Kroger - Climate Change 2023

C0. Introduction

C0.1

(C0.1) Give a general description and introduction to your organization.

At The Kroger Co. (NYSE: KR), we are Fresh for Everyone™ and dedicated to our Purpose: To Feed the Human Spirit®. We are, across our family of companies, nearly half a million associates who serve over 11 million customers daily through a seamless shopping experience under a variety of banner names. We are committed to creating #ZeroHungerZeroWaste communities by 2025.

Our retail formats include supermarkets, price-impact warehouse stores, and multi-department stores, which are similar to supercenters, but offer an expanded variety of national brand appeal and general merchandise. We have 2,719 supermarkets and retail department stores. We have 144 fine jewelry stores. Kroger also operates 44 distribution centers, 8 customer fulfillment centers powered by the Ocado Group, and 33 food production or manufacturing facilities producing high quality private-label products that provide value for customers and enhanced margins for Kroger. Kroger operates 1,642 supermarket fuel centers as well as 2,254 pharmacies, located in our combination food and drug stores.

For more information about Kroger, visit our 2021 Fact Book: 2021-PDF-Fact-Book.pdf (q4cdn.com).

To learn more about us, visit our newsroom, investor relations site and/or ESG report site.

C0.2

(C0.2) State the start and end date of the year for which you are reporting data and indicate whether you will be providing emissions data for past reporting years.

Reporting year
Start date
February 1 2022
End date
January 31 2023
Indicate if you are providing emissions data for past reporting years
No
Select the number of past reporting years you will be providing Scope 1 emissions data for
<Not Applicable>
Select the number of past reporting years you will be providing Scope 2 emissions data for
<Not Applicable>
Select the number of past reporting years you will be providing Scope 3 emissions data for
<Not Applicable>

C0.3

(C0.3) Select the countries/areas in which you operate.
United States of America

C0.4

(C0.4) Select the currency used for all financial information disclosed throughout your response.
USD

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.
Operational control
C0.8

(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.?)

<table>
<thead>
<tr>
<th>Indicate whether you are able to provide a unique identifier for your organization</th>
<th>Provide your unique identifier</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes, a Ticker symbol</td>
<td>KR</td>
</tr>
</tbody>
</table>

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

<table>
<thead>
<tr>
<th>Position of individual or committee</th>
<th>Responsibilities for climate-related issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board-level committee</td>
<td>The Public Responsibilities Committee of the Kroger Board of Directors has responsibility for climate and other sustainability topics. The Committee Charter is available here: <a href="https://s1.q4cdn.com/137099145/files/doc_governance/2021/Public-Responsibilities-Committee-Charter.pdf">https://s1.q4cdn.com/137099145/files/doc_governance/2021/Public-Responsibilities-Committee-Charter.pdf</a>. The Committee Composition is shown here: <a href="https://ir.kroger.com/CorporateProfile/governance/committee-composition/default.aspx">https://ir.kroger.com/CorporateProfile/governance/committee-composition/default.aspx</a>.</td>
</tr>
</tbody>
</table>

C1.1b

(C1.1b) Provide further details on the board’s oversight of climate-related issues.

<table>
<thead>
<tr>
<th>Frequency with which climate-related issues are a scheduled agenda item</th>
<th>Governance mechanisms into which climate-related issues are integrated</th>
<th>Scope of board-level oversight</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheduled – all meetings</td>
<td>Reviewing and guiding strategy. Overseeing and guiding the development of a transition plan. Monitoring the implementation of a transition plan. Monitoring progress towards corporate targets</td>
<td>&lt;Not Applicable&gt;</td>
<td>The Public Responsibilities Committee of the Kroger Board of Directors receives updates from the Group Vice President, Corporate Affairs on environmental, social &amp; governance topics and strategy at all Committee meetings. This includes discussion of current and future sustainability goals, including those pertaining to reducing climate impacts.</td>
</tr>
</tbody>
</table>

C1.1d

(C1.1d) Does your organization have at least one board member with competence on climate-related issues?

<table>
<thead>
<tr>
<th>Board member(s) have competence on climate-related issues</th>
<th>Criteria used to assess competence of board member(s) on climate-related issues</th>
<th>Primary reason for no board-level competence on climate-related issues</th>
<th>Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Several of Kroger’s Board Members have expertise managing ESG topics that are relevant to Kroger. As part of serving on the Board, our members have also developed competence on the topic of climate impacts management, including advising Kroger on goal setting expectations and timelines.</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

C1.2
(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

**Position or committee**
Chief Sustainability Officer (CSO)

**Climate-related responsibilities of this position**
- Developing a climate transition plan
- Integrating climate-related issues into the strategy
- Conducting climate-related scenario analysis

**Coverage of responsibilities**
<Not Applicable>

**Reporting line**
Other, please specify (CSO reports to our Chief People Officer, who is part of our Executive Leadership Team. CSO is primary liaison to Public Responsibilities Committee of the Kroger Board of Directors.)

**Frequency of reporting to the board on climate-related issues via this reporting line**
Half-yearly

**Please explain**
Kroger’s CSO shares information about the company’s ESG strategy, goals and other activities to the Public Responsibilities Committee of the Kroger Board of Directors at least three times per year.

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(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

<table>
<thead>
<tr>
<th>Provide incentives for the management of climate-related issues</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>For certain individuals within Kroger, their annual performance assessment includes objectives related to managing our ESG strategy, commitments and performance. For example, leading climate risk assessment, setting new goals, implementing energy efficiency measures and tracking and reporting on progress.</td>
</tr>
</tbody>
</table>

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(C1.3a)
(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

<table>
<thead>
<tr>
<th>Entitled to incentive</th>
<th>Type of incentive</th>
<th>Incentive(s)</th>
<th>Performance indicator(s)</th>
<th>Incentive plan(s) this incentive is linked to</th>
<th>Further details of incentive(s)</th>
<th>Explain how this incentive contributes to the implementation of your organization’s climate commitments and/or climate transition plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy manager</td>
<td>Monetary reward</td>
<td>Other, please specify (Corporate Utility Engineers’ annual performance evaluation reflects objectives related to managing utility consumption, including projects to increase efficiency and reduce energy consumption. These are individual performance objectives.)</td>
<td>Implementation of an emissions reduction initiative</td>
<td>Short-Term Incentive Plan</td>
<td>Corporate Energy/Utility Engineers – These individuals’ annual performance evaluation reflects objectives related to managing utility consumption, including implementation of projects to increase efficiency and reduce energy consumption. These are individual performance objectives, not company-wide incentive plans.</td>
<td>Implementing energy efficiency projects helps Kroger reduce energy consumption and resulting greenhouse gas emissions, positively impacting our GHG reduction goal.</td>
</tr>
<tr>
<td>Environment/Sustainability manager</td>
<td>Monetary reward</td>
<td>Other, please specify (Head of Sustainability’s annual performance evaluation reflects objectives related to GHG goal setting, progress movement and reporting. These are individual performance objectives.)</td>
<td>Progress towards a climate-related target</td>
<td>Short-Term Incentive Plan</td>
<td>Head of Sustainability – This individual’s annual performance evaluation reflects objectives to develop sustainability strategy, goals and implementation plans in partnership with business owners. This position is also responsible for leading Kroger’s climate risk assessment workstreams. Finally, this role leads the production of Kroger’s ESG report and other climate-related disclosures. These are individual performance objectives, not company-wide incentive plans.</td>
<td>Setting GHG reduction targets, engaging business partners to develop and implement plans to reduce emissions, and calculating and reporting progress on these goals helps Kroger develop and implement our climate transition plan.</td>
</tr>
<tr>
<td>Chief Sustainability Officer (CSO)</td>
<td>Monetary reward</td>
<td>Other, please specify (Group VP, Corporate Affairs’ annual performance is measured relative to corporate sustainability initiatives. These are individual performance objectives.)</td>
<td>Progress towards a climate-related target</td>
<td>Short-Term Incentive Plan</td>
<td>Chief Sustainability Officer - The Group Vice President, Corporate Affairs reports directly to the Public Responsibilities Committee of the Board of Directors about the company’s progress against ESG goals and targets and their performance is measured relative to corporate sustainability objectives.</td>
<td>Setting, advancing and communicating Kroger’s GHG reduction targets support our company climate transition plan.</td>
</tr>
</tbody>
</table>

C2. Risks and opportunities

(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?
Yes
### (C2.1a) How does your organization define short-, medium- and long-term time horizons?

