

# Code of Business Conduct & Ethics



 ALBERTSONS COMPANIES



# Table of Contents

<b>A Message from the CEO</b>	<b>3</b>
<b>Building Trust</b>	<b>4</b>
Business Integrity.....	5
Ethical Leadership.....	5
Reporting Non-Compliance.....	5
Corrective Action.....	5
Compliance Program Training.....	5
<b>In Our Workplace</b>	<b>6</b>
Conflicts of Interest.....	7
Diversity, Equity, and Inclusion.....	7
Engaging via Social Media.....	7
Gifts and Entertainment.....	7
Media Relations.....	7
Workplace Conduct.....	7
• <i>Fair Labor Standards</i> .....	7
• <i>Equal Employment Opportunity</i> .....	7
• <i>Drug and Alcohol Free</i> .....	8
• <i>Health and Safety</i> .....	8
<b>In Our Business</b>	<b>9</b>
Anti-Bribery.....	10
Anti-Money Laundering.....	10
Antitrust and Fair Competition.....	10
Company Assets and Resources.....	10
Confidential and Proprietary Information.....	11
Financial Integrity.....	12
Food Safety, Sanitation, and Freshness.....	12
Fraud, Waste, and Abuse of Government Funds.....	12
Insider Trading Laws.....	12
Intellectual Property.....	12
Privacy.....	12
Trade Controls.....	12
<b>In Our Community</b>	<b>13</b>
Environment.....	14
Human Rights.....	14
Political Activity.....	14
Sustainability.....	14
<b>Closing Thoughts</b>	<b>15</b>
Office of Ethics and Compliance.....	15
Resources.....	16

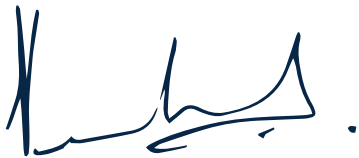


# A Message from the CEO

As an organization, we are committed to operating with the highest level of ethics and integrity. By focusing on doing the right thing each and every day, we maintain a healthy workplace and continue to earn the trust of our customers, communities, and stakeholders.

Each of us has a role to play in building an ethical and inclusive workplace. Our Code of Business Conduct and Ethics defines the expectations for how we work with each other and with our customers, vendors and other partners. Our Code is meant to be a helpful resource as you navigate your day-to-day activities and decision making.

Thank you for reviewing this Code and committing to uphold the high standards that are the foundation for our continued success. Together, we will continue to serve our communities in a way that makes all of us proud.



Vivek Sankaran  
CEO





# Building Trust

**Our most important offering isn't a product on the shelf. It's the TRUST we build with everyone who walks through our doors.**

Trust is something that is earned each day by acting with integrity in everything we do. By doing so, our communities will continue to trust us as a central part of their lives.

## Business Integrity

We act with integrity and comply with all laws, rules and regulations that apply to our business. We are expected to follow all policies and cooperate with compliance audits or internal investigations and make complete, accurate and truthful disclosures.

## Ethical Leadership

We must all promote a culture of ethics and compliance. Leaders can do this by setting an example of ethical behavior, following policies, taking each concern seriously, ensuring proper training, and reinforcing the Code. We lead by actions and not words.

## Reporting Non-Compliance

We all have a responsibility to report conduct that we believe violates a policy or this Code.

You are encouraged to work with your local leaders to resolve concerns. You may always report a concern using our hotline at **1-855-673-1084**, [albertsons.ethicspoint.com](http://albertsons.ethicspoint.com) or directly to the Office of Ethics and Compliance by emailing [ethics@albertsons.com](mailto:ethics@albertsons.com).

All reports will be treated confidentially, and information will only be shared as needed to thoroughly and promptly investigate and resolve concerns. We prohibit retaliation for good faith reporting of an ethical or legal violation.

## Corrective Action

Violation of this Code may result in corrective action, up to and including termination.

## Compliance Program Training

We require compliance and job-specific training on an on-going basis to stay up to date on current expectations. This ensures we have the tools necessary to honor our commitment to act with integrity.





# In Our Workplace

We best serve our customers, our communities and each other through collaboration, inclusion, and trust.

