






Albertsons Companies is committed to providing our customers with high-quality, sustainable, and traceable seafood from environmentally and socially responsible sources. We aim to improve transparency within our seafood supply chains; to protect the oceans; and to provide fair and equitable treatment for the people who depend on them for their livelihoods.

Category	Policy	Commitment
<p>Fresh & Frozen Seafood + Sushi</p> 	<p>We will endeavor to only source fresh and frozen seafood and sushi in our Prepared Foods Department that is:</p> <ul style="list-style-type: none"> • Green or Yellow rated by the Monterey Bay Aquarium's Seafood Watch program; or • Certified to an equivalent environmental standard; or • Sourced from fisheries or farms making measurable and time-bound improvements.* 	<p>Top 20 by 2022 Commitment (Fresh & Frozen Seafood): By year-end 2022, 100% of our top 20 wild and farm-raised fresh and our private label frozen seafood will be sourced in compliance with our Responsible Seafood Policy.</p> <p>Top 5 by 2022 Sushi Commitment: By year end 2022, 100% of the top five wild and farmed-raised seafood categories used in our prepared sushi will be sourced in compliance with our Responsible Seafood Policy.</p>
<p>Shelf-Stable Tuna</p> 	<p>We will endeavor to source shelf-stable tuna only from fisheries that are, in order of preference:</p> <ul style="list-style-type: none"> • Certified by the Marine Stewardship Council with Chain of Custody; and/or • Green or Yellow rated by the Monterey Bay Aquarium's Seafood Watch program; and/or • Engaged in fishery improvement projects making measurable and time-bound progress.* <p>Additionally, we prioritize shelf-stable tuna suppliers that:</p> <ul style="list-style-type: none"> • Have a public responsible sourcing policy and participate in initiatives which work to address environmental impact, social responsibility, and traceability; and/or • Are members of the International Pole & Line Foundation; and/or • Are International Seafood Sustainability Foundation participating companies. 	<p>Shelf-Stable Tuna Commitment: We will continually work to improve the responsibility of our shelf-stable tuna products by sourcing from tuna fisheries in compliance with our Shelf-Stable Tuna Policy. We will publicly report on our annual progress regarding these efforts.</p>
<p>Seafood Traceability</p> 	<p>We recognize that traceability in seafood supply chains is essential to ensuring that our seafood is sourced from legal and verifiable sources. We are committed to implementing industry best practices in traceability and working with our seafood suppliers to adopt more robust traceability systems.</p>	<p>We will continue to work toward industry best practices in traceability, including: standardized data collection, verification practices, and robust traceability systems for our seafood products and supply chains. We will publicly report on our annual progress regarding these efforts.</p>
<p>Social Responsibility</p> 	<p>We respect the fundamental human rights and dignity of individual workers, as stated in the International Bill of Human Rights. We expect our seafood suppliers to adopt and comply with comprehensive, transparent, and verifiable supply chains that are free of human trafficking and forced labor.</p>	<p>We will continue collaborative efforts with suppliers and other organizations to work toward industry best practices for reducing human trafficking and forced labor risks in seafood supply chains. We will publicly report on our annual progress in these areas.</p>
<p>Policy Engagement</p> 	<p>We understand that strong policy and management at local, state, national, and international levels is critical to long-term sustainability and socially responsible seafood production. Accordingly, we will engage in policy and management reform initiatives that lead to positive social, economic, and environmental outcomes in fisheries and aquaculture production.</p>	

*FIP Sourcing requirements: https://www.albertsonscorporation.com/content/dam/minisite/pdfs/Albertsons%20Companies%20FIP%20Requirements_2020-Final.pdf



Albertsons Companies Supplier Expectations & Supply Chain Accountability

Supplier Agrees to:

1. Comply with the Responsible Seafood Policy¹ (Policy);
2. Demonstrate that products are traceable and from legal, verifiable sources;
3. Communicate key data elements of these products, listed in the following table(s), to Albertsons Companies upon request;
4. Implement procedures to monitor supply chains and all labor involved to ensure they comply with laws on human trafficking and forced labor; and
5. Reduce the environmental impacts associated with wild fisheries and aquaculture production.