<table>
<thead>
<tr>
<th></th>
<th>From (years)</th>
<th>To (years)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term</td>
<td>1</td>
<td>3</td>
<td>The time horizons shared here are representative of how we approach our sustainability goals and programs. For example, we set annual goals to reduce refrigerant emissions in our stores; we set a zero food waste goal for 2025; and in 2020, we set a new carbon reduction target to reduce greenhouse gas emissions by 30% by 2030, using a 2018 baseline. Our physical climate risk assessment modeled climate scenarios to 2030.</td>
</tr>
<tr>
<td>Medium-term</td>
<td>4</td>
<td>6</td>
<td>The time horizons shared here are representative of how we approach our sustainability goals and programs. For example, we set annual goals to reduce refrigerant emissions in our stores; we set a zero food waste goal for 2025; and in 2020, we set a new carbon reduction target to reduce greenhouse gas emissions by 30% by 2030, using a 2018 baseline. Our physical climate risk assessment modeled climate scenarios to 2030.</td>
</tr>
<tr>
<td>Long-term</td>
<td>7</td>
<td>10</td>
<td>The time horizons shared here are representative of how we approach our sustainability goals and programs. For example, we set annual goals to reduce refrigerant emissions in our stores; we set a zero food waste goal for 2025; and in 2020, we set a new carbon reduction target to reduce greenhouse gas emissions by 30% by 2030, using a 2018 baseline. Our physical climate risk assessment modeled climate scenarios to 2030.</td>
</tr>
</tbody>
</table>
How does your organization define substantive financial or strategic impact on your business?

Kroger evaluates business impacts through multiple lenses, such as impact to financial performance, business continuity, regulatory and legal compliance and corporate citizenship and reputation. Kroger puts the customer at the center of everything it does as a company, which is why financial impacts as well as reputation and consumer trust are key drivers for evaluating business impacts and risks.

Example methods used to identify business impacts:

- Periodic meetings of the Board of Directors and relevant Committees, such as the Public Responsibilities and Audit Committees.

- Stakeholder engagement to discuss emerging trends, industry benchmarking and risks and opportunities pertaining to various topics, including environmental and social impacts. Stakeholder include NGOs, shareholders, investor research firms, and business partners.

- An environmental, social & governance materiality assessment process with the support of a consultant to identify and confirm the most material sustainability topics for the company. This involves in-depth interviews with external and internal stakeholders and a survey to help prioritize topics for inclusion in the company’s ESG Reports and to inform the company’s overall ESG strategy and focus areas.

- An internal Risk Assessment Survey to gain leaders’ insights on the type and magnitude of potential risks to the company.

- Dedicated business resiliency and continuity planning to assist in preparing for potential interruptions to business operations.

- Consumer insights research and associate engagement activities.

Several corporate departments are involved in Kroger’s ESG risk and issues management, such as Internal Audit, Corporate Affairs, Sustainability, Ethics and Compliance, Business Continuity Planning, Food Technology and Sourcing. Management provides regular updates throughout the year to the respective Board committees regarding the management of the risks they oversee, and each of these committees reports on risk to the full Board at each regular meeting of the Board.

Specific to climate impacts, in 2019, Kroger conducted a qualitative assessment to evaluate the economic, transitional and physical risks climate change poses to our business. In partnership with a third-party consultant, we prioritized notable risks in terms of the effect of the risk on the business and vulnerability of the business to the risk. We addressed four key business impact areas (lost revenue, reputational damage, increased costs and impact on associates) and defined a risk scale for each area, e.g., reputation impacts could span from the local community level to the national level. We considered multiple climate change risks, including: rising sea levels, increased temperature and temperature variability, changes in precipitation patterns, increased frequency and severity of extreme weather events, pricing of GHG emissions, stricter building energy codes, refrigerant transition regulations, energy transition, market shift and brand and reputational risk. This process was done with input from multidisciplinary stakeholders who are highly familiar with our operations and how we evaluate and manage risk in our business.

In 2021, Kroger conducted a quantitative assessment to evaluate the implications of climate risk on our operations using 96 representative facilities. This assessment quantified the likelihood of four physical climate risks—drought months, cooling degree days, extreme heat, and extreme precipitation—impacting Kroger’s operations. We used climate modeling in three scenarios reflecting different Representative Concentration Pathways from the 1/16th degree Localized Constructive Analogs climate dataset for 2030 and 2050 time frames.

We defined financial metrics to help contextualize the business impacts of the modeled physical climate risks, recognizing the limitations of such metrics to capture the entire financial impacts of climate risks over time. We considered how these metrics would change our financial performance (revenues and earnings), and at this time, do not anticipate the modeled physical risks to pose a substantive financial threat to our business on the modeled timeframe (2030).

We also considered the transitional climate risks due to refrigerant legislation. As a result of forthcoming state and federal requirements regarding the phase down of HFC refrigerants, we anticipate steadily replacing refrigerant infrastructure in the Kroger portfolio of stores to reach required levels, which could incur additional costs to the business. This rulemaking will impact all retailers using refrigerants in their operations, particularly other grocery retailers. After the Federal rulemaking is final, Kroger will finalize a strategy, including goals, for achieving the requirements. We will consider factors such as the optimal refrigerant application for different equipment types, financial feasibility and environmental protection.

C2.2
(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

Value chain stage(s) covered
- Direct operations
- Upstream

Risk management process
- Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment
- Annually

Time horizon(s) covered
- Short-term
- Medium-term
- Long-term

Description of process
Kroger evaluates business impacts through multiple lenses, such as impact to financial performance, business continuity, regulatory and legal compliance and corporate citizenship and reputation. Kroger puts the customer at the center of everything it does as a company, which is why financial impacts as well as reputation and consumer trust are key drivers for evaluating business impacts and risks.

Example methods used to identify business impacts:
- Periodic meetings of the Board of Directors and relevant Committees, such as the Public Responsibilities and Audit Committees.
- Stakeholder engagement to discuss emerging trends, industry benchmarking and risks and opportunities pertaining to various topics, including environmental and social impacts. Stakeholder include NGOs, shareholders, investor research firms, and business partners.
- An environmental, social & governance materiality assessment process with the support of a consultant to identify and confirm the most material sustainability topics for the company. This involves in-depth interviews with external and internal stakeholders and a survey to help prioritize topics for inclusion in the company’s ESG Reports and to inform the company’s overall ESG strategy and focus areas. We update this assessment every other year.
- An internal Risk Assessment Survey to gain leaders’ insights on the type and magnitude of potential risks to the company.
- Ongoing, dedicated business resiliency and continuity planning to assist in preparing for potential interruptions to business operations.

Several corporate departments are involved in Kroger’s ESG risk and issues management, such as Internal Audit, Corporate Affairs, Sustainability, Ethics and Compliance, Business Continuity Planning, Food Technology and Sourcing. Management provides regular updates throughout the year to the respective Board committees regarding the management of the risks they oversee, and each of these committees reports on risk to the full Board at each regular meeting of the Board.

Specific to climate impacts, in 2019, Kroger conducted a qualitative assessment to evaluate the economic, transitional and physical risks climate change poses to our business. In partnership with a third-party consultant, we prioritized notable risks in terms of the effect of the risk on the business and vulnerability of the business to the risk. We addressed four key business impact areas (lost revenue, reputational damage, increased costs and impact on associates) and defined a risk scale for each area, e.g., reputation impacts could span from the local community level to the national level. We considered multiple climate change risks, including: rising sea levels, increased temperature and temperature variability, changes in precipitation patterns, increased frequency and severity of extreme weather events, pricing of GHG emissions, stricter building energy codes, refrigerant transition regulations, energy transition, market shift and brand and reputational risk. This process was done with input from multidisciplinary stakeholders who are highly familiar with our operations and how we evaluate and manage risk in our business.

In 2021, Kroger conducted a quantitative assessment to evaluate the implications of physical climate risk on our operations using 96 representative facilities. This assessment quantified the likelihood of four physical climate risks—drought months, cooling degree days, extreme heat, and extreme precipitation—impacting Kroger’s business. We used climate modeling in three scenarios reflecting different Representative Concentration Pathways from the 1/16th degree Localized Constructive Analogs climate dataset for 2030 and 2050 time frames.

We defined financial metrics to help contextualize the business impacts of the modeled physical climate risks, recognizing the limitations of such metrics to capture the entire financial impacts of climate risks over time. We considered how these metrics would change our financial performance (revenues and profits), and at this time, do not anticipate the modeled physical risks to pose a substantive financial threat to our business.

We also considered the transitional climate risks due to refrigerant legislation. As a result of forthcoming state and federal requirements regarding the phase down of HFC refrigerants, we anticipate steadily replacing refrigerant infrastructure in the Kroger portfolio of stores to reach required levels, which could incur additional costs to the business. This rulemaking will impact all retailers using refrigerants in their operations, particularly other grocery retailers. After the Federal rulemaking is final, Kroger will finalize a strategy, including goals, for achieving the requirements. We will consider factors such as the optimal refrigerant application for different equipment types, financial feasibility and environmental protection.

To date, Kroger has had several commitments and initiatives in place to reduce our impacts to the environment. In 2020, Kroger set a science-based greenhouse gas reduction goal to reduce company-wide GHG emissions by 30% by 2030 (from a 2018 baseline).

A number of initiatives are involved in achieving these goals: participation in the US EPA ENERGY STAR and GreenChill programs; retrofitting existing stores and also building new stores to efficient specifications; piloting innovative technologies to gauge feasibility for scale; investing in improved maintenance and operation of equipment like lighting, heating and cooling; more efficient vehicles and fleet efficiency measures; accelerating food donations and increasing waste diversion, among other things.

Kroger also invests in staff who can accelerate sustainability efforts, engages in industry organizations that monitor and address longer-term impacts to business, and working with suppliers and other business partners to identify opportunities to advance progress.