## Conflicts of Interest

You should avoid conduct that creates a conflict of interest, or even an appearance of a conflict of interest. A conflict of interest arises when you have a personal interest that may be at odds with our interests. In general, conflicts of interest may arise when you have interests that may make it difficult to perform your work for us objectively and effectively. Some examples include:

1. For Corporate and Division Office associates, outside employment which competes with the Company or provides services to the Company.
2. Personal interest in a current or potential business partner.
3. Company decision-making that involves personal or family relationships that is at odds with our interests.

You are expected to promptly disclose any actual or potential conflicts of interest. Conflicts of interest by themselves may not be a violation of the Code, but the failure to disclose would be. If you have any questions, please consult your supervisor, your Human Resources representative, or the Office of Ethics and Compliance.

Resource: [Associate Handbook](#)

## Diversity, Equity, and Inclusion

We are committed to diversity, equity, and inclusion, and thoughtful people practices are a core element of our company's philosophy, ensuring our associates reflect the diverse communities we serve. We recognize and appreciate the variety of backgrounds and characteristics that make individuals unique, while providing a work environment that promotes and celebrates individual and collective achievement. We believe that diverse perspectives strengthen and enrich our company and our society.

To learn more please visit:

[Diversity, Equity, and Inclusion Statement](#)

## Engaging via Social Media

Social media is an extraordinary way to share content and communicate broadly and must be used responsibly. What you may think are private, off duty communications may have serious negative effects on business. Communications that intentionally or inadvertently negatively impacts the workplace or the business interest of the Company, our customers, vendors and other associates in a way that is contrary to our policies is prohibited.

Associates must avoid posting confidential or proprietary information about the Company on social media or sharing information that could be viewed as malicious, threatening, intimidating or contrary to company policies.

To learn more please reference our [Associate Handbook](#).

## Gifts and Entertainment

We do not accept gifts. Fair dealing with our partners is a key aspect of trust and helps ensure we receive fair value. We must remain objective when dealing with current or potential partners and cannot solicit or accept any personal benefit. Examples of partners may include: suppliers, purchasers, landlords, tenants, common area maintenance personnel, and manufacturers.

Resource: [Gift, Entertainment and Travel Policy](#)

## Media Relations

We are honest and accurate in our communications. Only individuals authorized to serve as a Company spokesperson can officially speak on our behalf. All media-related requests and inquiries must be referred to your Division Public Affairs representative or to the Corporate Communications team at [media@albertsons.com](mailto:media@albertsons.com). Questions from investors or analysts should be referred to [investor-relations@albertsons.com](mailto:investor-relations@albertsons.com).

Resource: [Associate Handbook](#)

## Workplace Conduct

We treat everyone with courtesy, dignity, and respect. We maintain a positive work environment and conduct ourselves in a manner that is professional and respectful of our customers, associates, and communities.

- ***Fair Labor Standards***

We comply with all employment-related laws and policies including those regarding pay, working conditions, and time keeping. We prohibit the use of all forms of forced labor, including child labor and human trafficking.

- ***Equal Employment Opportunity***

We do not tolerate discrimination or harassment on the basis of an individual's race, sex, color, religion, national origin, age, disability, genetic information, pregnancy, veteran status, sexual orientation, gender identity or expression or any other legally protected status. Additionally, we strive to provide accessible locations and assistance for applicants, associates, customers, and vendors with disabilities.

- **Drug and Alcohol Free**

We are committed to maintaining the highest standards of safety and promoting good health. We prohibit the use of illegal drugs and alcohol at work, or working while impaired by legal or illegal drugs, alcohol or prescription medications. These measures promote a safe and productive work environment and prevent accidents, injuries, and property damage.

- **Health and Safety**

We are committed to creating an environment that is safe, healthy and injury-free. Safety is essential and must never be compromised. We have a shared responsibility to contribute toward a safe work environment by following our workplace safety practices. All injuries that occur in the workplace (no matter how minor) must be reported immediately to your supervisor or the management on duty.

We do not tolerate violence, or threats of violence, in our workplace or in any work-related setting, even if the threats are made in a joking manner. Similarly, we do not allow any weapons, explosives or other personal items that could cause serious bodily harm in our facilities or on our property.

Resource: [Associate Handbook](#)







# In Our Business

As a cornerstone business in our communities, we are dedicated to ensuring integrity and fair dealing in our daily activities.



## Anti-Bribery

We do not bribe or engage in corruption. You may not offer or provide anything of value to secure an improper advantage or obtain/retain business. This also applies to our business partners acting on our behalf. We expect that our business partners act with the same level of honesty and integrity as we do.