Suppliers Will Use Reasonable Efforts to:

Support Albertsons Companies' efforts to reduce single-use packaging waste and pollution by (if applicable):

- Transitioning polystyrene/Styrofoam packaging and shipping materials to material that can be recycled, reused, or industrially composted (such as #5 polypropylene plastic corrugate boxes)
- Increasing recycled content in consumer-facing and operational packaging
- Adopting business practices or joining initiatives to address lost, discarded, or abandoned fishing gear in the oceans

Supply Chain Accountability:

The supplier is responsible for:

- Identifying any areas of its operations that do not conform to the expectations listed; and
- Implementing improvements designed to achieve conformance with this document and the Vendor Code of Conduct²

Furthermore, the supplier is expected to ensure any products that are imported comply with the Reasonable Care Guidelines for Forced Labor³ issued by U.S. Customs and Border Protection Agency (CBP) which includes, but is not limited to, the following:

- Knowing the workers, location, and labor conditions under which the imported goods are made
- Vetting new suppliers/vendors for forced labor risks through questionnaires or other means
- Establishing a reliable procedure for conducting periodic internal audits to check for forced labor in supply chains

In addition to its obligations under the Continuing Commodity Guaranty Terms and Conditions⁴, the supplier agrees to indemnify Albertsons Companies and hold it harmless with respect to any violation of or for any civil or criminal liability arising from the contravention of relevant laws and regulations by supplier or any of its suppliers of goods or services, including, but not limited to, any remediation. The supplier also agrees that, in the event that Albertsons Companies determines that a violation or contravention of relevant laws and regulations may have occurred, Albertsons Companies shall notify the supplier and the supplier shall immediately remedy or remediate or cause to be remedied or remediated, the potential violation or contravention. In the event that Albertsons Companies determines that the supplier has not made a good faith effort to remedy or remediate the potential violation or contravention in order to comply with the law, then Albertsons Companies may terminate its supplier contract immediately, and such termination will be with cause.

¹ https://www.albertsonscorporation.com/content/dam/minisite/pdfs/Albertsons_Companies_Responsible_Seafood_Policy_Commitment2.pdf

² https://suppliers.safeway.com/docs/Vendor_Code_of_Conduct.pdf

³ <https://www.cbp.gov/sites/default/files/assets/documents/2018-Mar/icprescare2017revision.pdf>

⁴ https://suppliers.safeway.com/usa/forms/CCG_Revised_cln.pdf

Key Data Elements (KDEs) Required from Suppliers:

The following key data elements (KDEs) listed in Table 1, below, must be reported to Albertsons Companies through Trace Register, an electronic traceability system, for each product or seafood source on a per purchase order or shipment basis. **

Table 1: KDEs required for each product or seafood source (with examples in parentheses).

For Wild Caught Products	For Farmed Products:
<ul style="list-style-type: none"> • Scientific Name (<i>Homarus americanus</i>) • Common Name (American lobster) • Fishing method (pots) • Catch Country (USA) • Production/FAO Area (FAO 21) • Management Zone (Maine) • Management Entity (NMFS) • Country of Processing (USA) • If MSC certified, provide valid CoC number • If sourced from a Fishery Improvement Project (FIP), list: <ul style="list-style-type: none"> • Name of FIP (link to website preferred) • FIP member you are sourcing product from 	<ul style="list-style-type: none"> • Scientific Name (<i>Salmo salar</i>) • Common Name (Atlantic salmon) • Farming Country (Chile) • Country of Processing (Chile) • Rearing Method (Marine Net Pen) • Production Area (Los Lagos) • Management Entity (Farm company or regional/national management body) • If ASC certified, provide valid CoC number • If BAP certified, at minimum provide valid BAP plant (p) and farm (f) codes

Tuna Specific Key Data Elements:

In addition to the information in Table 1, Albertsons Companies asks that suppliers of tuna (applies to both fresh and frozen tuna and shelf-stable tuna) collect the KDEs in Table 2 for each tuna product on a per purchase order basis and be able to submit this information through Trace Register. These data are used to assess compliance with our Responsible Seafood Policy and Commitments, ensure traceability down to the vessel and trip level, and help assess risk.