In addition, the 200+ Business Continuity Plans that Kroger has in place will be a key adaptation function in the face of changing climate conditions. When we do have climate-related events impact our business, such as extreme weather events, Kroger responds by allocating resources and staff to these regions to ensure we can continue to serve our customers.
C2.2a Which risk types are considered in your organization’s climate-related risk assessments?

<table>
<thead>
<tr>
<th>Relevance &amp; inclusion</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Current regulation</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td>We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. Example regulation risks could include policies to reduce GHG emissions or adapt to climate change.</td>
<td></td>
</tr>
</tbody>
</table>

| **Emerging regulation** | Relevant, always included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. Example regulation risks could include legislation that creates stricter operating limits on the use of specific refrigerants which could impact operating and labor costs in Kroger's business. |

| **Technology** | Relevant, always included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. An example technology risk could be the required or voluntary deployment of new technologies at Kroger's existing facilities, such as EV vehicles and charging technology. |

| **Legal** | Relevant, sometimes included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. An example legal risk is failing to mitigate impacts of climate change. |

| **Market** | Relevant, always included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. Market risks could include shifts in supply and demand for certain companies and products based on climate risks and opportunities. Kroger's commitment to our Zero Hunger | Zero Waste social impact plan is one way that we are reducing our greenhouse gas impacts (through food rescue and food waste reduction and recycling) and engaging our value chain including customers and suppliers (e.g., through the 10x20x30 initiative and standardized data labels for Our Brands products). We are installing EV chargers at multiple stores to meet increasing consumer demand for this service. |

| **Reputation** | Relevant, always included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. Reputational risks could include impact to brand value from perception of an organization’s response to the challenge of climate change. Kroger's commitment to our Zero Hunger | Zero Waste social impact plan is one way that we are reducing our greenhouse gas impacts (through food rescue and food waste reduction and recycling) and engaging our value chain including customers and suppliers (e.g., through the 10x20x30 initiative and standardized data labels for Our Brands products). |

| **Acute physical** | Relevant, always included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. Acute physical risks to Kroger's direct operations were included in our physical climate scenario modeling. Natural disasters and extreme weather conditions can be significant risks for a company like Kroger to factor into its planning process. Storms can cause store closures and facility damage that interrupt Kroger's ability serve its customers, which in turn can impact sales and customer satisfaction. Kroger has developed Business Continuity Plans to be prepared for these types of situations. |

| **Chronic physical** | Relevant, always included |
| We evaluate climate-related risks in multiple ways, such as our physical climate risk modeling, stakeholder engagement including our materiality assessment process, and tracking of regulations, innovation and reporting standards and requirements. Chronic physical risks to Kroger's direct operations were included in our physical climate scenario modeling. Chronic physical risks could include heat stress, crop production, water availability and quality, snowpack and permafrost, and ecosystems and specific change loss. This could impact Kroger's ability to operate our facilities as well as our supply chain. |

C2.3

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

C2.3a
(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

<table>
<thead>
<tr>
<th>Identifier</th>
<th>Risk 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where in the value chain does the risk driver occur?</td>
<td>Direct operations</td>
</tr>
<tr>
<td>Risk type &amp; Primary climate-related risk driver</td>
<td>Emerging regulation</td>
</tr>
</tbody>
</table>

**Primary potential financial impact**
Increased indirect (operating) costs

**Climate risk type mapped to traditional financial services industry risk classification**
Not Applicable

**Company-specific description**
Kroger has a significant refrigerant capacity in its supermarkets, manufacturing, logistics, and other facilities (fugitive emissions represented approximately 30% of Kroger's total Scope 1 and 2 emissions). As a result of existing and forthcoming state and federal requirements regarding the phase down of HFC refrigerants, we anticipate steadily replacing refrigerant infrastructure in the Kroger portfolio of stores to reach required levels, which could incur additional costs to the business. This rulemaking will impact all retailers using refrigerants in their operations, particularly other grocery retailers. As rulemaking is finalized, Kroger develops its strategy, including goals, for achieving the requirements. We consider factors such as the optimal refrigerant application for different equipment types, financial feasibility and environmental protection.

**Time horizon**
Medium-term

**Likelihood**
More likely than not

**Magnitude of impact**
Medium-high

**Are you able to provide a potential financial impact figure?**
No, we do not have this figure

**Potential financial impact figure (currency)**
Not Applicable

**Potential financial impact figure – minimum (currency)**
Not Applicable

**Potential financial impact figure – maximum (currency)**
Not Applicable

**Explanation of financial impact figure**
Kroger has a significant refrigerant capacity in its supermarkets, manufacturing, logistics, and other facilities (fugitive emissions represented approximately 30% of Kroger's total Scope 1 and 2 emissions). As a result of forthcoming state and federal requirements regarding the phase down of HFC refrigerants, we anticipate steadily replacing refrigerant infrastructure in the Kroger portfolio of stores to reach required levels, which could incur additional costs to the business. This rulemaking will impact all retailers using refrigerants in their operations, particularly other grocery retailers. As rulemaking is finalized, Kroger develops its strategy, including goals, for achieving the requirements. We consider factors such as the optimal refrigerant application for different equipment types, financial feasibility and environmental protection.

**Cost of response to risk**

**Description of response and explanation of cost calculation**
Kroger has a significant refrigerant capacity in its supermarkets, manufacturing, logistics, and other facilities (fugitive emissions represented approximately 30% of Kroger's total Scope 1 and 2 emissions). As a result of forthcoming state and federal requirements regarding the phase down of HFC refrigerants, we anticipate steadily replacing refrigerant infrastructure in the Kroger portfolio of stores to reach required levels, which could incur additional costs to the business. This rulemaking will impact all retailers using refrigerants in their operations, particularly other grocery retailers. As rulemaking is finalized, Kroger develops its strategy, including goals, for achieving the requirements. We consider factors such as the optimal refrigerant application for different equipment types, financial feasibility and environmental protection.

**Comment**
Kroger has a significant refrigerant capacity in its supermarkets, manufacturing, logistics, and other facilities (fugitive emissions represented approximately 30% of Kroger's total Scope 1 and 2 emissions). As a result of forthcoming state and federal requirements regarding the phase down of HFC refrigerants, we anticipate steadily replacing refrigerant infrastructure in the Kroger portfolio of stores to reach required levels, which could incur additional costs to the business. This rulemaking will impact all retailers using refrigerants in their operations, particularly other grocery retailers. As rulemaking is finalized, Kroger develops its strategy, including goals, for achieving the requirements. We consider factors such as the optimal refrigerant application for different equipment types, financial feasibility and environmental protection.

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(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?

No

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C2.4b
(C2.4b) Why do you not consider your organization to have climate-related opportunities?

<table>
<thead>
<tr>
<th>Primary reason</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>Opportunities exist, but none with potential to have a substantive financial or strategic impact on business</td>
</tr>
</tbody>
</table>

C3. Business Strategy

C3.1

(C3.1) Does your organization’s strategy include a climate transition plan that aligns with a 1.5°C world?

Row 1

Climate transition plan
No, but our strategy has been influenced by climate-related risks and opportunities, and we are developing a climate transition plan within two years

Publicly available climate transition plan
<Not Applicable>

Mechanism by which feedback is collected from shareholders on your climate transition plan
<Not Applicable>

Description of feedback mechanism
<Not Applicable>

Frequency of feedback collection
<Not Applicable>

Attach any relevant documents which detail your climate transition plan (optional)
<Not Applicable>

Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world and any plans to develop one in the future
Climate impacts management are an important part of our Environmental, Social and Governance (ESG) strategy. We set commitments for many of our ESG topics. Our current greenhouse gas (GHG) reduction goal, set in 2020, is aligned with a well-below 2-degree climate scenario. In early 2023, we released our GHG Roadmap: https://www.thekrogerco.com/wp-content/uploads/2023/02/Kroger-GHG-Goal-Roadmap_Feb-2023.pdf. In 2022, we committed to set a new goal that meets requirements of the Science Based Targets initiative (SBTi), which entails a revised Scope 1 and 2 target that aligned with a 1.5-degree scenario and new Scope 3 targets including a FLAG goal. As part of setting this new target, we will identify emissions reduction measures that help us achieve our new goal.

Explain why climate-related risks and opportunities have not influenced your strategy
<Not Applicable>

C3.2

(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?

<table>
<thead>
<tr>
<th>Use of climate-related scenario analysis to inform strategy</th>
<th>Primary reason why your organization does not use climate-related scenario analysis to inform its strategy</th>
<th>Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>Yes, qualitative and quantitative</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

C3.2a
(C3.2a) Provide details of your organization’s use of climate-related scenario analysis.

