

Code of Business Conduct & Ethics



 ALBERTSONS COMPANIES



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A photograph of an Albertsons Market Street store. The building is a modern, single-story structure with large glass windows and a prominent blue and white logo that reads "Albertsons Market Street". The store is situated on a street corner, with a crosswalk and a stop sign visible. Several cars are parked in the lot in front of the store, including a silver SUV, a red pickup truck, and a white van. A few people are walking on the sidewalk near the entrance. The sky is clear and blue.

 ALBERTSONS COMPANIES

CODE OF BUSINESS CONDUCT & ETHICS

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A Message from the CEO

At Albertsons Companies, we act with integrity and pride, hold ourselves accountable, and engage with others constructively to deliver results that matter. Our Code of Business Conduct and Ethics defines expectations for how we work with each other, our customers, and our partners. It is intended to be a helpful resource as you navigate your day-to-day activities and make decisions that align with our company's values.

We have a fantastic team committed to our customers, our communities, and each other. Thank you for reviewing our Code of Business Conduct and Ethics and committing yourself to uphold the high standards that are the foundation for us to earn customers for life.

Susan Morris
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. Concerns can be raised to your Store Director, Assistant Store Director, Location Manager, Human Resources, Labor Relations, where applicable, or Asset Protection. You may always report a concern using our Employee Ethics Hotline at **1-855-673-1084**, albertsons.ethicspoint.com or directly to the Office of Ethics and Compliance by emailing 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 ongoing 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. Conflicts may also arise when a family member or someone with whom you have a close personal relationship has a business interest that may influence your decision-making. Some examples of conflicts of interest include:

1. For Management, Corporate, and Market 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.

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

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 impact 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.

Gifts and Entertainment

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

Inclusion & Belonging

To achieve our business ambition of earning customers for life, we know an inclusive workplace that powers our business success is built on a foundation of courtesy, dignity and respect, for associates and customers alike. 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 different perspectives strengthen and enrich our company, and we are committed to cultivating a workforce that connects with the communities we serve.

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 Market Public Affairs representative or to the Corporate Communications team at media@albertsons.com. Questions from investors or analysts should be referred to investor-relations@albertsons.com.

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, vendors, and communities.

- ***Fair Labor Standards***

We comply with all applicable employment-related laws and policies including those regarding pay, working conditions, and timekeeping. 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. We never retaliate against individuals who have made a good faith complaint of harassment and discrimination. 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 policies and 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.





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 business partners acting on our behalf. We expect that our business partners act with the same level of honesty and integrity as we do.

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.

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.

Do not engage in conversation with competitors regarding pricing, sales information, or market allocation. You should avoid any conversations that would give even the appearance that pricing or promotional decision-making is influenced by a competitor or interested third party. Before engaging or cooperating with a competitor you should consult the Legal Department.

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 protecting 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.

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.
- Must not use the information in any unauthorized or non-enterprise systems or databases, including Artificial Intelligence (“AI”) software and solutions.

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.

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 must:

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



Food Safety, Sanitation, and Freshness

We are committed to providing our customers with safe, high-quality products in a clean and sanitary environment. You are required to comply with our policies and procedures, which are designed to meet or exceed industry and regulatory standards.

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.

Insider Trading

You are strictly prohibited from trading in our stock/securities while in possession of material nonpublic information ("MNPI") about the Company. You are also prohibited from sharing or recommending that anyone else buy or sell our stock/securities based on MNPI. Additionally, if you obtain MNPI 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.

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.

As permitted by applicable law, inventions, trademarks, copyrights, patents, trade secrets, and other works of authorship that you create as part of your employment with the company belong to the company and remains the property of the company when you leave.

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 data. Personal data is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked—directly or indirectly—to an individual or their household. Personal data includes but is not limited to:

- Name
- Contact Information (e.g., email address, phone number)
- Shopping History
- Government Identification Information
- Financial Information
- Date of Birth
- Employment History
- Unique identifiers (e.g., IP address)

For questions or concerns regarding privacy please contact 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 with any questions.

Trade Controls

As a publicly traded 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

We comply with all state and federal laws, including laws protecting human health and the environment. You are expected to comply with the terms of any applicable permits and follow our policies for the proper maintenance of equipment containing hazardous substances, as well as the transportation and handling of hazardous materials and hazardous waste.

Human Rights

Our responsibility to care for our community also extends to our business partners, who play a critical role in ensuring that we manage our business ethically while taking care of those who work for us. We engage business partners who share our commitment to human rights including prohibiting forced labor, child labor, and human trafficking. We expect our business partners to share our commitment to 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.

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 the communities we serve and the planet we share. 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 concerns to your manager, Human Resources, Labor Relations, where applicable, or Asset Protection. You can also report concerns to the Employee Ethics Hotline, or to the Office of Ethics and Compliance.

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

Tom Moriarty, EVP,
M+A and Corporate Affairs

Edward Hanover

Edward Hanover, SVP,
Chief Ethics and Compliance Officer

The Office of Ethics and Compliance

250 Parkcenter Blvd.
Boise, ID 83706
ethics@albertsons.com

Anonymous compliance reports or questions may be submitted to:

Employee Ethics Hotline

United States or Canada: 1-855-673-1084
Philtech (Philippines): 02 8590 0438
Albertsons Companies India: 000800005 03772
albertsons.ethicspoint.com

Contacts

Contact	Contact Information
Ethics Hotline	United States or Canada: 1-855-673-1084 Philtech (Philippines): 02 8590 0438 Albertsons Companies India: 00080005 03772 albertsons.ethicspoint.com
HIPAA Hotline	hipaahotline@albertsons.com
Office of Ethics and Compliance	250 Parkcenter Blvd. Boise, ID 83706 ethics@albertsons.com
Privacy Office	privacyoffice@albertsons.com
Public Relations	media@albertsons.com investor-relations@albertsons.com

Resources

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

This is not an exhaustive list of company policies.

Anti-Bribery and Anti-Corruption Policy	Conflicts of Interest & Outside Employment Policy and FAQs*
Anti-Money Laundering Policy and Procedures	Gifts, Entertainment, and Travel Policy & FAQs*
Artificial Intelligence Policies and Procedures	Information Security Policies & Procedures
Associate Handbook Management, Corporate & Market Office*	Insider Trading Policy and FAQs
Associate Handbook - Retail	Interactions with Government Officials Policy*
Associate Handbook - Supply Chain Hourly	Retail Pharmacy Policies & Procedures
Confidential & Proprietary Information Policy	Vendor Code of Business Conduct & Ethics

*Associates in non-U.S. locations should consult their local employment handbooks.