Table 2: Additional KDEs required for tuna products.

<p>Catch Location Information:</p> <ul style="list-style-type: none"> • Management Zone (Specific Fishing Area such as FAO sub-zone or specific state/government management area) • Caught within a country's Exclusive Economic Zone (Yes or No) <p>Date(s) of Landing:</p> <ul style="list-style-type: none"> • Offload start date(s) (DD/MM/YYYY) <p>Fishing Vessel Information:</p> <ul style="list-style-type: none"> • Unit Number (fishing vessel registration number or IMO number) • Vessel flag (country flag such as China, Vietnam, etc.) • Vessel registered owner (owner of harvest vessel) 	<p>Transshipment Information:</p> <ul style="list-style-type: none"> • Transshipment occurred (Yes or No) • Transshipment location (Did transshipment take place in port (P), at-sea inside an EEZ (In EEZ), or at-sea in international waters (Out of EEZ)) • Transshipment Date (DD/MM/YYYY) • Monitored by (Government (G), Observer (O), Electronic, None) • Transshipment Vessel Name (Name of transshipment vessel(s)) • Transshipment vessel ID (Transshipment vessel(s) registration number(s) - e.g. local registration number or IMO number)
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**Sushi vendors are only required to submit KDEs in Table 1 for each seafood source. This data is not collected in Trace Register

Key Terms:

- **At-sea Transshipment:** The transfer of fish, supplies, or other cargo between vessels. In seafood supply chains, fishing vessels at sea offload catch to a large refrigerated transport vessel (known as “carriers” or “reefers”).
- **Child Labor:** Work performed by a person who is under the minimum legal working age to be employed as determined by (i) a Business’s or Supplier’s policy, (ii) the law of the jurisdiction in which the work will be performed, or (iii) the International Labor Organization Minimum Age Convention No. 138 - whichever indicates the higher minimum age requirement.
- **EEZ:** The Exclusive Economic Zone is an area of coastal water and seabed within a certain distance of a country’s coastline, to which the country claims exclusive rights for fishing, drilling, and other economic activities.
- **Equivalent Environmental Standard:** The following certifications are equivalent to at least a Seafood Watch Yellow Rating and meet the Albertsons Companies Responsible Seafood Policy:

Certification	Eligible Species
Marine Stewardship Council (MSC)	All Wild Fisheries
Aquaculture Stewardship Council (ASC)	Farmed: Salmon, Shrimp, Pangasius (Swai), Bivalves, Tilapia
Best Aquaculture Practices (BAP) 2 Star	Farmed: Shrimp, Pangasius (Swai), Mussels, Tilapia
Naturland	Farmed: Carp, Freshwater Fishes, Mussels, Shrimp
Food Alliance	Farmed Shellfish
Canada Organic	Farmed Shellfish
Friend of the Sea	Farmed Mussels