<table>
<thead>
<tr>
<th>Climate-related scenario</th>
<th>Scenario analysis coverage</th>
<th>Temperature alignment of scenario</th>
<th>Parameters, assumptions, analytical choices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical climate scenario</td>
<td>Company-wide - Not Applicable</td>
<td>In 2021, Kroger completed a climate scenario analysis to assess physical climate risks to our direct operations. We assessed the likelihood that different climate risks, like extreme precipitation, drought and heat stress, would impact Kroger at different types of facilities and in different geographies (~90 facilities). We used climate modeling in three scenarios reflecting different Representative Concentration Pathways (RCPs): median under 2°C (cool RCP 4.5 models), 2°C to 4°C (warm RCP 4.5 models) and over 4°C (RCP 8.5 models) from the 1/16th degree Localized Constructive Analogs (LOCA) climate dataset for 2030 and 2050 time frames.</td>
<td></td>
</tr>
</tbody>
</table>

Physical climate scenario | RCP 4.5 | Company-wide - Not Applicable | In 2021, Kroger completed a climate scenario analysis to assess physical climate risks to our direct operations. We assessed the likelihood that different climate risks, like extreme precipitation, drought and heat stress, would impact Kroger at different types of facilities and in different geographies (~90 facilities). We used climate modeling in three scenarios reflecting different Representative Concentration Pathways (RCPs): median under 2°C (cool RCP 4.5 models), 2°C to 4°C (warm RCP 4.5 models) and over 4°C (RCP 8.5 models) from the 1/16th degree Localized Constructive Analogs (LOCA) climate dataset for 2030 and 2050 time frames. |

Physical climate scenario | RCP 4.5 | Company-wide - Not Applicable | In 2021, Kroger completed a climate scenario analysis to assess physical climate risks to our direct operations. We assessed the likelihood that different climate risks, like extreme precipitation, drought and heat stress, would impact Kroger at different types of facilities and in different geographies (~90 facilities). We used climate modeling in three scenarios reflecting different Representative Concentration Pathways (RCPs): median under 2°C (cool RCP 4.5 models), 2°C to 4°C (warm RCP 4.5 models) and over 4°C (RCP 8.5 models) from the 1/16th degree Localized Constructive Analogs (LOCA) climate dataset for 2030 and 2050 time frames. |

---

(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.

**Focal questions**
Kroger’s primary objective was to determine if there was substantive physical and financial risk to the company’s direct operations as a result of three different climate scenarios.

**Results of the climate-related scenario analysis with respect to the focal questions**
We did not find substantive physical risks to our own operations in the modeled timeframe as a result of the climate risk assessment conducted in 2021.

---

C3.3
(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.

<table>
<thead>
<tr>
<th>Have climate-related risks and opportunities influenced your strategy in this area?</th>
<th>Description of influence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Products and services</td>
<td>Yes</td>
</tr>
<tr>
<td>Supply chain and/or value chain</td>
<td>Yes</td>
</tr>
<tr>
<td>Investment in R&amp;D</td>
<td>Yes</td>
</tr>
<tr>
<td>Operations</td>
<td>Yes</td>
</tr>
</tbody>
</table>

(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.

<table>
<thead>
<tr>
<th>Financial planning elements that have been influenced</th>
<th>Description of influence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capital expenditures</td>
<td>(1) Procuring 'green' power from utility providers will allow Kroger to reduce climate impacts and meet greenhouse gas reduction targets. (2) Capital expenditures on energy efficiency, energy reduction and renewable energy installation projects have all reduced our energy and greenhouse gas impacts.</td>
</tr>
</tbody>
</table>

(C3.5) In your organization’s financial accounting, do you identify spending/revenue that is aligned with your organization’s climate transition?

<table>
<thead>
<tr>
<th>Identification of spending/revenue that is aligned with your organization’s climate transition</th>
<th>Indicate the level at which you identify the alignment of your spending/revenue with a sustainable finance taxonomy</th>
</tr>
</thead>
<tbody>
<tr>
<td>No, and we do not plan to in the next two years</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

C4. Targets and performance
## C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

**Absolute target**

## C4.1a

(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.

<table>
<thead>
<tr>
<th>Target reference number</th>
<th>Abs 1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Is this a science-based target?</strong></td>
<td>No, but we anticipate settling one in the next two years</td>
</tr>
<tr>
<td><strong>Target ambition</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Year target was set</strong></td>
<td>2020</td>
</tr>
<tr>
<td><strong>Target coverage</strong></td>
<td>Company-wide</td>
</tr>
<tr>
<td><strong>Scope(s)</strong></td>
<td>Scope 1, Scope 2</td>
</tr>
<tr>
<td><strong>Scope 2 accounting method</strong></td>
<td>Market-based</td>
</tr>
<tr>
<td><strong>Scope 3 category(ies)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year</strong></td>
<td>2018</td>
</tr>
<tr>
<td><strong>Base year Scope 1 emissions covered by target (metric tons CO2e)</strong></td>
<td>2313574</td>
</tr>
<tr>
<td><strong>Base year Scope 2 emissions covered by target (metric tons CO2e)</strong></td>
<td>3460486</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 2: Capital goods emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 5: Waste generated in operations emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 8: Upstream leased assets emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 10: Processing of sold products emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 11: Use of sold products emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 13: Downstream leased assets emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 14: Franchises emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td><strong>Base year Scope 3, Category 15: Investments emissions covered by target (metric tons CO2e)</strong></td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>
Base year Scope 1, Other (upstream) emissions covered by target (metric tons CO2e)  
<Not Applicable>

Base year Scope 1, Other (downstream) emissions covered by target (metric tons CO2e)  
<Not Applicable>

Base year total Scope 1 emissions covered by target (metric tons CO2e)  
<Not Applicable>

Total base year emissions covered by target in all selected Scopes (metric tons CO2e)  
5774060

Base year emissions covered by target as % of total base year emissions in Scope 1  
100

Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2  
100

Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 2: Capital goods emissions covered by target as % of total base year emissions in Scope 3, Category 2: Capital goods (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 5: Waste generated in operations emissions covered by target as % of total base year emissions in Scope 3, Category 5: Waste generated in operations (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 8: Upstream leased assets emissions covered by target as % of total base year emissions in Scope 3, Category 8: Upstream leased assets (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target as % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 10: Processing of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 10: Processing of sold products (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 11: Use of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 11: Use of sold products (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 13: Downstream leased assets emissions covered by target as % of total base year emissions in Scope 3, Category 13: Downstream leased assets (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 14: Franchises emissions covered by target as % of total base year emissions in Scope 3, Category 14: Franchises (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Category 15: Investments emissions covered by target as % of total base year emissions in Scope 3, Category 15: Investments (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Other (upstream) emissions covered by target as % of total base year emissions in Scope 3, Other (upstream) (metric tons CO2e)  
<Not Applicable>

Base year Scope 3, Other (downstream) emissions covered by target as % of total base year emissions in Scope 3, Other (downstream) (metric tons CO2e)  
<Not Applicable>

Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)  
<Not Applicable>

Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes  
<Not Applicable>
Target year
2030

Targeted reduction from base year (%)
30

Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]
4041842

Scope 1 emissions in reporting year covered by target (metric tons CO2e)
2358900

Scope 2 emissions in reporting year covered by target (metric tons CO2e)
2588805

Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 8: Upstream leased assets emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 9: Downstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 10: Processing of sold products emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 11: Use of sold products emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 12: End-of-life treatment of sold products emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 13: Downstream leased assets emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 14: Franchises emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Category 15: Investments emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Other (upstream) emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Scope 3, Other (downstream) emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)
<Not Applicable>

Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)
4894705

Does this target cover any land-related emissions?
No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

% of target achieved relative to base year [auto-calculated]
50.7646843526623

Target status in reporting year
Underway

Please explain target coverage and identify any exclusions
This current goal is for Kroger’s Scope 1 and 2 emissions.

Plan for achieving target, and progress made to the end of the reporting year
In early 2023, we released our roadmap for achieving this current goal: https://www.thekrogerco.com/wp-content/uploads/2023/02/Kroger-GHG-Goal-Roadmap_Feb-2023.pdf. We expect to refine and update our approach during implementation. We are exploring different opportunities to adopt more renewable energy in our procurement and on-site energy consumption.
To date, we have achieved a 15.1% reduction from our baseline year of 2018.
In June 2022, we committed to set a new goal aligned with the requirements of the Science Based Targets initiative (SBTi). We are developing this goal now and anticipate
submitting this goal for SBTi validation by the end of the year.

List the emissions reduction initiatives which contributed most to achieving this target

<Not Applicable>

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?
No other climate-related targets

C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.
Yes

C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

<table>
<thead>
<tr>
<th>Number of initiatives</th>
<th>Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under investigation</td>
<td></td>
</tr>
<tr>
<td>To be implemented</td>
<td></td>
</tr>
<tr>
<td>Implementation commenced</td>
<td></td>
</tr>
<tr>
<td>Implemented</td>
<td></td>
</tr>
<tr>
<td>Not to be implemented</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of initiatives</th>
<th>Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>4950</td>
</tr>
<tr>
<td>2</td>
<td>3668</td>
</tr>
</tbody>
</table>

C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

<table>
<thead>
<tr>
<th>Initiative category &amp; Initiative type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy efficiency in buildings</td>
</tr>
<tr>
<td>Other, please specify (Combination of lighting, HVAC)</td>
</tr>
</tbody>
</table>

Estimated annual CO2e savings (metric tonnes CO2e)

2770

Scope(s) or Scope 3 category(ies) where emissions savings occur

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

Voluntary

Investment required (unit currency – as specified in C0.4)

Voluntary

Payback period

Voluntary

Estimated lifetime of the initiative

Voluntary

Comment

This represents multiple energy efficiency projects in our Retail stores. Multiple projects are in process, including applying a film to frozen food doors that prevents condensation, allowing us to lower or turn off anti-sweat systems; retrofitting glass doors on medium temperature multi-deck cases; upgrading LEDs in multi-deck, frozen food and dairy coolers to more efficient LED versions; and retrofitting or re-lamping LED lighting. CO2e reductions reflect store projects completed in 2022. Investments required and annual monetary savings vary by project; thus, not reported here. Payback periods vary between 4 and 15 years and project life is typically 10 years.