Resource: [Associate Handbook](#)

## Anti-Money Laundering

We prohibit money laundering and are committed to complying with all applicable money laundering monitoring and reporting requirements. If you engage in money transfer services as part of your job (e.g., cashing of checks, money orders, or wire transfers) you must follow our applicable policy and procedures.

Resource: [Anti-Money Laundering Policy and Procedures](#)

## Antitrust and Fair Competition

We support free and fair competition. Anyone acting on our behalf must strictly adhere to federal and state antitrust and fair-trade practices and laws. Our activities are subject to antitrust and trade regulations that govern how we interact with competitors and business partners.

Resource: [Associate Handbook](#)

## Company Assets and Resources

Our assets and resources enable us to conduct business effectively and efficiently. We ensure proper use of company assets by:

- Using Company assets and information for legitimate business purposes and not for personal gain.
- Not taking, loaning, selling, damaging, or otherwise disposing of Company property in violation of our policy and protect against theft, damage, and misuse.
- Securing information and systems from accidental or unauthorized disclosure or access.
- Not using company resources in a way that is unlawful, disruptive, or offensive to others.
- Having no expectation of personal privacy in connection with Company resources, including messages sent or received using company computers and communication resources.

Resource: [Information Security Policies & Procedures](#)

## Confidential and Proprietary Information

Protecting information owned, licensed, or entrusted to the Company is not only vital to our success, but our trustworthiness. You may learn information that is unknown to the general public or competitors that must be maintained as confidential. This includes financial data and results, trade secrets, business relationships, and information concerning other companies.

If you have access to confidential information, you:

- May not use the information for personal benefit or the benefit of others.
- Must guard against the disclosure of that information, even to other associates unless authorized, and to others (e.g., family members or acquaintances).
- Must mark information as “confidential,” “proprietary,” or similar label.
- Must maintain it in accordance with policy, including, under password protection, in a secure place, and under your direct supervision when in use.

If you are asked to disclose confidential information, you must contact the Legal department prior to disclosure.

The obligation to treat information as confidential does not end when you leave. You must return all company documents and other materials containing confidential information upon your separation and must not disclose this information.

Resource: [Information Security Policies & Procedures](#)



## Financial Integrity

Financial integrity is critical to our reputation. We comply with all laws, regulations and policies concerning financial accounting to ensure that every business record is full, fair, accurate, complete, and reliable. To ensure accurate and complete record keeping you should:

- Truthfully, accurately, and honestly record and report business information.
- Do not falsify any form of documentation, including electronic records.
- Report any inaccuracies or fraud.
- Follow our records management policies when creating, retaining, or destroying records, whether paper or electronic.
- Comply with legal hold notices from our corporate Legal team.

## Food Safety, Sanitation, and Freshness

A key responsibility to our customers is to provide safe, fresh, and high-quality products in a clean and safe environment. You are required to comply with our policies and procedures that promote these standards, including those which are higher than those required by law.

## Fraud, Waste, and Abuse of Government Funds

We comply with all state and federal laws, including the requirement to report suspected fraud, waste and abuse when requesting, receiving, or avoiding government payments. You are required to immediately report a suspected violation of state or federal laws governing fraud, waste, and abuse.

Resource: [Associate Handbook](#)

## Insider Trading Laws

You are prohibited from trading our stock or our securities while in possession of material, nonpublic information about the Company. You are also prohibited from recommending, “tipping” or suggesting that anyone else buy or sell our stock or our securities based on information not publicly known that might be material to investors. In addition, if you obtain material nonpublic information about another company in the course of your employment you are prohibited from trading in the stock or securities of that company while in possession of such information or “tipping” others to trade on the basis of such information.

Resource: [Insider Trading Policy](#)

## Intellectual Property

We have built an unparalleled brand and reputation over our history. Trademarks and copyrights are an important part of how we protect that brand and reputation. You must use our brands and trademarks as well as the intellectual property entrusted to us by third parties properly.

## Privacy

We must protect and appropriately use the personal data (including sensitive personal data, Protected Health Information, and cardholder data) of our customers, patients, guests, and associates by following our data privacy and information security policies. This includes the secure and proper storage, transmittal, and destruction of this data. Personal data includes:

- Name
- Email Address
- Telephone Number
- Government Identification Information
- Financial Information
- Date of Birth
- Employment History
- Physical Description

For questions or concerns regarding privacy please contact [PrivacyOffice@albertsons.com](mailto:PrivacyOffice@albertsons.com).