- **FAO:** Food and Agriculture Organization of the United Nations. The FAO defines major fishing areas which are used for fisheries management and jurisdictional purpose.
- **Forced Labor:** Includes all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily⁵, encompassing traditional practices of forced labor as well as new forms of forced labor such as human trafficking⁶.
- **Human Trafficking:** Human trafficking involves the recruitment, harboring, transportation, provision or obtaining of a person for labor or for the purposes of a commercial sex act through the use of force, fraud, or coercion or for the purposes of subjection to involuntary servitude, peonage, debt bondage or slavery.
- **IMO Number:** International Marine Organization number; an identification number allocated to a specific maritime vessel.
- **IUU:** Illegal, unreported, and unregulated fishing.
- **Labor Trafficking:** The act of recruiting, harboring, transporting, providing, or obtaining a person for involuntary labor or services by means of force or physical threats, fraud or deception, or other forms of coercion.
- **Remediation:** Activities, systems, policies, or procedures that Albertsons Companies or supplier establishes to address and remedy confirmed instances of human trafficking or forced labor, including child labor, in its operations.
- **Remedies:** Financial or nonfinancial compensation awarded to victims of human trafficking or forced labor, including child labor.
- **RFMO:** Regional Fisheries Management Organization (e.g. International Commission for the Conservation of Atlantic Tunas (ICCAT)).

⁵ International Labour Organization (ILO). Forced Labor Convention, 1930: https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029

⁶ ILO, General Survey on the fundamental Conventions concerning rights at work in light of the ILO Declaration on Social Justice for a Fair Globalization, Report of the Committee of Experts on the Application of Conventions and Recommendations, 2012, ILC.101/III/1B, para. 272.

Key Terms (Continued):

- **Supplier:** Organizations and individuals in Albertsons Companies' supply chain who contracts directly with Albertsons Companies or a Supplier of Albertsons Companies.
- **Supply Chain:** Any organizations or individuals involved in providing services to Albertsons Companies or producing, processing, or distributing Albertsons Companies' products from the product's point of origin to Albertsons Companies or point of sale, as applicable.
- **Traceability:** The ability of each stakeholder in the supply chain who takes possession of the product to systematically identify a unit of production, track its location and associated sources (see KDE Table), and describe any treatments or transformations at all stages of production, processing, and distribution. This traceability must enable the product to be traced back to its original source(s) and comply with all applicable government regulations, such as the Seafood Import Monitoring Program (SIMP).
- **Trafficking-related activities:** All activities that directly support or promote Labor Trafficking or Child Labor, including but not limited to:
 - (i) using misleading or fraudulent recruitment practices during the recruitment of employees, such as failing to disclose basic information or making material misrepresentations regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions and housing (if employer-provided or employer-arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
 - (ii) charging employees recruitment fees; and
 - (iii) destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity documents, such as passports or drivers' licenses⁷.
- **Verifiable Source:** Albertsons Companies, or parties authorized by Albertsons Companies, can at any time request, and supplier will provide, data or documents to verify the legality, traceability, or source information of a product's seafood ingredients. A source is verifiable if the request data or documents can be proved accurate.

Supplier Acknowledgement Agreement

I have received a copy of the Albertsons Companies **Responsible Seafood Program Supplier Expectations & Supply Chain Accountability** on behalf of _____ (Company Name; hereinafter the "Supplier") and have been given an opportunity to review it. I understand that it is the responsibility of the Supplier to read, fully understand and comply with the terms of the Albertsons Companies Responsible Seafood Supplier Expectations.

I confirm that I am authorized to act on the Supplier's behalf and am authorized to bind the Supplier to this Agreement.

This Agreement shall be effective as of the date of execution by the Supplier and shall continue in effect with respect to all applicable seafood supplied.

Dated: _____, 20 ____

Supplier: _____
(Company, Partnership or Business Name - please print or type)

Address of Seller: _____
(Street and Number)

(City) (State) (Zip)

Supplier Representative Name: _____
(Please print or type)

Supplier Representative Title: _____
(Please print or type)

Supplier Representative Signature

If Seller is an individual, sign individual name as the proprietor and give tradename, if any. If Seller is a partnership, one general partner must sign in the partnership name. If Seller is a corporation, an officer must sign and indicate title. In all cases, the Agreement must be dated and the Seller's address filled in. Following execution of this Agreement, please return it to FISHWISE via email, j.zupcic@fishwise.org, or facsimile, (309) 213 4688.