Initiative category & Initiative type

<table>
<thead>
<tr>
<th>Initiative category &amp; Initiative type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fugitive emissions reductions</td>
</tr>
<tr>
<td>Other, please specify (Transition to lower GWP refrigerants in one of Kroger's Manufacturing Plants)</td>
</tr>
</tbody>
</table>

Estimated annual CO2e savings (metric tonnes CO2e)

4950

Scope(s) or Scope 3 category(ies) where emissions savings occur

Scope 1

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
0

Investment required (unit currency – as specified in C0.4)
5000000

Payback period
No payback

Estimated lifetime of the initiative
11-15 years

Comment
Kroger plans to transition an additional Manufacturing Plant from R22 to ammonia refrigerant. This is expected to start later in 2023 and be completed late 2024.

---

Initiative category & Initiative type

| Energy efficiency in buildings | Maintenance program |

---

Estimated annual CO2e savings (metric tonnes CO2e)
897

Scope(s) or Scope 3 category(ies) where emissions savings occur
Scope 2 (location-based)

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
77500

Investment required (unit currency – as specified in C0.4)
38000

Payback period
Please select

Estimated lifetime of the initiative
6-10 years

Comment
Energy optimization at a distribution center and fulfillment center were completed in 2022.

---

C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

<table>
<thead>
<tr>
<th>Method</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compliance with regulatory requirements/standards</td>
<td>Kroger aligns its business practices to be compliant with local, state and federal requirements.</td>
</tr>
<tr>
<td>Dedicated budget for energy efficiency</td>
<td>Each retail supermarket Division budgets to complete projects specified by the corporate energy group to achieve mutually predefined energy efficiency targets. Kroger also budgets the energy savings target.</td>
</tr>
<tr>
<td>Financial optimization calculations</td>
<td>Corporate greenhouse gas reduction investments are evaluated using the company's financial evaluation models, such as the process for capital expenditures and energy sourcing criteria.</td>
</tr>
<tr>
<td>Employee engagement</td>
<td>Kroger's Manufacturing team convenes Sustainability Champions from various plants to share best practices for achieving groups' sustainability commitments.</td>
</tr>
</tbody>
</table>

---

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?

No

---

C5. Emissions methodology

---

C5.1

(C5.1) Is this your first year of reporting emissions data to CDP?

No
C5.1a

(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

Row 1

Has there been a structural change?
No

Name of organization(s) acquired, divested from, or merged with
<Not Applicable>

Details of structural change(s), including completion dates
<Not Applicable>

C5.1b

(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

<table>
<thead>
<tr>
<th>Change(s) in methodology, boundary, and/or reporting year definition?</th>
<th>Details of methodology, boundary, and/or reporting year definition change(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

C5.2

(C5.2) Provide your base year and base year emissions.

Scope 1

Base year start
February 1 2006

Base year end
January 31 2007

Base year emissions (metric tons CO2e)
1604110

Comment

Scope 2 (location-based)

Base year start
February 1 2006

Base year end
January 31 2007

Base year emissions (metric tons CO2e)
5029526

Comment

Scope 2 (market-based)

Base year start
February 1 2006

Base year end
January 31 2007

Base year emissions (metric tons CO2e)
5029526

Comment

Scope 3 category 1: Purchased goods and services

Base year start

Base year end

Base year emissions (metric tons CO2e)

Comment

We did not calculate this Scope 3 category for our base year emissions.
Scope 3 category 2: Capital goods

Base year start

Base year end

Base year emissions (metric tons CO2e)

Comment
We did not calculate this Scope 3 category for our base year emissions.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

Base year start
February 1 2015

Base year end
January 31 2016

Base year emissions (metric tons CO2e)
248709

Comment

Scope 3 category 4: Upstream transportation and distribution

Base year start
February 1 2015

Base year end
January 31 2016

Base year emissions (metric tons CO2e)
2217

Comment

Scope 3 category 5: Waste generated in operations

Base year start
February 1 2015

Base year end
January 31 2016

Base year emissions (metric tons CO2e)
67867

Comment

Scope 3 category 6: Business travel

Base year start
February 1 2015

Base year end
January 31 2016

Base year emissions (metric tons CO2e)
9133

Comment

Scope 3 category 7: Employee commuting

Base year start
February 1 2015

Base year end
January 31 2016

Base year emissions (metric tons CO2e)
9133

Comment

Scope 3 category 8: Upstream leased assets

Base year start

Base year end

Base year emissions (metric tons CO2e)

Comment
We did not calculate this Scope 3 category for our base year emissions.
<table>
<thead>
<tr>
<th>Scope 3 category</th>
<th>Base year start</th>
<th>Base year end</th>
<th>Base year emissions (metric tons CO2e)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>9: Downstream transportation and distribution</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>10: Processing of sold products</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>11: Use of sold products</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>12: End of life treatment of sold products</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>13: Downstream leased assets</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>14: Franchises</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>15: Investments</td>
<td></td>
<td></td>
<td></td>
<td>We did not calculate this Scope 3 category for our base year emissions.</td>
</tr>
<tr>
<td>3: Other (upstream)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3: Other (downstream)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
C5.3

(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

- The Greenhouse Gas Protocol Agricultural Guidance: Interpreting the Corporate Accounting and Reporting Standard for the Agricultural Sector
- The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

C6. Emissions data

C6.1

(C6.1) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

<table>
<thead>
<tr>
<th>Reporting year</th>
<th>Gross global Scope 1 emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2335900</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Start date</th>
<th>&lt;Not Applicable&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>End date</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

C6.2

(C6.2) Describe your organization’s approach to reporting Scope 2 emissions.

<table>
<thead>
<tr>
<th>Row 1</th>
<th>Scope 2, location-based</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>We are reporting a Scope 2, location-based figure</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Row 1</th>
<th>Scope 2, market-based</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>We are reporting a Scope 2, market-based figure</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kroger is reporting location and market-based Scope 2 emissions in CDP and our ESG report. Our current GHG reduction goal uses market-based Scope 2 emissions.</td>
</tr>
</tbody>
</table>

C6.3

(C6.3) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

<table>
<thead>
<tr>
<th>Reporting year</th>
<th>Scope 2, location-based</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2695641</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Scope 2, market-based (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2558805</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Start date</th>
<th>&lt;Not Applicable&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>End date</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

No

C6.5
(C6.5) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

Evaluation status
Relevant, not yet calculated

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger has committed to setting science-based targets to reduce greenhouse gas emissions from its full value chain, including its operations and supply chains. As part of that commitment, the company will assess and compute additional scope 3 categories. While we have completed this work for our anticipated 2021 goal baseline, we are still in the process of finalizing our full 2022 Scope 3 emissions.

Capital goods

Evaluation status
Relevant, not yet calculated

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger has committed to setting science-based targets to reduce greenhouse gas emissions from its full value chain, including its operations and supply chains. As part of that commitment, the company will assess and compute additional scope 3 categories. While we have completed this work for our anticipated 2021 goal baseline, we are still in the process of finalizing our full 2022 Scope 3 emissions.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
11,560,170

Emissions calculation methodology
Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Please explain
Upstream emissions from purchased fuels and electricity, include generation and transmission and distribution emissions, and any other losses in this category. Upstream emissions of purchased electricity are calculated for the US by multiplying electricity activity data by region-specific emission factors. Upstream emissions from purchased fuels are calculated using emissions factors from UK Defra 2022 Guidelines for GHG Reporting. Emissions associated with losses were calculated for the US by multiplying the energy use by type by emission factors from UK Defra 2022 Guidelines for GHG Reporting. All GWP's are from the IPCC Fourth Assessment Report (GWP for CH4 = 25, GWP for N2O = 298, consistent with reporting under the United Nations Framework Convention on Climate Change (UNFCCC)).

Upstream transportation and distribution

Evaluation status
Relevant, not yet calculated

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger has committed to setting science-based targets to reduce greenhouse gas emissions from its full value chain, including its operations and supply chains. As part of that commitment, the company will assess and compute additional scope 3 categories. While we have completed this work for our anticipated 2021 goal baseline, we are still in the process of finalizing our full 2022 Scope 3 emissions. Kroger uses data estimates related to transportation to calculate the emissions associated with upstream transportation and distribution.
Waste generated in operations

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
368830

Emissions calculation methodology
Waste-type-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Please explain
Waste generated in operations represents global waste emissions from waste disposed via landfill, incineration, recycling, anaerobic digestion and composting based on actual destination sources for Kroger. Data on waste quantity are obtained and reported from Kroger’s sites. Emissions from waste are calculated using methodologies and emission factors from the EPA’s Waste Reduction Model (WARM). Landfill emissions factors are used directly from WARM. This model bases its emissions calculations on a life-cycle analysis, including emissions from the long-term decomposition of waste in a landfill and upstream sources/sinks. For all categories except landfill, the WARM method has been adjusted to align with the GHG Protocol’s Corporate Value Chain (Scope 3) Standard, based on emissions for transport to destination and processing of materials prior to reaching the end destination (be it recycling, incineration or other).

