

## US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of July 2025

Albertsons

Indicator	Finding	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	For Seafood: "We respect the fundamental human rights and dignity of individual workers, as stated in the International Bill of Human Rights"	Responsible Seafood Policy and Commitments 2022, PDF 1	https://s29.q4cdn.com/239956855/files/doc_downloads/2022/12/20 22
	Vendors: "Vendors must adhere to all applicable human rights laws and regulations."	Vendor Code of Business Conduct & Ethics 2024, pg 11	https://s29.q4cdn.com/239956855/files/doc_downloads/2024/FY24_Q2_VendorCOCandBE_fnl_Digital.pdf
Human rights policy - ILO Core Labor Standards	Vendors: "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."	Vendor Code of Business Conduct & Ethics, pg 11	https://s29.q4cdn.com/239956855/files/doc_downloads/2024/FY24_Q2_VendorCOCandBE_fnl_Digital.pdf
Forced labor & prison labor	See above		
Human rights defenders & civic space Gender equality and women's empowerment Indigenous Peoples	N/A Diversity, Equity & Inclusion: Albertsons Cos. is committed to cultivating a diverse No evidence	Webpage - Press Release	https://www.albertsonscompanies.com/newsroom/press-
Natural resources	N 9		
Land rights Free, Prior, and Informed Consent (FPIC)	No evidence No evidence		
<u>Living wage</u>		E 40 1/ 0000 PRE 00	
Living wage, own operations	A considerable number of our employees are paid at rates related to the federal minimum wage. Additionally, many of our stores are located in states, including California, where the minimum wage is greater than the federal minimum wage and where a considerable number of employees receive compensation equal to the state's minimum wage which are also slated to increase over the next few years.'	Form 10-K 2022, PDF 23	https://www.albertsonscompanies.com/investors/financial-reports/sec-filings/default.aspx
Living wage in supply chain	No evidence		
Human Rights Due Diligence and Supply Chain			
Process for assessing human rights risks and impacts	Conducted human rights risk assessments and social responsibility questionnaires with Fresh & Frozen and Sushi vendors to assess their policies and procedures and prioritize engagement.	Due Diligence Plan 2021, PDF 1	https://s29.q4cdn.com/239956855/files/our_impact/AlbertsonsCos_ Due_Dillgence_Plan.pdf
Heightened human rights due diligence in Conflict Affected an			
Affected stakeholder engagement	We analyzed the most critical ESG topics specific to our business and industry and worked with stakeholders to better understand where we should focus our efforts. We conducted interviews and surveys with internal business leaders, customers, investors, suppliers, and industry groups and included insights from industry reports and ESG rating agencies.'	Environment Social and Governance Report 2021/2022, pg 52	https://s29.q4cdn.com/239956855/files/our_impact/sustainability_doc/ALBCIV193285_CORP_ESG_Report_Update_October2022-(2).pdf
Human rights requirements in supplier code/requirements	Vendors: "Vendors must adhere to all applicable human rights laws and regulations."	Vendor Code of Business Conduct & Ethics 2024, pg 11	https://s29.q4cdn.com/239956855/files/doc_downloads/2024/FY24_Q2_VendorCOCandBE_fnl_Digital.pdf
Access to Remedy			
Grievance mechanism for own employees	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 [] or directly to the Office of Ethics and Compliance by emailing [] 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.	Code of Business Conduct & Ethics 2023, pg 5	https://s29.q4cdn.com/239956855/files/doc_governance/2023/08/2023_codeofbusinessconduct_final.pdf

Grievane mechanism for workers - supply chain See above Grievance mechanism for external individuals & communities See above

Governance and Staffing			
Board and/or C-Suite-level oversight	No evidence		
Senior level responsibility for human rights	No evidence		
Reporting and Transparency			
Human rights reporting (integrated or stand-alone)	No evidence		
Memberships			
RBA RSPO WEPs (signatory)	No Yes (Safeway) No	RBA RSPO WEPs	https://www.responsiblebusiness.org/about/members/ https://rspo.org/search-members/ https://www.weps.org/companies
Lobbying and Ethics			
Public statement or endorsement in support of mandatory human rights and environmental due diligence Anti-bribery and anti-corruption policy	N/A  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.	Code of Business Conduct & Ethics 2023, pg 10	https://s29.q4cdn.com/239956855/files/doc_governance/2023/08/20 23_codeofbusinessconduct_final.pdf

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