in any investigations of violations of the anti-discrimination, anti-harassment, and non-retaliation laws.

Inclusion & Belonging

Vendors are expected to share Albertsons Companies' value of inclusion and belonging and our commitment to building a culture that puts people first. We value different perspectives and ensure that everyone — customers, associates, business partners and people in the neighborhoods we serve — are treated with courtesy, dignity and respect.

Freedom of Association and Collective Bargaining

Vendors must respect workers' rights to freedom of association and collective bargaining and enable workers to exercise their rights in accordance with applicable law.



Health and Safety

Vendors must provide a safe and healthy work environment and fully comply with all applicable health and safety regulations and practices.

Human Rights

Vendors must adhere to all applicable human rights laws and regulations. Vendors may only use voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, or prison labor by an Albertsons Companies vendor or its subcontractors is strictly prohibited. Vendors may not keep workers' personal identity documents, or other necessities, or otherwise restrict movements of workers based on debts owed. All workers must be able to terminate their employment with reasonable notice. In those instances where housing is provided by vendors, such housing must meet all applicable laws and regulations. Vendors must comply with all applicable minimum age and child labor laws and requirements.

Recruitment

Vendors may not charge workers recruitment or similar fees regardless of what is allowed by local law and must inform migrant workers of their terms of employment. Vendors are expected to ensure representatives used in the recruitment process are held to the same standards.

Wages and Benefits

Vendors must comply with all applicable laws governing immigration, compensation, and working hours. In those countries where there is no applicable standard, overtime shall be paid, at a minimum, at the rate equal to the employee's regular wages.

Work Eligibility

Vendors must comply with all applicable laws governing immigration and work authorization. Vendors should ensure the work eligibility of their workers and not employ unauthorized workers.





Compliance

It is the responsibility of the vendor to ensure that its representatives understand and comply with this Code and to inform their Albertsons Companies' contact (or a member of the Albertsons Companies' management) if and when any situation develops that would require the vendor to operate in violation of this Code. Vendors should maintain relevant policies to further compliance, have effective grievance mechanisms for their employees to raise complaints, and implement remedies.

Access, Auditing, and Monitoring

Vendors must allow Albertsons Companies, or a third-party auditor selected by Albertsons Companies, to audit the vendor's compliance with this Code, which may include on-site inspections. Vendors must maintain documentation needed to demonstrate compliance and promptly respond and provide this documentation to Albertsons Companies upon request.

Acknowledgment

All vendors are required to educate and train their representatives to ensure that they understand and comply with this Code. Vendors may be required to acknowledge their obligation to comply with this Code as a condition to maintaining an active vendor relationship with Albertsons Companies.





Resources

For more information, policies, and other documents please visit:

[Albertsons Companies, Inc. - Suppliers](#)

Enforcement

Albertsons Companies will not tolerate any departure from its standards. Albertsons Companies' vendors are expected to self-monitor their compliance with this Code, which may be updated at Albertsons Companies' sole discretion from time-to-time. In addition to any other rights Albertsons Companies may have under their agreement(s) with the vendor, Albertsons Companies may request the immediate removal of any vendor or representative who behaves in a manner that is unlawful or inconsistent with this Code or any Albertsons Companies' policy.

Non-Retaliation

Albertsons Companies expects vendors to implement effective grievance mechanisms to resolve internal disputes and complaints. Albertsons Companies will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior under this Code or any Albertsons Companies policy.

Reporting Non-Compliance

Albertsons Companies encourage vendors or their representatives with questions regarding this Code to contact Albertsons Companies with their concerns. Vendors and their representatives should work with their Albertsons Companies contact in resolving a compliance concern. If the compliance issue is not resolved, the vendor or their representative should contact:

Albertsons Companies, Inc.

Office of Ethics and Compliance

250 Parkcenter Blvd.

Boise, ID 83706

vendor.ethics@albertsons.com