Business travel

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
27368

Emissions calculation methodology
Distance-based method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Please explain
Kroger’s business travel activities included air, hotel and car rentals. Air flight data included passenger miles that were segregated into short, medium and long-haul flights and Defra 2022 emissions factors were applied to calculate the emissions. Rental car activities included rentals from Kroger’s main providers and DEFRA 2022 emission factors were applied to car mileages to calculate the emissions. Emissions related to hotel stays were estimated based on hotel nights/room per night, and transportation emissions are calculated on a well-to-wheel (WTW) basis.

Employee commuting

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
540886

Emissions calculation methodology
Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
0

Please explain
This is internally tracked and calculated. Assumptions: 389,800 associates, 23.58 miles round trip: “Summary of Travel Trends: 2009 National Household Travel Survey 5% public transportation, 5% carpool, 90% single occupancy.” Emission factors are from EPA GHG Emission Factor Hub, and well-to-tank emissions are calculated using DEFRA emission factors.

Upstream leased assets

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger does not have any upstream leased assets.
Downstream transportation and distribution

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger has no Scope 3 emissions from downstream transportation and distribution.

Processing of sold products

Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
3369

Emissions calculation methodology
Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
0

Please explain
Kroger uses volume of products sold for further refinement and LCA emission factors to account for the processing of intermediate goods into final goods where the end product is known. Input data reflects milk and cream that Kroger dairy plants sell for others to manufacture.

Use of sold products

Evaluation status
Relevant, not yet calculated

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger has committed to setting science-based targets to reduce greenhouse gas emissions from its full value chain, including its operations and supply chains. As part of that commitment, the company will assess and compute additional scope 3 categories. While we have completed this work for our anticipated 2021 goal baseline, we are still in the process of finalizing our full 2022 Scope 3 emissions.

End of life treatment of sold products

Evaluation status
Relevant, not yet calculated

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger has committed to setting science-based targets to reduce greenhouse gas emissions from its full value chain, including its operations and supply chains. As part of that commitment, the company will assess and compute additional scope 3 categories. We are in the process of finalizing our Scope 3 emissions baseline and are awaiting final data before we publish results for End of life treatment of sold products.

Downstream leased assets

Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger currently does not act as a leasor for a material amount of property.
Franchises
Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger currently does not act as a franchisor.

Investments
Evaluation status
Relevant, calculated

Emissions in reporting year (metric tons CO2e)
72149

Emissions calculation methodology
Spend-based method

Percentage of emissions calculated using data obtained from suppliers or value chain partners
0

Please explain
Kroger uses revenue, equity, and spend based emission factors from the EPA Supply Chain Emission Factors V1.1.1 to estimate emissions associated with investments.

Other (upstream)
Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger does not have other upstream scope 3 emissions.

Other (downstream)
Evaluation status
Not relevant, explanation provided

Emissions in reporting year (metric tons CO2e)
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Kroger does not have other downstream scope 3 emissions.

C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?
No

C6.10
Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Intensity figure
0.403

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)
48947045

Metric denominator
megawatt hour transmitted (MWh)

Metric denominator: Unit total
12132350

Scope 2 figure used
Market-based

% change from previous year
9.85

Direction of change
Decreased

Reason(s) for change
Change in renewable energy consumption
Other emissions reduction activities

Please explain

Intensity figure
0.022

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)
4894705

Metric denominator
square foot

Metric denominator: Unit total
224131472

Scope 2 figure used
Market-based

% change from previous year
4.79

Direction of change
Decreased

Reason(s) for change
Change in renewable energy consumption
Other emissions reduction activities

Please explain

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?
Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

<table>
<thead>
<tr>
<th>Greenhouse gas</th>
<th>Scope 1 emissions (metric tons of CO2e)</th>
<th>GWP Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>986552</td>
<td>IPCC Fifth Assessment Report (AR5 – 100 year)</td>
</tr>
<tr>
<td>N2O</td>
<td>2741</td>
<td>IPCC Fifth Assessment Report (AR5 – 100 year)</td>
</tr>
<tr>
<td>CH4</td>
<td>483</td>
<td>IPCC Fifth Assessment Report (AR5 – 100 year)</td>
</tr>
<tr>
<td>HFCs</td>
<td>1337488</td>
<td>IPCC Fifth Assessment Report (AR5 – 100 year)</td>
</tr>
</tbody>
</table>
C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/area/region.

<table>
<thead>
<tr>
<th>Country/area/region</th>
<th>Scope 1 emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States of America</td>
<td>2335900</td>
</tr>
</tbody>
</table>

C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By business division
By activity

C7.3a

(C7.3a) Break down your total gross global Scope 1 emissions by business division.

<table>
<thead>
<tr>
<th>Business division</th>
<th>Scope 1 emissions (metric ton CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grocery</td>
<td>1672483</td>
</tr>
<tr>
<td>Logistics/Supply Chain</td>
<td>436534</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>220602</td>
</tr>
<tr>
<td>Offices</td>
<td>5913</td>
</tr>
<tr>
<td>Vitacost</td>
<td>191</td>
</tr>
<tr>
<td>KSP</td>
<td>177</td>
</tr>
</tbody>
</table>

C7.3c

(C7.3c) Break down your total gross global Scope 1 emissions by business activity.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Scope 1 emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stationary fuel</td>
<td>578392</td>
</tr>
<tr>
<td>Mobile</td>
<td>420020</td>
</tr>
<tr>
<td>Fugitive</td>
<td>1337488</td>
</tr>
</tbody>
</table>

C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/area/region.

<table>
<thead>
<tr>
<th>Country/area/region</th>
<th>Scope 2, location-based (metric tons CO2e)</th>
<th>Scope 2, market-based (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States of America</td>
<td>2695641</td>
<td>2558805</td>
</tr>
<tr>
<td>Puerto Rico</td>
<td>310</td>
<td>316</td>
</tr>
</tbody>
</table>

C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By business division
By activity

C7.6a
**C7.6a** Break down your total gross global Scope 2 emissions by business division.

<table>
<thead>
<tr>
<th>Business division</th>
<th>Scope 2, location-based (metric tons CO2e)</th>
<th>Scope 2, market-based (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grocery</td>
<td>2401553</td>
<td>2273995</td>
</tr>
<tr>
<td>Logistics/Supply</td>
<td>119242</td>
<td>111163</td>
</tr>
<tr>
<td>Chain</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturing</td>
<td>168305</td>
<td>167030</td>
</tr>
<tr>
<td>Office</td>
<td>2688</td>
<td>2627</td>
</tr>
<tr>
<td>Vitacost</td>
<td>2209</td>
<td>2230</td>
</tr>
<tr>
<td>KSP</td>
<td>1743</td>
<td>1759</td>
</tr>
</tbody>
</table>

**C7.6c**

**C7.6c** Break down your total gross global Scope 2 emissions by business activity.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Scope 2, location-based (metric tons CO2e)</th>
<th>Scope 2, market-based (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity (purchased)</td>
<td>2695641</td>
<td>2558805</td>
</tr>
</tbody>
</table>

**C7.7**

**C7.7** Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

No

**C7.9**

**C7.9** How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Decreased

**C7.9a**

**C7.9a** Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

<table>
<thead>
<tr>
<th>Change in emissions (metric tons CO2e)</th>
<th>Direction of change in emissions</th>
<th>Emissions value (percentage)</th>
<th>Please explain calculation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change in renewable energy consumption</td>
<td>Decreased</td>
<td>1</td>
<td>Kroger continued to procure renewable energy in 2022 with the purchase of Renewable Energy Certificates in the order of 370,794 MWh which amounts to 33,413.35 MTCO2e. When using market-based emissions factors, emissions decreased as a result.</td>
</tr>
<tr>
<td>Other emissions reduction activities</td>
<td>Decreased</td>
<td>7</td>
<td>Kroger reduced our emissions due to energy efficiency projects, refrigerant emissions reductions, lower energy consumption due to changes in store operations and consumer habits, among others.</td>
</tr>
<tr>
<td>Divestment</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acquisitions</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mergers</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in output</td>
<td>Increased</td>
<td>1</td>
<td>Overall emissions decreased by 7% year-over-year. However, the addition of Kroger's delivery fleet result in an increase in Scope 1 emissions.</td>
</tr>
<tr>
<td>Change in methodology</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in boundary</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in physical operating conditions</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unidentified</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**C7.9b**

**C7.9b** Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Market-based

**C8. Energy**
C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?
More than 0% but less than or equal to 5%

C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Indicate whether your organization undertook this energy-related activity in the reporting year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel (excluding feedstocks)</td>
<td>Yes</td>
</tr>
<tr>
<td>Consumption of purchased or acquired electricity</td>
<td>Yes</td>
</tr>
<tr>
<td>Consumption of purchased or acquired heat</td>
<td>No</td>
</tr>
<tr>
<td>Consumption of purchased or acquired steam</td>
<td>No</td>
</tr>
<tr>
<td>Consumption of purchased or acquired cooling</td>
<td>No</td>
</tr>
<tr>
<td>Generation of electricity, heat, steam, or cooling</td>
<td>Yes</td>
</tr>
</tbody>
</table>