In addition, as a pharmacy provider we must also take special care to protect the health information of our patients, including our associates who may receive services from our pharmacies. You may not provide health information regarding pharmacy patients, including the knowledge that a certain customer or associate is a patient of one of our pharmacies, to anyone other than the patient. Contact the Health Insurance Portability and Accountability Act or “HIPAA” Hotline at: **(877) 251-6559** or [HIPAAHotline@albertsons.com](mailto:HIPAAHotline@albertsons.com) with any questions.

Resources: [Information Security Policies & Procedures](#), [Pharmacy Policies & Procedures](#)

## Trade Controls

As a public company, we are subject to a number of laws governing international trade. If you are involved with business that crosses international borders or involves foreign companies, you must comply with all applicable trade control laws. Please contact the Office of Ethics and Compliance for additional information.



# In Our Community

We value not only our associates and customers,  
but also the world we live in.

## Environment

You are expected to consistently follow our policies for the proper handling of hazardous waste and to comply with environmental laws that provide for a safe and clean environment.

## Human Rights

Our responsibility to care for our community also extends to our suppliers, who play a critical role in ensuring that we manage our business ethically while taking care of those who work for us. We expect we all engage suppliers who share our commitment to diversity, equal employment opportunity, fair labor standards, and a safe and harassment free workplace, in full compliance with all applicable laws and regulations in all of their global operations.

## Political Activity

We actively engage in political processes and seek to shape public policy issues that can affect our business. We are committed to conducting political activities in accordance with the highest standards of ethics and in full compliance with all laws and regulations governing political activities. Political actions or contributions on behalf of the Company may be made only if permitted by law and approved in advance by the Government Affairs Department.

Resource: [Interactions with Government Officials Policy](#)

## Sustainability

We work to make our operations more efficient, and we understand the need to work towards reducing the overall environmental footprint of our business and ensuring a more sustainable future for our communities. It is critical that we achieve business growth while reducing greenhouse gas emissions, food waste and the use of other important resources.



# Closing Thoughts

## Thank you for taking the time to review our Code.

Please apply what you have learned in your day-to-day activities. It is impossible for us to address every situation you may face. Focus on doing the right thing and making decisions consistent with what you have read. If you see something that you are unsure about, please say something. You can report it to your supervisor, the hotline or the Ethics and Compliance Office. If you have questions about this code or questions about our ethics and compliance program, please do not hesitate to reach out to us. It is up to all of us to act with integrity. Remember that being unaware of the laws and policies that apply to you is not an excuse. **If in doubt, ask for help.**

Thank you for your commitment and dedication to building trust each and every day.

**Tom Moriarty**, EVP, General Counsel & Chief Policy Officer

### Office of Ethics and Compliance

Please do not hesitate to reach out to us with any questions.

#### The Office of Ethics and Compliance

250 Parkcenter Blvd.

Boise, ID 83706

[ethics@albertsons.com](mailto:ethics@albertsons.com)

There are many options for how you can report issues or ask questions.

Anonymous compliance reports or questions may be submitted to:

#### Ethics Hotline

United States: 1-855-673-1084

Philippines: +800-8739-5173 (Globe)

+800-1441-1062 (PLDT)

[albertsons.ethicspoint.com](http://albertsons.ethicspoint.com)

# Resources

Policies for the topics covered in this Code are available in the [Associate Handbook](#) and the [Ethics and Compliance Website](#).

Contact	Contact Info
Ethics Hotline	United States: 1-855-673-1084 Philippines: +800-8739-5173 (Globe) +800-1441-1062 (PLDT) <a href="http://albertsons.ethicspoint.com">albertsons.ethicspoint.com</a>
HIPAA Hotline	<a href="mailto:hipaahotline@albertsons.com">hipaahotline@albertsons.com</a>
Office of Ethics and Compliance	250 Parkcenter Blvd. Boise, ID 83706 <a href="mailto:ethics@albertsons.com">ethics@albertsons.com</a>
Privacy Office	<a href="mailto:privacyoffice@albertsons.com">privacyoffice@albertsons.com</a>
Public Relations	<a href="mailto:media@albertsons.com">media@albertsons.com</a> <a href="mailto:investor-relations@albertsons.com">investor-relations@albertsons.com</a>