C8.2a

(C8.2a) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Heating value</th>
<th>MWh from renewable sources</th>
<th>MWh from non-renewable sources</th>
<th>Total (renewable and non-renewable) MWh</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel (excluding feedstock)</td>
<td>HHV (higher heating value)</td>
<td>0</td>
<td>4870009</td>
<td>4870009</td>
</tr>
<tr>
<td>Consumption of purchased or acquired electricity</td>
<td>&lt;Not Applicable&gt;</td>
<td>370794</td>
<td>688529</td>
<td>7256323</td>
</tr>
<tr>
<td>Consumption of purchased or acquired heat</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Consumption of purchased or acquired steam</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Consumption of purchased or acquired cooling</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Consumption of self-generated non-fuel renewable energy</td>
<td>&lt;Not Applicable&gt;</td>
<td>6018</td>
<td>&lt;Not Applicable&gt;</td>
<td>6018</td>
</tr>
<tr>
<td>Total energy consumption</td>
<td>&lt;Not Applicable&gt;</td>
<td>376813</td>
<td>11755537</td>
<td>12132350</td>
</tr>
</tbody>
</table>

C8.2b

(C8.2b) Select the applications of your organization’s consumption of fuel.

<table>
<thead>
<tr>
<th>Application</th>
<th>Indicate whether your organization undertakes this fuel application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel for the generation of electricity</td>
<td>No</td>
</tr>
<tr>
<td>Consumption of fuel for the generation of heat</td>
<td>Yes</td>
</tr>
<tr>
<td>Consumption of fuel for the generation of steam</td>
<td>No</td>
</tr>
<tr>
<td>Consumption of fuel for the generation of cooling</td>
<td>No</td>
</tr>
<tr>
<td>Consumption of fuel for co-generation or tri-generation</td>
<td>No</td>
</tr>
</tbody>
</table>

C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

**Sustainable biomass**

**Heating value**

Please select

**Total fuel MWh consumed by the organization**

MWh fuel consumed for self-generation of electricity

<Not Applicable>

MWh fuel consumed for self-generation of heat

<Not Applicable>

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration

<Not Applicable>

Comment
<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Other biomass</td>
<td></td>
<td></td>
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<tr>
<td>Heating value</td>
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</tr>
<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>&lt;Not Applicable&gt;</td>
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<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of cooling</td>
<td>&lt;Not Applicable&gt;</td>
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<tr>
<td>MWh fuel consumed for self-cogeneration or self-trigeneration</td>
<td>&lt;Not Applicable&gt;</td>
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<td>Comment</td>
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</tr>
<tr>
<td>Other renewable fuels (e.g. renewable hydrogen)</td>
<td></td>
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<tr>
<td>Heating value</td>
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<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>&lt;Not Applicable&gt;</td>
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<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
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<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of cooling</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-cogeneration or self-trigeneration</td>
<td>&lt;Not Applicable&gt;</td>
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<td>Comment</td>
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<td></td>
</tr>
<tr>
<td>Coal</td>
<td></td>
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<td></td>
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<tr>
<td>Heating value</td>
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<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of cooling</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
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<td></td>
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<tr>
<td>MWh fuel consumed for self-cogeneration or self-trigeneration</td>
<td>&lt;Not Applicable&gt;</td>
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<tr>
<td>Oil</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Heating value</td>
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</tr>
<tr>
<td>HHV</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>1611555</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of cooling</td>
<td>&lt;Not Applicable&gt;</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>MWh fuel consumed for self-cogeneration or self-trigeneration</td>
<td>&lt;Not Applicable&gt;</td>
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<tr>
<td>Comment</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
Gas

Heating value
HHV
Total fuel MWh consumed by the organization
3258454
MWh fuel consumed for self-generation of electricity
<Not Applicable>
MWh fuel consumed for self-generation of heat
<Not Applicable>
MWh fuel consumed for self-generation of steam
<Not Applicable>
MWh fuel consumed for self-generation of cooling
<Not Applicable>
MWh fuel consumed for self-cogeneration or self-trigeneration
<Not Applicable>

Comment
Other non-renewable fuels (e.g. non-renewable hydrogen)
Heating value
Total fuel MWh consumed by the organization
MWh fuel consumed for self-generation of electricity
<Not Applicable>
MWh fuel consumed for self-generation of heat
<Not Applicable>
MWh fuel consumed for self-generation of steam
<Not Applicable>
MWh fuel consumed for self-generation of cooling
<Not Applicable>
MWh fuel consumed for self-cogeneration or self-trigeneration
<Not Applicable>

C8.2d

(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

<table>
<thead>
<tr>
<th>Total Gross generation (MWh)</th>
<th>Generation that is consumed by the organization (MWh)</th>
<th>Gross generation from renewable sources (MWh)</th>
<th>Generation from renewable sources that is consumed by the organization (MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity</td>
<td>11776</td>
<td>6018</td>
<td>5878</td>
</tr>
<tr>
<td>Heat</td>
<td>3180267</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Steam</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cooling</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

C8.2e
(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in C6.3.

**Country/area of low-carbon energy consumption**
United States of America

**Sourcing method**
Unbundled procurement of energy attribute certificates (EACs)

**Energy carrier**
Electricity

**Low-carbon technology type**
Solar

**Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)**
370794

**Tracking instrument used**
US-REC

**Country/area of origin (generation) of the low-carbon energy or energy attribute**
United States of America

**Are you able to report the commissioning or re-powering year of the energy generation facility?**
No

**Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)**
<Not Applicable>

**Comment**

---

(C8.2g) Provide a breakdown by country/area of your non-fuel energy consumption in the reporting year.

**Country/area**
United States of America

**Consumption of purchased electricity (MWh)**
7262341

**Consumption of self-generated electricity (MWh)**
5878

**Is this electricity consumption excluded from your RE100 commitment?**
<Not Applicable>

**Consumption of purchased heat, steam, and cooling (MWh)**
3180267

**Consumption of self-generated heat, steam, and cooling (MWh)**
0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**
10448486

---

(C9. Additional metrics)

---

(C9.1)
(C9.1) Provide any additional climate-related metrics relevant to your business.

<table>
<thead>
<tr>
<th>Description</th>
<th>Metric value</th>
<th>Metric numerator</th>
<th>Metric denominator (intensity metric only)</th>
<th>% change from previous year</th>
<th>Direction of change</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste</td>
<td>82</td>
<td>Waste reduced + diverted</td>
<td>Waste reduced + diverted + disposed</td>
<td>3</td>
<td>Increased</td>
<td>Kroger's company waste diversion percentage increased this year from 79% to 82%</td>
</tr>
</tbody>
</table>

C10. Verification

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

<table>
<thead>
<tr>
<th>Scope</th>
<th>Verification/assurance status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope 1</td>
<td>No third-party verification or assurance</td>
</tr>
<tr>
<td>Scope 2 (location-based or market-based)</td>
<td>No third-party verification or assurance</td>
</tr>
<tr>
<td>Scope 3</td>
<td>No third-party verification or assurance</td>
</tr>
</tbody>
</table>

C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?

No, we do not verify any other climate-related information reported in our CDP disclosure

C11. Carbon pricing

C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

No, and we do not anticipate being regulated in the next three years

C11.2

(C11.2) Has your organization canceled any project-based carbon credits within the reporting year?

No

C11.3

(C11.3) Does your organization use an internal price on carbon?

No, and we do not currently anticipate doing so in the next two years

C12. Engagement

C12.1
(C12.1) Do you engage with your value chain on climate-related issues?
Yes, other partners in the value chain

(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.

A few examples of how Kroger is engaging our suppliers on climate-related topics:

- Kroger is a member of the 10x20x30 initiative, led by World Resources Institute, through which we have engaged 20 of our suppliers, asking them to halve their food waste. As food waste is a major contributor to methane emissions in landfills, this is an effective means to promote collective action on this topic.

- In 2022/2023, Kroger launched carbon neutral eggs in the Simple Truth brand through Kroger's partnership with Kipster Farms and MPS. Kroger and Kipster Farms Announce Plans to Bring the World's First Carbon-Neutral Eggs to U.S. Customers - The Kroger Co. Kroger has also launched carbon neutral, certified upcycled Simple Truth items.

- We will be setting a new Scope 3 emissions reduction goal in 2022-2023 as part of our commitment to set a SBTi-aligned GHG reduction goal and plan to engage our suppliers through that framework in the future.

(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization’s purchasing process?
No, but we plan to introduce climate-related requirements within the next two years

(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?
Yes, we engage directly with policy makers

Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?
No, and we do not plan to have one in the next two years

Attach commitment or position statement(s)
<Not Applicable>

Describe the process(es) your organization has in place to ensure that your external engagement activities are consistent with your climate commitments and/or climate transition plan

We do not advocate for policies, laws or regulations that are in conflict with Kroger’s stated Climate plan objectives. Kroger’s government relations team reports to the GVP of Corporate Affairs who also serves as Chief Sustainability Officer, ensuring consistency between the company’s advocacy positions and stated sustainability goals.

Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate
<Not Applicable>

Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate
<Not Applicable>

(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?

Specify the policy, law, or regulation on which your organization is engaging with policy makers

The Final Regulation Order of California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4 transitions to <1400 GWP refrigerants in existing equipment and <150 GWP equipment in new systems.

Category of policy, law, or regulation that may impact the climate
Climate change mitigation

Focus area of policy, law, or regulation that may impact the climate
Emissions – other GHGs

Policy, law, or regulation geographic coverage
Sub-national

Country/area/region the policy, law, or regulation applies to
United States of America

Your organization’s position on the policy, law, or regulation
Support with no exceptions

Description of engagement with policy makers
Kroger has plans in place to meet those requirements and dates.

**Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation**

*<Not Applicable>*

Have you evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with the goals of the Paris Agreement?

No, we have not evaluated

Please explain whether this policy, law or regulation is central to the achievement of your climate transition plan and, if so, how?

*<Not Applicable>*

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

CA Senate Bill 1206 requires a transition to low GWP refrigerants by banning virgin refrigerants with GWPs >750.

**Category of policy, law, or regulation that may impact the climate**

Climate change mitigation

**Focus area of policy, law, or regulation that may impact the climate**

Emissions – other GHGs

**Policy, law, or regulation geographic coverage**

Sub-national

**Country/area/region the policy, law, or regulation applies to**

United States of America

Your organization’s position on the policy, law, or regulation

Support with major exceptions

Description of engagement with policy makers

Kroger’s facility engineering and Corporate Affairs teams have engaged with relevant policymakers to share feedback on anticipated outcomes of implementing these requirements.

**Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation**

Kroger’s concern is that the bill will strand existing systems, including all the systems we are modifying and installing to meet the requirements of the Final Regulation Order of California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4. Every refrigeration system would need to be replaced with a <150 GWP system.

Have you evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with the goals of the Paris Agreement?

No, we have not evaluated

Please explain whether this policy, law or regulation is central to the achievement of your climate transition plan and, if so, how?

*<Not Applicable>*

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

In the State of Washington, Chapter 173-443 WAC would require all new refrigeration systems to be <150 GWP. Existing systems that have cumulative maintenance costs over 3 years equal to half the cost of a new system, would also need to be replaced with a <150 GWP system.

**Category of policy, law, or regulation that may impact the climate**

Climate change mitigation

**Focus area of policy, law, or regulation that may impact the climate**

Emissions – other GHGs

**Policy, law, or regulation geographic coverage**

Sub-national

**Country/area/region the policy, law, or regulation applies to**

United States of America

Your organization’s position on the policy, law, or regulation

Support with major exceptions

Description of engagement with policy makers

Kroger’s facility engineering and Corporate Affairs teams have engaged with relevant policymakers to share feedback on anticipated outcomes of implementing these requirements.

**Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation**

This bill would eliminate our current system replacement initiative utilizing <1400 GWP refrigerants. Kroger supports the bill with major exceptions that do not force replacement of existing equipment with significant useful life remaining.

Have you evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with the goals of the Paris Agreement?

No, we have not evaluated

Please explain whether this policy, law or regulation is central to the achievement of your climate transition plan and, if so, how?

*<Not Applicable>*
(C12.4) Have you published information about your organization’s response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

**Publication**
In voluntary sustainability report

**Status**
Underway – previous year attached

**Attach the document**

**Page/Section reference**
Kroger’s 2022 Environmental, Social & Governance (ESG) Report discusses Climate Impacts on page 36-39; provides a Sustainability Accounting Standards Board (SASB) Index on page 66; includes a Task Force on Climate-related Financial Disclosures (TCFD) Index on page 65; and a detailed energy and climate disclosures on page 68.

**Content elements**
Governance
Strategy
Risks & opportunities
Emissions figures
Emission targets
Other metrics

**Comment**
We will publish our 2023 ESG Report in late August. Our ESG Reporting Hub is available here: https://www.thekrogerco.com/esgreport/

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**Publication**
In mainstream reports

**Status**
Complete

**Attach the document**

**Page/Section reference**
Kroger’s 2023 Proxy Statement and 2022 Annual Report provide discussion of our ESG strategy and climate impacts management on pages 6, 13, and 24-25.

**Content elements**
Governance
Strategy
Risks & opportunities

**Comment**
Kroger’s Investor Relations page is available here: https://ir.kroger.com/CorporateProfile/financial-performance/reports-statements/default.aspx

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(C12.5)

(C12.5) Indicate the collaborative frameworks, initiatives and/or commitments related to environmental issues for which you are a signatory/member.

<table>
<thead>
<tr>
<th>Environmental collaborative framework, initiative and/or commitment</th>
<th>Describe your organization’s role within each framework, initiative and/or commitment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Science Based Targets Network (SBTN) Task Force on Climate-related Financial Disclosures (TCFD)</td>
<td>(1) TCFD: Kroger includes an index in our ESG report that describes how our climate impacts management approach and disclosures align with the recommendations in the Task Force on Climate-related Financial Disclosures framework. (2) SBTN Kroger is committed to seeing a greenhouse reduction target that aligns with the requirements of the Science-Based Targets initiative (SBTi), part of the SBTN.</td>
</tr>
</tbody>
</table>

---

C15. Biodiversity

(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?

<table>
<thead>
<tr>
<th>Board-level oversight and/or executive management-level responsibility for biodiversity-related issues</th>
<th>Description of oversight and objectives relating to biodiversity</th>
<th>Scope of board-level oversight</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes, both board-level oversight and executive management-level responsibility</td>
<td>The Public Responsibilities Committee of the Kroger Board of Directors has responsibility for sustainability topics. The Committee Charter is available here: <a href="https://ir.kroger.com/CorporateProfile/governance/committee-composition/default.aspx">https://ir.kroger.com/CorporateProfile/governance/committee-composition/default.aspx</a>.</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>
### C15.2

(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?

<table>
<thead>
<tr>
<th>Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity</th>
<th>Biodiversity-related public commitments</th>
<th>Initiatives endorsed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Row 1</strong></td>
<td>Yes, we have made public commitments only</td>
<td>Commitment to avoidance of negative impacts on threatened and protected species Other, please specify (Seafood Sustainability Policy, No Deforestation Commitment for Our Brands)</td>
</tr>
</tbody>
</table>

### C15.3

(C15.3) Does your organization assess the impacts and dependencies of its value chain on biodiversity?

**Impacts on biodiversity**

- **Indicate whether your organization undertakes this type of assessment**
  - No, but we plan to within the next two years

  **Value chain stage(s) covered**
  - <Not Applicable>

  **Portfolio activity**
  - <Not Applicable>

  **Tools and methods to assess impacts and/or dependencies on biodiversity**
  - <Not Applicable>

  **Please explain how the tools and methods are implemented and provide an indication of the associated outcome(s)**
  - <Not Applicable>

**Dependencies on biodiversity**

- **Indicate whether your organization undertakes this type of assessment**
  - No, but we plan to within the next two years

  **Value chain stage(s) covered**
  - <Not Applicable>

  **Portfolio activity**
  - <Not Applicable>

  **Tools and methods to assess impacts and/or dependencies on biodiversity**
  - <Not Applicable>

  **Please explain how the tools and methods are implemented and provide an indication of the associated outcome(s)**
  - <Not Applicable>

### C15.4

(C15.4) Does your organization have activities located in or near to biodiversity- sensitive areas in the reporting year?

Not assessed

### C15.5

(C15.5) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

<table>
<thead>
<tr>
<th>Have you taken any actions in the reporting period to progress your biodiversity-related commitments?</th>
<th>Type of action taken to progress biodiversity-related commitments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Row 1</strong></td>
<td>Yes, we are taking actions to progress our biodiversity-related commitments</td>
</tr>
</tbody>
</table>

### C15.6

(C15.6) Does your organization use biodiversity indicators to monitor performance across its activities?

<table>
<thead>
<tr>
<th>Does your organization use indicators to monitor biodiversity performance?</th>
<th>Indicators used to monitor biodiversity performance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Row 1</strong></td>
<td>No</td>
</tr>
</tbody>
</table>

### C15.7
Have you published information about your organization’s response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

<table>
<thead>
<tr>
<th>Report type</th>
<th>Content elements</th>
<th>Attach the document and indicate where in the document the relevant biodiversity information is located</th>
</tr>
</thead>
<tbody>
<tr>
<td>In voluntary sustainability report or other</td>
<td>Projects on biodiversity</td>
<td>Kroger’s 2022 ESG Report shares information about our seafood sustainability work, progress on re-deforestation commitments and discussion of a future commitment related to pollinator protection and sustainable agriculture in our produce supply chain</td>
</tr>
</tbody>
</table>

C16. Signoff

C-Fi

(C-Fi) Use this field to provide any additional information or context that you feel is relevant to your organization’s response. Please note that this field is optional and is not scored.

Nothing additional to share at this time.

C16.1

(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.

<table>
<thead>
<tr>
<th>Job title</th>
<th>Corresponding job category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1 Group Vice President, Corporate Affairs</td>
<td>Chief Sustainability Officer (CSO)</td>
</tr>
</tbody>
</table>